

4899

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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17 REPORTER'S TRANSCRIPT OF PROCEEDINGS

18

19 TUESDAY, APRIL 5, 2005

20

21 8:30 A.M.

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23 (PAGES 4899 THROUGH 4960)

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

28 BY: Official Court Reporter 4899

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1 I N D E X

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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. Nicola is listed as "N" on index. Mr. Mesereau is listed as "M" on  
index.

6 Ms. Yu is listed as "Y" on index. Mr. Sanger is listed as "SA" on  
index.

7 Mr. Oxman is listed as "O" on index.

8

9 PLAINTIFF'S

10 WITNESSES DIRECT CROSS REDIRECT RECROSS

11 FRANZIA, Jason 4902-M 4944-Z

12 (Cont'd)

13 KALLMAN, Kris 4949-SN

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1 Santa Maria, California

2 Tuesday, April 5, 2005

3 8:30 a.m.

4

5 THE COURT: Good morning.

6 THE JURY: (In unison) Good morning.

7 THE COURT: Mr. Mesereau?

8 MR. MESEREAU: Yes. Thank you, Your Honor.

9

10 JASON FRANCIA

11 Having been previously sworn, resumed the

12 stand and testified further as follows:

13

14 CROSS-EXAMINATION (Continued)

15 BY MR. MESEREAU:

16 Q. Mr. Francia, we were discussing yesterday

17 your first interview with two police detectives

18 which took place on November 3rd, 1993, okay?

19 A. Okay.

20 Q. That's where we left off.

21 Now, did you discuss your testimony

22 yesterday with anyone after you left the courthouse?

23 A. Yeah.

24 Q. Who did you discuss it with?

25 A. My wife.

26 Q. Anyone else?

27 A. No.

28 Q. Did you discuss it with any prosecutor? 4902

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1 A. No, I was kind of nervous. I said, "How'd  
2 it go?" And they smiled and they said, "It went  
3 well."

4 Q. And which prosecutor told you that?

5 A. I can't specifically remember, but it was  
6 one of them.

7 Q. Okay. Did you discuss anything else with  
8 one of them?

9 A. No.

10 Q. Did you talk with any sheriff about your  
11 testimony?

12 A. No.

13 Q. Were you on the phone last night with anyone  
14 about your testimony?

15 A. No. I did tell my pastor this morning that  
16 I was on the stand, and if he could pray for me.  
17 But other than that, that was it.

18 Q. Anyone else?

19 A. Nope.

20 Q. Okay. Now, yesterday you told the jury that  
21 Mr. Jackson had given you some money, correct?

22 A. Right.

23 Q. And you told them he had given you  
24 hundred-dollar bills, right?

25 A. Right.

26 Q. Isn't it true that when you were originally  
27 interviewed by the police, you told them that Mr.

28 Jackson would give you money each time you read a 4903

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1 book?

2 A. Yeah, he also said that, as well. Yeah,

3 he'd give me \$20, I think it was.

4 Q. And you told the police that you remember

5 him having a room full of books, and you said every

6 time you complete a book, he'll pay you some money,

7 right?

8 A. I don't remember that, but I remember

9 listening to it on the tape.

10 Q. But that was your voice on the tape,

11 correct?

12 A. Yes.

13 Q. Okay. You also told the police that Mr.

14 Jackson told you one time that if you got A's in

15 school, he would also pay you every time you got an

16 A, correct?

17 A. Yes. That is correct. I remember -- I

18 don't remember him saying that, but I remember it on

19 the tape.

20 Q. And that was your voice on the tape?

21 A. Yes, sir.

22 Q. Telling it to the police, correct?

23 A. Yes, sir.

24 Q. Okay. When you met with the prosecutors

25 before you testified, did anyone tell you not to

26 mention that when you talked about money?

27 A. No.

28 Q. Okay. You just forgot? 4904

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1 A. I'm sorry?

2 Q. You just forgot yesterday?

3 MR. ZONEN: Objection; argumentative.

4 THE COURT: Overruled.

5 You may answer.

6 Q. BY MR. MESEREAU: When you were responding

7 the prosecutor's questions --

8 THE COURT: Wait. He has a question pending.

9 MR. MESEREAU: Oh, I'm sorry.

10 THE COURT: I overruled the objection.

11 THE WITNESS: Can you repeat the question?

12 THE COURT: The question was, "You just

13 forgot yesterday?"

14 THE WITNESS: I have no idea what you're

15 referring to. I just forgot about what?

16 Q. BY MR. MESEREAU: About Mr. Jackson paying

17 you money for, one, reading a book --

18 A. No --

19 Q. -- and, two, getting A's.

20 A. I didn't remember that, but I remember

21 saying that on the tape.

22 Q. Okay. Okay. Now, following your interview

23 with two police officers in November of 1993, to

24 your knowledge, Mr. Jackson was never charged with a

25 crime involving anything you said, correct?

26 A. I don't know.

27 Q. Okay. Did you ever hear anything about

28 that? 4905

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1 A. I -- no.

2 Q. Okay. To this day, you're not sure if Mr.

3 Jackson was ever charged with any crime involving --

4 A. I don't know.

5 Q. -- what you claim happened?

6 A. No.

7 Q. Okay. You also were interviewed a second

8 time.

9 A. There's a hand being raised behind you guys

10 over there.

11 Q. You were interviewed a second time on March

12 24th, 1994. Do you remember that?

13 A. Again, I personally don't remember, and I

14 didn't even really listen to that tape, so -- and I

15 didn't get a transcript for it either, so I didn't

16 even review it.

17 Q. You were given a tape of your second

18 interview?

19 A. I was, but I did not listen to it.

20 Q. And who gave you that tape?

21 A. It came in the same packet as tape one and

22 with the transcript.

23 Q. Do you remember present at that interview

24 was Tom Sneddon?

25 A. I remember saying that yesterday, yeah. And

26 I also remember saying that I was unsure if he was

27 there or not.

28 Q. Okay. But you do remember now he was there, 4906

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1 right?

2 A. I did not say that.

3 Q. Would it refresh your recollection if I just

4 show you a transcript?

5 A. Sure.

6 MR. MESEREAU: May I approach, Your Honor?

7 THE COURT: Yes.

8 THE WITNESS: Is this a transcript of '94?

9 MR. MESEREAU: (Nods head up and down.)

10 THE WITNESS: So these are the people that

11 were there? I -- I can't ask that.

12 THE COURT: He's asking you to look at that

13 and see if that refreshes your memory to see --

14 THE WITNESS: No, it does not refresh my

15 memory.

16 Q. BY MR. MESEREAU: So you don't remember if

17 you were interviewed by Tom Sneddon and two district

18 attorneys in '94?

19 A. I remember Mike Craft being there. That was

20 the only person. And a woman being there. Other

21 than that, I cannot -- because I think that was the

22 first time I told a woman what happened.

23 Q. Do you remember someone named Lauren Weis

24 from the Los Angeles District Attorney's Office

25 being there --

26 A. I don't. I'm really bad at names.

27 Q. I have to complete the question. Thank you.

28 Do you remember someone named Lauren Weis 4907

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1 from the Los Angeles District Attorney's Office  
2 being present at that interview?

3 A. No.

4 Q. Do you remember someone named Bill Hodgeman  
5 from the Los Angeles District Attorney's Office  
6 being at that interview?

7 A. No.

8 Q. And you don't remember whether or not Mr.  
9 Sneddon was there, right?

10 A. I -- correct.

11 Q. Are you saying he wasn't there, or you just  
12 don't remember?

13 A. I don't remember whether he was there or  
14 not.

15 Q. Do you remember Russ Birchim being there?

16 A. I do not.

17 Q. Do you remember your own lawyer, Terry  
18 Cannon, being there?

19 A. I do not.

20 Q. Do you remember stating in that interview,  
21 "They made me come out with a lot more stuff I  
22 didn't want to say. They kept pushing. I wanted to  
23 get up and hit them in the head"? Do you remember  
24 that?

25 A. No.

26 Q. Would it refresh your recollection if I show  
27 you the transcript of that?

28 A. Probably not. But you can show it to me 4908

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1 anyway.

2 MR. MESEREAU: May I approach, Your Honor?

3 THE COURT: Yes.

4 MR. ZONEN: What page, Counsel?

5 MR. MESEREAU: 30.

6 THE WITNESS: Okay.

7 Q. BY MR. MESEREAU: Have you had a chance to

8 look at that page of the transcript?

9 A. I have.

10 Q. Does it refresh your recollection about what

11 you've said?

12 A. No, it does not.

13 Q. Do you remember anything you said in that

14 interview at the moment?

15 A. Not really.

16 Q. Okay. All right. Do you remember in that

17 interview telling the people who were present that

18 at one point a woman came into a room where you and

19 Michael were present?

20 A. No, I do not.

21 Q. Do you remember seeing Janet Jackson on one

22 occasion?

23 A. I remember saying that, or do I remember

24 seeing her?

25 Q. Do you remember seeing her?

26 A. I think I did meet her once.

27 Q. Do you remember where you met her?

28 A. I think it was at the mansion in Encino. 4909

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1 Q. Okay.

2 A. But I really -- like, I think that's where  
3 it was.

4 Q. Okay. Do you remember telling the sheriffs  
5 that the first time you were tickled by Mr. Jackson  
6 you think it lasted about 30 seconds?

7 A. Are we talking the first interview, second  
8 interview?

9 Q. Either one.

10 A. I do not remember.

11 Q. Okay. You do remember giving more  
12 information the second time, correct?

13 MR. ZONEN: "Second time?" Objection;  
14 vague.

15 MR. MESEREAU: Excuse me. He's correct.

16 I'll withdraw it.

17 Q. You do recall giving more information during  
18 your second interview than you did in your first,  
19 right?

20 A. I do not recall.

21 Q. Okay. How did you meet Attorney Terry  
22 Cannon?

23 A. I can't -- I think I met them at Mike  
24 Craft's office.

25 Q. Excuse me, at whose office?

26 A. Mike Craft's, my counselor.

27 Q. Okay. And does Terry Cannon still represent

28 you? 4910

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1 A. I don't think so, no.

2 Q. Well, you gave an interview with Mr. Zonen  
3 in December of 2004, correct?

4 A. Yes. That was the first time I think I met  
5 them.

6 Q. And Terry Cannon was present, correct?

7 A. You're right.

8 Q. And Terry Cannon at that time was working  
9 for the District Attorney's Office in San Diego,  
10 correct?

11 A. Correct.

12 Q. But he still came up to act like your  
13 lawyer, didn't he?

14 MR. ZONEN: I'll object to the expression,  
15 "act like your lawyer"; vague. Or argumentative.

16 THE COURT: Well, I guess instead of "like,"  
17 it might be "as."

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

19 Q. Mr. Cannon was present at your interview  
20 with Ron Zonen on December 6th, 2004, right?

21 A. Yes, sir.

22 Q. At that interview, he was serving as your  
23 lawyer, correct?

24 A. I don't know.

25 Q. Do you know why he was there?

26 A. I didn't really know. I was asked by --

27 actually, I didn't even know how I met you guys. I

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28 was asked to be there, I think, and he was there. 4911

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1 Q. Okay. Did he give you any legal advice  
2 before that meeting?

3 A. Actually, he said, "You don't have to answer  
4 things if you don't want to," but I think that was  
5 just a -- man advice.

6 Q. So he was giving legal advice?

7 A. I don't know if that's legal advice or not.

8 Q. Did he discuss with you what you were going  
9 to say in that interview?

10 A. No.

11 Q. Do you remember when that interview began,  
12 you requested that your interview not be  
13 tape-recorded?

14 A. I don't remember that.

15 Q. Would it refresh your recollection if I show  
16 you a report on that interview?

17 A. Okay. Sure.

18 MR. MESEREAU: May I approach, Your Honor?

19 THE COURT: Yes.

20 THE WITNESS: Okay.

21 Q. BY MR. MESEREAU: Have you had a chance to  
22 look at that report?

23 A. I read the first paragraph.

24 Q. And does it refresh your recollection that  
25 you requested that your interview not be  
26 tape-recorded?

27 A. It does not, but I probably said that.

28 Q. Okay. You don't know for sure, though? 4912

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1 A. No.

2 Q. Okay. And you had requested that Mr. Cannon  
3 be present at the interview, right?

4 A. You're going to have to show me the paper  
5 probably.

6 MR. MESEREAU: May I approach, Your Honor?

7 THE COURT: Yes.

8 THE WITNESS: (Nods head up and down.)

9 Q. BY MR. MESEREAU: Have you had a chance to  
10 look at the report?

11 A. I did.

12 Q. Does it refresh your recollection that you  
13 wanted Mr. Cannon present?

14 A. It does not refresh my recollection.

15 Q. Let me just try and get this straight. You  
16 don't know why Mr. Cannon was there, correct?

17 A. Correct.

18 Q. You didn't ask him to be there, right?

19 A. I don't remember whether I asked for him to  
20 be there or not. I probably did, only because he  
21 was a friend of mine and he knows more legal stuff  
22 than I do.

23 Q. Okay. Did you know he was working for a  
24 District Attorney's Office at the time?

25 A. I believe I did, because we kept in touch --

26 Q. Okay.

27 A. -- after I was 18.

28 Q. All right. Now, Mr. Zonen began that 4913

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1 interview by telling you about the current case  
2 involving Mr. Jackson, right?

3 A. I didn't understand the question.

4 Q. Well, let me try and rephrase it.

5 A. Okay.

6 Q. At the beginning of that interview, Mr.

7 Zonen gave you his summary of the current case  
8 against Mr. Jackson, right?

9 A. I believe so.

10 Q. And he told you about a family named

11 "Arvizo," right?

12 A. Really bad at names. If that's -- he told  
13 me about a child molestation.

14 Q. Okay. That these were the charges against  
15 Mr. Jackson, right?

16 A. I believe so.

17 Q. Okay. Have you ever met Janet Arvizo?

18 A. I don't know who that is.

19 Q. Ever met David Arvizo?

20 A. I don't know who that is.

21 Q. Ever met Gavin Arvizo?

22 A. Oh, that -- I do know who that is. No, I  
23 have not met him.

24 Q. Have you ever met Star Arvizo?

25 A. I have never met an Arvizo I don't think.

26 Q. Never met Davellin Arvizo, correct?

27 A. Right.

28 Q. Have you ever talked to any of the Arvizo 4914

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1 family on the telephone?

2 A. No.

3 Q. Okay. But Mr. Zonen was telling you about

4 the Arvizo family, was he not?

5 A. If that's the child's parents, then yes.

6 Q. Incidentally, after your second interview,

7 which you don't remember a lot about, to your

8 knowledge, no criminal charges were ever filed

9 against Mr. Jackson involving anything you had told

10 anybody, right?

11 A. I don't know.

12 Q. You still don't know?

13 A. I -- are you talking about '94, the '94

14 interview?

15 Q. Yes.

16 A. Okay. And you're asking if there was

17 criminal charges pressed against Michael?

18 Q. I'm asking you what you know, okay? You've

19 already indicated that after your '93 interview, no

20 criminal charges were ever filed against Mr. Jackson

21 involving anything you said, right?

22 A. I don't know much. I don't watch the news.

23 Q. And -- okay. And after your '94 interview,

24 again, no criminal charges were ever filed against

25 Mr. Jackson involving anything you said, right?

26 A. I don't know.

27 Q. Okay. But at your '94 interview, you do

28 remember Terry Cannon being present, right? 4915

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1 A. I don't know. I don't know who was present  
2 other than Michael Craft in '94.

3 Q. Okay. To your knowledge, was it your mom's  
4 idea for you to have an attorney at that meeting?

5 A. To my knowledge, I don't know.

6 Q. Okay. And again, just for the record, how  
7 old were you --

8 MR. ZONEN: I'll object as vague as to which  
9 meeting.

10 MR. MESEREAU: He's correct. I'll withdraw  
11 it.

12 THE COURT: All right.

13 Q. BY MR. MESEREAU: To your knowledge, was it  
14 your mother's idea to have an attorney be present at  
15 the March 24th, 1994, interview?

16 A. To my knowledge, I have no clue.

17 Q. Okay.

18 A. When I was 13, I was really protected by my  
19 mom, so I didn't know much --

20 Q. Okay.

21 A. -- about anything.

22 Q. And certainly when you were 13, you didn't  
23 hire an attorney, someone else did, right?

24 A. I didn't -- probably.

25 Q. Okay. Okay. Do you remember meeting with  
26 Attorney Terry Cannon, with your mother, in 1994?

27 A. I do not remember, but I'm sure we did.

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28 Q. Okay. All right. Do you remember meeting 4916

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1 with any other attorneys that your mother had  
2 retained in 1994?

3 A. Other than Terry Cannon?

4 Q. Yes.

5 A. I don't remember. But there was another  
6 attorney, which is Kris Kallman.

7 Q. Okay. And Kris Kallman is the attorney who  
8 represented you in a settlement with Mr. Jackson,  
9 right?

10 A. I don't know whether it was Kris or Terry.

11 Q. And Kris also represented your mother, who  
12 wanted a settlement with Mr. Jackson, correct?

13 A. I don't know.

14 Q. Now, do you know whether or not your mother  
15 went to these attorneys after she learned that Mr.  
16 Jackson had settled with someone named Chandler?

17 A. I do not.

18 MR. ZONEN: Objection; lack of foundation.

19 THE COURT: Court reporter, was that an  
20 answer on there?

21 THE REPORTER: Yes.

22 THE COURT: I'll overrule the objection. The  
23 answer was, "I do not."

24 Q. BY MR. MESEREAU: Why didn't you want your  
25 interview in December of 2004 with the prosecutors  
26 tape-recorded?

27 A. I don't know.

28 Q. You don't have any idea why you made that 4917

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1 request?

2 A. Tape-recording is weird. I don't know. No,

3 I don't.

4 Q. Okay. Do you remember telling Prosecutor

5 Zonen in the December 2004 interview regarding the

6 first incident you described - okay? - that you and

7 Mr. Jackson were in a tickle contest? Do you

8 remember that?

9 A. I do not. I don't know whether it was the

10 first interview or the second interview that we

11 talked about Michael molesting me.

12 Q. Well, actually, in the December interview,

13 you told Prosecutor Zonen that, in all three

14 instances that you described where you claim you

15 were inappropriately touched, every incident was

16 preceded by a tickling contest between you and Mr.

17 Jackson, right?

18 A. I don't know.

19 Q. Would it refresh your recollection just to

20 show you the report?

21 A. You can show it to me, but I don't know

22 whether it was the first or the second.

23 MR. MESEREAU: May I approach, Your Honor?

24 THE COURT: Yes.

25 THE WITNESS: Okay.

26 Q. BY MR. MESEREAU: Have you had a chance to

27 review that page of the report?

28 A. I didn't read the whole page. I read that 4918

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1 paragraph.

2 Q. Does it refresh your recollection about what  
3 you told Prosecutor Zonen in that December 6th,  
4 2004, interview?

5 A. It doesn't -- I don't -- it doesn't help  
6 remembering, but --

7 Q. Well, you told him that all three events  
8 that you described were preceded by a tickling  
9 contest, correct?

10 A. I don't remember.

11 Q. You and Mr. Jackson were in a contest as to  
12 who could tickle the most, correct?

13 A. I just said I don't remember that. I don't  
14 mean to sound like I'm wasting your time, but this  
15 is kind of hard being up here, and --

16 Q. No, please don't. Just respond to my  
17 questions, if you would, please.

18 A. Okay. Sorry.

19 Q. Now, on November 19th, 2004, Prosecutor  
20 Zonen and Auchincloss interviewed your mother at the  
21 District Attorney's Office, right?

22 A. I don't know. Me and my mother don't talk  
23 about that stuff much.

24 Q. Well, you were present, weren't you?

25 A. Now I remember, yes.

26 Q. Now you remember?

27 A. Yeah. I was present there.

28 Q. You not only were present, but you also 4919

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1 requested that that not be tape-recorded, correct?

2 A. Probably.

3 Q. You don't know?

4 A. I don't know.

5 Q. Would it refresh your recollection to look

6 at that report?

7 A. No. But bring it on up.

8 MR. MESEREAU: May I approach, Your Honor?

9 THE COURT: No, he said it wouldn't.

10 Q. BY MR. MESEREAU: You're not willing to look

11 at it?

12 A. It's not about me willing. I'm willing to

13 look at it, but it's not going to help.

14 Q. Well, that was last November you had that

15 interview with your mom and these prosecutors,

16 correct?

17 A. Again, this is all difficult.

18 Q. I know it's difficult, but you're saying you

19 don't remember that interview?

20 A. You just said I met with my mom and I was

21 there, and I didn't remember until you said that,

22 and then I remembered.

23 Q. Do you remember you and your mom both

24 requested that the interview not be tape-recorded?

25 A. I do not.

26 Q. Would it refresh your recollection to see

27 what it says in the report about that?

28 A. Bring it over. It -- yeah. Bring it over. 4920

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1 MR. MESEREAU: May I approach, Your Honor?

2 THE COURT: Yes.

3 Q. BY MR. MESEREAU: Have you had a chance to  
4 look at the page of that report?

5 A. Yeah, I read the first paragraph.

6 Q. Does it refresh your recollection about you  
7 and your mother both requesting no tape-recording?

8 A. No, it does not.

9 Q. Okay. You don't remember one way or the  
10 other about that?

11 A. Right.

12 Q. Okay. Okay. Now, on that particular day,  
13 and I'm referring to November 19th, 2004, you were  
14 interviewed as well, correct?

15 A. Was this when my mother was present?

16 Q. Yes.

17 A. Okay.

18 Q. Do you remember you were interviewed on that  
19 day?

20 A. I think I was just there for my mom.

21 Q. Well, actually, they interviewed your mom  
22 first and then they interviewed you second, correct?

23 A. I don't remember that.

24 Q. Okay. They interviewed you for about an  
25 hour, didn't they?

26 A. They may have.

27 Q. Would it refresh your recollection if I show

28 you the report about that? 4921

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1 A. No.

2 Q. You're not willing to look at it?

3 A. I'll look at it. I'll look at it, but no,  
4 it probably won't.

5 Q. You don't remember an hour interview on  
6 November 19th, 2004?

7 A. Again, the issue is it's all kind of  
8 blending in together.

9 Q. You do remember the December interview with  
10 Prosecutor Zonen, right?

11 A. You asked me that --

12 Q. Yes.

13 A. Go ahead, ask it again. Do I remember the  
14 December interview?

15 Q. Yes.

16 A. I remember it taking place. I don't  
17 remember what specific was asked.

18 Q. Actually, let me clarify the date.

19 A. Okay.

20 Q. Okay. I'm talking about the report. You  
21 were interviewed on October 18th, 2004, by  
22 prosecutors, right?

23 A. I'm sorry?

24 Q. You were interviewed on October 18th by  
25 prosecutors, correct?

26 A. Of 2004?

27 Q. Yes.

28 A. I believe that was the first time that I met 4922

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1 these guys, but I don't know.

2 Q. And then you were interviewed approximately

3 a month later on November 19th, right?

4 A. You got a bunch of hands raised behind you.

5 THE BAILIFF: Mr. Mesereau, could you check

6 if it's on? I guess they can't hear you back there.

7 THE WITNESS: Sorry, that's what was kind of

8 distracting me.

9 Q. BY MR. MESEREAU: I had mentioned a December

10 date. Actually, you were interviewed in October and

11 November of 2004, right?

12 A. October, November, December. I don't know.

13 Q. Okay. Do you remember having Terry

14 Cannon --

15 A. They're raising their hands again.

16 THE COURT: Quit hitting my microphone.

17 MR. MESEREAU: Oh. Okay.

18 THE COURT: Beat the poor thing -- you know,

19 what's happening, you have a book that's hitting the

20 "off" button. I can see from here that you can't

21 see, maybe.

22 MR. MESEREAU: I think it's on, but --

23 THE COURT: Gently.

24 THE WITNESS: Yeah, it's bad to hit mikes.

25 THE BAILIFF: Actually, it's -- when you

26 step back and are at a far distance, it's hard to

27 hear.

28 MR. MESEREAU: Okay. 4923

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1 Q. In your interview with the prosecutors on

2 October 18th --

3 A. This is the first one?

4 Q. Well, first we have '93. Then we have '94.

5 A. Okay.

6 Q. Then we have October of 2004, and then

7 November of 2004. Okay?

8 A. Okay.

9 Q. In your interview in October of 2004, you

10 were asked about the third incident where you claim

11 Mr. Jackson tickled your testicles, right?

12 A. I was probably asked that, yes.

13 Q. Do you remember you told the prosecutors it

14 lasted for more than ten seconds, but you don't know

15 how much longer after that?

16 A. I don't remember saying that.

17 Q. Would it refresh your recollection if I

18 showed you your report?

19 A. My report? No, it wouldn't.

20 Q. Well, the police reports.

21 A. The police report. I'll look at it, but

22 it's probably not going to help.

23 Q. Are you willing to give it a chance?

24 A. Yeah.

25 Q. Think it might help?

26 A. No. I'm sorry. But you can -- I'll give it

27 a shot.

28 MR. MESEREAU: Okay. May I approach, Your 4924

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1 Honor?

2 THE COURT: Yes.

3 THE WITNESS: Okay.

4 Q. BY MR. MESEREAU: Have you had a chance to  
5 look at the page of that report?

6 A. I have.

7 Q. Does it refresh your recollection that you  
8 told the prosecutors it lasted more than ten  
9 seconds?

10 A. It does not help me remember.

11 Q. Don't remember that at all?

12 A. No, but I could probably agree with it if it  
13 was in the report.

14 Q. Okay. Before either the October interview  
15 or the November interview with prosecutors, did you  
16 discuss what you were going to say in any of those  
17 interviews with your mother?

18 A. No.

19 Q. You would agree that Attorney Terry Cannon  
20 was present at both the October interview, 2004, and  
21 the November interview, 2004, right?

22 A. I can't remember whether he was there on the  
23 November one with me and my mom.

24 Q. Did you discuss what you were going to say  
25 at either interview in advance with Attorney Terry  
26 Cannon?

27 A. I don't think so.

28 Q. How did he end up showing up for any of 4925

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1 those interviews, if you know?

2 A. I think he called me and said I might be  
3 subpoenaed for this. I can't -- I think Kris called  
4 me and said I might be subpoenaed up here.

5 Q. Correct me if I'm wrong, I think you said  
6 yesterday that you never knew that your mother had  
7 gotten \$20,000 from the television show Hard Copy to  
8 give an interview.

9 A. I think you're wrong.

10 Q. Okay. Did you know that before you  
11 testified yesterday?

12 A. Yes.

13 Q. And when did you first learn that your  
14 mother got \$20,000 to give an interview with Hard  
15 Copy in the early '90s?

16 A. I think it was last Sunday.

17 Q. Okay. And I guess she told you that?

18 A. No.

19 Q. She's never told you that?

20 A. That she received \$20,000? She has never  
21 told me that.

22 Q. Did you know before last week that your  
23 mother had been paid to go on the television show  
24 Hard Copy?

25 A. I think I assumed it.

26 Q. Okay. But you didn't know for sure?

27 A. I didn't know for sure.

28 Q. Never discussed it with her? 4926

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1 A. I don't think I did, no.

2 Q. Okay. All right. Now, you admitted that at  
3 the beginning of your first interview with sheriffs  
4 in '93, you said that Mr. Jackson had not touched  
5 your genital area, right?

6 A. I said that at the very beginning.

7 MR. ZONEN: Objection; asked and answered.

8 THE COURT: Sustained.

9 Q. BY MR. MESEREAU: It was only after you were  
10 pushed real hard by the sheriffs that you began to  
11 say anything like that, true?

12 MR. ZONEN: Objection; asked and answered.

13 THE COURT: Sustained.

14 Q. BY MR. MESEREAU: And at one point a sheriff  
15 actually used a curse word to get you to say  
16 something, correct?

17 A. I don't remember that, but you could show me  
18 the thing.

19 Q. Okay. But as you sit here today, you don't  
20 remember, right?

21 A. I don't remember the four-letter word.

22 Everybody in junior high cussed.

23 Q. How about the word "bullshit"?

24 A. What about it?

25 Q. Do you remember a sheriff telling you that?

26 A. I don't, but I think I remember listening to  
27 it on the tape.

28 Q. Do you remember in that interview one 4927

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1 sheriff telling you, "Mr. Jackson is a molester,"  
2 and the other saying, "He makes great music, he's a  
3 great guy, bullshit"? Do you remember that?

4 A. I don't remember that specifically, but I  
5 think I remember hearing it on the tape, which was  
6 my voice, or his voice.

7 Q. You do remember a sheriff's voice saying  
8 that, right?

9 A. I don't remember right now of '93, but I  
10 remember listening to the tape.

11 Q. Okay. And a sheriff said that to you,  
12 correct?

13 A. I believe so.

14 Q. And the sheriffs complained that, "Mr.  
15 Jackson has a lot of money" in that interview,  
16 right?

17 A. I believe he did say that, but can I look at  
18 the paper?

19 Q. Sure.

20 May I approach, Your Honor?

21 THE COURT: Yes.

22 THE WITNESS: Okay.

23 Q. BY MR. MESEREAU: Have you had a chance to  
24 look at the transcript?

25 A. I did.

26 Q. Does it refresh your recollection about what  
27 the sheriffs said to you about Mr. Jackson in the

28 interview? 4928

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1 A. I don't remember that specifically, but  
2 reading it in the transcript, I remember reading  
3 that in the transcript when I read it on Sunday,  
4 when I reviewed the tape.

5 Q. And even after sheriffs said to you, "He's a  
6 molester, he's a great guy, makes great music,  
7 bullshit, he has lots of money," you still said he  
8 had never touched your genital area, right?

9 A. I believe so. Probably towards the  
10 beginning again.

11 Q. Do you remember the sheriff interviewing you  
12 wanted to know whether Mr. Jackson went under your  
13 pants or on top of your underwear, and you said, "I  
14 don't know"?

15 A. I'm sorry?

16 Q. Do you remember the interviewing sheriff  
17 asked you, "Have you ever been touched under your  
18 pants or on top of your underwear?" And you said,  
19 "I don't know"?

20 A. Were we talking about a specific incident?

21 Q. I'm just asking about the interview.

22 A. Oh. Then --

23 MR. ZONEN: I'll object as vague, Your

24 Honor.

25 THE COURT: Sustained.

26 Q. BY MR. MESEREAU: Do you remember in that  
27 interview, when you first said in response to the

28 sheriffs questions, "Mr. Jackson touched me," you 4929

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1 had no idea how long he had ever touched you?

2 MR. ZONEN: Objection; vague. Which

3 incident?

4 Q. BY MR. MESEREAU: During any incident?

5 THE COURT: Do you want to rephrase the whole

6 question?

7 MR. MESEREAU: Sure.

8 Q. Do you remember in your first interview with

9 the sheriffs when, after repeated questioning, you

10 finally said, "Mr. Jackson touched me," do you

11 remember not knowing how long he had ever touched

12 you at any time?

13 A. I don't remember.

14 Q. Okay. Do you remember telling the sheriffs

15 that Mr. Jackson, during your tickle games, used to

16 pinch you in the stomach?

17 A. Tickling, pinching. Same thing.

18 Q. Okay. You did tell the sheriffs in your

19 first interview you had never spent the night with

20 Mr. Jackson, right?

21 A. I never slept in his bed with him.

22 Q. Okay. When did you last talk to Attorney

23 Terry Cannon?

24 A. Yesterday.

25 Q. Did you talk about your testimony?

26 A. No.

27 Q. Did you talk about the case?

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1 Q. Did he call you --

2 A. Wait, actually, I'm sorry, I didn't talk  
3 about the case, but I talked about I was being  
4 nervous up here.

5 Q. Did you call him or did he call you?

6 A. He called me.

7 Q. When did you last talk to Attorney Terry  
8 Cannon before yesterday?

9 A. Um -- um, um, um, um. I really cannot  
10 remember the specific date.

11 Q. Now, in your interview of March 24th, 1994,  
12 you didn't remember what cartoons you were watching  
13 when you claim you were improperly touched, right?

14 A. I don't know.

15 Q. Did you know you were being tape-recorded in  
16 that interview?

17 A. You know what? I don't know. Typically I'd  
18 remember that.

19 Q. And do you remember telling the interviewers  
20 that Michael Jackson tickled you in your stomach?

21 A. No.

22 Q. You don't remember that?

23 A. No. Can I review that?

24 Q. Sure.

25 A. Is that -- it was being taped then? Or you  
26 can't say. Okay, yeah.

27 MR. MESEREAU: May I approach, Your Honor?

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1 MR. ZONEN: What page, Counsel?

2 MR. MESEREAU: 58.

3 THE WITNESS: Okay.

4 Q. BY MR. MESEREAU: You remember telling the  
5 people interviewing you that Mr. Jackson did tickle  
6 you in your stomach, right?

7 A. I do not remember saying that, but I  
8 probably said that.

9 Q. Okay. Do you remember in that interview  
10 when you finally said Mr. Jackson had touched your  
11 penis, that you told the interviewers, "He tickled  
12 me there"? Right?

13 A. I don't know.

14 Q. Do you remember you were asked, "What did he  
15 do with his hands?" And you said, "He tickled me."  
16 Do you remember that?

17 A. "What did he do with his hands?" And I  
18 said, "He tickled me"?

19 Q. Yes.

20 A. That's kind of vague. Like overall he  
21 tickled me, or what are you talking about?

22 Q. You were asked what Mr. Jackson did with  
23 your penis. Do you remember that? And you said,  
24 "He tickled me." Do you remember that?

25 A. He did tickle me.

26 Q. Okay. You were asked to describe what Mr.  
27 Jackson did with his hands, and your response was,

28 "He tickled me," true? 4932

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1 A. I don't know. I was probably crying then.

2 Q. Would you like to review the transcript, see  
3 if it refreshes your recollection?

4 A. Sure.

5 MR. MESEREAU: Okay. May I approach, Your  
6 Honor?

7 THE COURT: Yes.

8 Q. BY MR. MESEREAU: By the way, if you don't  
9 remember the interview, how do you know you were  
10 crying?

11 A. Because I usually cry when we're talking  
12 about the molestation.

13 Q. Okay. Okay. Again, do you remember saying  
14 to the police officers in response to their  
15 question, "What did he do with your penis?" You  
16 said, "He tickled me"?

17 A. I thought you were going to bring me that  
18 thing.

19 Q. Would you like to see it?

20 A. Yes.

21 Q. Okay.

22 A. Okay.

23 Q. Do you remember describing what Mr. Jackson  
24 did as tickling?

25 A. Do I remember describing what Michael  
26 Jackson did as tickling?

27 Q. Yes.

28 A. Like tickling my penis or -- 4933

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1 Q. Yes.

2 A. Are we talking the first or second or third  
3 incident?

4 Q. I don't know.

5 MR. ZONEN: Well, I'm going to object as  
6 vague.

7 THE COURT: The objection is sustained.

8 Q. BY MR. MESEREAU: Do you remember telling  
9 the interviewers in that second interview in 1994,  
10 when they asked you what Mr. Jackson did with your  
11 penis, you said, "He didn't really touch it, he was  
12 above my shorts"? Do you remember that?

13 A. Are we talking first or second or third?

14 Q. I believe you were just answering their  
15 questions.

16 MR. ZONEN: Objection; vague.

17 THE COURT: Sustained.

18 Counsel, you're going to have to direct --  
19 if you're going to question in this manner, you're  
20 going to have to direct it to specific times. There  
21 were three interviews.

22 MR. MESEREAU: Okay. I'm sorry, Your Honor.

23 THE COURT: And you're being unfair to the  
24 witness in my opinion.

25 Q. BY MR. MESEREAU: Okay. Directing you to  
26 the second interview that you ever gave about these  
27 events, okay? And that was the interview --

28 A. In '94? 4934

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1 Q. Yes.

2 A. Okay.

3 Q. Yes. Okay?

4 A. I thought we were talking about 2004. I'm

5 sorry.

6 Q. Okay. That's my mistake, I apologize.

7 Let's talk about the 1994 interview.

8 A. Okay.

9 Q. All right? Do you remember being asked the

10 question, "Did Mr. Jackson touch your penis?" And

11 you said, "He didn't really touch it, he was above

12 my shorts"?

13 A. I do not --

14 THE COURT: Wait. Just a minute.

15 THE WITNESS: I'm sorry.

16 THE COURT: I want you to approach.

17 MR. MESEREAU: Sure.

18 (Discussion held off the record at sidebar.)

19 THE COURT: All right. You may proceed.

20 Q. BY MR. MESEREAU: Okay. I'm going to try

21 and direct my questions to a particular interview,

22 one of the four that you had, and direct them to one

23 of the three events that you have described when you

24 claim Mr. Jackson improperly touched you, okay?

25 Now, directing your attention to the second

26 interview, which is in 1994 - okay? - and directing

27 your attention to the first event that you have

28 described where you claim Mr. Jackson improperly 4935

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1 touched you - okay? - do you remember -- excuse me.

2 Isn't it true that, when asked about the first event

3 in that second interview, you said Mr. Jackson

4 didn't really touch your penis?

5 A. I don't --

6 MR. ZONEN: What page?

7 MR. MESEREAU: 60.

8 THE WITNESS: No, I don't remember.

9 Q. BY MR. MESEREAU: Would it refresh your

10 recollection if I show you a page of that

11 transcript?

12 A. Bring it over.

13 MR. MESEREAU: May I approach?

14 THE COURT: Yes.

15 THE WITNESS: Okay.

16 Q. BY MR. MESEREAU: Have you had a chance to

17 look at that page?

18 A. I have. Well, not the tape. I've read

19 those two little sentences there.

20 Q. Does it refresh your recollection of what

21 you told the people who were interviewing you about

22 that first event during the interview in 1994?

23 A. It does not refresh my memory. But in

24 reading it --

25 THE COURT: Wait. That's the end of your

26 answer.

27 THE WITNESS: Okay. Sorry.

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28 THE COURT: Listen to the question and just 4936

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1 answer the question asked.

2 THE WITNESS: Okay.

3 Q. BY MR. MESEREAU: You just don't recall

4 saying that, right?

5 A. Correct.

6 Q. Could you please describe, to the extent you

7 remember, the sleeping bag in the apartment that you

8 called the hideout?

9 A. Describe the bag itself?

10 Q. Yes. If you remember. How big it was,

11 where it was, et cetera.

12 A. Near a window. If you're looking at the

13 T.V., to the right of the T.V.

14 Q. And there was no furniture in the apartment

15 that you remember?

16 A. I did not say that.

17 Q. Okay. What did you say?

18 A. I said that there was an L-shaped couch in

19 the hideout somewhere, in the living room, I

20 believe.

21 Q. Okay. And at any time when you claim you

22 were improperly touched, were you sitting on the

23 couch?

24 A. No, I never said that either.

25 Q. During the events that you've described at

26 the hideout --

27 A. Okay.

28 Q. -- where you say you were improperly 4937

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1 tickled - okay? --

2 A. Okay.

3 Q. -- were you always on top of the sleeping  
4 bag?

5 A. No. The first time I was on a chair.

6 Q. Okay. The second time you were on a  
7 sleeping bag, right?

8 A. Correct.

9 Q. Okay. Did both of those instances start out  
10 as tickle contests?

11 A. Yeah.

12 Q. Okay. And in both of those incidences that  
13 you've described, you recall it starting out as  
14 innocent sort of tickling and leading to an improper  
15 touching, right?

16 A. Right.

17 Q. Okay. Now, you've admitted that Mr. Jackson  
18 said he would pay you money for completing a book  
19 and also for getting A's in school, right?

20 A. I remember hearing that on the tape.

21 Q. Do you recall Mr. Jackson saying that to  
22 you?

23 MR. ZONEN: Objection; asked and answered.

24 THE COURT: Sustained.

25 Q. BY MR. MESEREAU: Do you recall being paid  
26 for reading a book?

27 A. I wasn't a reader.

28 Q. Did you ever tell Mr. Jackson, if you 4938

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1 remember, "I've completed a book"?

2 A. If I did, I don't know.

3 Q. Okay. Do you remember telling Mr. Jackson

4 you got A's in school?

5 A. If I did get an A, it was probably in P.E.

6 Q. And do you remember telling that to Mr.

7 Jackson?

8 A. I don't think I ever did. I don't know.

9 Q. Okay. Now, without going into any amounts,

10 when did you ever receive any money?

11 A. From Michael?

12 Q. From a settlement --

13 A. Oh.

14 Q. -- in your case.

15 A. From the settlement?

16 Q. Without going into any amounts, just when

17 did you first receive any money?

18 A. When I turned 18.

19 Q. Okay. Without going into any amounts, do

20 you know if your mother has received any money from

21 Mr. Jackson?

22 A. She has.

23 Q. Do you know approximately when she received

24 money from a settlement?

25 A. I don't.

26 Q. Okay. Do you know if it was before you did?

27 A. I think it was.

28 Q. Okay. Have you ever been approached by 4939

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1 anyone in the media who wanted to talk to you about  
2 anything involving Mr. Jackson?

3 A. Yes.

4 Q. And when did that happen?

5 A. Geez. When I was in junior high; when I  
6 was -- shoot, in '93 -- in '93, '94 I think.

7 Recently. Well, actually, not recently. A couple  
8 years ago. They -- yeah, the media.

9 Q. Do you know how the media ever heard about  
10 you?

11 A. I don't.

12 Q. Okay.

13 A. Actually, I talked to a media guy once.

14 Q. Who was that?

15 A. I don't remember. He had a British accent.

16 But I did not say anything about the case, or  
17 anything about Michael. What --

18 Q. And when did this happen?

19 MR. ZONEN: I'm not sure the witness had  
20 completed his answer.

21 MR. MESEREAU: Oh, I'm sorry, I thought he  
22 had.

23 Q. BY MR. MESEREAU: Were you finished?

24 A. No, I wasn't.

25 Q. My mistake.

26 THE COURT: Let's just stop. There wasn't  
27 any question pending. He was in a narrative for

28 some reason. Next question. 4940

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1 THE WITNESS: Okay.

2 Q. BY MR. MESEREAU: Do you know approximately  
3 when you spoke to a representative of the media?

4 A. I don't. I know I was late to class, but I  
5 don't. I was in -- probably '92 or '93.

6 Q. How about in recent -- the last couple  
7 years, anyone approach you, to your knowledge?

8 A. Well, to my knowledge, no. They tried to,  
9 but I somehow always evade them. Not on purpose.

10 It just happens.

11 Q. In your second interview in 1994, you were  
12 asked, "Did you ever have any discussion with  
13 Michael Jackson about whether you should tell  
14 anybody about the things you described?" Remember  
15 that?

16 A. (Shakes head from side to side.)

17 Q. You don't? Okay.

18 A. No, I don't.

19 Q. Okay. Do you remember telling the  
20 interviewers, when you were asked do you remember  
21 anything that he said, you said, "No, I'm working on  
22 that"?

23 A. No.

24 MR. ZONEN: I'll object as to which  
25 interview; vague.

26 MR. MESEREAU: In the second interview, I'm  
27 sorry.

28 Q. In the second interview -- let me rephrase 4941

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1 the question. I'll withdraw it.

2 In the second interview in 1994 - okay? --

3 A. Okay.

4 Q. -- that was recorded - all right? - when

5 asked if Mr. Jackson said anything to you about

6 whether you should discuss what happened, do you

7 remember telling the interviewers, "No, but I'm

8 working on that"?

9 A. I do not remember that.

10 Q. Would it refresh your recollection if I show

11 you the transcript?

12 A. No. But -- you could bring it over.

13 Q. Well, I can't unless you're willing to see

14 if it refreshes your recollection.

15 A. Okay. Bring it over. I'll give it a shot.

16 I'll read it just to see if it refreshes my memory.

17 MR. MESEREAU: May I approach?

18 THE COURT: Yes.

19 MR. ZONEN: Page, Counsel?

20 MR. MESEREAU: Yes. Pages 105, 106.

21 THE WITNESS: Okay.

22 Q. BY MR. MESEREAU: Have you had a chance to

23 review those pages --

24 A. I have.

25 Q. -- of your transcript?

26 Do they refresh your recollection about what

27 you said on that subject?

28 A. No, it does not. 4942

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1 Q. It doesn't.

2 A. Sorry.

3 Q. Now, in that interview you indicated that  
4 you were aware that another boy had sued Mr. Jackson  
5 seeking money, right?

6 MR. ZONEN: I'm sorry, which interview?

7 Objection.

8 MR. MESEREAU: I'm sorry, the second -- let  
9 me rephrase it.

10 Q. In the second interview that you gave in  
11 1994 - okay? --

12 A. Okay.

13 Q. -- you indicated that you were aware that  
14 someone else had sued Mr. Jackson for money,  
15 correct?

16 A. I don't remember.

17 Q. Would it refresh your recollection to look  
18 at the transcript?

19 A. Probably not.

20 Q. Okay.

21 A. Both of them are really blurry. It was just  
22 hard for me at the time.

23 Q. Well, let me ask you this.

24 A. Okay.

25 Q. Looking back, when is the first time you  
26 recall you knew someone else had sued Mr. Jackson  
27 looking for money?

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28 A. Probably 16. 4943

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1 Q. Excuse me?

2 A. I was probably 16. Because that's when  
3 money started being an issue for me.

4 Q. Okay. Now, in your last interview with  
5 Prosecutor Zonen - and I'm talking about an  
6 interview on November 19th, 2004, okay? - Mr. Cannon  
7 was present, right?

8 A. I don't know.

9 Q. Do you recall Mr. Cannon not wanting a  
10 defense investigator present?

11 A. No, I don't recall.

12 Q. Did you know anything about that?

13 A. No.

14 MR. MESEREAU: Okay. At this time, I have  
15 no further questions, Your Honor.

16 THE COURT: All right. Redirect?

17

18 REDIRECT EXAMINATION

19 BY MR. ZONEN:

20 Q. Mr. Francia, did you get any money from Mr.  
21 Jackson for reading a book?

22 A. I don't think so.

23 Q. Did you ever get any money from Mr. Jackson  
24 for getting A's?

25 A. I don't think so.

26 Q. Were grades a problem for you when you were  
27 in school about that time?

28 A. Shoot, through all my whole life, grades 4944

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1 were a problem.

2 Q. Did you -- do you sometimes have difficulty  
3 with reading?

4 A. Yeah.

5 Q. At this time even?

6 A. Yeah.

7 Q. All right. A lot of questions were asked of  
8 you by Mr. Mesereau that dealt with that first  
9 interview that took place in 1993, the first time  
10 that there was a disclosure. And you indicated, I  
11 believe, that what you said toward the end of the  
12 interview was very different than what you said at  
13 the beginning of the interview. Would you explain  
14 that for us, please? Why is that?

15 A. Why there was a difference in the beginning  
16 and --

17 Q. Yes.

18 A. Because in the beginning, I thought I could  
19 hold them off and make them go away. And they  
20 didn't go away. At all. It's kind of an issue when  
21 I was 13. I didn't want to tell anybody that I'd  
22 been molested; that I didn't want to tell anybody  
23 that anything ever happened to me. That's weird.

24 Q. Why?

25 A. Because you're 13. That's weird.

26 Q. What were the issues that you were dealing  
27 with at that time about that?

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28 A. In fifth grade, I told my friends that I 4945

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1 knew Michael Jackson, and I thought it was cool. My  
2 friends thought it was cool. They didn't believe  
3 me. But they thought it was cool.

4 In junior high, it's no longer cool to know  
5 somebody that had issues with kids, because then  
6 they're going to make fun of you.

7 And even at the church, they made fun of me.

8 At the church, worse than school, they made fun of  
9 me.

10 Q. And you were actually teased?

11 A. Yeah.

12 Q. You said yesterday to one of Mr. Mesereau's  
13 questions that you told the detective, "No, I'm not  
14 gay." Did you make that statement to them?

15 A. I remember listening to it in the tape. I  
16 don't recall saying that. But I remember listening  
17 to it on the tape.

18 Q. Do you recall whether or not that was an  
19 issue for you during the course of that interview,  
20 that that was one of your concerns, that people  
21 would see you as that?

22 A. Yes. That was a concern of mine.

23 Q. You mentioned yesterday to one of Mr.  
24 Mesereau's questions that the defendant put the  
25 money down your pants. Would you describe that for  
26 us?

27 A. What do you want to know?

28 Q. Where did the money go? In other words, 4946

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1 when he -- when he gave you money, did he hand it to  
2 you, or did he do something else? And if so, tell  
3 us what that is.

4 A. He put the money in my shorts, because I  
5 pulled it out, and that's when my mom saw -- noticed  
6 that I had pulled money out of my shorts and she  
7 asked me where I got it from.

8 Q. Do you remember which of the three occasions  
9 this was?

10 A. I can't remember whether it was the first or  
11 the second.

12 Q. But this was back when you were young?

13 A. Yeah.

14 Q. Seven or eight?

15 A. Seven or eight.

16 Q. You say in your shorts. What are we talking  
17 about? In a pocket?

18 A. I don't think my mom put pockets on the  
19 shorts.

20 Q. That was a little more complicated?

21 A. She's a good seamstress, but I don't think  
22 for shorts.

23 Q. Tell us as best you can recall where would  
24 that money have been.

25 A. That would have been in my shorts.

26 Q. I'm sorry?

27 A. It would have been in my shorts.

28 Q. In the inside? 4947

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1 A. In the inside.

2 Q. Do you know if the money was in your  
3 underwear?

4 A. I don't. I don't know.

5 Q. Mr. Mesereau asked you yesterday questions  
6 about whether you talked to your mother about what  
7 had happened, and if so, to what extent.

8 Did you ever have a conversation with your  
9 mother where you told her that you were molested?

10 A. I think I told her that I was molested in  
11 counseling, because then she shared that she was  
12 molested as well.

13 Q. Okay. Did you ever tell her the details of  
14 the molestation?

15 A. No.

16 Q. What had happened, how it happened, how  
17 often it happened, any of those types of details?

18 A. I don't think so.

19 Q. To this day, have you ever?

20 A. To this day. My wife found out on the  
21 stand.

22 Q. The details you had not yet told your wife?

23 A. Right.

24 Q. Have you ever told anybody the details other  
25 than your therapist?

26 A. My pastor.

27 Q. Your pastor?

28 A. And I don't think I told him the details. 4948

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1 MR. ZONEN: Thank you. I have no further  
2 questions.

3 THE COURT: Recross?

4 MR. MESEREAU: No further questions, Your  
5 Honor.

6 THE COURT: All right. You may step down.  
7 He needs to move away.

8 MR. SNEDDON: Don't forget your jacket.

9 Call Kris Kallman, Your Honor.

10 THE COURT: Come forward to the witness  
11 stand, please. When you get to the witness stand,  
12 remain standing.

13 Face the clerk and raise your right hand.

14

15 KRIS KALLMAN

16 Having been sworn, testified as follows:

17

18 THE WITNESS: Yes.

19 THE CLERK: Please be seated. State and  
20 spell your name for the record.

21 THE WITNESS: My name is Kris, K-r-i-s,  
22 Kallman, K-a-l-l-m-a-n.

23 THE CLERK: Thank you.

24

25 DIRECT EXAMINATION

26 BY MR. SNEDDON:

27 Q. Good morning, Mr. Kallman.

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28 A. Good morning, Mr. Sneddon. 4949

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1 Q. You're an attorney?

2 A. Yes.

3 Q. Licensed to practice in the State of

4 California?

5 A. Yes, sir.

6 Q. And what is your brief educational

7 background to prepare you for the practice of law in

8 the State of California?

9 A. Well, I graduated from Santa Barbara High

10 School. Went to Santa Barbara City College.

11 Graduated from Cal Poly San Luis Obispo. Went to

12 Pepperdine University Law School.

13 Q. Do you have a certain area of law that you

14 specialize in?

15 A. Yes. I am a civil trial lawyer, and for the

16 most part, I represent people that get injured due

17 to the fault of another person or company.

18 Q. How long have you been practicing law in the

19 State of California?

20 A. 29 years.

21 Q. And how long have you lived in Santa Barbara

22 County?

23 A. My whole life, except when I was away at

24 college.

25 Q. And where do you live in Santa Barbara

26 County?

27 A. I live in Santa Barbara, on the mesa, in the

28 city. 4950

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1 Q. Now, during the time that you've practiced  
2 law in Santa Barbara County, have you had associates  
3 that have practiced with you in your firm?

4 A. Yes.

5 Q. Are you a sole practitioner?

6 A. Essentially. Although I currently have two  
7 lawyers that office with me and they act as "of  
8 counsel." They're not employees, but they help me  
9 out on cases.

10 Q. Are you familiar with an attorney by the  
11 name of Terry Cannon?

12 A. I sure am.

13 Q. And how long have you known Mr. Cannon?

14 A. Oh, I've known Mr. Cannon for at least 20  
15 years.

16 Q. And at some point in time prior to today,  
17 was Mr. Cannon one of the people who was associated  
18 with you in the practice of -- your civil practice?

19 A. Yes.

20 Q. And during what period of time was that; do  
21 you recall?

22 A. Well, the relevant period here would have  
23 been in the early to mid '90s.

24 Q. And at that time Mr. Cannon was practicing  
25 with you?

26 A. He was associating with me on certain cases.

27 Q. And do you recall where Mr. Cannon was

28 residing at that particular point in time? 4951

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1 A. I believe he was living in Santa Barbara.

2 Q. Now, at some later time, did Mr. Cannon  
3 leave your association and take up the practice of  
4 law somewhere else?

5 A. Yes.

6 Q. To your knowledge, where was that?

7 A. In Oregon.

8 Q. And then after that, did Mr. Cannon come  
9 back?

10 A. He came back to San Luis Obispo County, and  
11 then moved to San Diego County.

12 Q. And at this particular point in time, do you  
13 know where Mr. Cannon is?

14 A. Not exactly this moment. But I happen to  
15 know that he bought a condominium here in Orcutt.

16 Q. And is he, once again, associated with you  
17 in the practice of law?

18 A. Yes, sir.

19 Q. Now, did you have occasion to represent  
20 Jason Francia in some litigation?

21 A. He and his mother, yes.

22 Q. And can you tell us, did you ever prepare a  
23 lawsuit on behalf of Jason Francia?

24 A. We prepared a Complaint, which is a document  
25 that's the beginning of a lawsuit, yes.

26 Q. And when you say "we," who's "we"?

27 A. Mr. Cannon and myself.

28 Q. So Mr. Cannon was working with you on that 4952

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1 particular case?

2 A. Yes, sir.

3 Q. And after the preparation of that  
4 document -- well, with regard to that document, what  
5 were the allegations set forth in the proposed  
6 Complaint to be filed?

7 A. Well, it's been --

8 MR. MESEREAU: Objection. Hearsay;  
9 relevance.

10 THE COURT: Sustained.

11 Q. BY MR. SNEDDON: Who was the individual that  
12 the Complaint was directed towards?

13 A. Mr. Jackson.

14 Q. At some point in time, did you have contact  
15 with individuals who were representing Mr. Jackson  
16 over the proposed filing of the criminal -- of the  
17 civil complaint?

18 A. Yes.

19 Q. And who did you make contact with?

20 A. Initially our contacts were with Johnnie  
21 Cochran and his associate, Carl Douglas.

22 Q. Do you recall approximately when it was when  
23 you first made contact with Mr. -- or when contact  
24 was made between you and Mr. Cochran and Mr.  
25 Douglas?

26 A. It was either late '94 or early '95.

27 Q. Did you, after your conversations with those

28 individuals, file the civil lawsuit? 4953

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1 A. No.

2 Q. At some point in time later, were you then  
3 dealing with other lawyers with regard to the  
4 proposed filing of that civil lawsuit?

5 A. Yes. At some point, Mr. Jackson's  
6 representation was assumed by a lawyer named Zia  
7 Modabber, and a lawyer named Howard Weitzman.

8 Q. And do you recall approximately when it was  
9 that you then began contact with those particular  
10 individuals?

11 A. I believe it was in mid 1995.

12 Q. And the purpose of those contacts?

13 A. Well, the --

14 MR. MESEREAU: Objection. Vague;  
15 foundation.

16 THE COURT: Overruled.

17 You may answer.

18 THE WITNESS: The purpose of the contacts  
19 was that they knew that we had a Complaint that we  
20 were about to file in Santa Barbara County Superior  
21 Court, and they didn't want us to do that.

22 MR. MESEREAU: Objection. Hearsay;  
23 foundation.

24 THE COURT: The answer is stricken.

25 Sustained.

26 Q. BY MR. SNEDDON: As a result of the  
27 conversations between these individuals, did you

28 pursue your lawsuit? 4954

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1 A. Well, we never filed the lawsuit.

2 Q. Did you reach an agreement, a settlement  
3 agreement?

4 A. Yes, we did.

5 Q. Did you reach a settlement agreement in  
6 which Jason Francia received monetary compensation  
7 from Mr. Jackson?

8 A. Yes, sir.

9 Q. Did you receive -- did you reach an  
10 agreement in which Blanca Francia received monetary  
11 compensation from Mr. Jackson?

12 A. Yes, we did.

13 Q. During the time that you were  
14 representing -- during the time that you had  
15 prepared a Complaint ready to be filed and you were  
16 in contact with attorneys representing Mr. Jackson,  
17 can you give the ladies and gentlemen of the jury an  
18 idea of how old Jason Francia was at that particular  
19 point in time?

20 A. Well, he was about 14 years old. He's 24  
21 now, as I understand it, and we're talking about  
22 things that happened just about exactly ten years  
23 ago.

24 Q. And in your position as a civil litigator,  
25 at the time that an individual is of minority, at  
26 the age of 14, how do you deal with representing a  
27 person like that?

28 A. Well, a child -- 4955

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1 MR. MESEREAU: Objection. Vague;

2 foundation; relevance.

3 THE COURT: Overruled.

4 You may complete your answer.

5 THE WITNESS: A child, under California law,

6 under the age of 18, is not permitted to enter into

7 a contract. I suppose he or she could, but it

8 wouldn't be enforceable. So the only way a child

9 can act legally is through a guardian ad litem. And

10 it's normally the parent and normally the mother.

11 Q. BY MR. SNEDDON: Was that the case in this

12 particular instance?

13 A. Yes.

14 Q. Now, during the course of the time that you

15 were involved in obtaining a settlement from Mr.

16 Jackson on behalf of the Francias, did you deal

17 personally with Jason at any time?

18 A. Yeah. Sure.

19 Q. In what respect?

20 A. Well, I knew who he was, I met with him. I

21 met with he and his mom. He was a teenaged boy, and

22 a nice young man.

23 Q. Now, at some point in time was Jason

24 required to sign some kind of documents in

25 conjunction with the settlement?

26 A. Yes. When he turned 18, part of the

27 condition was that he sign a confidentiality

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1 Q. Now, with regard to the confidentiality --

2 and to your knowledge, did he sign that?

3 A. Yes.

4 Q. And with regard to the confidentiality

5 agreement, did it have a provision that required

6 notice to Mr. Jackson in the event that Jason

7 Francia talked to anybody?

8 MR. MESEREAU: Objection. Leading; move to

9 strike.

10 THE COURT: Overruled.

11 You may answer.

12 THE WITNESS: I believe so, yes.

13 Q. BY MR. SNEDDON: And what was the

14 requirement notice in the confidentiality agreement

15 with regard to notice to the defense?

16 A. I believe it's five days.

17 Q. And were you at some point contacted by Mr.

18 Zonen of our department with regard to interviewing

19 your -- Jason Francia?

20 A. Yes.

21 Q. And in that particular case, did you

22 indicate to Mr. Zonen that you would have to do

23 something before you could agree with that?

24 A. Yes.

25 Q. And what was that?

26 A. Well, I'd have to notify somebody on Mr.

27 Jackson's legal staff that they wanted to talk to

28 him. 4957

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1 Q. And did you do that?

2 A. Yeah. Yes. Excuse me.

3 Q. And did you then grant permission for Mr.

4 Zonen to have a conversation with your -- with Jason

5 Francia?

6 A. Yes.

7 Q. Now, were you present during the

8 conversations between Jason Francia and Mr. Zonen?

9 A. I don't think so. I think I was there, and

10 then I think I had to go to another court or

11 something like that. I don't remember being an

12 integral part of any of those -- if there was more

13 than one, I don't even know.

14 Q. And I'm talking about the conversations that

15 occurred after you gave notice to the defense in

16 this case, or gave notice to Mr. Jackson. To your

17 knowledge, was Mr. Cannon present?

18 A. I believe so. At least for part of it.

19 Again, I'm not certain.

20 Q. Do you remember when it was that you

21 finally -- the year that you finally reached a

22 settlement agreement with Mr. Jackson?

23 A. Yes. It's been a long time. But it was a

24 big deal. And I do remember --

25 MR. MESEREAU: Objection. Nonresponsive;

26 move to strike.

27 THE COURT: The answer is stricken.

28 Nonresponsive. 4958

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1 Q. BY MR. SNEDDON: Just --

2 A. Yes.

3 Q. And what year was that, approximately?

4 A. It was either '95 or '96, I believe.

5 THE COURT: Counsel, we'll take our break.

6 (Recess taken.)

7 --o0o--

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1 REPORTER'S CERTIFICATE

2

3

4 THE PEOPLE OF THE STATE )

5 OF CALIFORNIA, )

6 Plaintiff, )

7 -vs- ) No. 1133603

8 MICHAEL JOE JACKSON, )

9 Defendant. )

10

11

12 I, MICHELE MATTSON McNEIL, RPR, CRR,

13 CSR #3304, Official Court Reporter, do hereby

14 certify:

15 That the foregoing pages 4902 through 4959

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 April 5, 2005, and thereafter

20 reduced to typewriting by computer-aided

21 transcription under my direction.

22 DATED: Santa Maria, California,

23 April 5, 2005.

24

25

26

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

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

5

6

7 THE PEOPLE OF THE STATE OF )

8 CALIFORNIA, )

9 Plaintiff, )

10 -vs- ) No. 1133603

11 MICHAEL JOE JACKSON, )

12 Defendant. )

13

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17 REPORTER'S TRANSCRIPT OF PROCEEDINGS

18

19 TUESDAY, APRIL 5, 2005

20

21 8:30 A.M.

22

23 (PAGES 4961 THROUGH 5156)

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

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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. Nicola is listed as "N" on index. Mr. Mesereau is listed as "M" on  
index.

6 Ms. Yu is listed as "Y" on index. Mr. Sanger is listed as "SA" on  
index.

7 Mr. Oxman is listed as "O" on index.

8

9 PLAINTIFF'S

10 WITNESSES DIRECT CROSS REDIRECT RECROSS

11 KALLMAN, Kris 4966-M

12 FRANCIA, Blanca 4977-Z 5057-M 5130-Z 5154-M

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1 E X H I B I T S

2 FOR IN

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

4 781 Photograph 5054 5056

5 782 Photograph 5054 5056

6 783 Photograph 5145 5150

7 784 Photograph 5145 5150

8 785 Photograph 5145

9 786 Photograph 5145 5150

10 787 Photograph 5145 5150

11 788 Photograph 5145 5150

12 789 Photograph 5145 5150

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1 THE COURT: Counsel?

2 MR. SNEDDON: Your Honor, I've just about  
3 completed my examination. But I would request if we  
4 could approach the bench for just one second. I  
5 don't want to run afoul of the Court.

6 THE COURT: All right.

7 (Discussion held off the record at sidebar.)

8 THE COURT: (To the jury) All right. Knock  
9 it off.

10 (Laughter.)

11 THE COURT: Okay. Counsel, you may proceed.

12 MR. SNEDDON: All right.

13 Q. Mr. Kallman, I think I just have a couple  
14 questions left.

15 I think where we were headed before the  
16 break was you told us the approximate year in which  
17 the case actually reached a settlement.

18 And what I wanted to know was, after the  
19 settlement of the case, have you kept in contact  
20 with Jason over the years?

21 A. Yes.

22 Q. And to your knowledge, has Mr. Cannon kept  
23 in contact with Jason over the years?

24 A. I believe so.

25 Q. Now, with regard to the lawsuit that was  
26 contemplated against Mr. Jackson at the time, the  
27 basis of the -- of the nature of the representation

28 of Jason Francia involved inappropriate sexual 4965

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1 conduct against Jason by the defendant, Mr. Jackson?

2 A. Yes.

3 MR. SNEDDON: Nothing further, Your Honor.

4 THE COURT: Cross-examine?

5 MR. MESEREAU: Yes, please. Your Honor.

6

7 CROSS-EXAMINATION

8 BY MR. MESEREAU:

9 Q. Good morning, Mr. Kallman.

10 A. Good morning.

11 Q. My name is Thomas Mesereau and I speak for

12 Mr. Jackson.

13 A. Pleasure to meet you.

14 Q. I want to ask you some questions about the

15 settlement agreement you referred to in response to

16 the prosecutor's questions, okay?

17 First of all, you had separate settlement

18 agreements for the mother, Blanca Francia, and the

19 son, Jason Francia, correct?

20 A. I believe so. I can tell you, I have not

21 reviewed this material and it's been ten years, but

22 I believe that was the case. Some of this I'm going

23 to have to take your word for it.

24 Q. Well, I can show you a copy if you need it.

25 A. I don't disbelieve that.

26 Q. Okay. The settlement agreement with Blanca

27 Francia was entered into approximately April 1st,

28 1996, right? 4966

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1 A. I don't know.

2 Q. Would it refresh your recollection if I show  
3 you a copy of the agreement?

4 A. Sure.

5 MR. MESEREAU: May I approach, Your Honor?

6 THE COURT: Yes.

7 THE WITNESS: That's what it says.

8 Q. BY MR. MESEREAU: The settlement agreement  
9 with Jason Francia was entered into approximately  
10 June 1st, 1998, right?

11 A. Don't know.

12 Q. Would it refresh your recollection if I just  
13 show you a copy of it?

14 A. Sure.

15 MR. MESEREAU: May I approach, Your Honor?

16 THE COURT: Yes.

17 THE WITNESS: That's what it says.

18 Q. BY MR. MESEREAU: Okay. Now, that would  
19 suggest, wouldn't it, that the mother had agreed to  
20 get money for herself before there was any agreement  
21 for Jason to get money in a settlement, right?

22 A. No, it was all part of one global  
23 settlement.

24 Q. Then why would there be a two-year  
25 difference between the execution of those settlement  
26 agreements?

27 A. Remember when I told the jury that a minor

28 can't enter into a contract? 4967

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1 Q. Yes.

2 A. Jason wouldn't have been able to sign before  
3 he was 18. My guess is that's probably when he  
4 turned 18, and that's what Mr. Weitzman and Modabber  
5 wanted.

6 Q. And then just for the jury's benefit, why  
7 would the mother sign in '96?

8 A. She was an adult. She could sign.

9 Q. The point I'm making is that she had a  
10 separate settlement from her son.

11 A. Exactly. I mean -- yes. She got money.

12 Q. Yes. Okay. Now, the prosecutor asked you  
13 some questions about provisions in the settlement  
14 agreement, okay? And one of the issues that was  
15 carefully negotiated by the people representing Mr.  
16 Jackson was that he deny any wrongdoing in that  
17 agreement, right?

18 A. Again, the best evidence of that would be  
19 what's in the agreement. I don't remember what's in  
20 there.

21 Q. Okay. Well, let me -- the prosecutor read  
22 you a provision, asked you about it.

23 Let me ask you about this: There was  
24 language in that agreement that said, "The parties  
25 acknowledge that Jackson has elected to settle the  
26 claims solely in view of the potential impact any  
27 litigation could have in the future on his

28 reputation, earnings and potential income, and not 4968

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1 because of any alleged wrongful conduct on his  
2 part," right?

3 A. If you're asking me if that's in the  
4 document, I'll have to take your word for it. You  
5 don't need to show it to me. It sounds pretty  
6 standard to me.

7 Q. The agreement further said -- excuse me, let  
8 me rephrase that.

9 Both agreements, the one involving Jason and  
10 the one involving Blanca, his mother, both had  
11 language which said, "This agreement shall not, in  
12 any manner, be construed as an admission by Jackson  
13 that he has acted wrongfully with respect to  
14 Francia, Blanca, or any other person, or at all, or  
15 that Francia or Blanca have any rights whatsoever  
16 against Jackson or Jackson's releasees." Sound  
17 familiar to you?

18 A. It sounds like standard language in  
19 virtually every release that I deal with. But, yes,  
20 it does sound familiar.

21 Q. Actually, there's a whole separate paragraph  
22 entitled, "Denial of Claims by Mr. Jackson,"  
23 correct?

24 A. Don't know.

25 Q. Would it refresh your recollection if I show  
26 you a copy?

27 A. It would.

28 MR. MESEREAU: May I approach, Your Honor? 4969

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1 THE COURT: Yes.

2 THE WITNESS: It does refresh my  
3 recollection.

4 Q. BY MR. MESEREAU: Okay. And do you recall  
5 that language being in both agreements?

6 A. I believe so, yes, sir.

7 Q. Okay. In addition to the language that I  
8 have read, there's further language which says,  
9 "Jackson specifically disclaims any liability to,

10 and denies any wrongful acts against, Francia,  
11 Blanca or any other person and may continue to do so  
12 publicly, to the extent reasonably necessary, to  
13 respond to any inquiries in this regard." Right?

14 A. Correct.

15 Q. It said further, "The parties acknowledge  
16 that Jackson is a public figure, and that his name,  
17 image and likeness have commercial value and are an  
18 important element of his earning capacity." Right?

19 A. That's true.

20 Q. And that language was in both settlement  
21 agreements, the one involving Blanca Francia and the  
22 one involving Jason Francia, correct?

23 A. I don't remember that. I will take your  
24 word for it. You don't need to refresh my  
25 recollection. It sounds like it should be or would  
26 be.

27 Q. Now, Mr. Kallman, provisions in which a

28 settling party denies liability are fairly standard 4970

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1 in settlement agreements, right?

2 A. True.

3 Q. But the language that I just read to the  
4 jury is not standard language in a settlement  
5 agreement, is it?

6 A. This is not a standard case, or was not.

7 And no, you're right. These were carefully drafted  
8 by a team of lawyers, and we agreed to the terms.

9 Q. And the reason those terms are different is  
10 because Mr. Jackson is an unusual individual in  
11 terms of his need to preserve his reputation and  
12 public image so he can earn a living, right?

13 MR. SNEDDON: Calls for speculation on this.

14 It wasn't drafted by him. No foundation.

15 MR. MESEREAU: I think it was drafted by  
16 this witness.

17 THE COURT: All right. I'll sustain a  
18 foundation.

19 MR. MESEREAU: Okay.

20 Q. When you settled these matters - and I'm  
21 talking about matters involving Michael Jackson,  
22 Blanca Francia, and Jason Francia - you put in  
23 language involving denial of claims by Mr. Jackson  
24 that was not standard language in a typical  
25 settlement agreement, right?

26 MR. SNEDDON: Your Honor, I'm going to  
27 object to the question as lack of foundation; that

28 he put the language in there. 4971

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1 THE COURT: Well, that was the foundation I  
2 was looking for.  
3 So I'll allow you to answer the question as  
4 long as you understand the limitations of your  
5 answer.

6 THE WITNESS: Well --

7 THE COURT: If you put the language in.

8 THE WITNESS: I didn't draft that agreement.

9 THE COURT: Okay.

10 Q. BY MR. MESEREAU: Did lawyers from your  
11 office draft the agreement?

12 A. No.

13 Q. Who drafted the agreement?

14 A. Somebody in Mr. Modabber's office, the  
15 Katten, Muchin, Zavis & Weitzman firm in Century  
16 City.

17 Q. Did you have any input into the language in  
18 the agreement?

19 A. Only to review it. And if there was  
20 language we found objectionable, we could strike it,  
21 I suppose.

22 Q. Okay.

23 A. But they wanted that in there, and I didn't  
24 find it objectionable.

25 Q. Okay. Now, you made a statement, I believe,  
26 in response to the prosecutor's questions, that if  
27 someone from law enforcement wanted to speak to your

28 client, you had to first notify representatives of 4972

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1 Mr. Jackson, true?

2 A. True.

3 Q. That -- really, that language is not in that  
4 agreement, is it?

5 A. I don't know.

6 Q. Then why would you say it?

7 A. Because that's part -- in one of the  
8 agreements, I have to give notice to the defense  
9 team. And I've given notice once to Mr. Sanger.

10 And then when I got subpoenaed on Friday, I gave  
11 notice to Mr. Modabber down in Los Angeles.

12 Q. But the notice you're supposed to give to  
13 the defense team does not involve requests by law  
14 enforcement to speak to your client, does it?

15 A. I assume that anybody from law enforcement  
16 that wants to talk to my client, there was a  
17 requirement to notify somebody from the defense  
18 team.

19 Q. Nowhere in those settlement agreements is  
20 there language to that effect, is there?

21 A. I have no idea.

22 MR. SNEDDON: Object as immaterial;  
23 irrelevant.

24 MR. MESEREAU: The prosecutor brought it up  
25 on direct, Your Honor.

26 THE COURT: The objection is overruled. And  
27 the answer came in as, "I have no idea."

28 Q. BY MR. MESEREAU: It would be against public 4973

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1 policy for a civil litigator to put language in a  
2 settlement agreement precluding anyone from  
3 cooperating with law enforcement, wouldn't it?

4 A. In my opinion, yes.

5 Q. Lawyers are not allowed to have language  
6 like that in settlement agreements, right?

7 A. Wrong.

8 Q. Pardon me?

9 A. No. It's a notice requirement. It's not a  
10 preclusion requirement.

11 Q. When did you last review the notice  
12 provisions in these agreements?

13 A. Probably in 1996 or 1997.

14 Q. Well, let me ask you this question: Did you  
15 talk with Mr. Sneddon about what questions he was  
16 going to ask you before you testified today?

17 A. No. I mean, we talked, but it was very,  
18 very general and I don't think the conversation was  
19 more than five or ten minutes long.

20 Q. Okay. The notice provisions that you  
21 describe talk primarily about anyone who's suing Mr.  
22 Jackson or if he's contacted by the media, correct?

23 A. I don't -- not the notice provisions I'm  
24 thinking about. I think there's a specific  
25 provision -- it may not be in that agreement. Maybe  
26 it's in another agreement, but there's a provision  
27 that I'm supposed to contact either Johnnie Cochran

28 or Zia Modabber or somebody on the defense team if 4974

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1 there was a request to speak or interview my  
2 clients.

3 Q. But never in the agreement did it refer to  
4 law enforcement, right?

5 A. That I don't remember. It's been a long  
6 time.

7 Q. Okay. Okay. Now, you answered some  
8 questions about Terry Cannon.

9 A. Yes, sir.

10 Q. When did -- excuse me, you're currently  
11 associated with Mr. Cannon, correct?

12 A. He is "of counsel" to my law firm.

13 Q. When did he become "of counsel" to your law  
14 firm.

15 A. He's been "of counsel" twice. Once about  
16 ten years ago, during this period, and then again  
17 just recently, within the last two months.

18 Q. So he wasn't "of counsel" to your law firm  
19 in October, November and December of last year,  
20 right?

21 A. I don't believe so, but I can't be sure.

22 Q. During October, November and December of  
23 last year, he was with the District Attorney's  
24 Office in San Diego, wasn't he?

25 A. Well, I know he recently retired from the  
26 San Diego D.A.'s Office. I don't know precisely  
27 when he retired, but you're right, it's been recent.

28 MR. MESEREAU: Okay. No further questions, 4975

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1 Your Honor.

2 MR. SNEDDON: No questions, Your Honor.

3 THE COURT: All right. Thank you. You may  
4 step down.

5 THE WITNESS: Thank you, Your Honor.

6 MR. ZONEN: We'll call Blanca Francia to the  
7 stand.

8 THE COURT: Come to the front of the  
9 courtroom, please.

10 When you get to the witness stand, remain  
11 standing. Face the clerk over here, and raise your  
12 right hand.

13 Remain standing.

14 BAILIFF CORTEZ: Remain standing.

15 THE COURT: Face the clerk here. Right over  
16 here.

17 BAILIFF CORTEZ: Right over there, please.

18

19 BLANCA FRANCIA

20 Having been sworn, testified as follows:

21

22 THE WITNESS: Yes, I do.

23 THE CLERK: Please be seated. State and  
24 spell your name for the record.

25 THE WITNESS: Blanca Francia. B-l-a-n-c-a;  
26 F-r-a-n-c-i-a.

27 BAILIFF CORTEZ: Ma'am, you need to move

28 over here, please. 4976

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1 THE WITNESS: Oh.

2 MR. ZONEN: Would you like her to spell her  
3 name again?

4 THE COURT: Did the court reporter get the  
5 spelling?

6 THE REPORTER: Yes.

7 THE COURT: That's fine.

8 THE JURY: (In unison) We didn't.

9 (Laughter.)

10 THE COURT: Yes, please ask her to spell her  
11 name again.

12 MR. ZONEN: Could you please spell your name  
13 again?

14 THE WITNESS: B-l-a-n-c-a; F-r-a-n-c-i-a.

15

16 DIRECT EXAMINATION

17 BY MR. ZONEN:

18 Q. Miss Francia, good morning.

19 A. Good morning.

20 Q. Do you currently live in Santa Barbara

21 County?

22 A. Yes.

23 Q. Up in the North County area?

24 A. Uh-huh.

25 Q. Are you the mother of Jason Francia?

26 A. Yes, I am.

27 Q. What kind of work are you currently doing?

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1 Q. All right. What we need to do, we have a  
2 problem here. And it's not just with you, a lot of  
3 witnesses. You have to be as close as you can get  
4 to the microphone so that you can be heard all the  
5 way to the back of the courtroom. Okay?

6 A. Okay.

7 Q. All right. Are you the mother of Jason  
8 Francia?

9 A. Yes.

10 Q. And what kind of work are you currently  
11 doing?

12 A. Caregiving.

13 Q. I'm sorry?

14 A. Caregiving.

15 Q. And what does that mean, a caregiver?

16 A. Taking care of elderly people. Disabled.

17 Q. Do you have a couple clients who you work  
18 for?

19 A. Yes.

20 Q. And are they disabled in some fashion?

21 A. Yes. I deal with one six years, almost six  
22 years, yeah.

23 Q. Okay.

24 A. And another one just recently, about a  
25 couple of months.

26 Q. And how long have you been doing this kind  
27 of work?

28 A. On and off, I've been doing it for about 15 4978

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1 years.

2 Q. And prior to that, what kind of work did you  
3 do?

4 A. Housekeeping. Housecleaning.

5 Q. And for what period of time did you do that  
6 work?

7 A. Since I came to the country.

8 Q. When did you come to the United States?

9 A. 1975.

10 Q. And from what country did you come from?

11 A. El Salvador.

12 Q. You have been to -- in this country  
13 continuously since 1975?

14 A. Yes.

15 Q. Have you been back to El Salvador to visit  
16 at all?

17 A. A couple of times.

18 Q. Your English, how did you learn English?

19 Did you go to school?

20 A. No.

21 Q. How did you learn English?

22 A. Reading, and listening to people, and  
23 that's --

24 Q. How old were you when you came to this  
25 country?

26 A. About 21.

27 Q. Okay. Do you know Mr. Jackson, Michael

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1 A. Yes.

2 Q. Do you see him in this courtroom?

3 A. Yes.

4 Q. Would you indicate where he is sitting,  
5 please?

6 A. He's sitting right there.

7 MR. ZONEN: Your Honor, could the court  
8 record reflect that the witness has identified the  
9 defendant?

10 THE COURT: All right.

11 Q. BY MR. ZONEN: How do you know Mr. Jackson?

12 A. I work -- work about five years.

13 Q. When did you begin working for Mr. Jackson?

14 A. 1986.

15 Q. And where did you begin working for Mr.

16 Jackson, at what location?

17 A. Havenhurst. Encino, California.

18 Q. Havenhurst is the name of the street?

19 A. Yes.

20 Q. And was there a house on that street --

21 A. Yes.

22 Q. -- where he lived?

23 All right. What were you doing for Mr.

24 Jackson at the Havenhurst residence?

25 A. I was hired to be his personal housekeeper.

26 Q. Were there other members of the Jackson

27 family living at the Havenhurst residence?

28 A. Yes. 4980

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1 Q. Can you tell us who they were?

2 A. At that time Janet and LaToya, and his  
3 father and mother.

4 Q. Would you describe the Havenhurst residence  
5 for us, just briefly? A large home?

6 A. Their whole house? Yeah. He has his  
7 separate quarters in the house. But it was in the  
8 same house.

9 Q. Okay. Was it a large home?

10 A. Yes.

11 Q. And his quarters, were you responsible for  
12 just his quarters or did you clean in the whole  
13 house?

14 A. Well, yes, just his quarters. His place.  
15 But eventually when he will go out on tour, I will  
16 stay at the house and help the household.

17 Q. You would clean the rest of the house as  
18 well?

19 A. Uh-huh.

20 Q. Did Mr. Jackson ever have an additional  
21 residence other than the residence on Havenhurst?

22 A. After I was there for about a year, I think,  
23 or less than a year, he got another one. Like --  
24 kind of an apartment, suite. Called it "The  
25 Hideout."

26 Q. Where was that; do you know?

27 A. I know it's on Wilshire. And I don't know

28 the other street. 4981

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1 Q. And describe that location for us, if you  
2 would.

3 A. What do you mean?

4 Q. Tell us what it was like, his apartment.

5 A. Oh.

6 Q. Or his residence. How many rooms in it; do  
7 you know? Do you recall?

8 A. Three. It had a master bedroom, and two  
9 other rooms, bedrooms.

10 Q. Did it have a living room?

11 A. Yes.

12 Q. I assume a kitchen?

13 A. Kitchen, and another little room.

14 Q. Okay. At least a couple bathrooms?

15 A. I don't remember.

16 Q. You don't recall --

17 A. No.

18 Q. -- how many bathrooms?

19 A. I don't remember.

20 Q. It's okay. Do you recall for what period of  
21 time you cleaned that residence?

22 A. For about a year.

23 Q. Was he living at that residence during that  
24 time, Mr. Jackson?

25 A. Yeah, he totally move his --

26 Q. I'm sorry?

27 A. He totally move from Encino to that hide --

28 to that place. He move his office to -- to near 4982

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1 that location.

2 Q. Okay. Was there a bed at that residence?

3 A. No.

4 Q. Never?

5 A. Never.

6 Q. The whole time that you were cleaning there?

7 A. Yeah.

8 Q. Okay. Did you go to a different location

9 after the hideout? Was there yet another residence?

10 A. Yeah, he was in process to get a ranch.

11 Q. Okay.

12 A. In Los Olivos.

13 Q. And was that Neverland?

14 A. Yeah.

15 Q. Was that the ranch that he actually did

16 purchase?

17 A. Uh-huh. Yes.

18 Q. Did he move to that ranch?

19 A. Eventually, yeah. But he was on and off.

20 They sent me over here before he moved in.

21 I mean --

22 Q. I'm not sure I understood that, "They sent

23 me over here before he moved in." Who is "they,"

24 first of all?

25 A. Well, they arrange, Mr. Jackson and Bill

26 Bray and one of the secretaries.

27 Q. Okay. Bill Bray was who?

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28 A. His personal assistant I guess. 4983

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1 Q. All right. And you said, "They sent me  
2 here." Where is "here"?

3 A. Santa Maria.

4 Q. Santa Maria. So did you actually move to  
5 Santa Maria?

6 A. Yeah. They pay me to move here.

7 Q. And did you move with your child?

8 A. Yes.

9 Q. Is Jason your only child?

10 A. My only son.

11 Q. Did Jason grow up with his father at all?

12 A. No.

13 Q. Has he had contact with his father at all?

14 A. No.

15 Q. How old was Jason when you moved to Santa  
16 Maria?

17 A. I guess about nine.

18 Q. About nine years old?

19 A. Eight or nine, yeah.

20 Q. Okay. Did you continue working for Mr.

21 Jackson after you moved to Santa Maria?

22 A. Excuse me?

23 Q. Did you continuing to work for Mr. Jackson --

24 A. Yes.

25 Q. -- after you moved to Santa Maria?

26 A. Yes.

27 Q. And was that at Neverland?

28 A. Yes. 4984

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1 Q. All right. What were your responsibilities  
2 at Neverland? What did you do for Mr. Jackson?

3 A. To clean his room.

4 Q. I'm sorry?

5 A. To clean his bedroom. And taking care of  
6 his clothes and his personal stuff.

7 Q. All right.

8 A. His -- all his -- you know, whatever he  
9 needed. And to clean up and arrange all his  
10 clothes, press them, iron them, and, you know,  
11 everything.

12 Q. What was your schedule at Neverland? How  
13 often did you work there?

14 A. In the beginning, I think I was just -- he  
15 was there, I will come, you know, and work for three  
16 days, whatever time he will stay there, and then,  
17 you know, not to be there for another two days. But  
18 eventually he move to -- like to 9:00 to 5:00.

19 Q. Five days a week?

20 A. Five days a week. Six days.

21 Q. Six days? Did you ever work more than 9:00  
22 to 5:00?

23 A. Yeah.

24 Q. Your hours, times, would they vary different  
25 days?

26 A. Yeah. Christmastime and -- you know,  
27 whatever time they needed me, because he was there.

28 Q. Were there occasions that you would work 4985

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1 late?

2 A. Yes.

3 Q. And you say six days a week. Was that

4 common?

5 A. Was that what?

6 Q. Was that a common event, that you would work

7 six days a week?

8 A. Yeah.

9 Q. Okay. During that time, did you ever bring

10 Jason with you to work? And by "this time," I'm

11 referring to at Neverland.

12 A. Yes.

13 Q. Okay. Did you ever bring Jason to work with

14 you at the Havenhurst residence in Encino?

15 A. Yes, it was.

16 Q. Did you ever bring Jason to work with you at

17 the hideout on Wilshire Boulevard?

18 A. Yeah.

19 Q. And why did you do that?

20 A. Well, the first time I didn't know that

21 I was allowed to do it. But Mr. Jackson asked me

22 to -- to bring him.

23 Q. You said the first time. Where was that?

24 A. At the Encino house.

25 Q. At the Encino house?

26 A. Yeah.

27 Q. Did he say why?

28 A. He just told me to bring him. 4986

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1 Q. Okay. And did you bring him on occasion?

2 A. Yeah. From then on, he was there a lot of  
3 times.

4 Q. Okay. How often would you bring him to the  
5 residence at Encino?

6 A. Probably every weekend. And probably twice  
7 a month, then, different -- differently. I don't  
8 remember.

9 Q. Was that schedule more or less at the  
10 hideout? Did you bring him to the hideout as often?

11 More often?

12 A. Uh-huh.

13 Q. Less often? What?

14 A. Not a lot of times, because he was in  
15 school, so probably on Saturday or Sundays.

16 Q. Did you continue cleaning at the hideout  
17 even after Mr. Jackson moved to Neverland in '88?

18 A. Yes.

19 Q. How often?

20 A. Probably every week. Sometimes twice a  
21 week.

22 Q. At Neverland, what were your specific  
23 responsibilities? What were your obligations? What  
24 did you do at Neverland?

25 A. Do you mean for him?

26 Q. Yes, for Mr. Jackson. Yes.

27 A. Like I said, taking care of his clothes, his

28 room. 4987

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1 Q. Okay.

2 A. And right after he leave the room, I will  
3 have to clean it right away, because sometime he  
4 will stay there, you know, he'll come out, and then  
5 he'll go back in right away.

6 Q. Okay. Were your responsibilities beyond his  
7 room as well? In other words, did you clean the  
8 rest of the house?

9 A. Yes.

10 Q. Did you ever clean other buildings at  
11 Neverland?

12 A. Yes.

13 Q. The arcade?

14 A. The arcade, yeah.

15 Q. The theater?

16 A. The theater.

17 Q. Okay.

18 A. Yeah.

19 Q. Most of the time where did you work?

20 A. In the house.

21 Q. Were there other maids at Neverland --

22 A. Yes.

23 Q. -- who were -- there were other maids at  
24 Neverland?

25 A. Yes.

26 Q. Yes, all right. At any given time, how many  
27 maids were working at Neverland at any given time?

28 A. Maybe about six. 4988

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1 Q. Were there others who had responsibility for  
2 cleaning Mr. Jackson's bedroom?

3 A. No.

4 Q. You were the only one?

5 A. Yeah.

6 Q. Did you have a key?

7 A. Yes.

8 Q. Is that the only way you got in?

9 A. Yeah.

10 Q. Was there a combination lock at any point?

11 A. No.

12 Q. Not while you were there? Is that a key

13 that you carried around with you?

14 A. Yes.

15 Q. Okay. Would you just let yourself in?

16 A. Yes.

17 Q. How would you announce your presence? How

18 would you let Mr. Jackson know you were coming in,

19 if, in fact, he was there?

20 A. I'll knock.

21 Q. Uh-huh. Now, could you describe the suite

22 that is his bedroom? It's actually more than one

23 room; is that right?

24 A. Yeah. It's two rooms. One downstairs and

25 one upstairs.

26 Q. And is there a hallway that goes into it?

27 A. Closet.

28 Q. I'm sorry? 4989

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1 A. A closet.

2 Q. There's a closet, okay.

3 A. Yeah.

4 Q. When you go --

5 A. A walk-in closet.

6 Q. When you go into his suite, do you go

7 through a door that is locked?

8 A. No.

9 Q. All right. Is there any way of securing his

10 bedroom suite?

11 A. Well, his bedroom suite, with a key --

12 Q. Yes.

13 A. -- that I would have.

14 Q. Where is that door, the one that you unlock

15 with the key that you carry?

16 A. In the hallway.

17 Q. In the hallway?

18 A. Yeah.

19 Q. So you unlock that door and you go through

20 that door. And where do you find yourself at that

21 point?

22 A. Yeah.

23 Q. I'm sorry?

24 A. Yes.

25 Q. Where are you? As soon as you walk through

26 that door, the door that you unlock, where are you

27 at that point? Are you in a room or a hallway?

28 A. In the bedroom. 4990

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1 Q. In the bedroom, all right.

2 A. Uh-huh.

3 Q. Was there at that time some kind of an alarm  
4 or a bell?

5 A. Yeah, that's before you get to the door.

6 Q. Before you get to the door?

7 A. Yeah, that's in the hallway.

8 Q. All right. And you would announce your  
9 presence when you came in?

10 A. Yeah.

11 Q. Were there ever occasions that you would  
12 announce your presence and Mr. Jackson would be in  
13 the room?

14 A. Yeah.

15 Q. Were there ever occasions where you would  
16 announce your presence and he wasn't there?

17 A. Yeah.

18 Q. Did you try to go to his room when he wasn't  
19 there to clean?

20 A. When he was there? When he wasn't?

21 Q. Yeah, what did you try to do, what was your  
22 preference? To clean while he was there, or to  
23 clean while he wasn't there?

24 A. I'll -- well, sometimes he'll be there and  
25 I'll be cleaning.

26 Q. Uh-huh.

27 A. It didn't matter.

28 Q. Okay. Where was his bed, incidentally, at 4991

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1 that time? Where did he sleep?

2 A. As soon as you came into the bedroom, that's  
3 his bed.

4 Q. So his bed was downstairs?

5 A. Yes.

6 Q. Was there another bed upstairs?

7 A. Yes.

8 Q. Which bed did he sleep in?

9 A. Downstairs.

10 Q. And you would make --

11 A. Most of the --

12 Q. And you would make that bed; is that right?

13 A. Yes.

14 Q. All right. Did he ever have visitors over  
15 at his home?

16 A. Yeah.

17 Q. Visitors who stayed?

18 A. Excuse me?

19 Q. Visitors who stayed for periods of time?

20 A. Yes.

21 Q. Did you know a person by the name of Wade  
22 Robeson?

23 A. Yeah.

24 Q. Who was Wade Robeson?

25 A. He was a young kid, a young little boy.

26 Q. How old was Wade Robeson when you first met  
27 him?

28 A. Probably eight. Seven or eight. 4992

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1 Q. Do you know where Mr. Robeson -- where Mr.

2 Robeson - an eight-year-old - where Wade Robeson

3 came from?

4 A. Yes. From a different country. I mean,

5 from another country. Switzer --

6 Q. Do you know which country?

7 A. No, I don't remember.

8 Q. But you recall that it was from a different

9 country?

10 A. Yeah.

11 Q. Was it an English-speaking country or a

12 country with a different language?

13 A. Different language.

14 Q. Did you ever talk to Wade Robeson?

15 A. A little bit.

16 Q. Was he there with family?

17 A. With his mother.

18 Q. Do you remember --

19 A. I think he has a little sister. I don't

20 remember.

21 Q. All right. Did Wade Robeson --

22 MR. MESEREAU: Objection. The prosecutor

23 didn't let the witness finish.

24 MR. ZONEN: I'm sorry, I thought she had.

25 Q. Please go ahead, if you hadn't finished that

26 answer.

27 A. Excuse me?

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28 Q. I think you said he has a little sister? 4993

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1 A. Yeah. I don't remember, tell you the truth.

2 Q. Do you have a recollection of a sister?

3 A. I -- you know, I don't remember, tell you  
4 the truth.

5 Q. Do you remember his mother?

6 A. His mother, yeah.

7 Q. Where did she stay when they were there?

8 A. In the guesthouse outside. They call them  
9 the guest quarters.

10 Q. The guest quarters?

11 A. Uh-huh.

12 Q. Do you remember if Wade Robeson's father was  
13 there?

14 A. No.

15 Q. Where did Wade Robeson stay?

16 A. In Mr. Jackson's room.

17 Q. All right. In the bedroom?

18 A. Yeah.

19 Q. For what period of time was Wade Robeson  
20 visiting Mr. Jackson?

21 A. Weeks.

22 Q. Weeks?

23 A. Yeah.

24 Q. When he would come, would he stay -- what's  
25 the longest that he would stay at any one time?

26 MR. MESEREAU: Objection; foundation.

27 THE COURT: Sustained.

28 MR. ZONEN: Well, let me ask a couple 4994

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1 preliminary questions.

2 Q. You've already told us that you cleaned Mr.

3 Jackson's room.

4 A. Yes.

5 Q. Were you the only one who cleaned Mr.

6 Jackson's room?

7 A. Yes.

8 Q. Did you go into Mr. Jackson's room daily,

9 every single day, when you were working?

10 A. Yes.

11 Q. Were you working at that period of time, as

12 you said, at least five and sometimes six days a

13 week?

14 A. Yeah.

15 Q. Would you be the first one in his room in

16 the morning?

17 A. Yes.

18 Q. Would you have to fix his bed?

19 A. There were times when nobody knew that he

20 was going to be there, and they call me at home,

21 telling me, "He's here, and so you have to come and

22 clean up."

23 Q. Did you see Wade Robeson there?

24 A. Yeah.

25 Q. All right. Did you see him there for days

26 at a time?

27 A. Yeah. Yes.

28 Q. Did you see where he was staying? 4995

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1 A. Yes.

2 Q. Okay. Where was he staying?

3 A. In Mr. Jackson's room.

4 Q. All right. Did you see Wade Robeson's  
5 belongings?

6 A. Yeah.

7 Q. What kind of belongings did he have?

8 A. He had clothes, little suitcase, kids'  
9 suitcase, and his clothes in there.

10 Q. All right. Would you wash Michael Jackson's  
11 clothing as part of your job?

12 A. Yeah.

13 Q. Did you wash Wade Robeson's clothing?

14 A. As well, yes.

15 Q. Always?

16 A. Yes.

17 Q. Whenever he was there?

18 A. Yes. I find them on the floor, so I'll --  
19 I'll wash them.

20 Q. And his clothing was found on the floor in  
21 where?

22 A. Different places.

23 Q. Whose room?

24 A. Mr. Jackson's room.

25 Q. All right. Would you find Mr. Jackson's  
26 clothing there as well?

27 A. Yes.

28 Q. And that was your responsibility, your job, 4996

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1 to simply gather up the clothing and launder it?

2 A. Yeah. Yes.

3 Q. And then return it to his room?

4 A. Uh-huh.

5 MR. MESEREAU: Objection. Leading; move to

6 strike.

7 THE COURT: It's leading; sustained.

8 Stricken.

9 Q. BY MR. ZONEN: Was there a place that --

10 where you kept Wade Robeson's clothing after you

11 laundered it?

12 A. No, I put them together with his clothes and

13 in his case, his little suitcase.

14 Q. Now, tell us how often Wade Robeson came to

15 visit.

16 I have two questions and we'll do one at a

17 time. Let me tell you both of them. How often he

18 came, and how often -- how long he stayed each time

19 he came. So let's start with the first one.

20 How often did he come, Wade Robeson?

21 MR. MESEREAU: Objection; foundation.

22 THE COURT: Overruled.

23 You may answer.

24 THE WITNESS: How often did he come?

25 Q. BY MR. ZONEN: How often did he come to

26 Neverland to visit Mr. Jackson?

27 A. Uh --

28 MR. MESEREAU: Vague as to time; objection. 4997

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1 THE COURT: Sustained.

2 Q. BY MR. ZONEN: Well, tell me when he first  
3 came. You said he was eight years old. Do you  
4 remember what year that was?

5 Excuse me.

6 A. Probably --

7 Q. I'm sorry.

8 A. '99.

9 Q. '99 or '89?

10 A. '89, I mean.

11 Q. You quit working there when?

12 A. In '90 -- '91, I think. '91.

13 Q. '91. All right. So you think it might have  
14 been in 1989 that Mr. Robeson visited?

15 A. '89.

16 Q. Young Wade Robeson?

17 A. Yeah.

18 Q. And were you the one who was working for  
19 Mr. Jackson exclusively in his bedroom during that  
20 time?

21 A. Yes. One occasion I left and somebody else  
22 got in charge. The manager --

23 Q. Uh-huh.

24 A. -- got in charge of cleaning, you know, when  
25 I left for vacation.

26 Q. And for how long was that?

27 A. Probably about two weeks.

28 Q. All right. But for the rest of the time, 4998

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1 you were there cleaning?

2 A. Yes.

3 Q. And during that period of time when Wade

4 Robeson was there, were you able to see him?

5 A. Yes.

6 Q. Were you able to do his laundry?

7 A. Yes.

8 Q. Were you able to see him daily? Did you

9 ever actually see him in Mr. Jackson's bedroom?

10 A. Yes.

11 Q. Daily?

12 A. (Nods head up and down.)

13 Q. Daily?

14 A. Yes.

15 Q. Okay. Now, you said that he first came, you

16 think, in 1999?

17 A. Uh-huh yes.

18 Q. How many separate times? When was the last

19 time he came? In other words, how long after the

20 first visit was the final visit, to your knowledge?

21 A. I don't remember. It was, I guess, about a

22 year, less than a year before I left.

23 Q. So were the visits, then, over a period of

24 time of one year?

25 A. Yeah.

26 Q. Do you know how many separate times he came

27 during that one-year period to visit?

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28 A. He'll be there for weeks, and then he'll 4999

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1 leave and come back after two weeks.

2 Q. And stay for how long?

3 A. For another week.

4 Q. Did he generally stay for at least a week?

5 A. Yes.

6 Q. Mr. -- Wade Robeson was there for quite some  
7 time?

8 A. Yes.

9 Q. All right. And during that time, are you  
10 aware of him staying anyplace other than Michael  
11 Jackson's bedroom?

12 A. No. He'll stay there as far as I know.

13 Q. Now, your obligation, of course, was not  
14 just to clean up, but to do the linens?

15 A. Yes.

16 Q. The sheets off the beds; is that right?

17 A. Change.

18 Q. You said that there were two beds --

19 A. Uh-huh, yeah.

20 Q. -- at least? Were there more than two beds  
21 in his suite or just two?

22 A. No, just two.

23 Q. Did you make the beds every single day?

24 A. Yes.

25 Q. During the time that Wade Robeson was there,  
26 how many beds did you make? One or more than one?

27 A. Just that one.

28 Q. The one that was Mr. Jackson's bed? 5000

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1 A. Yeah. The one upstairs was rarely used.

2 Q. All of the visits when Wade Robeson came,  
3 was his mother there for all of the visits?

4 A. Sometimes.

5 Q. Were there some times that she was not  
6 there?

7 A. Yes.

8 Q. But Wade Robeson came by himself?

9 A. Yeah.

10 Q. Do you know how?

11 A. Mr. Jackson will bring him.

12 Q. He would bring him?

13 A. Yeah.

14 Q. And during that entire year of visits, did  
15 you ever see Wade Robeson's father?

16 A. You know, that I don't remember. I --

17 Q. You don't have a picture of him in your  
18 mind?

19 A. No.

20 MR. MESEREAU: Objection. Leading; move to  
21 strike.

22 THE COURT: Sustained. It's stricken.

23 Q. BY MR. ZONEN: Do you have a picture of him  
24 in your mind?

25 A. Of the little boy?

26 MR. MESEREAU: Objection; asked and  
27 answered.

28 THE COURT: The objection is overruled. But 5001

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1 she's asked for clarification.

2 MR. ZONEN: Let me change the question, if I  
3 can. I'll withdraw the question.

4 THE COURT: All right.

5 Q. BY MR. ZONEN: Can you describe Wade  
6 Robeson's father to us?

7 A. No.

8 Q. And I think that you said that there might  
9 have been a sister. Do you recall a sister?

10 A. I don't remember. So many kids there, I  
11 don't remember.

12 Q. Okay. Was there ever an occasion, to your  
13 recollection, where any other child stayed with Mr.  
14 Jackson in his room while Wade Robeson was there?

15 A. No.

16 Q. Only Wade Robeson?

17 A. Yes.

18 Q. All right. Was there ever an occasion where  
19 you walked into his room and you saw some kind of a  
20 separate sleeping arrangement, what you believe to  
21 be a separate sleeping arrangement for Wade Robeson?

22 MR. MESEREAU: Objection. Vague; leading;  
23 foundation.

24 THE COURT: I'll sustain vague.

25 Q. BY MR. ZONEN: Did you ever see a sleeping  
26 bag on the floor?

27 A. No.

28 Q. Did you ever see anything that causes you to 5002

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1 believe that Wade Robeson was sleeping someplace  
2 other than in Michael Jackson's bed?

3 A. No.

4 Q. Was there an occasion that you went into  
5 Michael Jackson's room and came upon Michael Jackson  
6 and Wade Robeson?

7 MR. MESEREAU: Objection; leading.

8 THE COURT: Overruled.

9 You may answer.

10 THE WITNESS: Did I what?

11 Q. BY MR. ZONEN: Come into Michael Jackson's  
12 room and discover that Michael Jackson was there  
13 with Wade Robeson.

14 A. Yeah.

15 Q. Okay. Was there an occasion when you went  
16 in and they were in the shower?

17 MR. MESEREAU: Objection; leading.

18 THE COURT: Sustained.

19 Q. BY MR. ZONEN: Did you ever come in and find  
20 them in a situation that made you uncomfortable?

21 MR. MESEREAU: Objection; leading.

22 THE COURT: Overruled.

23 Q. BY MR. ZONEN: Do you understand what I'm  
24 asking?

25 A. That I was what?

26 Q. Where you were uncomfortable. You found  
27 them and you were uncomfortable.

28 MR. MESEREAU: Objection; leading. 5003

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1 THE COURT: Overruled.

2 You may answer.

3 THE WITNESS: Well, I came one time and -- in

4 the bedroom.

5 MR. ZONEN: Uh-huh.

6 THE WITNESS: And first I thought they were

7 playing.

8 MR. MESEREAU: Objection.

9 THE WITNESS: And --

10 MR. MESEREAU: Nonresponsive.

11 THE COURT: Sustained.

12 Q. BY MR. ZONEN: All right. The question was

13 "yes" or "no."

14 A. Yes.

15 Q. Okay. Tell us what you heard when you first

16 walked into the room.

17 A. Laughing.

18 Q. Okay.

19 A. And playing; like playing around.

20 Q. Okay. What did you do?

21 A. I came in, and I -- first I thought that

22 they were playing in the bathtub, Jacuzzi, and I

23 didn't see them. And then I thought they were

24 outside, playing outside the house; I mean, in his

25 garden. And I walked and they were in the shower.

26 Q. You have to explain to us a little bit the

27 layout here.

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28 A. Uh-huh. 5004

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1 Q. Is there a Jacuzzi inside his house, inside  
2 his bedroom?

3 A. Inside his bedroom, yeah.

4 Q. So explain that for us. Describe to us what  
5 you get to first. The shower? The Jacuzzi?

6 Explain how it's laid out.

7 A. First, you get to the bed. And then you get  
8 in the bathroom, they call it the ladies' bathroom,  
9 and there's a big Jacuzzi there.

10 Q. Okay. Was there a door that goes to that  
11 bathroom?

12 A. Yeah.

13 Q. Was the door open or was the door closed?

14 A. No, the door is open. It was open.

15 Q. And what did -- did you look into that door?

16 A. Which door?

17 Q. The door that goes to the bathroom.

18 A. Well, I have to go through there.

19 Q. Okay.

20 A. Yeah.

21 Q. What do you mean, you have to go through  
22 there?

23 A. To get to the bathroom.

24 Q. And did you do that?

25 A. Yeah.

26 Q. What did you see?

27 A. And then I was going to walk outside to the

28 garden, but then -- 5005

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1 Q. Okay.

2 A. -- on my way going, I peek, and it was in  
3 the shower.

4 Q. And what did you see?

5 A. And I hear this playing around. That's  
6 where he was taking a shower, I guess.

7 Q. Okay.

8 A. With little Wade.

9 Q. What did you see? Tell me what you saw.

10 A. I -- what I saw, I -- just some clothes on  
11 the floor.

12 Q. You saw clothes on the floor in the bathroom  
13 or in the bedroom?

14 A. No, in the shower.

15 Q. In --

16 A. By the shower.

17 Q. By the shower. What clothing did you see on  
18 the floor?

19 A. Underwear.

20 Q. Underwear?

21 A. (Nods head up and down.)

22 Q. More than one pair?

23 A. Yeah.

24 MR. MESEREAU: Objection; leading.

25 THE COURT: Overruled. Next question.

26 Q. BY MR. ZONEN: How many pair did you see?

27 A. Two.

28 Q. Two pair of underwear? 5006

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1 A. Yeah.

2 Q. Did you recognize the underwear?

3 A. Yeah.

4 Q. And how did you happen to recognize the  
5 underwear?

6 A. The -- Mr. Jackson's, I knew they were  
7 white. And the little boy, they were colored.

8 Q. All right.

9 A. They were little underwear.

10 Q. Can you describe the little boy's underwear?

11 A. They were little green underwear.

12 Q. Green underwear?

13 A. Uh-huh. Had like a neon color.

14 Q. Neon green?

15 A. Yeah.

16 Q. Just in case he lost them?

17 You did his underwear previously, didn't

18 you? You had washed his underwear previously?

19 A. Uh-huh.

20 Q. Did you know Wade Robeson's underwear?

21 A. Yeah.

22 Q. Okay.

23 A. They have little, you know, characters, like  
24 Spiderman and things like that.

25 Q. Child's?

26 A. Child's.

27 Q. A small child's underwear?

28 A. Yeah. 5007

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1 Q. And Mr. Jackson's underwear you washed

2 regularly as well?

3 A. Yeah.

4 Q. And his underwear was what type?

5 A. I don't know. I think they call them

6 briefs.

7 Q. And what color?

8 A. White.

9 Q. Okay. You say you found two pair. Where

10 were they?

11 A. On the floor.

12 Q. Okay. And on the floor in the bathroom?

13 A. Yeah.

14 Q. Now, how far is the underwear from either

15 the Jacuzzi or the shower?

16 A. Well, they're right by -- they were right by

17 the door, by the shower.

18 Q. Okay. Was water running?

19 A. Yeah.

20 Q. Excuse me. And the water was running in

21 the -- in the shower?

22 A. Yes.

23 Q. Did you -- did you know that, that the water

24 was running, when you first came into his bedroom

25 suite?

26 A. Well, I heard the radio, and then eventually

27 I hear the water going.

28 Q. I'm sorry, I heard the first part. 5008

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1 A. The radio. I heard the radio.

2 Q. You heard the radio?

3 A. Yeah, playing. And then eventually I hear  
4 the water going.

5 Q. And then you heard the water?

6 A. Yeah, because I hear two people, you know,  
7 playing.

8 Q. And you say you heard two people playing.

9 What were the sounds that you heard?

10 MR. MESEREAU: Objection; asked and  
11 answered.

12 THE COURT: Sustained.

13 Q. BY MR. ZONEN: Did you hear two voices?

14 A. Yeah.

15 MR. MESEREAU: Objection; asked and  
16 answered.

17 THE COURT: Leading; sustained.

18 Q. BY MR. ZONEN: For what period of time did  
19 you hear sounds?

20 A. Maybe about a minute.

21 Q. Did you recognize the voices that you heard?

22 A. Yeah.

23 Q. Whose voices were they?

24 A. Mr. Jackson.

25 Q. Did you recognize the second voice?

26 A. Yeah.

27 Q. Whose voice was that?

28 A. The little kid, the -- 5009

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1 Q. Wade?

2 A. Wade's, little boy.

3 Q. When you finally reached a spot where you  
4 could see in, was your vision obscured by anything?

5 MR. MESEREAU: Objection. Leading; assumes  
6 facts not in evidence.

7 MR. ZONEN: Withdraw the evidence --  
8 withdraw the question.

9 Q. In that bathroom, is there a shower curtain?

10 A. No.

11 Q. What is there in that bathroom?

12 A. A glass door.

13 Q. A glass door. Is it a glass door that is  
14 fogged or is it a glass door that is clear?

15 A. It's clear, but at that time it was smoky.

16 Q. Okay. Smoky?

17 A. Cloudy.

18 Q. Cloudy? From the shower?

19 A. Yeah.

20 Q. All right. When there's no shower going,  
21 can you see through the glass?

22 A. Yeah.

23 Q. On this occasion when the shower was going,  
24 could you see through the glass?

25 A. No.

26 Q. Could you see any figure at all? What could  
27 you see?

28 MR. MESEREAU: Asked and answered. 5010

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1 THE WITNESS: I saw a figure.

2 MR. ZONEN: Hold on.

3 THE COURT: Just a minute.

4 The objection is overruled. "I saw a  
5 figure" is the answer. Go ahead.

6 Q. BY MR. ZONEN: Did you see more than one  
7 figure?

8 A. Yeah.

9 Q. All right. Did you recognize either of the  
10 figures that you saw?

11 A. Mr. Jackson.

12 Q. All right.

13 A. And the little kid.

14 Q. Was one figure larger than the other?

15 A. Yeah.

16 Q. Was the second figure the size of Wade  
17 Robeson?

18 A. Yeah. Yes.

19 Q. What did you do at that point?

20 A. That he was going to get mad, or --

21 MR. MESEREAU: Objection; nonresponsive.

22 THE COURT: Sustained.

23 MR. MESEREAU: Move to strike.

24 Q. BY MR. ZONEN: What did you do at the time  
25 that you saw Mr. Jackson and Wade Robeson in the  
26 shower? What did you do then?

27 A. I was going to talk to them, but then I

28 thought, "No, I better not," so I just went back. 5011

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1 Q. Did you leave the room?

2 A. I -- yeah, I left the room.

3 Q. Did you tell Mr. Jackson that you had been  
4 in the room?

5 A. No.

6 Q. Did you back into the room at a later time?

7 A. Yeah, to clean the room.

8 Q. Miss Francia, was there ever an occasion  
9 where you saw your son Jason with Mr. Jackson and  
10 you were concerned?

11 MR. MESEREAU: Objection; leading.

12 THE COURT: Overruled.

13 You may answer.

14 Q. BY MR. ZONEN: Go ahead.

15 A. I was concerned for my son, yes.

16 Q. Can you tell us when that happened?

17 A. The first time, it was -- I think it was in  
18 Encino.

19 Q. Okay.

20 A. That I remember that I walked in, because I  
21 had the key to that room, too.

22 MR. MESEREAU: Objection. Nonresponsive;  
23 move to strike.

24 THE WITNESS: And I walked in --

25 THE COURT: Wait. Just a moment, please.

26 All right. No question was pending, so I'll  
27 strike her answer.

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28 Q. BY MR. ZONEN: All right. It was in Encino. 5012

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1 Do you remember when that was?

2 A. Do you mean the date?

3 Q. Or the year.

4 A. Probably '86. I don't remember.

5 Q. Okay. How old was Jason?

6 A. Probably about seven or eight, probably.

7 Seven.

8 Q. Seven. And what did you see that concerned

9 you?

10 A. Well, I saw little things before that with

11 other kids, and --

12 MR. MESEREAU: Objection; nonresponsive.

13 Q. BY MR. ZONEN: Just tell us what you saw --

14 THE COURT: Sustained.

15 Q. BY MR. ZONEN: Just tell us what you saw

16 with Jason.

17 A. Well, he was sitting on his lap.

18 Q. Okay. And what concerned you?

19 A. And I walked in, and he was sitting on his

20 lap, and Mr. Jackson was just reclining, reclining

21 to the back.

22 Q. Reclining?

23 A. Reclining to the back.

24 Q. Okay.

25 A. And having my son in his lap.

26 Q. And where was Jason positioned on his lap?

27 A. His legs.

28 Q. Okay. And what did you do? 5013

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1 A. I just told my son to get out. And he  
2 was -- I remember he say, "No, I'm fine."

3 MR. MESEREAU: Objection. Nonresponsive;  
4 move to strike.

5 Q. BY MR. ZONEN: You told your son to get out?

6 THE COURT: Just a moment.

7 Stricken.

8 Q. BY MR. ZONEN: You told your son to get out?

9 A. Yeah.

10 Q. Did he do so?

11 A. No.

12 Q. What did you do then?

13 A. I think I push him, and -- oh, he was --  
14 some kind of -- reading a book or coloring. And Mr.  
15 Jackson say, "I want him to read," or "I'm reading a  
16 story," something like that.

17 Q. Did you take your son off of his lap?

18 A. Yeah. Yes.

19 Q. Was there another occasion that you were  
20 concerned?

21 MR. MESEREAU: Objection; leading.

22 THE COURT: Overruled.

23 Q. BY MR. ZONEN: You can answer.

24 A. Yeah, I remember one time, too, at the  
25 Encino house that I want my son to stay downstairs,  
26 because he -- he will come and -- Mr. Jackson will  
27 come and, you know, probably wanted to be by

28 himself, and I said, "You stay here," and I -- 5014

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1 Q. You said that to who?

2 A. To my son, you know, to "Stay here. Stay  
3 here, because Michael is here, and," you know, "he  
4 probably want to be by himself."

5 And then he find out -- I guess Mr. Jackson  
6 find out that my son was there, and so he took him  
7 upstairs.

8 And I got mad, because my -- I told my son  
9 not to go with him, but I got concerned because my  
10 son --

11 MR. MESEREAU: Objection. Nonresponsive;  
12 move to strike.

13 THE COURT: I'll strike the last sentence.

14 Q. BY MR. ZONEN: Did you go look for your son?

15 A. No.

16 Q. When did you next see your son?

17 A. What do you mean?

18 Q. On that day, on that occasion.

19 A. Oh. Well, I -- I did my cleaning, or  
20 whatever I was doing, and after, he came -- he came  
21 down.

22 Q. Okay. Let me ask you about the hideout. At  
23 the hideout, you had mentioned that there wasn't a  
24 bed. What did Mr. Jackson sleep in?

25 A. He sleeps in a sleeping bag.

26 Q. All right. The whole time that he was at  
27 the hideout?

28 A. Yeah. There was no bed. 5015

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1 Q. I'm sorry?

2 A. There was no bed there.

3 Q. Was there ever an occasion that you and your  
4 son stayed the night at the hideout?

5 A. No.

6 Q. You always left at the end of the day?

7 A. Yeah.

8 Q. And did you have an apartment that was  
9 someplace in Los Angeles at that time?

10 A. He?

11 Q. You.

12 A. Oh, yeah, I did.

13 Q. So during the time that you were going to  
14 the hideout regularly --

15 A. Yeah.

16 Q. -- you had an apartment.

17 And I think that you had testified that even  
18 after you moved to Santa Maria, there were still  
19 occasions that you went back to clean at the  
20 hideout?

21 A. Many times, yeah.

22 Q. Do you know for approximately how long after  
23 you moved to Santa Maria?

24 A. Probably a year.

25 Q. Okay. Now, what did he -- I asked you what  
26 he slept on, and you said a sleeping bag. Describe  
27 the sleeping bag for us. What kind of a sleeping

28 bag was it? 5016

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1 A. A regular sleeping bag that you sleep on.

2 Q. Sleeping bag for one person? For two

3 people? How big?

4 A. A regular one.

5 Q. Just a regular sleeping bag?

6 A. Yeah.

7 Q. Was that sleeping bag always open, or was it

8 rolled up?

9 A. It was open.

10 Q. Always?

11 A. Well, when I made it, I would try to make it

12 like a bed, you know.

13 Q. Were there any blankets on the sleeping bag

14 or under the sleeping bag?

15 A. Yeah, there were blankets.

16 Q. Which? On the sleeping bag or --

17 A. On the sleeping bag, yes.

18 Q. Was the sleeping bag simply on the floor?

19 A. Yeah.

20 Q. Was there carpet on the floor?

21 A. Yes.

22 Q. Did you ever see Jason on or in the sleeping

23 bag?

24 A. One time.

25 Q. Was Mr. Jackson there?

26 A. Yes.

27 Q. Were they on the sleeping bag or were they

28 in the sleeping bag? 5017

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1 A. They were on the sleeping bag, yeah.

2 Q. On top of the sleeping bag?

3 A. Yeah.

4 Q. Could you see their body -- bodies, both of  
5 them?

6 A. Not Mr. Jackson's.

7 Q. Why not?

8 A. Because it was covered.

9 Q. Okay. So the sleeping bag covered Mr.

10 Jackson?

11 A. Yeah.

12 Q. How about Jason? Where was Jason?

13 A. He was in the sleeping bag, too.

14 Q. He was in the sleeping bag.

15 How were they positioned relative to each

16 other? Do you know what I mean? Were they facing

17 each other? Were they facing away from each other?

18 Do you recall?

19 A. I remember this time he was this -- on this

20 side, and my son was on this side. And I got there

21 about three or four times, and one time he was -- my

22 son was --

23 MR. MESEREAU: Objection; nonresponsive.

24 THE COURT: It's kind of hard to tell. Maybe

25 you could start with another question.

26 MR. ZONEN: Yes, I can.

27 Q. I asked you initially how they were

28 positioned. In other words, were they facing each 5018

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1 other? Were they facing away from each other? Do  
2 you recall? When you saw them the first time.

3 A. The first time, my son was just laying  
4 there.

5 Q. Okay.

6 A. But on one time, because I was cooking for  
7 Mr. Jackson, I was doing some lunch, or snacks, or  
8 something --

9 Q. I'm sorry?

10 A. I was cooking some snacks.

11 Q. Snacks. Okay.

12 A. Popcorn.

13 Q. Okay.

14 A. I don't remember.

15 Q. Are we still talking about the same event,  
16 the same day?

17 A. Yes.

18 Q. Okay. So when --

19 A. Hmm?

20 Q. When you first saw your son in the sleeping  
21 bag with Mr. Jackson, did you say anything to your  
22 son at all when you first saw him in the sleeping  
23 bag?

24 A. I told him to come up, outside, and eat,  
25 because I wanted to feed him.

26 Q. Okay. And did he?

27 A. No.

28 Q. All right. What did you do? 5019

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1 A. He say, "I want to stay here."

2 Q. Okay. What did you do?

3 A. And -- well, I got mad. And I said, you  
4 know, "You got to get out to the kitchen," and he  
5 didn't wanted to.

6 Q. All right. Were you speaking with him in  
7 English or in Spanish at that time; do you recall?

8 A. No, I don't remember.

9 Q. Do you know what language -- what language  
10 do you speak with your son now?

11 A. Spanish.

12 Q. You speak Spanish?

13 A. Yeah.

14 Q. You've always spoke Spanish with him?

15 A. Yeah.

16 Q. His wife does or does not speak Spanish?

17 A. No.

18 Q. In her presence, what do you speak?

19 A. English.

20 Q. Okay. But he grew up speaking Spanish?

21 A. Yes.

22 Q. And he's very fluent in Spanish?

23 A. Yes.

24 Q. When you asked him to come out to go eat, in  
25 what language was that?

26 A. I think I said it in Spanish. But then I  
27 want Mr. Jackson to understand what I was telling

28 him to do, and so I guess I said it in Spanish and 5020

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1 English. I don't remember.

2 Q. So you're not certain at this point?

3 A. No.

4 Q. All right. Did he get out of the sleeping  
5 bag?

6 A. No.

7 Q. What did you then do? Did you leave the  
8 room or --

9 A. I left the room and I proceed to do my stuff

10 and --

11 Q. Okay. And what happened then?

12 A. Then I went back and -- and then he was  
13 eating, but he was -- oh, I took something to eat to  
14 him.

15 Q. Okay. When you came back out, was he still  
16 in the sleeping bag with Mr. Jackson?

17 A. Yeah.

18 Q. What were they doing in the sleeping bag? I  
19 don't mean in the sleeping bag, but what were they  
20 doing in the room?

21 A. They were watching T.V.

22 MR. MESEREAU: Objection; foundation.

23 THE COURT: A time frame?

24 MR. MESEREAU: Yes.

25 THE COURT: Sustained.

26 Q. BY MR. ZONEN: At the time that you first  
27 came into that room, was the television on?

28 A. On, yes. 5021

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1 Q. Do you remember approximately what time of  
2 the day it was?

3 A. Probably was about 2:00, 1:00 or 2:00 in the  
4 afternoon.

5 Q. Was the room light or was the room dark?

6 A. It was dark. It gets really dark.

7 Q. But this was about 1:00 or 2:00 in the  
8 afternoon?

9 A. Yeah.

10 Q. Were there shades on the windows?

11 A. Draperies, curtains.

12 Q. Draperies. And were they drawn? Were they  
13 closed?

14 A. Closed.

15 Q. So the light was not in?

16 A. No.

17 Q. Do you remember what they were watching on  
18 television?

19 A. No.

20 Q. Do you know what Jason used to like to watch  
21 at that time?

22 MR. MESEREAU: Objection; relevance.

23 THE WITNESS: At that time --

24 MR. ZONEN: I'll withdraw the question.

25 THE COURT: All right.

26 Q. BY MR. ZONEN: How old was Jason, to your  
27 recollection, at that time, as best you can recall?

28 A. Probably like eight. Probably eight. That 5022

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1 was --

2 Q. I'm sorry, go ahead.

3 A. -- before we move here to Santa -- to --

4 before he moved here to Neverland.

5 Q. It was before he moved to Neverland?

6 A. Yeah.

7 Q. And Jason was born on, if I'm not mistaken,

8 May 30, 1980?

9 A. Yes.

10 Q. Is that his birth date?

11 A. Yes.

12 Q. When you moved to Neverland in 1988, he

13 would have been about eight years old?

14 A. Yeah.

15 Q. And you believe this was before?

16 A. Oh, yeah. Yeah.

17 Q. Okay. Do you know if Mr. Jackson ever gave

18 Jason money?

19 A. Yeah.

20 Q. Do you know on how many occasions?

21 A. That I remember, because it was -- to me, it

22 was a lot of money for a little kid. At the hideout

23 he gave him some money.

24 Q. Do you know how much money he gave him?

25 A. From what I remember, it was two

26 hundred-dollar bills.

27 Q. Two 100-dollar bills?

28 A. Two 100-dollar bills, yes. 5023

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1 Q. When did you first see that money?

2 A. After -- what happened was that I left the  
3 key at his apartment. And we were walking to get --  
4 take the bus home, back home. My car key, I left it  
5 there. And we were going to walk to -- to the bus  
6 stop.

7 Q. Okay. Were you taking the bus back and  
8 forth?

9 A. No, I was driving. But I left the key, my  
10 car key there, and I didn't want to go back and  
11 knock at the door, because --

12 Q. You didn't have your key?

13 A. Yeah, Mr. Jackson wouldn't open the door.

14 Q. Okay.

15 A. So I remember we were walking to the bus  
16 stop, and he say -- my son told me he has money --

17 MR. MESEREAU: Objection.

18 THE WITNESS: -- in his pocket.

19 MR. MESEREAU: Nonresponsive.

20 THE COURT: Just a moment.

21 True, there's no question pending. It's

22 nonresponsive.

23 MR. ZONEN: All right.

24 Q. Where were you when you first saw the money?

25 A. At the bus stop.

26 Q. Okay. Did he give you the money, your son?

27 A. No.

28 Q. All right. How did you see the money? 5024

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1 A. Well, he say he had lots of money and that  
2 it was a secret.

3 Q. Okay. What did you say?

4 A. And I say, "What do you mean, a secret? How  
5 much money?" But I thought it was maybe two  
6 dollars.

7 MR. MESEREAU: Objection; hearsay.

8 MR. ZONEN: Spontaneous declaration, Your  
9 Honor.

10 THE COURT: I'm going to allow the answer to  
11 the question of, "What did you say?" which I think  
12 is the objection you were making.

13 MR. MESEREAU: Has to do with third-party  
14 statements, Your Honor.

15 MR. ZONEN: I'm sorry.

16 THE COURT: I'm going to ask you to rephrase  
17 the question. The question you last asked where the  
18 objection came was, "And what did you say?" And she  
19 did say what she said. But then she was going to  
20 say something else.

21 MR. ZONEN: Yes. Thank you.

22 Q. What did your son say to you in response to  
23 your statement?

24 MR. MESEREAU: Objection; hearsay.

25 MR. ZONEN: That's a spontaneous  
26 declaration.

27 THE COURT: Okay.

28 MR. ZONEN: That's what I originally meant. 5025

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1 THE COURT: I will allow it on that basis.

2 MR. ZONEN: Thank you, Your Honor.

3 Q. What did your son say?

4 A. That he has the money; that it was a secret;  
5 he wasn't going to tell me.

6 Q. Okay.

7 A. But at this point I thought it was maybe two  
8 dollars or a dollar.

9 Q. Did you ask to see it?

10 A. And I say, "I want to see it." And he say,

11 "No, because Michael told me that it's for me and

12 not to tell you." But like I say, I thought it was

13 two dollars. I say, "How much is it?"

14 And I pull it out of his pocket.

15 Q. It was in his pocket?

16 A. It was in his pocket. He said he put --

17 Q. Do you remember what he was wearing?

18 A. Pants.

19 Q. You believe it was pants?

20 A. Yeah. He says, "He put it in my pocket.

21 Don't take it out."

22 So I pull it out, and I said, "\$200?"

23 MR. MESEREAU: Objection; nonresponsive.

24 THE COURT: Sustained.

25 Q. BY MR. ZONEN: Did you reach into his

26 pocket?

27 A. Yeah.

28 Q. Did you retrieve it? 5026

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1 A. Yeah.

2 Q. What was it?

3 A. It was two 100-dollar bills.

4 Q. Were there ever other occasions that you  
5 were aware of where Mr. Jackson gave your son money?

6 A. No.

7 Q. Was that the only occasion that you recall?

8 MR. MESEREAU: Objection; asked and  
9 answered.

10 THE COURT: Sustained.

11 Q. BY MR. ZONEN: Did you ever see your son  
12 with money on other occasions?

13 A. I'll give him allowances. And, you know,  
14 he'll keep it -- you know, a dollar or two.

15 Q. Do you know who Macaulay Culkin is?

16 A. Yes.

17 Q. Who is Macaulay Culkin?

18 A. The little kid from the movies.

19 Q. Yes. Did you ever see Macaulay Culkin --

20 A. Yes.

21 Q. -- personally?

22 Where did you see him?

23 A. At the Neverland. At the ranch.

24 Q. Did he visit Neverland?

25 A. Yes.

26 Q. How often did he visit Neverland?

27 A. I don't remember. But it was a few times

28 when I was there. 5027

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1 Q. More than once?

2 A. Yes.

3 Q. Over what period of time, from the first

4 time to the last time?

5 A. Probably six months.

6 Q. Were you working that entire time?

7 A. Yes.

8 Q. Were you working in the same job you've

9 already described for us, as Mr. Jackson's personal

10 maid?

11 A. Yes.

12 Q. Were you cleaning his room?

13 A. Uh-huh. Yes.

14 Q. And doing his laundry?

15 A. Yes.

16 Q. When Mr. Culkin came -- well, it was

17 Macaulay Culkin. How old was he when you first saw

18 him, approximately?

19 A. I think about eight or nine. Probably

20 eight.

21 Q. Was this before or after Wade Robeson was

22 visiting?

23 A. After.

24 Q. Did they ever visit at the same time?

25 A. No. Not that I can remember.

26 Q. Did Wade Robeson continue to visit during

27 the time that Macaulay Culkin was coming?

28 A. I don't remember. 5028

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1 Q. Do you know where Macaulay Culkin stayed  
2 when he came to Neverland?

3 A. With Mr. Jackson.

4 Q. Did Macaulay Culkin come with any other  
5 family members that you recall?

6 A. Yeah, I remember him with his father and  
7 mother.

8 Q. Father and mother?

9 A. And the other kids.

10 Q. Other --

11 A. Brothers and sisters.

12 Q. Other siblings?

13 A. Yes.

14 Q. Do you know how many siblings he had,  
15 whether they were boys or girls?

16 A. No, I don't remember.

17 Q. Do you know if it was more than one other  
18 sibling?

19 A. Yeah. More than one.

20 Q. Did he have at least one brother and one  
21 sister at least?

22 A. Yes.

23 Q. Do you know the total number of brothers and  
24 sisters?

25 A. No. No. Probably five. I don't remember.

26 Q. I asked you where Macaulay Culkin stayed,

27 and you said with Mr. Jackson. How do you know

28 that? 5029

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1 A. Because I'll go to his bedroom and clean up  
2 after.

3 Q. Did you ever see Macaulay Culkin in Mr.  
4 Jackson's bedroom?

5 A. Yes.

6 Q. Were his possessions there in the bedroom?

7 A. Yeah. I don't remember.

8 Q. That you don't recall?

9 A. No.

10 Q. Do you recall if you ever washed his  
11 clothing as you did Wade Robeson's?

12 A. Yeah.

13 Q. Would you have washed his clothing if his  
14 clothing was someplace other than his bedroom?

15 MR. MESEREAU: Objection; calls for  
16 speculation.

17 THE COURT: Sustained.

18 Q. BY MR. ZONEN: Was it your responsibility to  
19 wash clothing from rooms other than Mr. Jackson's  
20 bedroom?

21 A. No.

22 Q. If guests did not stay with Mr. Jackson,  
23 where would they have stayed?

24 A. In the guest rooms. They call them the  
25 outside guest rooms. You know, they're like four --  
26 four guest rooms outside.

27 MR. ZONEN: Could I have those photographs,

28 please? Oh. Thank you. 5030

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1 I'm sorry, did you say something?

2 MR. MESEREAU: I'm going to object as

3 cumulative.

4 MR. ZONEN: Oh, okay. All right.

5 Q. And I think that you said it was for a

6 number of months that Macaulay Culkin stayed?

7 A. Yeah. Weeks.

8 Q. I don't mean continuously. But what do you

9 think was the longest period that you ever saw him

10 there during that few-month period of time?

11 A. About a week.

12 Q. Okay. Do you know if he always came with

13 his family?

14 A. Not always.

15 Q. How else did he come?

16 A. How often?

17 Q. How else, if he was not with his family?

18 Was he with other people?

19 A. No.

20 Q. Did he come by himself?

21 A. Yes.

22 Q. Do you have a recollection of how many times

23 Macaulay Culkin came to visit Neverland by himself?

24 A. Maybe I remember about two times.

25 Q. All right. How old was Jason during the

26 time that Macaulay Culkin was there?

27 A. At that time he was probably already ten.

28 Q. Jason was older than Macaulay Culkin? 5031

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1 A. Yeah.

2 Q. About how much older?

3 A. Probably a year or two. I don't know.

4 Q. During the time that Macaulay Culkin stayed  
5 in Mr. Jackson's bedroom, do you know if other  
6 members of his family also stayed in the bedroom  
7 with them?

8 A. Yeah, I think they did.

9 Q. On every occasion?

10 A. Not all the time.

11 Q. Are you aware --

12 A. When --

13 Q. I'm sorry, go ahead.

14 A. When he was by himself, he was there by  
15 himself with Mr. Jackson.

16 Q. Do you know of any occasions when Macaulay  
17 Culkin came to visit when he did not stay in Mr.  
18 Jackson's room?

19 A. No.

20 Q. And on those occasions when Macaulay Culkin  
21 stayed in Mr. Jackson's room, do you know if there  
22 was ever a separate sleeping arrangement, in other  
23 words, a separate bed or a separate sleeping bag  
24 that you would have to clean up?

25 A. No.

26 Q. Excuse me, I'm sorry.

27 Why did you leave Neverland, your employment

28 at Neverland? 5032

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1 MR. MESEREAU: Objection; relevance.

2 THE COURT: Sustained.

3 Q. BY MR. ZONEN: Did you leave your employment  
4 at Neverland?

5 A. Yes.

6 Q. Okay. Did you leave of your own volition?

7 A. Yes.

8 Q. Do you remember when it was you left  
9 Neverland?

10 A. May, I think.

11 Q. Of what year?

12 A. '91. '90 or '91. '91, I think.

13 Q. May of '91?

14 A. '91.

15 Q. All right. So you would have been employed  
16 by Mr. Jackson for a period of about five years?

17 A. Five years, yeah.

18 Q. Now, May of '91 your son would be turning  
19 11; is that right?

20 A. Yes.

21 Q. Do you know if you left before his 11th  
22 birthday?

23 A. Uh-huh. About.

24 Q. Did your son have any more association with  
25 Michael Jackson after you?

26 A. After?

27 Q. Yes, after you left.

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1 Q. Did you ever go back to Neverland after you  
2 left?

3 A. No.

4 Q. Did you ever visit with Mr. Jackson after  
5 you left?

6 A. No.

7 Q. Were you contacted by law enforcement at  
8 some time after you left Neverland, your employment  
9 at Neverland, for an interview?

10 A. Yeah. 1994 or '93. I don't remember.

11 Q. '93 or '94? So it was already some time  
12 after you left Neverland; is that right?

13 A. Yes.

14 Q. At least a year, and probably two?

15 MR. MESEREAU: Objection; leading.

16 MR. ZONEN: Let me withdraw the question.

17 Q. How long after you left your employment at  
18 Neverland was it that law enforcement contacted you?

19 A. About two and a half years.

20 Q. Did you contact them or did they contact  
21 you?

22 A. They came to me.

23 Q. At the time they contacted you, did you know  
24 whether or not there was an investigation going on  
25 involving Mr. Jackson?

26 A. Yeah. Yes. I was -- kind of.

27 Q. Were you expecting to be contacted?

28 MR. MESEREAU: Objection. Calls for 5034

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1 speculation; relevance; foundation.

2 MR. ZONEN: Goes to her state of mind.

3 THE COURT: Sustained.

4 Q. BY MR. ZONEN: All right. Did it come as a  
5 surprise to you when you were contacted?

6 MR. MESEREAU: Objection. Relevance;  
7 foundation; leading.

8 THE COURT: And I'm going to back up a minute  
9 and change my ruling on the question, "Were you  
10 expecting to be contacted?" She may answer that  
11 "yes" or "no." I'll overrule the last objection.

12 Q. BY MR. ZONEN: Did you understand that? You  
13 may answer the question, "Were you expecting to be  
14 contacted?"

15 A. Yes and no.

16 Q. Did you ultimately give an interview with  
17 the sheriff's office?

18 A. Yes.

19 Q. At some point in time were you called to  
20 give a deposition? Were you subpoenaed to give a  
21 deposition?

22 A. I was subpoenaed, yeah.

23 Q. All right. Now, do you know who it was who  
24 subpoenaed you to give a deposition?

25 A. Mr. Feldman.

26 Q. Was that Larry Feldman?

27 A. Yes.

28 Q. Do you know who Larry Feldman represented at 5035

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1 that time?

2 A. Yeah. Another little boy.

3 Q. I'm sorry?

4 A. Another little boy.

5 Q. Do you know that person's name?

6 A. The -- the little boy?

7 Q. Yes, that he represented.

8 A. At that time I didn't know. Now -- now I

9 hear --

10 Q. What do you know the name to be?

11 A. Chandler. Chandler. Something like that.

12 But I don't know. I don't know the first name.

13 Q. Did you know that child, Mr. Chandler?

14 A. No. No.

15 Q. "Mr." You don't know how old he was? You

16 don't know how old he was?

17 A. No.

18 Q. Did you know his first name?

19 A. No.

20 Q. Was this a child you were ever introduced to

21 during the time that you were at Neverland?

22 A. No.

23 Q. And tell us what a deposition is. Having

24 gone through one, what is it?

25 MR. MESEREAU: Objection; foundation.

26 MR. ZONEN: Well, let me withdraw that.

27 Q. Did you, in fact, go through a deposition?

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28 A. Did I went through -- 5036

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1 Q. Did you have a deposition? Did they take  
2 your deposition?

3 A. Yeah. Yes.

4 Q. Okay. And did you, in fact, give testimony  
5 in that deposition?

6 A. Yes.

7 Q. Now, I asked you who it was who subpoenaed  
8 you, and you said it was Larry Feldman.

9 A. Uh-huh.

10 Q. Were there other lawyers in the room asking  
11 you questions as well?

12 A. Yes.

13 Q. Who were the other lawyers? Do you remember  
14 any of their names?

15 A. I remember Johnnie Cochran, and there were  
16 about five or six.

17 Q. About five or six lawyers?

18 A. Yeah.

19 Q. All in the room at one time?

20 A. Yeah.

21 Q. And was Johnnie Cochran asking you  
22 questions?

23 A. Yes.

24 Q. Were other lawyers asking you questions as  
25 well?

26 A. I don't remember. But I think there was one  
27 "Waysman" or "Wiseman."

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28 Q. Weitzman? Perhaps Howard Weitzman? 5037

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1 A. I don't remember his last name. I mean --

2 Q. Do you know on which side Mr. Weitzman was?

3 A. With Mr. Cochran.

4 Q. He was with Mr. Cochran?

5 A. They were the two together, yeah.

6 Q. Who did Mr. Cochran and Mr. Weitzman

7 represent?

8 A. Mr. Jackson.

9 Q. Okay. Was Mr. Jackson present during that

10 deposition?

11 A. No.

12 Q. Was he ever there during the deposition at

13 any time?

14 A. No.

15 Q. Did that deposition go longer than one day?

16 A. Yeah.

17 Q. How many days did it go?

18 A. Two days.

19 Q. Do you know how many hours each day you were

20 deposed?

21 A. No.

22 Q. Do you know if there were other lawyers

23 sitting with Mr. Feldman, Larry Feldman, in other

24 words, on his side, other than Mr. Feldman?

25 A. No.

26 Q. Was Mr. Feldman the only one asking you

27 questions from that side?

28 A. Yes. 5038

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1 Q. Have you ever reviewed the transcript of  
2 that deposition?

3 A. No.

4 Q. Even back then?

5 A. Not that I remember.

6 Q. Do you remember what year it was, of that  
7 deposition?

8 A. '94, I think. Or '95.

9 Q. Was it before or after you had your first  
10 interview with law enforcement? Do you recall?

11 A. After.

12 Q. It was after? Do you remember approximately  
13 how long after?

14 A. No, I don't remember the date or --

15 Q. Miss Francia, when you had this deposition  
16 that went on for two days, and you say that there  
17 were lawyers, a number of them in the room, did you  
18 have a lawyer with you?

19 A. No.

20 Q. Had you retained a lawyer at that time?

21 A. Not at that time, no.

22 Q. Did you give answers to questions that were  
23 put to you at that time.

24 A. Did I answer?

25 Q. Yes.

26 A. Yes.

27 Q. Did you -- did they explain to you that a

28 deposition is the same thing as testifying? 5039

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1 MR. MESEREAU: Objection; leading.

2 THE COURT: Just a moment.

3 MR. ZONEN: I'll withdraw the question.

4 THE COURT: Overruled.

5 MR. ZONEN: I won't withdraw the question.

6 THE COURT: You may answer.

7 Q. BY MR. ZONEN: Did they explain to you that  
8 a deposition was the same thing as testifying?

9 A. No.

10 Q. Did you have to raise your hand to take an  
11 oath to tell the truth?

12 A. Oh, yeah.

13 Q. And you did do that?

14 A. Yeah.

15 Q. All right. Did they ask you questions  
16 about -- questions similar to the questions I've  
17 asked you so far since you've been on the witness  
18 stand?

19 A. (Nods head up and down.)

20 Q. You have to answer out loud, if you would,  
21 please.

22 A. Yes.

23 Q. All right. Did they ask you about Wade  
24 Robeson?

25 A. Yes.

26 Q. Did they ask you if in fact you had seen  
27 them in the shower together?

28 A. Yes. 5040

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1 Q. Do you remember the answers that you gave to  
2 those questions?

3 A. Kind of.

4 Q. Did you tell one of the attorneys that you  
5 did not see Wade Robeson in the shower?

6 A. Yeah, I probably did.

7 Q. All right. Was that accurate?

8 A. Well, at that time I guess I was tired and  
9 nervous, I guess.

10 Q. Did you tell them that you believed Wade  
11 Robeson was in the shower?

12 A. Yes, I told them that.

13 Q. Did you tell them about the underwear?

14 A. Yeah.

15 Q. Did you tell them about hearing the voices?

16 A. Yes.

17 Q. Did you tell them about the music?

18 A. Yes.

19 Q. Did you do an interview for Hard Copy?

20 A. Yes.

21 Q. What is Hard Copy?

22 A. A program.

23 Q. A program?

24 A. Yeah.

25 Q. A program on what? On television?

26 A. On television, yeah.

27 Q. Was that a program that you had seen before

28 that interview? 5041

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1 A. No.

2 Q. Had you ever watched Hard Copy before?

3 A. No.

4 Q. Do you know what kind of -- did you know --

5 before you were on it, did you know what kind of a

6 program it was?

7 A. No.

8 Q. Were you -- did somebody contact you from

9 Hard Copy?

10 A. Yeah.

11 Q. And do you remember who that was who

12 contacted you?

13 A. That -- the lady who interview me.

14 Q. Okay. Do you happen to remember her name?

15 A. Yeah.

16 Q. What was her name?

17 A. Diane Dimond.

18 Q. Diane Dimond. Did you discuss with Miss

19 Dimond what it was she wanted to talk with you

20 about?

21 A. Yeah, we kind of talk about it.

22 Q. Okay. Did you agree to go on television?

23 A. Yeah.

24 Q. Was there some discussion with Miss Dimond

25 about whether or not you would be paid or

26 compensated for appearing on television?

27 A. Yeah. My friend and I went together.

28 Q. You went with a friend? 5042

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1 A. Yeah.

2 Q. Who was your friend?

3 A. One of -- one of the workers at Neverland.

4 Q. One of the workers at Neverland?

5 A. Yeah.

6 Q. What was her name?

7 A. Evangeline.

8 Q. Evangeline?

9 A. Yes.

10 Q. And what did she do at Neverland?

11 A. She was a housekeeper and a cook.

12 Q. A housekeeper and a cook?

13 A. And a cook, yeah. And she helped the cook.

14 Q. Okay. And you were talking with Diane

15 Dimond with Evangeline?

16 A. Yeah.

17 Q. All right. Why is that? Why was Evangeline

18 there, or Vangie, was why she there?

19 MR. MESEREAU: Objection; foundation.

20 THE COURT: I'm not sure what you're

21 looking for, foundation.

22 MR. MESEREAU: And speculation.

23 THE COURT: Okay.

24 MR. ZONEN: I'll withdraw that, then. I

25 understand that objection.

26 Q. Did you ask Evangeline to be there with you?

27 A. She was the one who contact, I believe,

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1 Q. Did she -- she's the one who introduced you  
2 to Diane Dimond?

3 A. Yeah, she was the one who told me, you know,  
4 that she can get everything arranged.

5 Q. Okay. That she could arrange the interview?

6 A. The interview, yeah.

7 Q. And payment as well?

8 A. Yeah. She say, "I'll help you."

9 Q. What did you understand the interview to be  
10 about? What did they want to ask you about?

11 MR. MESEREAU: Objection. Calls for  
12 speculation.

13 MR. ZONEN: Withdraw the question.

14 Q. What was your belief that you were going to  
15 be telling them?

16 MR. MESEREAU: Objection. Leading.

17 THE WITNESS: About --

18 THE COURT: Overruled. You may answer.

19 Q. BY MR. ZONEN: What was your belief that you  
20 would be telling them?

21 A. About me working there.

22 Q. Working where?

23 A. At Neverland.

24 Q. Okay. Did you think they would be asking  
25 you questions about Michael Jackson?

26 A. No. I mean, that -- not the way they were  
27 asking me.

28 Q. How much money did they represent from Hard 5044

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1 Copy -- how much money did they represent that they

2 would give you for an interview?

3 A. How much money they gave me?

4 Q. Yes.

5 A. \$20,000.

6 Q. \$20,000.

7 A. Yes.

8 Q. And what were you going to do for \$20,000?

9 What were you going to say in this interview for

10 \$20,000?

11 A. Well, I -- I thought that it was going to be

12 just talking about, you know, how it was working for

13 him and how he was.

14 Q. Did that seem, to you, an unusually large

15 amount of money?

16 MR. MESEREAU: Objection; leading.

17 THE COURT: Sustained.

18 Q. BY MR. ZONEN: How much money were you

19 making a year at that time?

20 A. Less than \$20,000.

21 Q. Less than \$20,000?

22 A. Yeah, probably around 20.

23 THE COURT: All right. We'll take our break.

24 (Recess taken.)

25 THE COURT: Go ahead.

26 Q. BY MR. ZONEN: When we left off, I was

27 asking some questions about the interview with Hard

28 Copy. Did that interview finally take place? 5045

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1 A. Yes.

2 Q. Did you actually watch it on television when  
3 it was screened?

4 A. No.

5 THE BAILIFF: Can you turn your microphone  
6 on?

7 Q. BY MR. ZONEN: I asked you about the  
8 interview with Hard Copy. You finally did that  
9 interview, did you not?

10 A. Yes.

11 Q. Did you watch it on television when it was  
12 screened?

13 A. No.

14 Q. Have you ever watched it?

15 A. No. I watch a little bit, you know, when  
16 I --

17 Q. Did you receive \$20,000?

18 A. Yes.

19 Q. Okay. Do you know if your friend Evangeline  
20 got any money?

21 A. She didn't get any money from them, no. I  
22 gave her some money.

23 Q. Was that interview -- was that interview  
24 with Hard Copy before or after your interview with  
25 the sheriff's detectives?

26 A. After.

27 Q. Was it before or after your deposition with

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1 A. Oh, before.

2 Q. It was before the deposition?

3 A. Yes.

4 Q. Do you remember being asked some questions

5 about the Hard Copy --

6 A. Yes.

7 Q. -- interview during that deposition?

8 A. Yes.

9 Q. Did Mr. Jackson ever have a nickname for

10 your son, for Jason, that he used?

11 MR. MESEREAU: Objection; foundation.

12 THE COURT: Sustained.

13 Q. BY MR. ZONEN: Did you ever hear Mr. Jackson

14 call your son by a name other than Jason, his real

15 name?

16 A. Yes.

17 Q. What name was that?

18 A. "Rubba."

19 Q. "Rubba," R-u-b-b-a, do you think?

20 A. I think.

21 Q. Is that what it sounds like?

22 A. Yeah.

23 Q. Did you ever hear him call other kids

24 "Rubba"?

25 A. Yes.

26 Q. Did he call Wade Robeson "Rubba"?

27 A. Yes.

28 Q. Did he call Macaulay Culkin "Rubba"? 5047

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1 A. Yeah.

2 Q. Did you ever receive any gifts from Mr.

3 Jackson?

4 A. Yes.

5 Q. What kind of gifts did you receive from him?

6 A. I don't remember. They were a lot.

7 Q. Do you remember any of them?

8 A. He told me to get whatever I want, you know,

9 like promotional things that he'll get from the

10 companies, or toys for my son.

11 Q. Do you mean if he had them in his

12 possession?

13 A. Yeah. He will buy little stuff for me, too.

14 Q. And he would give them to you?

15 A. Yeah.

16 Q. Did he ever give you any furniture?

17 A. Yeah.

18 Q. What kind of furniture?

19 A. I remember one time he -- he had a table in

20 the attic, and he say he doesn't want it there. And

21 I asked him if I could take it, and he said, "Yeah,

22 sure. Take it."

23 Q. The attic where?

24 A. The attic at Havenhurst.

25 Q. At Havenhurst?

26 A. Yeah.

27 Q. How long ago was that?

28 A. When I first started there, to work there. 5048

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1 Q. So '86?

2 A. Yeah.

3 Q. All right. Any other things that you can  
4 remember that he gave you over the years?

5 A. Toys for my son.

6 Q. Toys for your son? Did he ever give you  
7 money?

8 A. I don't remember.

9 Q. You don't remember if he gave you money, or  
10 how much, or how often?

11 A. How often? No, I don't remember.

12 Q. All right. When you had the deposition with  
13 Johnnie Cochran, did he ask you if you ever took  
14 something from --

15 MR. MESEREAU: Objection; misstates the  
16 evidence. There were other lawyers involved.

17 THE COURT: Overruled.

18 You may --

19 Q. BY MR. ZONEN: When you had the  
20 deposition --

21 It was overruled, Your Honor?

22 THE COURT: It was overruled. Yes.

23 Q. BY MR. ZONEN: When you had the deposition  
24 with Johnnie Cochran, did he or any other lawyer  
25 representing Michael Jackson ask you if you took  
26 something from Michael Jackson's room?

27 A. I don't remember.

28 Q. Did they ask you about a watch? 5049

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1 A. Yeah.

2 Q. Do you remember the watch?

3 A. Yes.

4 Q. Did you have a watch from Michael Jackson?

5 A. Did he have it?

6 Q. No. Did he ever give you a watch?

7 A. I got it from his room.

8 Q. What kind of a watch are we talking about?

9 A. It was a toy watch. You know, like I think

10 it was from one of his commercials or something.

11 Q. Did you --

12 A. That I had it, and he look at it, and he

13 say, "Oh, that's nice." And I say, "Yeah, I got it

14 from your room." And he didn't -- I told one of the

15 housekeepers that I -- "Oh, look what I got from his

16 room." But I guess I used to get stuff from his

17 room and --

18 Q. Are you talking about promotional things?

19 A. Yeah. Things like that.

20 Q. What is a promotional item? What do you

21 mean by that?

22 A. Like when he make a commercial. I think

23 this watch was from Captain Eo.

24 Q. I'm sorry?

25 A. I think it was from one of his videos.

26 Q. Did he have his name on it?

27 A. Yeah.

28 Q. Did it have his picture on it? 5050

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1 A. Yes.

2 Q. What was that watch worth, do you think?

3 A. About \$10, probably.

4 Q. At some time were you contacted by an  
5 attorney or did you retain an attorney?

6 MR. MESEREAU: Objection; compound.

7 MR. ZONEN: I'll withdraw the question.

8 Q. Did you ever retain an attorney?

9 A. I don't understand.

10 Q. Oh. Did you ever hire a lawyer?

11 A. Oh. Did I personally went to a lawyer and  
12 say -- no.

13 Q. Okay. Do you know Terry Cannon?

14 A. Yes.

15 Q. Do you know Kris Kallman?

16 A. Yes.

17 Q. Do you know them to be lawyers?

18 A. Yes.

19 Q. All right. Did either of those two lawyers  
20 represent you?

21 A. Yes, at one time.

22 Q. Did they represent Jason?

23 A. Yes.

24 Q. How did that happen? How did you come into  
25 contact with these two lawyers?

26 A. Well, since I -- I was felt like --

27 MR. MESEREAU: Objection. Relevance; 352.

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1 Q. BY MR. ZONEN: Did Jason get subpoenaed to  
2 appear at a deposition?

3 A. Yes.

4 Q. How old was Jason at that time?

5 MR. ZONEN: We forgot the tags. Would you  
6 mark the next two exhibits in order, please?

7 THE WITNESS: Probably about 12.

8 Q. BY MR. ZONEN: Did he actually get a  
9 subpoena to appear at a deposition?

10 A. No, they told me that they were going to  
11 subpoena him.

12 Q. Was that at the end of your deposition?

13 A. Yes, they told me they want him and myself  
14 at another office. Not there, but another office.  
15 Mr. Cochran told me.

16 Q. All right. Were you concerned about Jason  
17 giving a deposition?

18 A. At that time, yeah.

19 Q. Did you think he --

20 MR. MESEREAU: Objection. Leading; move to  
21 strike.

22 THE COURT: Overruled. Next question.

23 Q. BY MR. ZONEN: What were your concerns about  
24 Jason giving a deposition?

25 MR. MESEREAU: Objection. 352; foundation.

26 THE COURT: Overruled.

27 Q. BY MR. ZONEN: You can answer the question.

28 What was your concern? 5052

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1 A. That he -- being so young, that he was going  
2 to be embarrassed and teased by other kids.

3 Q. All right. At some point in time, did you  
4 talk with -- let me change that. At some point in  
5 time, did you agree to file a lawsuit against  
6 Michael Jackson?

7 A. Not at that time.

8 Q. Do you know if there was some kind of a  
9 settlement with Michael Jackson's attorneys?

10 A. Yes.

11 Q. Did you receive -- and I'm not asking you  
12 how much, but did you receive compensation?

13 A. Yes.

14 Q. Did you receive payment?

15 A. Yes.

16 Q. Did Jason also receive payment?

17 A. Yeah. Yes.

18 Q. When did he receive his payment?

19 A. I believe it was his 18th birthday.

20 Q. His 18th birthday?

21 I had asked you a question about the watch  
22 from his room. Did Mr. Jackson ever talk to you  
23 about being able to take things if you wanted to?

24 A. He never told me that.

25 Q. Did he say anything like that?

26 A. Oh. No.

27 Q. There was no conversation about that?

28 A. He told me that sometimes people gave him 5053

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1 things, and that he'd display it, and then -- you  
2 know, and then he would like to get rid of it.

3 Q. Did you show him the watch?

4 A. Yeah. At one time I was wearing it, one of  
5 his jackets, and he say -- and he told me that it  
6 was his jacket. And I say, "Yeah, I was cold." And  
7 he say, "Oh, that's okay."

8 MR. ZONEN: May I approach the witness, Your  
9 Honor?

10 THE COURT: Yes.

11 Q. BY MR. ZONEN: I have two photographs  
12 previously shown to counsel. I'd like to show you  
13 these two exhibits, if I can. Exhibit No. 781 and  
14 Exhibit No. 782.

15 And do you see the numbers here? This is  
16 781 and that's 782. I'm going to put them both in  
17 front of you.

18 A. Uh-huh.

19 Q. And then I'll go back.

20 781, would you pick that one up, please, and  
21 tell us what that photograph is? Take a look at it.

22 A. That was one of his school pictures.

23 Q. And who is "he"?

24 A. My son.

25 Q. Your son Jason. How old was Jason in that  
26 photograph?

27 A. I would say about ten.

28 Q. About ten years old? Do you remember that 5054

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1 photograph being taken?

2 A. No.

3 Q. But you do recognize him?

4 A. Yes.

5 Q. Is that an accurate photograph of Jason when

6 he was about ten years old?

7 A. Yes.

8 Q. All right. Look at the another one now,

9 please, I think 782. And what is that a photo of?

10 A. My son and I.

11 Q. All right. The two of you together?

12 A. Yes.

13 Q. All right. Is that photograph dated?

14 A. Yes.

15 Q. Whose handwriting is that?

16 A. Mine.

17 Q. Okay. And what is the date on that?

18 A. 1994.

19 Q. And your son was -- what was the month on

20 that?

21 A. The month is March.

22 Q. March? It's written in Spanish, is it not?

23 A. Yes.

24 Q. But it's March 19 --

25 A. '94.

26 Q. '94. And how old was he at that time?

27 A. About 14.

28 Q. All right. He would turn 14 in May of '94? 5055

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1 A. Uh-huh.

2 Q. So he was 13 at the time; is that right?

3 A. 13.

4 Q. Is that photograph an accurate photograph of  
5 your son at that time?

6 A. Yes.

7 MR. ZONEN: Your Honor, I would move both of  
8 those exhibits into evidence.

9 MR. MESEREAU: No objection.

10 THE COURT: They're admitted.

11 MR. ZONEN: I'd ask to publish them at this  
12 time.

13 THE COURT: All right.

14 Q. BY MR. ZONEN: We'll start with 781.

15 Could we dim the lights, if we could?

16 And could you take a look over your shoulder  
17 and tell us, is that the photograph that you  
18 identified?

19 A. Yes.

20 Q. And how old was he at that time again?

21 A. About ten.

22 Q. About ten. And then the second photograph,  
23 782. And he was at that point 13?

24 A. Yes.

25 Q. All right. Was that about the time that he  
26 was being interviewed by law enforcement?

27 A. Yes, I think.

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28 MR. ZONEN: Thank you. I have no further 5056

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1 questions.

2 THE COURT: Cross-examine?

3 MR. MESEREAU: Yes, please, Your Honor.

4 If I may take a second, Your Honor, just to  
5 set up.

6 THE COURT: Yes, you may.

7 MR. MESEREAU: Thank you.

8

9 CROSS-EXAMINATION

10 BY MR. MESEREAU:

11 Q. Ma'am, I'll say good morning, but I think  
12 it's afternoon. Okay?

13 My name is Tom Mesereau and I speak for Mr.

14 Jackson, okay? We met for the first time at the  
15 break, right? We've never spoken before that,  
16 right?

17 A. No.

18 Q. All right. Now, if anything -- if anything

19 I ask you is unclear, please don't answer it, okay?

20 Just say you don't understand. Okay?

21 A. Okay.

22 Q. And if you don't understand, I'll try and

23 rephrase it --

24 A. Uh-huh.

25 Q. -- to make it more understandable, okay?

26 If you're not sure about what I'm asking,

27 just don't answer. Just make sure it's clear in

28 your mind what I'm asking for, okay? 5057

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1 You know I'm on his side, okay?

2 A. Okay.

3 Q. Mr. Jackson, all right?

4 Now, you began working for Mr. Jackson in

5 1986; is that correct?

6 A. Yes.

7 Q. And do you know approximately what month

8 that was?

9 A. No.

10 Q. Okay. And you stopped working for Mr.

11 Jackson in approximately 1991, right?

12 A. Yes.

13 Q. And you never worked for him since you

14 stopped working in 1991, right?

15 A. No. I never went back.

16 Q. Okay. Now, you testified that in the

17 apartment owned by Mr. Jackson that you referred to

18 as "The Hideout," there was no furniture, right?

19 A. Uh-huh.

20 Q. Was there any bed in there at all?

21 A. No.

22 Q. Okay. And approximately when were you

23 cleaning that apartment as part of your work?

24 A. Do you mean how long would it take me to

25 clean or --

26 Q. No, no, let me rephrase it.

27 During what period of time do you remember

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28 you were going to that apartment and cleaning it? 5058

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1 A. Probably a year. I don't remember.

2 Q. And would you go to clean that apartment

3 when Mr. Jackson was not there?

4 A. Yes.

5 Q. Do you remember Mr. Jackson going on what

6 was called a "Bad" tour; do you remember that?

7 A. Yes.

8 Q. Do you remember Mr. Jackson produced an

9 album and a videotape called "Bad"?

10 A. Yeah. Yes.

11 Q. And do you remember he was traveling on that

12 tour from approximately September of 1987 to January

13 of 1989?

14 A. Yes.

15 Q. And during that period of time he was often

16 out of the country, wasn't he?

17 A. Yes.

18 Q. And he told you about where he was going,

19 didn't he?

20 A. Yes.

21 Q. He told you he was going to Japan, right?

22 A. Yes.

23 Q. Australia, right?

24 A. Yeah.

25 Q. And a lot of cities in America, right?

26 A. Yes.

27 Q. New York, right?

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28 A. Yes. 5059

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1 Q. Indianapolis? Went to Texas? Georgia?

2 MR. ZONEN: I'll object as beyond the scope  
3 of her knowledge; lack of foundation.

4 THE WITNESS: I don't know.

5 MR. MESEREAU: I think she's answering she  
6 did know, Your Honor.

7 THE WITNESS: He told me he was on tour,  
8 but --

9 MR. ZONEN: There's an objection.

10 THE WITNESS: You know --

11 THE COURT: The only one she said she didn't  
12 know were the last two, so I'll overrule the  
13 objection.

14 Q. BY MR. MESEREAU: So you knew he traveled to  
15 Italy on that tour, correct?

16 MR. ZONEN: I'm going to object on lack of  
17 foundation or based on hearsay.

18 MR. MESEREAU: State of mind, Your Honor.

19 I'll be happy to rephrase it if the Court wants.

20 THE COURT: The objection is overruled.

21 Q. BY MR. MESEREAU: Did you know that he  
22 traveled to Italy on that tour as well?

23 A. No.

24 Q. How about Austria?

25 A. I don't remember.

26 Q. And England?

27 A. I don't remember.

28 Q. Do you remember he went to a lot of 5060

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1 countries --

2 A. Yes.

3 Q. -- on that tour? And he told you that,

4 didn't he?

5 A. Yes.

6 Q. And that tour lasted almost a year and a

7 half, didn't it?

8 A. Not really. I didn't stop seeing him for a

9 year and a half.

10 Q. But he was out of the country much of the

11 time, wasn't he?

12 A. Yeah.

13 Q. And he was out of Los Angeles much of the

14 time?

15 A. Out of -- yes.

16 Q. Now, you didn't often see him -- excuse me.

17 Let me rephrase that.

18 Do you remember him staying overnight at the

19 hideout apartment?

20 A. Yeah.

21 Q. Okay. And he didn't like to invite other

22 people to that apartment, right?

23 MR. ZONEN: I'll object as speculative; lack

24 of foundation.

25 MR. MESEREAU: I'll rephrase.

26 Q. Do you know whether or not Mr. Jackson liked

27 to keep his presence at that apartment private?

28 MR. ZONEN: Objection; speculative. 5061

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1 THE COURT: Overruled.

2 You may answer.

3 THE WITNESS: I don't know.

4 Q. BY MR. MESEREAU: Okay. Okay. But you

5 didn't see him invite lots of people to that

6 apartment, did he?

7 A. No, I didn't see many people.

8 Q. Okay. And you were the only one that would

9 clean that apartment, right?

10 A. Yeah.

11 Q. And did you used to help Mr. Jackson prepare

12 when he was leaving town for the "Bad" tour?

13 A. Yes.

14 Q. And what did you used to do for Mr. Jackson

15 to help him?

16 A. Pack his stuff, his makeup, his clothes, and

17 shine his shoes.

18 Q. And he went on approximately 123 concerts

19 during that period, didn't he?

20 A. I don't know.

21 MR. ZONEN: I'm going to object as lack of

22 foundation.

23 Q. BY MR. MESEREAU: Do you know how many --

24 THE COURT: She said, "I don't know," so next

25 question.

26 Q. BY MR. MESEREAU: Okay. When you used to

27 clean the home at Havenhurst in Encino -- okay?

28 Havenhurst is a street, right? 5062

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1 A. Yes.

2 Q. And that was where Michael Jackson's parents

3 lived --

4 A. Yes.

5 Q. -- right?

6 Did other family members live there at the

7 time you were cleaning that house?

8 A. I think Janet was still there. And LaToya.

9 Q. Okay. So to your knowledge, at the time you

10 cleaned that house, his parents, Janet, LaToya and

11 Michael were living there, right?

12 A. Yeah.

13 Q. And would you go there every day?

14 A. Yes.

15 Q. Okay. And were there other people besides

16 you that cleaned the house?

17 A. Not at that time. They didn't have a

18 housekeeper. I mean, they have one, but it quit

19 after about two months.

20 Q. Did you appear to be the primary

21 housecleaner?

22 A. Well, while Mr. Jackson was on tour, I end

23 up staying, cleaning the house too.

24 Q. Okay. So when he was out of town, you would

25 still go there to work, right?

26 A. Yeah.

27 Q. Now, would you bring Jason there when --

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28 A. Yes. 5063

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1 Q. -- when Mr. Jackson was out of town?

2 A. Yeah.

3 Q. And where would Jason typically be when you  
4 worked at the house while Mr. Jackson was out of  
5 town; do you know?

6 A. Outside in the arcade room. At the house.

7 Q. Okay. And would you see Mr. Jackson's  
8 parents when you used to clean the house?

9 A. Yes.

10 Q. Okay. Would you see Janet?

11 A. Sometimes.

12 Q. And how about LaToya?

13 A. Yeah, sometimes.

14 Q. Okay. And what areas of the house did you  
15 used to clean?

16 A. The whole house.

17 Q. Okay. Every day?

18 A. Yeah. If there was nothing else to do.

19 Q. Now, how long did you work -- excuse me.

20 Let me rephrase that.

21 For how long a period of time did you clean  
22 the house at Havenhurst?

23 A. While he was on tour, I guess. I don't  
24 remember. But it was many months, because Bill Bray  
25 told me that at least it's going to be about six  
26 months that he was going to be out of -- out of the  
27 country, and either I be laid off or work at the

28 house. 5064

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1 Q. Okay. And did there come a point in time  
2 when you stopped cleaning the house on Havenhurst?

3 A. Yes.

4 Q. And approximately when was that, if you  
5 remember?

6 A. No.

7 Q. Okay. Was it 1986, do you think?

8 A. No.

9 Q. 1987?

10 A. 1987, yeah.

11 Q. Do you think it was 1987?

12 A. Yeah.

13 Q. Okay. When you stopped cleaning the house  
14 at Havenhurst, you kept working for Mr. Jackson,  
15 right?

16 A. Yes.

17 Q. And what did you do for Mr. Jackson after  
18 you stopped cleaning the house on Havenhurst?

19 A. Well, went back to my same routine.

20 Cleaning his room and mainly being there. Even if I  
21 didn't have anything to do, he wanted me in his  
22 room.

23 Q. Okay. And which room are you talking about  
24 now?

25 A. His bedroom.

26 Q. Okay. His bedroom now?

27 A. In Encino.

28 Q. In Encino, okay. Okay. So Mr. Jackson 5065

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1 would leave town, but always wanted you to still  
2 come to the house and do your work, right?

3 A. Yes.

4 Q. And you said that Mr. Bray told you  
5 something about you might lose your work?

6 A. No, no, no. He told me that I either be  
7 laid off or -- well, probably it's the same thing,  
8 or work at the house.

9 Q. Okay. Okay. When you stopped working at  
10 the house on Havenhurst, what were you doing then  
11 for Mr. Jackson?

12 A. When I stopped working at the Havenhurst --  
13 do you mean at the house?

14 Q. Yes. You kept working for Mr. Jackson,  
15 right?

16 A. Yes.

17 Q. And what were you doing then?

18 A. The same thing I was hired to do for him.  
19 Pick up his clothes.

20 Q. And where were you doing that?

21 A. Cleaning his room. At the Havenhurst.

22 Q. No, no, after you stopped working at  
23 Havenhurst.

24 A. Oh.

25 Q. Okay?

26 A. Uh-huh.

27 Q. You worked at Havenhurst for a while, right?

28 A. Yeah. 5066

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1 Q. And then at some point you stopped cleaning  
2 Havenhurst, didn't you; is that right?

3 A. Yeah, but we still live there -- I mean, he  
4 still live there at the Havenhurst.

5 Q. Okay. I'm sorry. Maybe I'm confusing you.

6 There was a point in time when you didn't  
7 clean Havenhurst anymore; is that right?

8 A. Uh-huh.

9 Q. And approximately when was that, do you  
10 think?

11 A. No, I don't remember.

12 Q. Okay. You did work at Neverland at one  
13 point, right?

14 A. Yeah, that was back after about three years.

15 Q. And when you worked at Neverland, were you  
16 still working at Havenhurst?

17 A. When I still working --

18 Q. I'm sorry?

19 A. -- at Neverland?

20 Q. Yes. Let me rephrase the question.

21 When you were working for Mr. Jackson at  
22 Neverland - okay? - were you still doing work at the  
23 home on Havenhurst?

24 A. No.

25 Q. You were working full time at Neverland  
26 then, right?

27 A. No.



1 A. I would go to the hideout.

2 Q. Okay.

3 A. And sometime he will tell me to go to  
4 Havenhurst to get stuff, or retrieve something,  
5 or --

6 Q. So when you were living at Neverland and  
7 working at Neverland, you still would sometimes go  
8 to Havenhurst, right?

9 A. Yes. Sometimes.

10 Q. But most of the time you did your work at  
11 Neverland, right?

12 A. Neverland and the hideout.

13 Q. Okay. Okay. Now, Mr. Jackson was very  
14 generous to you, wasn't he?

15 A. Yes.

16 Q. He gave you a couple of televisions; is that  
17 right?

18 A. Yes.

19 Q. And you would also ask him from time to time  
20 if you could take something, and he would often say  
21 "Yes," right?

22 A. (Nods head up and down.)

23 Q. What are some of the things that you asked  
24 him that you'd like to have?

25 A. Knickknacks. And clothes. He gave me a  
26 couple of jackets from his tour, I think. I don't  
27 remember. It was -- there were a lot of stuff.

28 Q. And did he give you any cash himself? 5068

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1 A. I don't remember.

2 Q. Didn't he give you approximately \$5,000

3 total at one point?

4 A. I don't remember.

5 Q. Wouldn't he give you 500 or 300 or \$200 at a

6 time?

7 A. I don't remember.

8 Q. Do you remember saying that in your

9 deposition with Mr. Feldman?

10 A. Yeah. I probably did, yeah.

11 Q. So let me ask you what you remember.

12 A. Uh-huh.

13 Q. Do you remember Mr. Jackson giving you 500

14 or 300 or \$200 at a time?

15 A. He probably did, but at this time I don't

16 remember.

17 Q. Okay. Do you remember saying in your

18 deposition that, in total, he may have given you

19 \$5,000?

20 A. I probably did.

21 Q. Okay. Does that sound accurate to you?

22 A. Yeah, probably, I did. It wasn't that much,

23 probably, but I don't remember how much he gave me.

24 Q. Okay. But would you ask him for cash

25 sometimes?

26 A. No.

27 Q. Would he just volunteer and give it to you?

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28 A. I don't remember that, you know. I don't -- 5069

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1 I don't -- I think so, but I don't remember.

2 Q. Okay. I'm probably not being clear. I'm  
3 asking why Mr. Jackson gave you money. Would you  
4 ask him for money once in a while?

5 A. I think I did -- I don't remember.

6 Q. Okay. But you do remember him giving you  
7 money from time to time, right?

8 A. Yeah.

9 Q. Okay. And you're not sure of the total,  
10 right?

11 A. No.

12 Q. Okay. And did he give you money from time  
13 to time during the entire period that you worked for  
14 him?

15 A. Someone -- yeah.

16 Q. Okay. And you don't recall him ever saying  
17 "No" if you ever told him you needed some money, did  
18 he?

19 A. No.

20 Q. Okay. He always was generous with you with  
21 money, wasn't he?

22 A. Yeah. Yes.

23 Q. Okay. All right. Now, your deposition was  
24 taken in 1993, right? Do you remember that?

25 A. I don't remember.

26 Q. Okay.

27 A. But I think it was '94. I don't remember.

28 Q. Would it refresh your recollection if I just 5070

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1 show you the transcript with a date on it? Would  
2 that help you remember?

3 A. I mean, I'll read it and -- I know that it  
4 was that, but I don't remember.

5 Q. If you saw the transcript, might that help  
6 you remember? Would you like to see it?

7 A. Yeah. I mean, you can put whatever that you  
8 want to and I will say probably.

9 Q. No, I don't want to do that. Would it help  
10 refresh your recollection --

11 A. No.

12 Q. -- if I just show you the date on the  
13 deposition?

14 MR. ZONEN: Your Honor, I'd be prepared to  
15 stipulate to the two dates of the transcript.

16 MR. MESEREAU: Okay. Sure.

17 MR. ZONEN: And the first date is December  
18 15, 1993.

19 MR. SNEDDON: Can't hear you.

20 MR. ZONEN: The first date --

21 MR. SNEDDON: Turn it on.

22 MR. ZONEN: We make this complicated, don't  
23 we?

24 The first date is December 15, 1993. The  
25 date of the second day of the deposition was January  
26 11, 1994. I would so stipulate.

27 MR. MESEREAU: So stipulated.

28 THE COURT: All right. I'll approve that 5071

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1 stipulation.

2 THE WITNESS: I do remember '94. But I

3 don't remember the dates.

4 Q. BY MR. MESEREAU: Okay. Okay. Do you

5 remember in your deposition saying you had never

6 seen Mr. Jackson touch anyone improperly?

7 A. Yeah, I --

8 Q. Do you remember saying you never saw him

9 touch anyone?

10 A. Yeah.

11 Q. You did say that, didn't you?

12 A. Yes.

13 Q. Okay. And in that deposition, you told the

14 truth, right?

15 A. As -- as I recall it at that time, yeah.

16 Q. You told the truth at that time, right?

17 A. As I remember it.

18 Q. Yes. And you were under oath, right?

19 A. Yes.

20 Q. Okay. And you said that you had never seen

21 Michael Jackson touch anyone in a sexual way, right?

22 A. Yeah.

23 Q. Okay. And you said at no time while you

24 worked for Michael Jackson did you ever see him have

25 sexual contact with anyone, right?

26 A. When I say "sexual," I mean sexual.

27 Q. But you did say under oath that you had

28 never saw Mr. Jackson have sexual contact with 5072

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1 anyone, right?

2 A. No. No.

3 Q. Isn't that what you said?

4 A. Yeah, yeah, that's what I said.

5 Q. Okay. Now, you mentioned that Mr. Jackson

6 has a Jacuzzi, right?

7 A. Where at? At the Havenhurst?

8 Q. Well, let's start with Havenhurst.

9 A. Uh-huh.

10 Q. Did Mr. Jackson have a Jacuzzi at

11 Havenhurst?

12 A. Yes.

13 Q. And just tell the jury where the Jacuzzi

14 was, please.

15 A. It's outside his patio.

16 Q. Okay.

17 A. Outside of his bedroom.

18 Q. And did various family members use that

19 Jacuzzi?

20 A. No.

21 Q. Did you ever see anyone use that Jacuzzi at

22 Havenhurst?

23 A. Only Mr. Jackson.

24 Q. And it was outside?

25 A. Yes.

26 Q. Okay. Can you see that Jacuzzi from the

27 house?



1 Q. Can you see it from any windows?

2 A. Not from the house. From a separate -- from  
3 a separate -- from -- I think from up on the garage,  
4 you can see it, but it's not a bedroom.

5 Q. Did you ever see Mr. Jackson in that Jacuzzi  
6 at Havenhurst?

7 A. I remember one time.

8 Q. One time seeing Mr. Jackson use the Jacuzzi  
9 at Havenhurst?

10 A. Yeah.

11 Q. Okay. But you didn't see anyone else ever  
12 use it?

13 A. There was a little -- a boy there.

14 Q. Did you ever see his parents use the  
15 Jacuzzi?

16 A. Whose parents? Michael?

17 Q. Yeah.

18 A. No.

19 Q. Did you ever see Janet use it?

20 A. No.

21 Q. Ever see LaToya use it?

22 A. No.

23 Q. Ever see anyone use it besides Mr. Jackson?

24 A. No.

25 Q. All right. Was there a Jacuzzi at  
26 Neverland?

27 A. Well, inside his bedroom there is a bathroom

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28 with a Jacuzzi in it. 5074

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1 Q. Okay. And you saw Mr. Jackson use that

2 Jacuzzi, didn't you?

3 A. Yeah.

4 Q. Is it downstairs or upstairs in his bedroom

5 area?

6 A. Downstairs.

7 Q. It's downstairs; is that right?

8 A. His bedroom, yeah.

9 Q. Okay. Now, the prosecutor asked you

10 questions about Mr. Robeson, okay?

11 A. Uh-huh.

12 Q. And did you say that Mr. Jackson was

13 sleeping on a bed in the lower level of his bedroom?

14 A. Yes.

15 Q. Okay. You didn't see him sleeping in the

16 bedroom on the upper level?

17 A. No.

18 Q. And was it your belief that during the time

19 you worked at Neverland, that Mr. Jackson only slept

20 on the bed on the lower level?

21 A. Yes. There were times that the other bed

22 was used.

23 Q. Okay.

24 A. But I never saw him in that bedroom.

25 Q. So you would see the bed upstairs used, but

26 you didn't know who had used it, right?

27 A. No.

28 Q. You would see the bed downstairs used, but 5075

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1 you didn't know who used it, right?

2 A. It was time when it was just one -- one bed  
3 was undone.

4 Q. Sometimes, right?

5 A. Sometimes.

6 Q. And sometimes there was a bed upstairs that  
7 seemed undone, right?

8 A. Yeah.

9 Q. And you were responsible for making both  
10 beds, right?

11 A. Yes.

12 Q. Okay. Have you ever seen Mr. Jackson lying  
13 on his bed watching television?

14 A. Yeah. A couple of times.

15 Q. How many times did you see Mr. Jackson lying  
16 on his bed watching television?

17 A. Probably a couple of times.

18 Q. And you would see him watch videos also,  
19 right?

20 A. Yeah.

21 Q. Were you often in Mr. Jackson's room when he  
22 was watching television?

23 A. No.

24 Q. You typically cleaned his room when he  
25 wasn't there, right?

26 A. Yeah.

27 Q. Is that true?

28 A. Yes. 5076

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1 Q. And it was your understanding that you were  
2 supposed to clean his room when he wasn't in there,  
3 right?

4 A. No.

5 Q. Was it your understanding that you weren't  
6 supposed to go in when Mr. Jackson was in the room?

7 A. Yeah. Sometimes I'll unlock his room and  
8 he'll be there, and he tell me that it was okay to  
9 come in.

10 Q. Okay. And sometimes you would unlock his  
11 door, he'd ask you not to come in, right?

12 A. Yeah.

13 Q. Most of the time when you cleaned his room  
14 at Neverland, he wasn't in it, right?

15 A. Most of the time when he wasn't in?

16 Q. Let me rephrase. Let me rephrase.

17 During the time you worked at Neverland,  
18 most of the time when you cleaned his room, he  
19 wasn't in there, right?

20 A. Yeah.

21 Q. You okay?

22 Do you want some water?

23 A. Huh?

24 Q. Do you want some water?

25 A. No, that's okay.

26 Q. Was it your understanding that when you  
27 cleaned Mr. Jackson's room you were usually supposed

28 to do it when he wasn't around? 5077

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1 A. Yeah.

2 Q. Okay. Okay. And if you opened the door and  
3 he was in there, you would ask for permission to  
4 come in, right?

5 A. Yes.

6 Q. Okay. Now, his bedroom is a very big area,  
7 isn't it?

8 A. Yes.

9 Q. How would you describe it?

10 A. Big.

11 Q. Very big, isn't it?

12 A. Uh-huh. Yeah.

13 Q. And how do you get into his bedroom? If  
14 you're going -- let me rephrase it. If you're going  
15 into Mr. Jackson's room, what do you have to do to  
16 get in?

17 A. Open the door with a key.

18 Q. Okay. And is that what you would typically  
19 do?

20 A. Yes.

21 Q. Was there any kind of a bell that would  
22 ring?

23 A. Yes.

24 Q. And would the bell always ring when you  
25 entered?

26 A. Yeah. But it -- it doesn't have a -- you  
27 know, it would ring just once.

28 Q. Right. Just one ring? 5078

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1 A. And then close, yeah.

2 Q. Would you then stop it? Would you shut the  
3 bell off?

4 A. I used to unplug it.

5 Q. You unplugged it. Okay. So you'd hear a  
6 ring, and then you would unplug it; is that right?

7 A. Well, you have to unplug it from the inside  
8 of the bedroom.

9 Q. So you'd open the door, right, with a key?

10 A. Yeah.

11 Q. The bell would go off, and then you would  
12 unplug it, right?

13 A. When I was there by myself, I used to unplug  
14 it.

15 Q. Okay. Okay. And then it would stop  
16 ringing, right?

17 A. And it would stop ringing, yeah.

18 Q. And then you would do your cleaning, right?  
19 Is that right?

20 A. No.

21 Q. Tell me what --

22 A. I'll get there --

23 Q. Yes.

24 A. -- and then -- once I get there, I unplug  
25 it, because when people get close to it, it rings.  
26 But it rings, and then it rings one time, it  
27 doesn't ring anymore.

28 Q. Okay. Okay. To stop it from ringing, you 5079

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1 would unplug it?

2 A. Yeah.

3 Q. Okay. Okay. All right. Now, do you know

4 who Quincy Jones is?

5 A. Yes.

6 Q. And who's Quincy Jones?

7 A. A writer, I think.

8 Q. Okay. And his daughter used to visit

9 Michael, right?

10 A. At Havenhurst.

11 MR. ZONEN: Beyond the scope of the direct,

12 and irrelevant.

13 THE COURT: Overruled. Go ahead.

14 THE WITNESS: At Havenhurst?

15 Q. BY MR. MESEREAU: Yes.

16 A. I think she was there a couple of times.

17 Q. Her name was Kidada, right?

18 A. I don't know.

19 Q. But you saw her visit Michael, correct?

20 A. Yes.

21 Q. Did you ever see -- do you know who Lionel

22 Ritchie is?

23 A. Yes.

24 Q. Did you ever see his daughter visit the

25 Jacksons?

26 A. Not at Havenhurst.

27 Q. Okay. Did you see her visit Michael?

28 A. Him I remember visiting. 5080

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1 Q. You remember him visiting Michael. You

2 don't remember his daughter?

3 A. No.

4 Q. Okay. Before you testified today, did you

5 meet with any prosecutor to discuss what you were

6 going to be asked?

7 A. Yeah.

8 Q. And when did that meeting take place?

9 A. Saturday.

10 Q. And who did you meet with?

11 A. I don't remember his name.

12 Q. Pardon me?

13 A. Ron, I think.

14 Q. Prosecutor Zonen?

15 A. And another one.

16 Q. Okay. And how long did the meeting take

17 place?

18 A. Couple of hours.

19 Q. And how many people were there meeting with

20 you?

21 A. Just the two of them.

22 Q. Did they tell you what they were going to

23 ask you in court?

24 A. They -- they went to what I say before.

25 Q. Did they discuss the questions they were

26 going to ask you today?

27 A. Kinda.

28 Q. And did they discuss your answers with you? 5081

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1 A. No. They told me about, you know, what I  
2 say in my deposition before, and if I remember, and  
3 there was stuff that I didn't remember.

4 Q. Did they give you a copy of your deposition  
5 to look at?

6 A. No.

7 Q. Did they appear to be reading from your  
8 deposition?

9 A. No.

10 Q. Okay. Did they have any documents they  
11 showed you?

12 A. Yeah. They gave me a paper of things that I  
13 say when I talk to another detective.

14 Q. Okay.

15 A. Not -- not at my deposition.

16 Q. Okay. So it was a paper that they gave you  
17 to look at?

18 A. Yeah.

19 Q. And what was on that paper, if you remember?

20 A. When I talked to the other detectives, they  
21 came, you know, at the beginning.

22 Q. Okay.

23 A. The first time.

24 Q. Do you remember meeting with a lawyer named  
25 Larry Feldman?

26 A. Yes.

27 Q. And you met with Larry Feldman before your

28 deposition was taken, right? 5082

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1 A. Yes.

2 Q. And he came out to see you, didn't he? Let  
3 me rephrase it. Maybe you don't understand.

4 A. Yeah, I understand.

5 Q. You do?

6 A. But I don't remember. Yeah, I think he did.

7 He came to my house, I think.

8 Q. He came to your house, didn't he?

9 A. (Nods head up and down.)

10 Q. And he wanted to speak to you before your  
11 deposition was taken by him, right?

12 A. Yes. Yes.

13 Q. Okay. And obviously that was quite a while  
14 ago, right? Was that around 1993 sometime?

15 A. Yes.

16 Q. Okay. Do you remember how much time Larry  
17 Feldman spent with you?

18 A. No.

19 Q. Do you remember if it was a long time?

20 A. I don't remember.

21 Q. Okay. Was that the only time you met with  
22 Attorney Larry Feldman?

23 A. No. Then I was taken to L.A., and I --

24 Q. Did you meet with him again?

25 A. Yeah, for the deposition.

26 Q. Okay. And he was giving you some advice  
27 during the deposition, wasn't he?

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28 A. I don't remember. I don't think so. 5083

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1 Q. Didn't he advise you from time to time  
2 during that deposition?

3 A. I don't remember. There were a lot of  
4 people talking to me at that one.

5 Q. And he was one of them talking to you,  
6 wasn't he?

7 A. Yes.

8 Q. And you said that deposition went more than  
9 a day, right?

10 A. Yeah. It was twice.

11 Q. Okay. And was it after that deposition that  
12 you first spoke to an attorney named Terry Cannon?

13 A. That was -- that was after. After when Mr.  
14 Cochran told me that my son was going to be  
15 subpoenaed and I would have to bring him.

16 Q. Okay. And then you went to hire an  
17 attorney, correct?

18 A. Then I -- yeah, then I talked to Terry.

19 Q. Okay. And has he been your lawyer ever  
20 since?

21 A. Yes.

22 Q. Okay. Has he been your son's lawyer ever  
23 since?

24 A. Yes.

25 Q. Okay. When did you last talk to Terry  
26 Cannon?

27 A. I think it was December or November. I

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28 don't remember. It was in December. 5084

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1 Q. Last December?

2 A. Last December.

3 Q. Okay. Okay. And do you remember having a  
4 meeting with Prosecutor Zonen and Terry Cannon last  
5 year?

6 A. On December? It was -- Zonen? I don't know  
7 his last name. He was a tall guy.

8 Q. Prosecutor Zonen, who you see right here --

9 A. Oh.

10 Q. -- do you remember meeting with him?

11 A. Oh. Yeah, I think he was -- he was there,  
12 too. That's when they gave me that deposition.

13 Q. Okay. Okay. In your deposition, you said  
14 that you had never seen Mr. Jackson molest a child,  
15 right?

16 MR. ZONEN: Objection; asked and answered.

17 THE COURT: Overruled.

18 Q. BY MR. MESEREAU: In your deposition, you  
19 said under oath you had never seen Mr. Jackson  
20 molest a child, right?

21 A. Molest a child? No. Yeah, I say that.

22 Q. Okay. Was it after that deposition that you  
23 were interviewed by Hard Copy?

24 A. No.

25 Q. It was before?

26 A. Oh, before I met with him, with -- at my  
27 deposition? No, that interview was before.

28 Q. So the interview with Hard Copy was before 5085

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1 the deposition --

2 A. Yes.

3 Q. -- right?

4 And that's the interview you were paid

5 \$20,000 --

6 A. Yes.

7 Q. -- to do, right?

8 A. Yes.

9 Q. And that's the interview that you had your

10 friend Evangeline help you arrange, right?

11 A. Yes.

12 Q. And then after you were paid, you said you

13 paid her some money, right?

14 A. Yeah.

15 Q. Okay. Okay. Did you ever talk to anyone

16 from The National Enquirer?

17 A. No.

18 Q. Is Hard Copy the only media --

19 A. Yeah.

20 Q. -- group that you ever met with?

21 A. Yeah. I guess someone tried to -- someone

22 contacted me from National Enquirer, I think, and

23 from Los Angeles Time.

24 Q. In your deposition, you said the people from

25 Hard Copy are not honest, right?

26 A. Yeah.

27 Q. When did you last talk to anyone from Hard

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1 A. When did I -- recently?

2 Q. Let me rephrase it.

3 A. Uh-huh.

4 Q. After your interview with Hard Copy, did you  
5 ever talk to them again?

6 A. No.

7 Q. Okay. Did you tell Attorney Larry Feldman  
8 that you were going to be interviewed by Hard Copy?

9 A. No.

10 Q. And Evangeline worked at Neverland, right?

11 A. Yes.

12 Q. Did you tell anyone else who worked at  
13 Neverland, besides Evangeline, that you were going  
14 to be paid to interview with Hard Copy?

15 A. No. Not that I remember.

16 Q. Now, at some point you learned -- let me  
17 rephrase that, excuse me. Let me start again.

18 After your interview with Hard Copy appeared  
19 on television - okay? - at some point you learned  
20 that other employees at Neverland now wanted to be  
21 paid to go on television to talk about Mr. Jackson,  
22 right?

23 A. Did I know that?

24 Q. Yes.

25 A. No.

26 Q. After you hired a lawyer --

27 A. Uh-huh.

28 Q. -- you learned that other employees at 5087

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1 Neverland started hiring lawyers, right?

2 MR. ZONEN: I'll object. Lack of

3 foundation; speculative.

4 THE WITNESS: I don't remember that.

5 THE COURT: Wait.

6 The objection's overruled.

7 Q. BY MR. MESEREAU: Did you learn at some

8 point after your Hard Copy interview was on

9 television, that now other people who worked for

10 Michael Jackson were hoping they could make money

11 doing media interviews like you did?

12 MR. ZONEN: Objection; speculative.

13 THE WITNESS: No, I didn't know that.

14 THE COURT: Overruled.

15 Q. BY MR. MESEREAU: Did you discuss your Hard

16 Copy interview with anyone besides Evangeline at

17 Neverland?

18 A. I don't remember, no.

19 Q. Okay.

20 A. No.

21 Q. Okay. Who did you work for at Neverland?

22 A. Did I work for?

23 Q. Besides Mr. Jackson. I mean, who did you

24 work -- let me rephrase it.

25 Obviously you worked for Mr. Jackson, but

26 did you report to other people?

27 A. Did I report to other people? Oh.

28 Q. As part of your job. 5088

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1 A. I was working as part of the household,  
2 housekeepers.

3 Q. And who did you work with; do you remember?

4 A. The workers? I don't remember their names.

5 But I -- I --

6 Q. Okay. Now, the Hard Copy interview was in  
7 1993, right?

8 A. Yes.

9 Q. It was in December of 1993, right?

10 A. Yes.

11 Q. And you stopped working in 1991, right?

12 A. (Nods head up and down.)

13 Q. So after you left -- after you stopped  
14 working for Mr. Jackson, you stayed in touch with  
15 some people who worked for Mr. Jackson, right?

16 A. No.

17 Q. What about Evangeline?

18 A. But she wasn't working there no more.

19 Q. When did she stop?

20 A. Before me.

21 Q. Was she in touch with people at Neverland?

22 MR. ZONEN: Objection; speculation.

23 MR. MESEREAU: To your knowledge.

24 THE WITNESS: Not that I know.

25 MR. ZONEN: There's an objection.

26 THE COURT: To her knowledge. I'll limit it.

27 She answered no, not that she knows.

28 Q. BY MR. MESEREAU: Did you talk to any 5089

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1 representative of the media before you had your  
2 deposition taken?

3 A. Did I -- did I talk --

4 Q. I'm -- yes, let me rephrase it.

5 A. Uh-huh.

6 Q. And if I'm unclear, just tell me, and I'll  
7 try and say it again.

8 You said your interview with Hard Copy was  
9 after the deposition, right?

10 A. No. It was before.

11 Q. It was before. Okay. How long before it,  
12 if you know?

13 A. About a month.

14 Q. Okay. Did you discuss the fact that you  
15 were going to be interviewed by Hard Copy with any  
16 attorney?

17 A. No.

18 Q. Okay. Do you remember Evangeline saying to  
19 you, "Would you like to go to The National  
20 Enquirer"?

21 A. I don't remember.

22 Q. Pardon me?

23 A. I don't remember. I remember a guy called  
24 me, but he never told me that someone refer me or --

25 Q. But didn't Evangeline suggest that you call  
26 The National Enquirer?

27 A. No.

28 Q. She didn't? She didn't ask you, "Do you 5090

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1 want me to find The Enquirer?"

2 A. I don't remember that, no.

3 Q. Would it refresh your memory if I just show  
4 you a transcript --

5 A. Uh-huh.

6 Q. -- of your deposition?

7 A. Oh, okay.

8 Q. Can I do that?

9 A. Yeah.

10 MR. MESEREAU: May I approach?

11 THE COURT: Yes.

12 MR. ZONEN: What page, Counsel?

13 MR. MESEREAU: 208.

14 Q. Have you had a chance to look at that page?

15 A. No. Oh.

16 (Laughter.)

17 Q. You've had a chance to look at the page,  
18 right?

19 A. Did I what?

20 Q. Have you had a chance to read that page  
21 of your deposition?

22 A. Before today?

23 Q. No, no, today.

24 A. Oh, yeah.

25 Q. Okay. I just showed you the page, right?

26 A. Yeah.

27 Q. Have you had a chance to look at it?

28 A. Yeah. 5091

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1 Q. And does it refresh your memory about what  
2 Evangeline said to you?

3 A. You know, tell you the truth, I probably did  
4 at that time. And I remember at the time, but this  
5 time I don't remember.

6 Q. Okay.

7 BAILIFF CORTEZ: Ma'am, speak into the mike.

8 THE WITNESS: Oops.

9 Q. BY MR. MESEREAU: Didn't you tell Evangeline  
10 that you were willing to talk to The Enquirer?

11 A. I don't remember.

12 Q. Okay. Would it refresh your recollection  
13 just to look at the page?

14 A. No.

15 Q. It wouldn't? So even if you read the page,  
16 it won't help, do you think?

17 A. It won't help me.

18 Q. Okay. Okay. But you don't remember what  
19 you said to Evangeline about talking to The  
20 Enquirer?

21 A. I don't even remember the whole sit -- I  
22 don't remember.

23 Q. Okay.

24 A. It was a lot -- at that time, you know, it  
25 was --

26 Q. Evangeline called Hard Copy for you, right?

27 A. Uh-huh. Yeah, I think so.

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28 Q. And she did it for you, right? 5092

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1 A. Yeah, I think she did.

2 Q. You wanted her to find a way to communicate  
3 with Hard Copy, right?

4 A. Yeah.

5 Q. Okay. And you wanted to talk to either Hard  
6 Copy or The Enquirer, right?

7 A. I don't remember if it was either of them,  
8 but I remember that I say yeah.

9 Q. Okay. Okay.

10 A. Because I think they approach her first,  
11 someone approach her. And she said, "Well, they  
12 want to talk to you, too." That's what I got.

13 Q. Did you have an understanding with  
14 Evangeline that if she arranged these interviews for  
15 you, that you would pay her?

16 A. That I would pay her?

17 Q. Yes.

18 A. No.

19 Q. Did you believe she was just doing it as a  
20 friend?

21 A. Yeah.

22 Q. Okay. So you didn't have any arrangement  
23 with her that you would split the money, right?

24 A. No.

25 Q. You gave her some money later on because you  
26 appreciated what she had done for you, right?

27 A. Yeah. Yeah, because of the trouble that she

28 was going -- you know, she did, yeah. 5093

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1 Q. Okay. So you gave her money as a friend,  
2 right?

3 A. Yeah.

4 Q. Okay. There was no understanding before the  
5 interview with her how much she would get?

6 A. No.

7 Q. Okay. Okay. Now, Evangeline told you that  
8 she had reached Diane Dimond of Hard Copy, right; is  
9 that right?

10 A. Yes.

11 Q. And Evangeline arranged for you to meet with  
12 Diane Dimond, right?

13 A. Yes.

14 Q. How many meetings did you have with Diane  
15 Dimond with Hard Copy?

16 A. I think it was just one.

17 Q. Do you remember going to the Hilton Hotel?

18 A. My -- yes.

19 Q. Is that where you saw Diane Dimond during a  
20 meeting?

21 A. Yes.

22 Q. And that's the meeting Evangeline went with  
23 you to, right?

24 A. Yes.

25 Q. You told Diane Dimond during that interview  
26 that you never told anyone that you had ever seen  
27 Michael Jackson molesting boys, right?

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28 A. Yes, I believe so. 5094

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1 Q. And it was Evangeline that negotiated how  
2 much money you were going to get, right?

3 A. Yes.

4 Q. You learned that you were going to get  
5 \$20,000 from Evangeline, right?

6 A. From Hard Copy.

7 Q. Yeah.

8 A. Not from Evangeline.

9 Q. Let me rephrase it to make sure you  
10 understand.

11 A. Yeah.

12 Q. You learned from Evangeline that you were  
13 going to get \$20,000 for the interview with Hard  
14 Copy, right?

15 A. Yeah.

16 Q. Is that correct?

17 A. Yes.

18 Q. Evangeline was supposed to speak to Hard  
19 Copy about the money you were going to get, right?

20 A. Yes.

21 Q. So she was really your assistant, wasn't  
22 she?

23 A. Yeah.

24 Q. Okay. If you remember, how long was the  
25 meeting at the Hilton Hotel with Diane Dimond?

26 A. About three hours, probably.

27 Q. Okay. Were there other people at that

28 meeting as well? 5095

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1 A. I don't remember. I don't think so.

2 Q. Do you know if you were given a contract to  
3 sign?

4 A. I signed it, but I don't remember at what  
5 time I did, if it was during that time or after the  
6 interview.

7 Q. But you did sign the contract with Hard  
8 Copy --

9 A. Yeah.

10 Q. -- right?

11 A. Yes.

12 Q. How did you get that contract?

13 A. How did I what?

14 Q. How did you get a copy of that contract?

15 A. I guess they give it to me.

16 Q. Okay. Did Miss Dimond give it to you  
17 directly or did Evangeline give it to you?

18 A. No.

19 Q. Pardon me?

20 A. Miss Dimond gave it to me, I think.

21 Q. At the meeting?

22 A. I don't remember. It was during the -- in  
23 the room.

24 Q. Okay. And you were asked to sign that  
25 contract in that room before you left, right?

26 A. Yeah, I guess so.

27 Q. Is that what you remember?

28 A. That's what I remember. I don't know. 5096

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1 Q. Okay. Okay. The day after you were  
2 interviewed by Hard Copy, Miss Dimond called you  
3 again, right?

4 A. The day after?

5 Q. Yes. The day after your interview with Hard  
6 Copy, Ms. Dimond called you again, right?

7 A. I don't remember.

8 Q. Okay.

9 A. I don't remember her calling me, but I don't  
10 remember if it was the next day or --

11 Q. Do you remember her wanting pictures of  
12 Michael Jackson?

13 A. Yeah.

14 Q. Ms. Dimond wanted you to get her pictures of  
15 Mr. Jackson, right?

16 A. I don't remember.

17 Q. Do you remember that?

18 A. I think I give it to her, but I don't  
19 remember.

20 Q. Okay. Do you remember saying to Ms. Dimond  
21 you don't have pictures of Michael Jackson?

22 A. I don't -- ask that --

23 Q. I'm sorry, I may not be explaining it  
24 properly. Let me just rephrase the question. I'll  
25 withdraw the question.

26 A. Uh-huh.

27 Q. The day after you interviewed with Hard

28 Copy, Miss Dimond called you on the phone, right? 5097

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1 A. I don't remember.

2 Q. Well, after the interview with Hard Copy, do  
3 you remember at some point in time Miss Dimond  
4 called you?

5 A. I don't remember.

6 Q. Okay. Do you remember Miss Dimond ever  
7 asking you to get her pictures of Michael Jackson?

8 A. I don't remember, but I give it to her  
9 sometimes. Or one time, I guess, she got some  
10 pictures of him.

11 Q. And was that part of your contract with the  
12 show Hard Copy, that you would give them pictures?

13 A. Yeah -- yes.

14 Q. Okay. And when they paid you \$20,000, was  
15 part of what you had to do to give them pictures?

16 A. Yes. I guess.

17 Q. Do you remember sending any pictures of Mr.  
18 Jackson's animals to Hard Copy?

19 A. I think all the pictures I got, I give her,  
20 it was me with animals, probably. But it was me  
21 mostly. Not of animals.

22 Q. Did you send pictures of Mr. Jackson's lion?

23 A. No.

24 Q. How about his tiger?

25 A. Not -- I was in the picture, but it wasn't  
26 by itself of the --

27 Q. Okay.

28 A. -- tiger. 5098

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1 Q. You gave Ms. Dimond a picture of your son  
2 with Mr. Jackson, right?

3 A. With Mr. Jackson? I don't remember, but  
4 I -- no, I don't remember.

5 Q. Would it refresh if I just show you the  
6 transcript of your deposition?

7 A. Uh-huh.

8 MR. MESEREAU: Okay. May I approach, Your  
9 Honor?

10 THE COURT: Yes.

11 MR. ZONEN: Page number, Counsel?

12 MR. MESEREAU: 231.

13 MR. ZONEN: 231?

14 Q. BY MR. MESEREAU: Have you had a chance to  
15 review that page of your deposition?

16 A. Yes.

17 Q. And you said under oath during the  
18 deposition that you gave Ms. Dimond a picture of  
19 your son and Mr. Jackson, right?

20 A. Yes.

21 Q. Okay. And you could -- you didn't think  
22 people would notice your son on the show, right?

23 A. Yeah. Probably. Probably, yes.

24 Q. You said in the deposition you didn't think  
25 anybody would recognize who your son was on the Hard  
26 Copy show, right?

27 A. Yeah. Probably I said that.

28 Q. That's what you said, right? 5099

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1 A. I probably -- yes.

2 Q. Okay. Now, at some point, you called Diane

3 Dimond and she didn't return your calls, right?

4 A. Yeah.

5 Q. You called her because you thought she had

6 lied, right?

7 A. She had lied?

8 Q. Yes.

9 A. I didn't like -- I thought that -- that Hard

10 Copy interview thing was going to be shown on Hard

11 Copy, and then I see my pictures everywhere, and

12 even in The National Enquirer, and that's what I

13 thought that it was. You know, I didn't know that

14 they can sell the story to someone else. That's how

15 I felt.

16 Q. Do you remember telling Ms. Dimond that you

17 had other pictures from Neverland Ranch --

18 A. I don't remember.

19 Q. -- that you could get? Do you remember

20 that?

21 A. No, I don't remember.

22 Q. Do you remember Miss Dimond telling you she

23 could send a messenger to get other pictures that

24 you had of Mr. Jackson?

25 A. I don't remember that.

26 Q. Okay. You gave Ms. Dimond pictures of Mr.

27 Jackson after your interview, right?

28 A. I don't remember. 5100

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1 Q. You don't remember if you gave the pictures  
2 before or after the interview?

3 A. No, no, no. After -- of Mr. Jackson? No.

4 Q. Okay. I'm asking you when you gave pictures  
5 to Miss Dimond. Was it before the interview or  
6 after it?

7 A. Oh. I think it was after.

8 Q. The prosecutor asked you questions about  
9 Wade Robeson. Okay?

10 A. Uh-huh. Yes.

11 Q. Do you remember saying in your deposition  
12 that you saw Mr. Robeson sleeping in Mr. Jackson's  
13 bed?

14 A. Yes.

15 Q. Do you remember you were asked how many  
16 times you saw that, and you said, "Maybe twice"?

17 A. I don't remember that I say that, but I  
18 think that's what it was.

19 Q. Maybe twice?

20 A. I remember -- I don't remember what I say at  
21 the time, but I think that was the time -- I mean,  
22 that was the times.

23 Q. So you think you saw Mr. Robeson in Mr.  
24 Jackson's bed maybe twice?

25 A. Yeah.

26 Q. And you think you saw Mr. Jackson in a  
27 shower with Mr. Robeson one time, right?

28 A. Yes. 5101

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1 Q. But you said the shower was fogged up and  
2 you couldn't really see, right?

3 A. I saw the figure.

4 Q. You saw the figure. And you heard a lot of  
5 laughing, right?

6 A. Yeah.

7 Q. And you thought they were playing, right?

8 A. Yes.

9 Q. In your deposition, you said under oath you  
10 couldn't tell whether they were touching each other  
11 or not, right?

12 A. Yeah.

13 Q. Do you remember meeting Joy Robeson, who is  
14 Mr. Robeson's mother?

15 A. Yes.

16 Q. When did you first meet Joy Robeson?

17 A. I don't remember.

18 Q. Do you know about when it was, what year?

19 A. No.

20 Q. Okay. You told the jury that you walked  
21 into the door at the hideout apartment and saw your  
22 son on Mr. Jackson's lap one time, right?

23 A. Not at the hideout.

24 Q. Where was it?

25 A. Havenhurst.

26 Q. Okay. And you said your son was reading a  
27 book?

28 A. (Nods head up and down.) 5102

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1 Q. Is that right?

2 A. Yeah.

3 Q. Okay. The prosecutor asked you questions  
4 about finding money in your son's pants, right?

5 A. Uh-huh.

6 Q. You found the money in his pockets, correct?

7 A. Yes.

8 Q. Have you ever seen that Hard Copy interview  
9 that you did?

10 A. No.

11 Q. Okay. Has anyone from the prosecution tried  
12 to show it to you?

13 A. No.

14 Q. No? Okay.

15 A. I saw little hints. One day I got home and  
16 they were showing, you know, like little parts, what  
17 they going to show the next day. That's what I saw.

18 Q. Okay. Do you remember stating that you  
19 thought Michael Jackson was very childlike?

20 A. Yeah. Yes.

21 Q. He very often acted like a child, in your  
22 mind, right?

23 A. Yes.

24 Q. Do you remember saying that he would let his  
25 chimpanzee sleep in his room?

26 A. Yes.

27 Q. Do you remember that?

28 A. Yeah. 5103

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1 Q. The chimpanzee's name was "Bubbles," right?

2 A. Yes.

3 Q. And Bubbles would sometimes stay in Mr.

4 Jackson's room, right?

5 A. Yes.

6 Q. You talked about Bubbles wearing a diaper,

7 right?

8 A. Yes.

9 Q. You said the monkey didn't like the diaper,

10 right?

11 A. Yeah.

12 Q. And you would often clean after the monkey

13 was in Mr. Jackson's room, right?

14 A. Yes.

15 Q. You said at one time Bubbles got too old and

16 then there was another monkey, right? Right?

17 A. I remember -- I don't remember about the

18 other monkey, but it was Bubbles.

19 Q. Mr. Jackson and a lot of children used to

20 play with the monkey, didn't they?

21 A. At Havenhurst he only had Bubbles.

22 Q. Okay. But children would come and play with

23 the monkey, wouldn't they?

24 A. Not at Havenhurst. Just one time.

25 Q. Where would you see Bubbles?

26 A. At Havenhurst, I think.

27 Q. Okay. Did you ever see Bubbles at



1 A. I don't remember. I think it was bigger at  
2 that time.

3 Q. Okay. But he was at Neverland, right?

4 A. He was at Neverland? I don't remember.

5 Q. Okay. Okay. But you would often at  
6 Neverland see Mr. Jackson playing with kids, right?

7 A. Yes.

8 Q. He would play with kids all the time,  
9 wouldn't he?

10 A. Yes.

11 Q. And kids would often visit Neverland, right?

12 Is that true?

13 A. Yes.

14 Q. Did you -- excuse me, let me rephrase that.

15 Do you remember a dance room where Mr.

16 Jackson used to do dance routines?

17 A. A what?

18 Q. I'm sorry. Let me rephrase it.

19 Do you remember a dance room --

20 A. Oh, a dance room, yeah.

21 Q. -- where Mr. Jackson used to practice dance  
22 routines?

23 A. Where at? Neverland?

24 Q. Anywhere.

25 A. Yes.

26 Q. Where was the dance room?

27 A. Behind the theater.

28 Q. At Neverland, right? 5105

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1 A. Yes.

2 Q. And you used to see Mr. Jackson go there and  
3 practice dance, right?

4 A. Uh-huh.

5 Q. You also saw Mr. Jackson teaching children  
6 to dance, right?

7 A. Playing with the kids.

8 Q. Yes.

9 A. Yeah.

10 Q. And he used to teach children how he dances,  
11 right?

12 A. I don't know if it was the children, but I  
13 see him with the kids.

14 Q. Okay. In the dance room, right?

15 A. In the dance room, yeah.

16 Q. Okay. Have you ever discussed your son's  
17 claim that Mr. Jackson improperly touched him with  
18 your son? Have you ever had a discussion about  
19 that?

20 A. At one time, back in '94.

21 Q. Okay. You talked to your son about what he  
22 said --

23 A. I'm --

24 Q. I'm sorry, go ahead.

25 A. I say, "What's going on?" And he say, "I  
26 just don't want to talk about it."

27 Q. This was in 1994?

28 A. '94, I think so. 5106

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1 Q. Have you ever discussed with your son his  
2 claims about Mr. Jackson?

3 A. No.

4 Q. Never?

5 A. No. I -- I ask him that I was going to ask  
6 his counselor.

7 Q. Okay.

8 A. And he say no.

9 Q. Okay. So you've never discussed --

10 A. No.

11 Q. -- your son's claims with him?

12 A. No.

13 Q. Okay. Have you had a meeting with

14 Prosecutor Sneddon?

15 A. Yeah, one time.

16 Q. And approximately when was that?

17 A. '93, I think.

18 Q. Okay. Have you met with Mr. Sneddon since  
19 1993?

20 A. No.

21 Q. Okay. Have you had any meetings with any  
22 sheriffs to discuss your testimony?

23 A. Other than -- no.

24 Q. Okay. Have you ever had a meeting with any  
25 sheriff about what you're going to say today?

26 A. Other than Saturday, that, you know, they  
27 told me that I was going to come here.

28 Q. Okay. Okay. Was any lawyer at that 5107

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1 meeting?

2 A. No.

3 Q. Okay.

4 THE COURT: Shall we take our break?

5 MR. MESEREAU: Okay.

6 (Recess taken.)

7 THE COURT: Go ahead.

8 MR. MESEREAU: Thank you, Your Honor.

9 Q. Miss Francia, I'd like to ask you some

10 questions about the deposition you gave on January

11 11th, 1994, okay?

12 A. Uh-huh.

13 Q. Before you attended that deposition, you had

14 been asked to bring the contract you had with Hard

15 Copy with you to the deposition, right?

16 MR. ZONEN: I'm going to object as

17 irrelevant.

18 MR. MESEREAU: Your Honor, I believe the

19 prosecutor introduced the subject of Hard Copy.

20 MR. ZONEN: Not a contract.

21 THE COURT: The objection's overruled.

22 You may answer.

23 Q. BY MR. MESEREAU: Do you remember that? Let

24 me rephrase it.

25 A. Okay.

26 Q. Before you appeared at a sworn deposition on

27 January 11th, 1994, you had been asked to bring a

28 copy of the contract you had with Hard Copy to the 5108

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1 deposition, right?

2 A. I don't remember.

3 Q. Do you remember at that deposition, you said  
4 you had destroyed the contract?

5 A. I don't remember what I said or --

6 Q. Do you remember saying you'd gotten rid of  
7 it?

8 A. I don't remember.

9 Q. Would it refresh your recollection if I just  
10 show you the transcript?

11 A. Yeah.

12 MR. MESEREAU: May I approach, Your Honor?

13 THE COURT: Yes.

14 Q. BY MR. MESEREAU: Miss Francia, have you had  
15 a chance to review those deposition pages?

16 A. Did I have a -- had I had a chance? No.

17 Q. I'm sorry, no. I just showed you some pages  
18 from the deposition, right?

19 A. Yes.

20 Q. Did you have a chance to review that portion  
21 of the page that I showed you?

22 A. I haven't read any of the deposition paper.

23 Q. Okay. Did you just read it when I showed it  
24 to you?

25 A. Yes.

26 Q. And does it remind you that you said you had  
27 gotten rid of the contract?

28 A. Yeah, I probably did. 5109

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1 Q. Okay. Do you remember saying that in the  
2 deposition?

3 A. No, I don't.

4 Q. Okay. Did you get rid of that contract at  
5 some point?

6 A. Yeah, I don't have it anymore. Yeah, I  
7 don't have it.

8 Q. Did you throw it out?

9 A. I think I -- yeah, I think I threw it away,

10 or --

11 Q. Did you throw it out before the deposition  
12 of January 1994?

13 A. Yeah, I think I destroy -- I destroyed it.

14 Q. Okay. Do you remember stating in that  
15 deposition that you showed the contract to Larry  
16 Feldman?

17 A. No.

18 Q. Do you remember showing that contract to  
19 Attorney Larry Feldman?

20 A. No, I don't remember.

21 Q. Would it refresh your recollection if I show  
22 you the deposition page?

23 A. Yeah.

24 MR. MESEREAU: May I approach, Your Honor?

25 THE COURT: Yes.

26 Q. BY MR. MESEREAU: Miss Francia, have you had  
27 a chance to look at that page of your deposition?

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1 Q. Okay. I just showed you a page of your  
2 deposition --

3 A. Oh, just now, yeah.

4 Q. Did you have a chance to read that page?

5 A. Yes.

6 Q. Does it refresh your recollection about your  
7 saying you let Larry Feldman see the contract?

8 A. I don't remember.

9 Q. Okay. You don't remember showing it to

10 Larry Feldman?

11 A. No.

12 Q. Okay. And you met with Larry Feldman, what,  
13 twice?

14 A. Well, first it was here in Santa Maria. He  
15 came down.

16 Q. Okay.

17 A. And then I met with him when I went there  
18 twice.

19 Q. So is that three meetings you had with  
20 Attorney Larry Feldman?

21 A. Yes.

22 Q. And that would be in the early 1990s, right?

23 A. Yes.

24 Q. Okay. Did you go to him to get some advice?

25 A. No.

26 Q. Did you talk to him about what you were  
27 going to say on television?



1 Q. You've talked to Santa Barbara Sheriff Russ  
2 Birchim a number of times, haven't you?

3 A. Russ Bir -- it was from Santa Barbara, but I  
4 don't remember the name.

5 Q. Do you know a Santa Barbara sheriff named  
6 Russ Birchim?

7 A. Russ --

8 Q. Do you know a Santa Barbara sheriff named  
9 Russ Birchim?

10 A. I don't remember the name of it, but it was  
11 a detective or sheriff.

12 Q. Do you remember when your son Jason first  
13 spoke to any police officer about what he claims  
14 happened with Michael Jackson?

15 A. I remember one of the times, but I don't  
16 know which time it was.

17 Q. At your deposition, you said that you went  
18 on Hard Copy after your son spoke to the police,  
19 right?

20 A. I don't remember if it was before or after.

21 Q. Okay. Would it refresh your recollection to  
22 just show you --

23 A. Uh-huh.

24 Q. -- the deposition?

25 May I approach, Your Honor?

26 THE COURT: Yes.

27 Q. BY MR. MESEREAU: Have you had a chance to

28 look at that page from your sworn deposition? 5112

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1 A. Yes.

2 Q. Does it remind you that your son had talked  
3 to the police before you went on Hard Copy?

4 A. It doesn't -- I don't remember.

5 Q. Okay. Did you know your son was going to  
6 speak to any police officer about Mr. Jackson?

7 A. No.

8 Q. It happened without you knowing about it?

9 A. I didn't know he was -- they were going to  
10 talk to him.

11 Q. Do you have any idea why the police wanted  
12 to talk to your son at that point in time?

13 A. No, I don't remember. I think when they  
14 first talked to him, they came to the house and  
15 asked me if they could talk to him, but I don't  
16 remember when was this.

17 Q. Do you know who told the police anything  
18 about your son?

19 A. I think they -- someone told me that they  
20 needed to talk to my son, or they need to talk to me  
21 about my son.

22 Q. Do you know if Larry Feldman, the attorney,  
23 contacted the police about your son?

24 A. No, I don't know.

25 Q. Now, you worked approximately five years at  
26 the Havenhurst address, right?

27 A. Altogether --

28 MR. ZONEN: Misstatement of evidence; 5113

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1 objection.

2 THE WITNESS: Altogether --

3 THE COURT: Just a moment.

4 I sustain the objection, Counsel.

5 MR. MESEREAU: Okay.

6 Q. You worked for approximately two years at

7 Neverland, right?

8 A. Yeah.

9 MR. ZONEN: Objection; misstatement of

10 evidence.

11 THE COURT: Overruled.

12 Q. BY MR. MESEREAU: Is that true?

13 THE COURT: She answered "Yes" before.

14 THE WITNESS: Yes.

15 MR. MESEREAU: Oh, I didn't hear her. Thank

16 you.

17 Q. Now, while you were at Neverland, you

18 reported to someone named Norma Stakos, right?

19 A. Yes.

20 Q. And who was Norma Stakos?

21 A. One of the secretaries. She was a

22 secretary.

23 Q. A secretary to who?

24 A. Mr. Jackson.

25 Q. Okay. And you would speak to her from time

26 to time, correct?

27 A. Yeah.

28 Q. And do you remember she talked to you in 5114

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1 1991 about the fact that for the third time your  
2 wages had been garnished by a creditor?

3 MR. ZONEN: Objection; irrelevant.

4 THE COURT: Sustained.

5 MR. ZONEN: And hearsay.

6 Q. BY MR. MESEREAU: Did you ask Miss Stakos on  
7 behalf of Mr. Jackson to help you with any bills you  
8 couldn't pay?

9 A. No.

10 MR. ZONEN: Objection; irrelevant.

11 THE COURT: Overruled. The answer was, "No."

12 Q. BY MR. MESEREAU: Did you have a discussion  
13 with Miss Stakos about the fact that she couldn't  
14 pay you?

15 A. No, never did.

16 Q. You don't know anything about a wage  
17 garnishment?

18 A. Yes.

19 Q. What do you know about that?

20 A. That --

21 MR. ZONEN: I'm going to object as  
22 irrelevant.

23 MR. MESEREAU: I don't think so, Your Honor.

24 THE COURT: I thought it was initially, but I  
25 changed my mind. So I'll overrule the objection.

26 Q. BY MR. MESEREAU: What do you remember  
27 telling Miss Stakos about a wage garnishment?

28 A. About my taxes, not paying in time, and I 5115

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1 need -- you know, they needed to wage - how do you  
2 call that? - take money out of my paycheck.

3 Q. Did Miss Stakos help you with that?

4 A. Well, she was the payroll, so she's the one  
5 who took it off of my paycheck. But she never gave  
6 me money, or anybody gave me money to pay that.

7 Q. Do you remember you owed money to a store  
8 called Dearden's?

9 A. Yes.

10 Q. Okay. And they were trying to garnish your  
11 wages, right?

12 A. Uh-huh. Yeah.

13 Q. And did you -- you asked Miss Stakos to help  
14 you straighten that out, right?

15 A. Not to straighten it, but to -- you know,  
16 just to pay off of my check.

17 Q. Okay. And did she work with you on that?

18 A. Yes.

19 Q. Okay. And she did that for you on a couple  
20 of other occasions, right?

21 A. I remember two times. And I don't remember  
22 more than that.

23 Q. Okay. And she had a problem at one point  
24 because you had a phony Social Security number,  
25 right?

26 A. Yes.

27 Q. Okay. And she helped you straighten that

28 out, right? 5116

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1 A. No.

2 Q. You eventually got a proper Social Security  
3 number?

4 A. Yes. Yes.

5 Q. But you did discuss that with Miss Stakos,  
6 right?

7 A. I don't remember. But they knew that I was  
8 illegal, and Mr. Bray wanted to help me to get my  
9 papers.

10 Q. Okay. And that got straightened out, didn't  
11 it?

12 A. Yeah.

13 Q. Okay. Did you know someone named Gayle  
14 Goforth?

15 A. Yeah.

16 Q. And who was Gayle Goforth?

17 A. The housekeeper. One of the housekeepers.

18 The head housekeeper of the house.

19 Q. And did you work with her?

20 A. Yes.

21 Q. For how long did you work with her?

22 A. Probably a year, a year and a half. Maybe a  
23 year.

24 Q. And at one point you admitted going into her  
25 purse, right?

26 A. Uh-huh.

27 Q. And you went into her purse to see how much

28 she was being paid, right? 5117

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1 A. Her purse was on top of the -- our desk, and  
2 she have her check on top of it.

3 Q. And you admitted going into her purse,  
4 right?

5 A. Yes.

6 Q. The purpose was to see what she was being  
7 paid, wasn't it?

8 A. Yes.

9 Q. Okay.

10 A. I admitted to Mr. Jackson.

11 Q. Excuse me?

12 A. I told Mr. Jackson about it.

13 Q. Yes. And he -- he didn't get you in any  
14 trouble or anything, did he?

15 A. No.

16 Q. Okay. Now, you got a coffee table from Mr.  
17 Jackson, didn't you?

18 A. Yes.

19 Q. And that was a beautiful oak table, right?

20 A. (Nods head up and down.)

21 Q. And where did that come from?

22 A. From Havenhurst.

23 Q. Okay. Did you ask for that?

24 A. Yes.

25 Q. And he said you could have it, didn't he?

26 A. Yeah.

27 Q. Did you ask him for the watch that you

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28 described before? 5118

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1 A. No.

2 Q. How did you end up with the watch?

3 A. I think it was one of the boxes that he  
4 get -- he get stuff from the companies, and I got it  
5 from there.

6 Q. Okay. And at some point did you tell Mr.

7 Jackson you had taken a watch?

8 A. No, he saw it on me. I show it to him.

9 Q. And he had no problem with that, right?

10 A. Yeah.

11 Q. And you indicated that he used to let you  
12 take lots of things from time to time, right?

13 A. Yeah.

14 Q. And a lot of those things, I think you  
15 described as samples; is that correct?

16 A. Samples, and gifts, and things that he get  
17 from -- for himself.

18 Q. The oak coffee table had a signature on it,  
19 didn't it?

20 A. A signature? Of him?

21 Q. Yes.

22 A. No.

23 Q. Didn't it have a signature of him?

24 A. No.

25 Q. You tried to sell that at one point, right?

26 A. No.

27 Q. Still have it?

28 A. Yeah, it's in the garage somewhere. 5119

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1 Q. Okay. When you left Neverland, who did you  
2 report to to tell them that you were leaving?

3 A. Who did I report?

4 Q. Yes.

5 A. I mean, I quit. I just --

6 Q. Yeah. When you quit, who did you go to and  
7 say, "I quit"?

8 A. I told that lady who was working there at  
9 that time. Gayle.

10 Q. And did you give her one day's notice?

11 A. No.

12 Q. How much notice did you give?

13 A. No notice.

14 Q. Okay. You just left, right?

15 A. I just left.

16 Q. Okay. Now, on a couple of occasions you got  
17 in trouble for not doing your time card properly,  
18 correct?

19 A. A lot of occasions.

20 Q. Huh?

21 A. A lot of occasions for being late.

22 Q. Yes, you got in trouble for being late,  
23 right?

24 A. Yeah.

25 Q. And you got in trouble for not properly  
26 doing your time card, right?

27 A. Yeah.

28 Q. Okay. But Mr. Jackson never yelled at you 5120

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1 or did anything mean to you, did he?

2 A. No. No.

3 Q. But you didn't get along with some of the  
4 help, right?

5 A. Yeah.

6 Q. You didn't get along with Gayle Goforth,  
7 right?

8 A. Yeah.

9 Q. She's the one whose purse you went into,  
10 right?

11 A. Yes.

12 Q. You and she just didn't get along, right?

13 A. In the beginning we got along very nice.

14 Q. Do you remember complaints that you wouldn't  
15 let anybody get near Mr. Jackson?

16 A. That I would get --

17 Q. Do you remember --

18 MR. ZONEN: I'll object as hearsay --

19 THE WITNESS: That I would get --

20 MR. ZONEN: -- and vague.

21 THE COURT: Just a moment.

22 The objection's overruled.

23 Do you want the question read back? Do you

24 want me to repeat the question for you?

25 THE WITNESS: Yes, please.

26 THE COURT: I'll have the court reporter do

27 it.

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1 THE WITNESS: No.

2 Q. BY MR. MESEREAU: Never heard of that?

3 A. Complaints that I wouldn't let anybody?

4 Q. Yes.

5 A. No.

6 Q. On the staff at Neverland?

7 A. Probably that I was the one allowed in his

8 room, that I was -- I just wanted to do that --

9 Q. Okay.

10 A. -- myself.

11 Q. So you basically wouldn't let other people

12 on the staff get near his room?

13 A. Yeah.

14 MR. ZONEN: Objection; misstatement of

15 evidence.

16 THE COURT: Overruled. The answer was,

17 "Yeah."

18 THE WITNESS: Because he told me that. He

19 told me not to let anyone in his room.

20 Q. BY MR. MESEREAU: Okay. Now, the prosecutor

21 asked you about the nickname "Rubba," okay?

22 A. Yes.

23 Q. "Rubba" is short for "Rubber Head," right?

24 A. I don't know.

25 Q. You never heard that?

26 A. I don't know.

27 Q. Okay.

28 A. I never hear that before. 5122

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1 Q. And Mr. Jackson used to call his cousins,

2 Levon and Elijah, "Rubba," right?

3 A. He call the kids "Rubba," yeah.

4 Q. He also called kids "Rubber Head," or

5 "Rubba," right?

6 A. Yeah.

7 Q. He'd also use "Apple Head," right?

8 A. I don't know.

9 Q. He'd use "Doo-Doo Head," right?

10 A. Yeah. I think I hear that one time.

11 Q. Okay. But it's certainly a term that he

12 used quite often, isn't it?

13 A. "Rubba," yeah.

14 Q. He used it on lots -- he used it for lots of

15 children, including his own cousins, didn't he?

16 A. Yeah.

17 Q. Okay. When is the last time you talked to

18 Larry Feldman?

19 A. After the -- I mean, the last time I went

20 over there and testified, or for the subpoena.

21 Q. So that was quite a while ago?

22 A. Yeah.

23 Q. Okay. Okay. Now, the prosecutor asked you

24 questions about what you said in the deposition

25 about what you could see in the shower, right?

26 A. Yeah.

27 Q. And in the deposition you said under oath

28 that all you could see was a shadow, right? 5123

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1 A. Yeah.

2 Q. Was that the truth?

3 A. A shadow, an image, yeah.

4 Q. That's all you could see --

5 A. Yeah.

6 Q. -- in the shower, correct?

7 A. I hear two voices.

8 Q. You heard giggling and laughing, right?

9 A. Yeah.

10 Q. And all you could see was a shadow through

11 the glass?

12 A. The glass, yes.

13 Q. And that's because the glass was fogged up,

14 right?

15 A. Yeah.

16 Q. Okay. You only saw one person in the

17 shower, right?

18 A. I saw him in the shower and the little kid.

19 Q. But in your deposition you said you could

20 only see one person, but you heard giggling, right?

21 A. Yeah, but I hear two people --

22 Q. You heard two people. You could only see

23 one through the glass, right?

24 A. Mostly, yeah. Mostly.

25 Q. Do you remember you were asked in your

26 deposition, "Did you hear anything else other than

27 Michael laughing?" And you said, "No"?

28 A. Yeah. 5124

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1 Q. Was that the truth?

2 A. Yes.

3 Q. Do you remember in the deposition saying you  
4 never saw anyone else in the shower but Mr. Jackson?

5 A. I don't think I say that.

6 Q. Would it refresh your recollection if I show  
7 you the transcript?

8 A. Okay.

9 MR. MESEREAU: May I approach, Your Honor?

10 THE COURT: Yes.

11 MR. ZONEN: Page?

12 MR. MESEREAU: 401.

13 Q. Have you had a chance to look at that page  
14 of the deposition?

15 A. Yes.

16 Q. Does it refresh your memory about what you  
17 said about the shower?

18 A. Yeah.

19 Q. You saw one person, Mr. Jackson, right?

20 A. Yes.

21 Q. Or it looked like him through the glass,  
22 right?

23 A. Yes.

24 Q. And the only voice you really heard was Mr.  
25 Jackson, correct?

26 A. No.

27 Q. That wasn't correct?

28 A. I hear two -- two. 5125

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1 Q. You heard laughter?

2 A. Laughing and --

3 Q. And that was at Neverland, right?

4 A. Yes.

5 Q. Okay. You've seen Mr. Jackson in his

6 Jacuzzi, correct?

7 A. Correct.

8 Q. You've seen him playing in his Jacuzzi,

9 correct?

10 A. Yeah.

11 Q. You've never seen him molesting anyone in

12 his Jacuzzi, right?

13 A. No.

14 Q. Let me just make sure that's phrased

15 properly. You've never seen Mr. Jackson improperly

16 touch anyone in his Jacuzzi?

17 A. No.

18 Q. Never saw that, right?

19 A. No.

20 Q. Okay. Have you seen Mr. Jackson at

21 Neverland tickling and playing with children?

22 A. Yes.

23 Q. You've seen him do that often, haven't you?

24 A. Playing, yeah. Playing a lot with the kids.

25 MR. ZONEN: I'll object to the compound

26 nature of the question, "tickling and playing."

27 THE COURT: Sustained.

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28 Q. BY MR. MESEREAU: You've seen Mr. -- 5126

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1 MR. ZONEN: Move --

2 MR. MESEREAU: Oh.

3 MR. ZONEN: Move to strike the answer.

4 THE COURT: I think she clarified it in her  
5 answer.

6 MR. ZONEN: Okay. That's fine.

7 THE COURT: Go ahead, Counsel.

8 Q. BY MR. MESEREAU: You've seen Mr. Jackson  
9 tickling children at Neverland, haven't you?

10 A. Not that I remember, no.

11 Q. You never saw him playing in the yard?

12 A. Playing in the yard, yeah. Not tickling --

13 MR. ZONEN: Objection to the use of

14 "playing" and "tickling" interchangeably as  
15 compound.

16 THE COURT: Sustained.

17 MR. MESEREAU: All right. I'll move on.

18 Q. You've seen children at Neverland from an  
19 organization called Make-A-Wish Foundation, correct?

20 A. Yes.

21 Q. And children from Make-A-Wish Foundation  
22 often used to visit Neverland, right?

23 A. Yes.

24 Q. And they would crowd and climb all over  
25 Michael Jackson, right?

26 A. Play with him, yeah.

27 Q. Well, they would all just surround him,

28 wouldn't they? 5127

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1 A. Yes.

2 Q. And you would see him play with them often,  
3 didn't you?

4 A. Yes.

5 Q. You would see those children running around  
6 Neverland a lot, correct?

7 A. Yes.

8 Q. And Mr. Jackson used to run around with  
9 them, didn't he?

10 A. Yes.

11 Q. He used to take them to the theater to watch  
12 movies, didn't he?

13 A. Yes.

14 Q. And children would sometimes sit in his lap  
15 in the theater watching the movies, didn't they?

16 A. I --

17 Q. Did you ever see that?

18 A. I never see that. Because I --

19 Q. I'm sorry.

20 A. I was never there when he was there with  
21 kids.

22 Q. Okay. Okay. Now, have you participated in  
23 any event -- excuse me, during the time you worked  
24 at Neverland, did you participate in any large  
25 events when guests would come to Neverland?

26 A. In any events, like --

27 Q. Guests, parties, things of that sort?

28 A. Yeah, we used to have an employee barbecue 5128

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1 or -- then we all would come.

2 Q. Do you remember any other big events at

3 Neverland while you worked there?

4 A. No.

5 Q. Do you remember helping set up for guests

6 who would visit?

7 A. Yes.

8 Q. That would happen a lot, wouldn't it?

9 A. Yes.

10 Q. And when guests were going to visit

11 Neverland, what would you do?

12 A. What do you mean?

13 Q. Yeah. What were your responsibilities when

14 guests would visit Neverland? What kind of work

15 would you do?

16 A. Help in the house, help the cooks, help to

17 clean their bedrooms.

18 Q. Would you clean bedrooms other than Mr.

19 Jackson's?

20 A. Yeah, the guest rooms.

21 Q. And you used to see guests stay in the guest

22 quarters from time to time, right?

23 A. Yes.

24 Q. Would you see Mr. Jackson's children in the

25 main house when you worked there?

26 A. If I see who?

27 Q. Did you ever see any children --

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1 Q. -- staying in the guest main house when you  
2 were there?

3 MR. ZONEN: Objection. "Guest main house"?

4 MR. MESEREAU: That didn't come out too  
5 well. I withdraw that.

6 Q. When you worked at Neverland, did you see  
7 any children who used to stay there, besides what  
8 you've described?

9 MR. ZONEN: Stay where? Objection; vague.

10 MR. MESEREAU: Neverland.

11 THE WITNESS: Stay where, at the guest  
12 rooms?

13 Q. BY MR. MESEREAU: Yes.

14 A. No. They will stay in the house, in the  
15 main house.

16 Q. Children usually stayed in the main house,  
17 right?

18 A. Yeah.

19 Q. And do you know someone named Frank Cascio?

20 A. Frank Cascio. No, I don't remember.

21 Q. Do you know a family named "Cascio"?

22 A. No. I don't remember.

23 Q. Do you know someone named Tyson?

24 A. No.

25 MR. MESEREAU: Okay. No further questions

26 at this time.

27

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1 BY MR. ZONEN:

2 Q. Miss Francia, you told us that Mr. Jackson  
3 had mentioned to you about not letting people in his  
4 room. What exactly was it that Mr. Jackson told you  
5 in that regard?

6 A. Not to let people in; that people want to  
7 know about his business all the time, and not to let  
8 anybody get in there.

9 Q. Did he tell you people in particular?

10 A. No. Just everybody. Anybody.

11 Q. Was that something he said to you often?

12 A. Yeah.

13 Q. Did you have a key to that room?

14 A. Yes.

15 Q. Did he tell you he wanted the room kept  
16 locked?

17 A. Yeah.

18 Q. During the time that you worked for him at  
19 Neverland, did you see people coming and going into  
20 his room?

21 A. No.

22 Q. During the time that you worked at  
23 Neverland, did that door stay locked fairly  
24 regularly?

25 A. Closed all the time.

26 Q. Were there ever people coming and going into  
27 his room that he did not give permission to come and

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28 go into the room? 5131

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1 A. No.

2 Q. Did Wade Robeson come and go into his room  
3 at will?

4 A. Yeah. Kids were allowed to go there.

5 Q. Other kids were allowed to come into his  
6 room?

7 A. Yeah.

8 Q. If he was there -- if he was not there, or  
9 only when he was there?

10 A. Kids were there when he was there.

11 Q. If he wasn't there, they didn't stay in his  
12 room?

13 A. They -- they never came when he wasn't  
14 there.

15 Q. On those occasions that he was traveling,  
16 the "Bad" tour -- Mr. Mesereau was asking you about  
17 his travels during the "Bad" tour.

18 A. Uh-huh.

19 Q. And he mentioned a period of time that  
20 exceeded a year and a half that he was on tour. Was  
21 he continuously away from California for a full year  
22 and a half, or would he come and go?

23 A. He'd come and go.

24 Q. There were times that he would return?

25 A. Yeah.

26 Q. And stay?

27 A. Yeah.

28 Q. Do you know the longest period of time that 5132

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1 he would be away from his residence during that  
2 time?

3 A. Probably about three months.

4 Q. Three months? Was the residence both the  
5 Encino home and the hideout in L.A.?

6 A. It was mostly the hideout.

7 Q. Did that tour extend to the period of time  
8 after which he moved to Neverland Ranch, or was he  
9 completed with his tour by then; do you recall?

10 A. I don't remember.

11 Q. You told Mr. Mesereau that you had answered  
12 a question in the deposition about seeing a shadow  
13 in the shower. What did you mean by that? What is  
14 a shadow? Tell me, what is a shadow?

15 A. An image.

16 Q. An image. All right. What did you see when  
17 you looked into that shower?

18 A. Mr. Jackson.

19 Q. All right. Did you see the shadow of Mr.  
20 Jackson, or did you see a person that looked like a  
21 shadow?

22 A. Through the glass.

23 Q. What did you see through the glass?

24 A. Mr. Jackson.

25 Q. The actual person?

26 A. Yeah.

27 Q. Okay. You didn't see his shadow cast

28 against a wall, or against the floor? 5133

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1 A. Huh-uh. No.

2 Q. All right. So what did you mean by the word

3 "shadow"?

4 A. His image.

5 Q. His image. That's what he looked like?

6 A. Yeah.

7 Q. All right. And was the door blurred during

8 that time?

9 A. Yeah.

10 MR. ZONEN: Excuse me. These are all next

11 in order, please.

12 Q. At the time that you looked through the

13 glass into the shower, were you able to see a second

14 person in there?

15 A. I want to say yeah, but I don't -- you know,

16 I hear the laughing and the talking and, you know,

17 playing, and I -- I didn't see the actual person,

18 but it was moving, you know, with him.

19 Q. Do you believe that you saw the image of a

20 second person?

21 A. Yeah.

22 Q. But not as clearly as Mr. Jackson?

23 A. Not as clearly, no.

24 Q. Did you hear one voice or two?

25 A. Two.

26 Q. And were you clear about that?

27 A. Yes.

28 Q. And did you tell that to Mr. Feldman in the 5134

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1 deposition?

2 A. Oh.

3 Q. I'm sorry?

4 A. I don't remember.

5 Q. You don't remember what you said?

6 A. No.

7 Q. The deposition was how many years ago?

8 A. More than ten years, I think.

9 Q. Okay. The portion that Mr. Mesereau asked

10 you, when he showed you that transcript about one or

11 two people, do you recall when in the deposition

12 that question was asked of you? Was it the first

13 day or the second day of the deposition?

14 A. I don't know.

15 Q. Was it toward the end of the deposition?

16 A. I don't know. I think so. I don't

17 remember.

18 Q. Before the deposition began, did they ask

19 you if you wanted to testify in either English or

20 Spanish?

21 A. I don't think so.

22 Q. Did they simply assume that you would

23 testify in English?

24 A. Yeah.

25 Q. All right. This was 11 years ago?

26 A. Yes.

27 Q. Is your English as good as it is now?

28 A. A little better, I think. 5135

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1 Q. A little better now?

2 A. Yeah.

3 Q. Would you have preferred to have testified  
4 in Spanish at that time?

5 MR. MESEREAU: Objection. Relevance; calls  
6 for speculation.

7 THE COURT: Sustained.

8 Q. BY MR. ZONEN: Were you comfortable in  
9 English at this time?

10 A. I wish it would have been in Spanish.

11 Q. Did you understand all of the questions that  
12 were asked of you during that deposition?

13 A. I was very confused.

14 Q. Were you confused as to some of the  
15 questions?

16 A. Yeah, and all the lawyers and --

17 Q. There were a lot of lawyers there, weren't  
18 there?

19 A. Yeah.

20 MR. MESEREAU: Objection. Leading; move to  
21 strike.

22 THE COURT: Overruled. Next question.

23 Q. BY MR. ZONEN: Were you intimidated during  
24 that deposition?

25 MR. MESEREAU: Objection; leading.

26 THE COURT: Sustained.

27 Q. BY MR. ZONEN: How did you feel during that

28 deposition? 5136

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1 MR. MESEREAU: Objection --

2 THE WITNESS: I was uncomfortable.

3 MR. MESEREAU: -- knowledge; foundation.

4 THE COURT: Overruled. She said,

5 "Uncomfortable."

6 Q. BY MR. ZONEN: You remembered the monkey

7 Bubbles -- excuse me, the chimp, the chimpanzee; is

8 that right?

9 A. Bubbles, yes.

10 Q. Was Bubbles at more than one location?

11 A. I don't remember that. I think I remember

12 that other little monkey. I think it was a

13 different one. But I remember Bubbles at

14 Havenhurst. And then he was taken to some kind of

15 farm or trainer.

16 Q. Did Bubbles get a little too big?

17 A. Yeah.

18 Q. Did Bubbles get rambunctious, wild?

19 A. Wild.

20 Q. Did Bubbles ever bite you?

21 A. Yeah.

22 Q. On more than one occasion?

23 A. Twice.

24 Q. Twice?

25 At some time did you become a legal

26 resident?

27 A. Yes.

28 Q. And you had told them at Neverland about 5137

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1 your status?

2 A. Yeah.

3 Q. Is that correct?

4 A. It was at that time. At that time that I --

5 Q. While you were working at Neverland; is that  
6 correct?

7 A. Yeah.

8 Q. You mentioned about the coffee table. Where

9 was the coffee table at the time that Mr. Jackson  
10 gave it to you?

11 A. Havenhurst.

12 Q. It was at Havenhurst. And where at  
13 Havenhurst?

14 A. It was at his dance floor.

15 Q. Uh-huh.

16 A. And on top, in the attic.

17 Q. In the attic?

18 A. Yeah.

19 Q. Was it being used as a coffee table or was  
20 it being stored?

21 A. No, it was being used. It just -- I guess  
22 the room was too small, and, you know, it was just  
23 in the way for everybody to -- I mean, for -- I  
24 guess for people to be there, and --

25 Q. How did the coffee table end up going to  
26 you?

27 A. Because he wanted it to move out. He wanted

28 it to be moved out, out of there. 5138

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1 Q. He was getting rid of it?

2 A. Yes.

3 Q. And you knew that?

4 A. Well, he said, "Move it out of here," and I  
5 asked him if I can take it.

6 Q. And what did he say?

7 A. And he said, "Yeah, take it."

8 Q. Mr. Mesereau asked you questions about your  
9 interview with Hard Copy.

10 A. Yes.

11 Q. All right. Were you interviewed by more  
12 than one person with Hard Copy?

13 A. No.

14 Q. Was that one person Diane Dimond?

15 A. Yes.

16 Q. Did you have more than one conversation with  
17 her?

18 A. Do you mean personally?

19 Q. Yes.

20 A. Yes, just one.

21 Q. Was there a conversation, like an interview,  
22 and then the interview on television?

23 A. No, that -- the same day we did everything.

24 She came to the lobby of the hotel, and then we went  
25 upstairs and did it.

26 Q. She came to the lobby. So it was all on the  
27 same day?

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1 Q. Was the interview done at the hotel?

2 A. Yeah.

3 Q. Were there a number of questions that were  
4 asked of you during that interview?

5 A. There were many questions asking about who?

6 Me?

7 Q. Were there a lot of questions that they  
8 asked?

9 A. Oh. Yeah.

10 Q. I say "they," but actually, was it just

11 Diane Dimond who asked you questions?

12 A. Yes.

13 Q. Yes?

14 A. Yes.

15 Q. Was anyone else asking you questions?

16 A. No, I don't remember. I don't think so.

17 Q. Did you know in advance what the questions  
18 were going to be?

19 A. No.

20 Q. Were you surprised by what the questions  
21 were?

22 A. Yeah. Yes.

23 Q. Did you know it was going to be about

24 Michael Jackson?

25 A. No. I thought it was going to be about me  
26 working there.

27 Q. All right. That was the part that surprised

28 you? 5140

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1 A. Yeah.

2 Q. Were you upset about it?

3 A. Yeah, because then I start to answer, and I  
4 felt like I was just there, you know, answering  
5 questions that I didn't know they were going to ask  
6 me.

7 Q. Okay. Did it upset you?

8 A. Yeah.

9 Q. Did you tell them you were upset about that?

10 A. No.

11 Q. Were you truthful in your answers?

12 A. Yeah.

13 Q. Mr. Mesereau asked you if it was true that  
14 you told Diane Dimond in this interview that you  
15 never saw Michael Jackson molest a child; is that  
16 correct?

17 A. Yeah.

18 Q. What else did you tell Diane Dimond in the  
19 interview?

20 A. I don't remember.

21 Q. Did you tell Diane Dimond about seeing him  
22 sleeping with boys?

23 A. Yeah.

24 Q. Did you tell her that that concerned you?

25 MR. MESEREAU: Objection. These are leading  
26 questions.

27 THE COURT: Sustained.

28 Q. BY MR. ZONEN: Was there any conversation 5141

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1 with Diane Dimond regarding any of the boys that you  
2 testified to so far today?

3 A. I'm sorry, repeat?

4 Q. Was there any conversation with Diane Dimond  
5 regarding the testimony you've given today about any  
6 of those boys? You testified about Wade Robeson.

7 You testified about Macaulay Culkin. Did you  
8 discuss either of those boys with Diane Dimond?

9 A. No, I said -- I think the only -- that I say  
10 that I see him is sleeping with the kids and being  
11 in the bathtub with them, playing.

12 Q. And you told Diane Dimond that?

13 A. Yeah, I think I did.

14 Q. Now, this is the bathtub or this is the  
15 shower?

16 A. I don't remember if I told her about the  
17 shower. But I remember that I told him about the  
18 bathtub and the Jacuzzi, I think.

19 Q. I'm sorry?

20 A. I told her about the Jacuzzi and the  
21 bathtub, I think.

22 Q. And being there with boys?

23 A. Being with boys. Yeah, that I will clean up  
24 their -- you know, their toys in the bathtub.

25 Q. Mr. Mesereau asked you on cross-examination  
26 if you ever saw Michael Jackson in the Jacuzzi at  
27 the Havenhurst residence; is that correct?

28 A. Excuse me? Mr. -- 5142

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1 Q. Mr. Mesereau asked you if you saw Mr.  
2 Jackson in the Jacuzzi at the Havenhurst residence.

3 A. Uh-huh. Yeah.

4 Q. And you said, "Yes"?

5 A. Yeah.

6 Q. With a boy; is that true?

7 A. It wasn't -- yeah.

8 Q. Mr. Mesereau asked you if you had seen

9 Michael Jackson in bed with Wade Robeson twice, and

10 you said, "Yes"?

11 A. Yeah.

12 Q. Did you actually see Wade Robeson in bed

13 with Michael Jackson?

14 A. Yeah. Yes.

15 Q. And that was on two different occasions?

16 A. Yes.

17 Q. That doesn't include the times that you

18 didn't see them in bed, but you cleaned up after

19 them?

20 A. Yeah.

21 Q. When were the two times that you actually

22 saw him in bed with Wade Robeson?

23 A. When was the two times? Do you mean the

24 dates?

25 Q. Well, I doubt you could do that, but --

26 could you do that? Do you know the dates?

27 A. No. No.

28 Q. Can you give me -- do you remember the two 5143

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1 occasions when you saw them? Do you remember either  
2 of the two occasions?

3 A. Just simply be in bed with him.

4 Q. How did that happen, that you were there and  
5 they were in bed together? How did it happen that  
6 you saw them?

7 A. Watching T.V.

8 Q. They were watching T.V. Were they inside  
9 the bed or on top of the bed?

10 A. Inside the bed.

11 Q. Do you remember what they were wearing?

12 A. No.

13 Q. Do you remember if they were wearing  
14 anything?

15 MR. MESEREAU: Objection; no foundation.

16 THE WITNESS: No.

17 THE COURT: Just a moment.

18 Sustained.

19 Q. BY MR. ZONEN: Could you see any clothing on  
20 either one of them?

21 MR. MESEREAU: Objection; foundation.

22 THE COURT: Overruled.

23 You may answer.

24 Q. BY MR. ZONEN: Could you see any clothing on  
25 either one of them?

26 A. I saw from the waist up, so -- I don't know  
27 if they had pajamas or --

28 Q. But from the waist up, were either one of 5144

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1 them wearing anything?

2 A. No.

3 Q. They were both nude from the waist up?

4 A. Yeah.

5 Q. On both occasions?

6 A. On one occasion I remember.

7 Q. On one occasion?

8 A. On one occasion.

9 MR. ZONEN: May I have those photographs,

10 Counsel? Oh, thank you.

11 Q. I'd like to show you a series of

12 photographs, if I may. These photographs are

13 numbered consecutively 783 through 789.

14 May I approach the witness, Your Honor?

15 THE COURT: Yes.

16 Q. BY MR. ZONEN: Let me begin with Photograph

17 No. 783. Could you take a look at that photograph?

18 A. Uh-huh.

19 Q. Do you recognize the content of that

20 photograph?

21 A. Yeah.

22 Q. And what is that of?

23 A. This is Mr. Jackson.

24 Q. Oh, you need to use the microphone. I don't

25 think anybody can hear you.

26 783, then, is what, please?

27 A. Mr. Jackson's bed.

28 Q. That's his bedroom? 5145

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1 A. His bedroom, yeah.

2 Q. Is that upstairs or downstairs?

3 A. Downstairs.

4 Q. Does this show the bed?

5 A. Yes.

6 Q. 784, please, what is that?

7 A. That's his bedroom.

8 Q. Upstairs or downstairs?

9 A. Downstairs.

10 Q. 785, what is that, please?

11 A. His bedroom.

12 Q. Upstairs or downstairs?

13 A. Downstairs.

14 Q. 786, what is that?

15 A. That's the Jacuzzi.

16 Q. I'm sorry?

17 A. The Jacuzzi.

18 Q. First floor?

19 A. In the bathroom.

20 Q. Okay. And can you see where the shower is

21 in that photograph?

22 A. I can just see the -- right here, the frame,

23 the door frame.

24 Q. If I were to give you a pen and ask you to

25 draw an arrow to where the shower goes, would you do

26 that?

27 A. Yeah. I mean, the --

28 Q. Yes, go ahead. 5146

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1 Okay. And for the record, an arrow has been  
2 drawn to the far right side of this exhibit,

3 No. 786.

4 No. 777, can you tell me what that is?

5 A. That's the bathroom.

6 Q. The shower?

7 A. The shower.

8 Q. On the first floor?

9 A. Yes.

10 Q. No. 788, what is that, please?

11 A. That's the shower, that's the security -- I

12 mean, the bedroom -- I mean, the closet.

13 Q. And that's the garden?

14 A. And that's the Jacuzzi.

15 Q. Okay. Now, we were looking at a few

16 different things that you -- we're going to go

17 through this when we present it.

18 But in this photograph, which is No. 788,

19 can you see both the Jacuzzi and the room that has

20 the shower in it?

21 A. Yes. Right across from each other.

22 Q. Okay. And then finally, 789, if you'd look

23 at that, please.

24 A. Yeah, this is the room upstairs.

25 Q. That's the bedroom upstairs?

26 A. The bedroom upstairs, yes.

27 Q. And that has a bed as well?

28 A. Yeah. 5147

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1 Q. The photographs that I've just asked you to  
2 look at, which are No. 783 through 789, do each of  
3 these photographs accurately depict the subject  
4 matter contained in the photograph, which means are  
5 they accurate? Are the photographs accurate of  
6 those rooms and those locations?

7 A. Yes.

8 Q. Okay. Now, are these accurate as of 1993?

9 A. Do you mean --

10 Q. As of the time that you were there, last  
11 there, is it how it looked around the time when you  
12 were there?

13 A. No.

14 Q. Okay. Tell me what's different.

15 A. Well, the T.V. -- like, the bed is the same  
16 thing. And the television is the same. It's just  
17 more stuff in it.

18 Q. Just more stuff in it?

19 A. Yeah.

20 Q. Okay. And the one that you're looking at,  
21 as you say that, is 783.

22 All right. And 784, does that appear the  
23 same as you last saw it?

24 A. No.

25 Q. What's different?

26 A. There's more stuff in it.

27 Q. More stuff?

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1 Q. But the furniture is in the same place?

2 A. Yes.

3 Q. 785?

4 A. Yeah. This wasn't here when I was there.

5 Q. I'm sorry?

6 A. It wasn't -- it wasn't like when I used to  
7 clean it.

8 Q. How was it different?

9 A. The paintings and this mannequin.

10 Q. All right. I'm going to withdraw this one.

11 I'm going to withdraw 785.

12 786. Take a look at 786.

13 A. Yeah, that's the same. I mean, that's the  
14 same, the same as far as the furniture, and even the  
15 towels and --

16 Q. Okay.

17 A. -- the toys.

18 Q. 787?

19 A. It's the same.

20 Q. Okay.

21 A. It's just crowded.

22 Q. 788?

23 A. Yeah, it's the same.

24 Q. And seven -- let me see that again. All  
25 right. This was 789 that I showed you and  
26 originally called it 787.

27 Back to 789. So this is the same?

28 A. Yes. 5149

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1 Q. All right. Here is the real 787, with the  
2 shower. Is that the same?

3 A. Yes.

4 Q. Okay. And then 787 is the same?

5 A. Yes.

6 MR. ZONEN: Okay. Your Honor, I'm going to  
7 move into evidence 783, 784, 786, 787 and 788 and  
8 789, and withdraw 785.

9 MR. MESEREAU: No objection.

10 THE COURT: They're admitted.

11 MR. ZONEN: May I publish these at this  
12 time?

13 THE COURT: Yes.

14 Q. BY MR. ZONEN: Mrs. Francia, this is a laser  
15 pen, and it sheds a laser beam. And you just go  
16 like that. Don't show it in anybody's eyes.  
17 The first one is 783. And would you tell us  
18 what that is, please?

19 A. 783, this?

20 Q. Yes, that room.

21 A. Mr. Jackson's bed and --

22 Q. Oh, we have a problem. Unfortunately,  
23 you're going to have to turn back to use the  
24 microphone. Take a look at it, and then turn back  
25 to use the microphone so we can hear you.

26 A. That's Mr. Jackson's bed, and television.

27 And that's the entrance, the stair that goes to the

28 stairs, three. And then you go around to the 5150

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1 bathroom.

2 Q. Okay. 784. And tell us what that is,

3 please.

4 A. That's the same. This will be the

5 television cabinet.

6 Q. And this is the first floor again; is that

7 right?

8 A. Yes.

9 Q. All right. Now, did you say that there was

10 some things that weren't there --

11 A. Yes.

12 Q. -- at the time that you last worked for Mr.

13 Jackson.

14 Show us what that is.

15 A. These pictures here.

16 Q. Those pictures right there. Anything else?

17 A. This horse.

18 Q. Okay. Now, Mr. Jackson did not have

19 children of his own at that time, did he?

20 A. No.

21 Q. Okay. 786, please.

22 Now, here's the one where I asked you to put

23 an arrow. Do you recognize the arrow where you put

24 it?

25 A. Yes.

26 Q. Show it.

27 A. Right there.

28 Q. What does that point to? 5151

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1 A. The shower.

2 Q. And where is the shower?

3 A. Right here. About right here.

4 Q. And you had told us earlier in your -- this

5 is the first-floor bathroom; is that right?

6 A. Yes.

7 Q. And you told us earlier in your testimony,

8 that you had to come closer to be able to see into

9 that room?

10 A. Yes.

11 Q. Can you show us in this picture where you

12 were standing at the time that you actually looked

13 into that room?

14 A. Probably about right here. So I can see in.

15 Q. All right. And then you said that there was

16 also a Jacuzzi outside?

17 A. It's a shower. Right there.

18 Q. A shower. So is that on the other side of

19 that wall, the back wall?

20 A. Yes.

21 Q. All right. Next picture, please.

22 And this, I think, is 787. And what is

23 that?

24 A. That's the shower.

25 Q. All right. Is that the same door that you

26 recall?

27 A. Yes.

28 Q. All right. And that's the shower that you 5152

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1 gave testimony to.

2 And the last one, please. Two more.

3 788. And this is 788. Is that the same

4 bathroom downstairs?

5 A. Yes.

6 Q. All right. Do you have a better view of the

7 room that has the shower?

8 A. Yes.

9 Q. Show us where that is, with the laser.

10 A. Right here.

11 Q. Okay. That's the toilet that you can see?

12 A. Yes.

13 Q. And on the other side of the toilet is the

14 shower?

15 A. Uh-huh. Right next to it.

16 Q. All right. Can you show us now where you

17 were standing? Can you put the laser on where your

18 feet were at the time you were standing?

19 A. Probably right here. Right here on this

20 corner.

21 Q. Okay. And then finally, 789.

22 And what is that, please?

23 A. That's his -- that's another room.

24 Q. That was the bed upstairs?

25 A. Uh-huh. Second floor.

26 Q. Now, Mr. Mesereau asked you about that bed.

27 Sometimes it is slept in and sometimes it is not.

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1 Q. During that period of time that Wade Robeson  
2 was coming and visiting, was that bed slept in a  
3 lot?

4 A. No.

5 Q. Was it slept in infrequently?

6 A. No, I always -- just only when a lot of kids  
7 were there.

8 Q. Okay. If it was just Wade Robeson, he  
9 didn't sleep in that bed?

10 A. No.

11 Q. How about Macaulay Culkin?

12 A. No.

13 Q. He didn't either?

14 A. No.

15 MR. ZONEN: Thank you.

16 I have no further questions, Your Honor.

17 And these exhibits are in evidence. Yes,  
18 they are. Thank you. No further questions.

19

20 RE-CROSS-EXAMINATION

21 BY MR. MESEREAU:

22 Q. Just very briefly.

23 When -- during the time you worked at

24 Neverland, Mr. Jackson would often have guests in  
25 his room, right?

26 A. Yes.

27 Q. And people would often hang out on his bed

28 and watch television, correct? 5154

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1 A. Yes.

2 Q. You would often serve them food, right?

3 A. Yes.

4 Q. And you would serve them drinks, right?

5 A. Yes.

6 Q. That went on at all hours of the day,

7 correct?

8 A. Yes.

9 MR. MESEREAU: No further questions.

10 THE COURT: All right. Thank you.

11 MR. ZONEN: And I have no further questions,

12 Your Honor.

13 THE COURT: All right. You may step down.

14 And we'll recess for the day. And there's

15 no court tomorrow. I'll see you Thursday morning.

16 (The proceedings adjourned at 2:30 p.m.)

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1 REPORTER'S CERTIFICATE

2

3

4 THE PEOPLE OF THE STATE )

5 OF CALIFORNIA, )

6 Plaintiff, )

7 -vs- ) No. 1133603

8 MICHAEL JOE JACKSON, )

9 Defendant. )

10

11

12 I, MICHELE MATTSON McNEIL, RPR, CRR,

13 CSR #3304, Official Court Reporter, do hereby

14 certify:

15 That the foregoing pages 4965 through 5155

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 April 5, 2005, and thereafter

20 reduced to typewriting by computer-aided

21 transcription under my direction.

22 DATED: Santa Maria, California,

23 April 5, 2005.

24

25

26

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

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