

6989

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

5

6

7 THE PEOPLE OF THE STATE OF)

8 CALIFORNIA,)

9 Plaintiff,)

10 -vs-) No. 1133603

11 MICHAEL JOE JACKSON,)

12 Defendant.)

13

14

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17 REPORTER'S TRANSCRIPT OF PROCEEDINGS

18

19 WEDNESDAY, APRIL 20, 2005

20

21 8:30 A.M.

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23 (PAGES 6989 THROUGH 7054)

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

28 BY: Official Court Reporter 6989

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1 I N D E X

2

3 Note: Mr. Sneddon is listed as "SN" on index.

4 Mr. Zonen is listed as "Z" on index. Mr. Auchincloss is listed as "A"
on index.

5 Mr. Mesereau is listed as "M" on index. Ms. Yu is listed as "Y" on
index.

6 Mr. Sanger is listed as "SA" on index. Mr. Oxman is listed as "O" on
index.

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8

9 PLAINTIFF'S WITNESSES DIRECT CROSS REDIRECT RECROSS

10

11 BARRON, Brian 6992-A 7025-SA

12

13

14

15 E X H I B I T S

16 FOR IN

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

18 300-335 Black notebook containing

19 Neverland Ranch logs 7004 7014

20

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23

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27

28 6991

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1 Santa Maria, California

2 Wednesday, April 20, 2005

3 8:30 a.m.

4

5 THE COURT: Good morning.

6 COUNSEL AT COUNSEL TABLE: (In unison)

7 Good morning, Your Honor.

8 THE COURT: You may proceed.

9 MR. AUCHINCLOSS: Thank you, Your Honor.

10 People will call as our next witness Brian

11 Barron.

12 THE COURT: When you get to the witness

13 stand, remain standing.

14 Face the clerk and raise your right hand.

15

16 BRIAN BARRON

17 Having been sworn, testified as follows:

18

19 THE WITNESS: I do.

20 THE CLERK: Please be seated. State and

21 spell your name for the record.

22 THE WITNESS: Brian Barron, B-a-r-r-o-n.

23 THE CLERK: Thank you.

24

25 DIRECT EXAMINATION

26 BY MR. AUCHINCLOSS:

27 Q. Good morning, Mr. Barron.

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28 A. Good morning. 6992

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1 Q. Who do you work for, please?

2 A. Currently I work for the City of Guadalupe
3 as a police officer.

4 Q. How long have you been a police officer?

5 A. About six and a half years.

6 Q. And for the City of Guadalupe that entire
7 time?

8 A. Correct.

9 Q. At some time in your past, were you an
10 employee of Neverland Ranch?

11 A. Yes.

12 Q. And what did you do for Neverland Ranch?

13 A. I was a security officer there.

14 Q. How long were you a security officer at
15 Neverland?

16 A. For about five, five and a half years.

17 Q. Was that continuous or sporadic?

18 A. It was sporadic. It was over three periods
19 of time.

20 Q. Can you characterize approximately what
21 those three periods were?

22 A. I started in the fall of 1997. Worked for
23 about a year. I was in the police academy at that
24 time. I then got hired by Guadalupe Police
25 Department. Left the ranch for about a year. And
26 then went back again about nine or ten months after
27 that, and was there for about three years, three and

28 a half years. 6993

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1 Q. And when did you ultimately leave your
2 employment at Neverland?

3 A. It was about April or May of last year.

4 Q. And whose decision was that to leave?

5 A. Mine.

6 Q. Tell me what your duties were as a security
7 officer at Neverland Ranch.

8 A. Our duties consisted of the ranch itself,
9 securing the ranch itself, the guests on the ranch,
10 the owner of the ranch, and anything that had to do
11 with the ranch as far as first aid, security.

12 Anything that we could do to help, we would do. But
13 mostly it was to secure the ranch, the owner, and
14 the guests that were there, the employees.

15 Q. Did you have set days and hours that you
16 worked?

17 A. Generally, yes. Hours, yes. At times the
18 days weren't always set, but hours, yes.

19 Q. So during your time working there, did you
20 always work days or nights? Or you tell me.

21 A. Generally I worked nights for the entire
22 time I was there.

23 Q. And tell me what a night shift would consist
24 of.

25 A. Night shift would consist of 6 p.m. to 6:30
26 a.m. And then we would do rotating shifts at the
27 front gate. And then we would do -- which would be

28 about four hours per person at the gate. And then 6994

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1 secure the ranch after you've done your -- before or
2 after you've done your gate time.

3 Q. So if you would, if you can, give me a
4 description of an evening of work at Neverland Ranch
5 from the time that you check in to the time that you
6 finish your evening's work and you go home. And I'm
7 interested in particularly where you go, where you
8 are on the ranch at various times.

9 A. Okay. If I were to get there at 6 p.m. and
10 were to take the first shift at the gate, I would be
11 at the gate from 6 p.m. till about 10:15. And that
12 would be checking in and out people who are coming
13 in and off the property, answering phones, doing
14 whatever was necessary there.

15 Q. So when you'd come to work, there's a gate
16 that is -- approximates the perimeter of the
17 property, is that --

18 A. Correct.

19 Q. Or is that inside the property?

20 A. No, that would be the guard house at the
21 front gate. So you'd come in the gate there and
22 there's a guard.

23 Q. Okay. There's a house there, a guard house?

24 A. Yeah.

25 Q. And when you'd come to work, would you just
26 check in at the gate and stay there, or would you go
27 to the main house first and go back to the gate?

28 A. Sorry. We'd go to the main house first, get 6995

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1 any pass-on information that was going to happen
2 that we needed to know that had happened on the
3 prior shift or the things that we needed to know
4 from the oncoming shift. That would be just
5 speaking with the officers who were there at the
6 house office. Security office.

7 Q. And where is that located?

8 A. If you can imagine the entire house
9 property, and if you were looking at it from the
10 front, it would be on the far left. Sorry, it would
11 be on the far left of the building. There's a main
12 house, a walkway, Mr. Jackson's office, video
13 library, and the security office.

14 Q. So the security office is contiguous to the
15 main house structure?

16 A. By way of a breezeway.

17 Q. Okay. And access to the security office, is
18 that an exterior door or an interior door?

19 A. It's an exterior door.

20 Q. Does it have any interior connection to
21 other parts of that structure?

22 A. No.

23 Q. When you go in the security office, how many
24 rooms are there?

25 A. There's two.

26 Q. And could you describe them for me?

27 A. First room would be -- had a desk in it.

28 Had a computer in it. So it technically had two 6996

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1 desks in it, one on each side of the wall. There
2 was a window that faced out towards the front
3 property, the front lawn area of the house. And
4 then as -- that would be basically the inside of
5 that room. There was also in that room a grease
6 board that we put pass-on information on, guest
7 information on. And then as you go into the next
8 room, it was basically a break room. There was
9 lockers, refrigerator, and a table to eat on.

10 Q. What was the computer used for in the first
11 room you mentioned?

12 A. Mostly what we used it for was generating
13 our forms that we use on a daily basis, accident
14 forms. It wasn't really used for much. We would
15 create, like, reports on that computer, security
16 reports, anything that had to do with us. If there
17 was a -- you know, we noticed damage to something on
18 the property, we would write it up on the computer
19 there. But that was mostly what that computer was
20 used for.

21 Q. All right. So moving back to our chronology
22 of a day in the life of a security guard. You check
23 with the main office. If you have gate duty, you go
24 out to the gate. What next?

25 A. If you don't have gate duty, then you would
26 start your regular patrols. First thing you would
27 do when you got on the property was make sure --

28 you know, we would know who was there, if we had 6997

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1 guests, if the owner was on the property. And we
2 would check all of the doors around the house first.
3 We'd do a check of the house area, make sure all the
4 doors were locked, everything was in order. If
5 buildings needed to be opened, that those buildings
6 were opened around the house area. And then we
7 would -- after completing that check, we would do a
8 similar check to the rest of the properties on the
9 residence, any other buildings on the residence.

10 Q. If you're on patrol, would you be doing
11 continuous checks?

12 A. Hourly checks.

13 Q. And what would you be doing between those
14 checks?

15 A. Stuff to keep busy. We did a lot of
16 training. The fire department, they're trained
17 regularly, and we would assist with that. We were
18 all basically part of the same group.

19 Q. How many security guards are on duty during
20 an evening shift?

21 A. When I was working there, it was between
22 three and four.

23 Q. How many on a day shift?

24 A. About the same.

25 Q. And as far as the next thing you'd do in
26 your evening's work, would you continue to do these
27 security checks throughout the evening?

28 A. That's correct. 6998

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1 Q. How many would you do in an evening?

2 A. If we did one an hour, 12. If we did more,
3 just -- it would depend on need.

4 Q. Okay. And where would a security check take
5 you on the property?

6 A. Everywhere.

7 Q. Would different officers check out different
8 areas?

9 A. No. We'd check all -- being there would

10 only be two of us at the house. If there was three
11 of us working, there would be one of us at the gate
12 and two of us at the house office. If there were
13 guests or anyone on the property that was in -- at
14 the house area, we would -- one of us would stay
15 there, and the other one would check all the doors
16 on the residence, all the buildings -- on the
17 property, excuse me, everything.

18 Q. As far as checking the doors of the main
19 residence, would you have -- did you have a key to
20 the main residence?

21 A. Yes.

22 Q. And what door did that open?

23 A. The back door.

24 Q. Okay. As far as -- did -- the main
25 residence has a punch card that can --

26 A. A key pad.

27 Q. -- that can give you access?

28 A. Like a telephone pad. 6999

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1 Q. Did you have the code to that key pad?

2 A. No.

3 Q. Did you have the code to the key pad that
4 gave access into Mr. Jackson's private suite?

5 A. No.

6 Q. Did any of the security guards, as far as
7 you know?

8 A. Not that I'm aware.

9 Q. When you'd work in the security guard booth
10 at the entrance to the property, tell me about what
11 your duties would be there.

12 A. Duties there were generally letting people
13 on and off the ranch. We had paperwork that would
14 allow us -- that we would know ahead of time who was
15 allowed to come on the ranch, whether that would be
16 guests, or it would be general deliveries,
17 contractors, things of that nature. We would know
18 who was coming and who was supposed to be there for
19 that day, so we would have those people come on and
20 off.

21 We also checked in all the employees and
22 checked out all the employees, times they were in,
23 times they were out. Every time they came or left
24 the property.

25 Answering phones was a large part of it.

26 The majority of the phone calls that came in,
27 especially in the evening time, they all came

28 basically through us.

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1 Q. When you were conducting your duties as a
2 security officer at Neverland, did you have occasion
3 to see the owner of the property?

4 A. Yes.

5 Q. And that would be Mr. Jackson?

6 A. Yes.

7 Q. Is he seated to my right, the man with the
8 black hair?

9 A. Yes.

10 Q. And how much would you see Mr. Jackson on
11 the property, assuming -- let me strike that
12 question.

13 How often would you see Mr. Jackson on the
14 property during those times when he was visiting
15 Neverland or staying at Neverland?

16 A. Daily. At least.

17 Q. Okay. And would you be able to see him --
18 would you see him interacting with guests when they
19 were on the property?

20 A. Occasionally.

21 Q. Would you ever talk to Mr. Jackson
22 personally?

23 A. Only if I needed to.

24 Q. Okay. And how often would you have contact
25 with him?

26 A. Not on a regular basis. Only if there was
27 something pressing that he needed to know or we

28 needed to ask him. We tried to let him have his

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1 privacy when he was there.

2 Q. You mentioned forms that are prepared on the
3 computer. Are there daily logs that are kept at
4 Neverland?

5 A. Yes.

6 Q. What are the daily logs?

7 A. The daily logs that we kept at the
8 gatehouse, where those logs were kept always, was
9 the employee entry list, the daily activity list,
10 which would include, like I said, anybody other than
11 employees coming on and off the property, which
12 would mean anything -- general contractors,
13 deliveries, anything like that, any guests that were
14 on the property.

15 Also our time checks for all of the -- we
16 would call in the start of a check of the ranch, a
17 security check, all the doors, and we would call in
18 anything that would happen that we would find out of
19 the ordinary and log that at the gate. And then the
20 end of that check also.

21 Q. Were these logs used during the entire I
22 believe four years that you said you worked there?

23 A. About five years. Yes.

24 Q. Five years you worked there?

25 A. They changed. At times they looked
26 different, but they were basically the same.

27 Q. What about accident reports? You mentioned

28 those. How are they prepared?

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1 A. In the same fashion. We would -- initially
2 we would let whoever was at the gate know that we
3 found something or something had happened, somebody
4 had wrecked one of the golf carts or fallen down,
5 whatever the case may be. We would let -- either
6 the gate would let us know, because they called the
7 gate, or we would let the gate know, because we were
8 notified at the house. And then we would prepare
9 that form after the conclusion of whatever was going
10 on.

11 Q. How often would you have to prepare accident
12 reports?

13 A. Not often. I didn't prepare very many. The
14 day shift usually prepared more, because more
15 things -- there's more people, more activity on the
16 ranch, more employees. More guest activity during
17 the daytime generally. But, you know, a couple
18 times a month.

19 Q. You mentioned they'd be prepared if a golf
20 cart was wrecked?

21 A. Uh-huh.

22 Q. Would that be a common occurrence?

23 A. It happened -- it seemed to happen a lot
24 more than it needed to, yeah.

25 Q. Why do you say that?

26 MR. SANGER: Objection, calls for
27 speculation, Your Honor.

28 THE COURT: Sustained.

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1 Q. BY MR. AUCHINCLOSS: Okay. Was there --
2 tell me, was there a difference in the attitude and
3 demeanor of employees when Mr. Jackson was on
4 property as opposed to when he was off?

5 A. Yes.

6 Q. How would you describe that?

7 A. Tense.

8 Q. Can you elaborate on that? Why would
9 employees be tense?

10 A. Well, they would have to get there earlier
11 usually. They'd have more work to do. He was --
12 he's very -- at least the way I feel, is he's
13 very -- like a perfectionist, everything has to be
14 right. His property, his prerogative to be that
15 way. But there was a lot more work to be done.
16 Everybody just seemed to be walking on pins and
17 needles a little bit more just to make sure things
18 were right.

19 MR. AUCHINCLOSS: Madam Clerk, do we have a
20 notebook with Exhibits 300, et seq.?

21 THE CLERK: Yes.

22 MR. AUCHINCLOSS: Thank you.

23 May I approach, Your Honor?

24 THE COURT: Yes.

25 Q. BY MR. AUCHINCLOSS: Mr. Barron, I show you
26 a black notebook that appears to have numerous
27 records in it. It is labeled as Exhibits 300

28 through 335. I'd like you to take a moment and look

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1 at that.

2 I don't really want you to look at every

3 exhibit, but --

4 A. That's all right.

5 Q. If you could just kind of thumb through it

6 quickly.

7 A. They look very familiar.

8 Q. All right. Have you looked at a notebook

9 like that?

10 A. Yes.

11 Q. And can you identify those records for me,

12 please?

13 A. Yes. They are the employee in-and-out logs,

14 the gate activity logs, and the daily entry access

15 logs.

16 Q. And are these the type of logs that you were

17 talking about when you said that you personally

18 would prepare records at Neverland?

19 A. They are the logs.

20 Q. Okay. Now, just to help us a little bit

21 with the various types of forms here, looking at

22 Exhibit No. 300, the first page, can you tell us

23 what that is, please?

24 A. That's an accident or damage report.

25 Q. All right. And is that the type of report

26 that would be prepared by a security officer in his

27 normal duties at Neverland Ranch?

28 A. Yes.

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1 Q. Did you yourself ever prepare these reports?

2 A. Yes.

3 Q. Does this look to be an authentic copy or an
4 authentic document as far as an accident damage
5 report?

6 A. Yes.

7 Q. Would these reports, the accident damage
8 reports, be prepared in the normal course of your
9 duties as a security officer at Neverland Ranch?

10 A. Yes.

11 Q. When would these reports be prepared in
12 relation to the accident that they are describing?

13 A. Generally right after, or very soon after
14 the -- whatever happened happened.

15 Q. And is the information -- does the person
16 who prepares these reports have a duty to accurately
17 describe what is in the report itself?

18 A. Yes.

19 Q. Moving on to Exhibit 301, it appears to
20 be -- it appears to be a daily log.

21 A. Uh-huh.

22 Q. Is that, in fact, what it is?

23 A. Yes.

24 Q. And tell me what type of daily log this is.

25 A. This would be the employee in-and-out entry
26 and exist list. So the time you were in and time
27 you were out, if you were there overnight. You

28 notice there's "CO" here, carry-over, you were

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1 carried over from the midnight hour to the next day.

2 Q. Okay. And there are numerous names on

3 there?

4 A. Yes.

5 Q. Are those the names of the employees at

6 Neverland?

7 A. Yes.

8 Q. And the written in information, in and out,

9 depicts the time that they checked in and the time

10 they checked out?

11 A. Correct.

12 Q. Again, this is a report that's prepared in

13 the ordinary course of your duties as a security

14 officer?

15 A. Yes.

16 Q. And does the security officer have a duty to

17 accurately record the information in this report?

18 A. Yes.

19 Q. And is it prepared at or near the time of

20 the entries that are made?

21 A. At the time.

22 Q. Okay. Now, there appears to be a -- turning

23 over page 301, on the back of it and on the next

24 page there appears to be a report entitled "Daily

25 Entry Access."

26 A. Correct.

27 Q. Tell me what that is.

28 A. That would be the entry and access of

1 anybody who normally would come on the ranch. Most
2 of these on the top part of it are deliveries, and
3 then those on the bottom would be the guests who are
4 on the ranch.

5 Q. Okay.

6 A. For that day.

7 Q. Again, the same question. Are those parts
8 of your duties as an officer at the ranch?

9 A. Yes.

10 Q. And are they prepared at or near the time of
11 the events recorded in that report?

12 A. At the time.

13 Q. And your duty is to prepare those reports
14 accurately?

15 A. Yes.

16 Q. Okay. Now, I'm also seeing -- looking at a
17 report now that is on the back page of Exhibit No.
18 302.

19 A. Uh-huh.

20 Q. It's entitled "Gate Activity Log." Tell me
21 what that is, please.

22 A. The gate activity log is, like I was
23 explaining earlier, when something happens or
24 there's some information that officers need to know
25 or anybody else who may need to know, we would write

26 it down on the gate activity log.
27 The top part of that paperwork is the
28 officer who was working the gate and the time that

1 they were there. And then the center part is,
2 again, that information that would be necessary for
3 officers to know or to pass along to other people
4 who are coming on and off the ranch, and that
5 information is written down at the time it's given
6 and then there's a time that it's given. If it
7 says, "CO," which again is carry-over, that would
8 mean that's something that needs to be on this list
9 for an extended period of time, so that we're aware
10 of it.

11 And then the bottom portion is the time we
12 start our checks of the ranch, and then the time we
13 finish the house checks, and then the exterior
14 patrols also.

15 Q. Okay. I hate to be redundant, but I have to
16 ask you the same questions. Is that prepared in the
17 ordinary course of your duties as a security officer
18 at the ranch?

19 A. Yes.

20 Q. Is it a document that is -- that your duty
21 is to accurately describe the gate activity at the
22 time that it is happening or contemporaneous with
23 the information that's in that log?

24 A. Yes.

25 Q. And you yourself have filled these logs out
26 and are familiar with how these are prepared?

27 A. Many of them, yes.

28 Q. All right. And I asked you previously if

1 you had reviewed a book similar to this. There's
2 one more page here that I think I'll ask you about.

3 Looking at 320, there is a security
4 clearance and guest information form.

5 A. Correct.

6 Q. Tell me what that is.

7 A. That would be given to the gate. For
8 instance, this one was given hopefully the day
9 before, so it's June 18th of '02, telling us that
10 the next day this gentleman would be coming onto the
11 property, that did he not need to sign a
12 confidentiality form, and then what he was going to
13 be doing or where he needed to go.

14 Q. Okay. So before you'd let somebody on the
15 ranch, would one of these have to be filled out if
16 they were not already a guest or employee?

17 A. Yes.

18 Q. And were you notified beforehand whether to
19 let a guest onto the property or not?

20 A. Yes.

21 Q. Would guests be allowed on the property if

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22 you did not have a form authorizing their admission?

23 A. No.

24 Q. Showing you Exhibit 333, there appears to be

25 an emergency medical report.

26 A. Uh-huh.

27 Q. What is that, please?

28 A. That would be if someone was injured, one of

1 the firefighters, who were for the most part all

2 EMTs, would complete one of these forms for the

3 ranch purposes to have record of whatever the

4 accident -- where they had been injured had

5 happened.

6 Q. Okay. And same questions there, duty to

7 accurately prepare that information?

8 A. Yes.

9 Q. You're familiar with how that information's

10 prepared?

11 A. Yes.

12 Q. You filled those out yourself?

13 A. I think maybe one I filled out for the EMT

14 that was working on the person, just handwriting for

15 them. I never did one of my own.

16 Q. These are prepared at or near the time of

17 the event that's recorded?

18 A. Yes.

19 Q. And there's a duty to accurately depict the

20 information on there?

21 A. Yes.

22 Q. And then I'm showing you lastly a Neverland
23 Valley Medical Report Log. Have you ever seen one
24 of those?

25 A. Yes.

26 Q. Tell me what that is.

27 A. That is a log of all the medical reports
28 that were done for the year. So all of them had

1 their incident report number, the date, who took it,
2 the time it was taken, the name of the person, what
3 was -- what happened, the injury, and then what type
4 of treatment they were given.

5 Q. Okay. The person filling that form out had
6 a duty to prepare it accurately?

7 A. Yes.

8 Q. Prepared at or near the time of the act,
9 condition or event that's depicted in the form?

10 A. Yes.

11 Q. And you're familiar with how those are
12 prepared?

13 A. Yes.

14 Q. Okay. And then I'm showing you -- I don't
15 think we've gone over one of these yet, have we?

16 A. Again, that's the same, it's just a
17 different looking form. It's the blanket routine

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18 form, the guest form, and then ranch -- again, a lot
19 of these forms changed. This is the same form as
20 one of the earlier forms that we looked at.

21 Q. This is a form in Exhibit 335. It's on the
22 back page of one -- well, on the second page, there
23 appears to be one. So this is a similar form as far
24 as guest activity?

25 A. It's the exact same, it's just written
26 different.

27 MR. SANGER: Excuse me, Your Honor. 335 has
28 a number of pages, as far as I can tell. What page

1 are we talking about?

2 MR. AUCHINCLOSS: I had said the second
3 page. Turn the page over and it's on the back side
4 of the first page.

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

6 I think the book that we were given may be out of
7 order in 335.

8 THE COURT: Yes, go ahead.

9 MR. SANGER: Thank you.

10 MR. AUCHINCLOSS: Do you have 335? It
11 should be the second page.

12 MR. SANGER: You have it on the back side.

13 MR. AUCHINCLOSS: We doubled it up.

14 MR. SANGER: All right. Thank you.

15 Q. BY MR. AUCHINCLOSS: So all the questions

16 I'd asked you before would apply to this one as

17 well --

18 A. Yes.

19 Q. -- that you've spoken about, guest activity

20 logs and such?

21 A. Yes.

22 Q. Okay. And I previously asked you if you had

23 a chance to review these records. Would your

24 testimony be the same concerning all of the records

25 that are contained in this notebook regarding the

26 accuracy of the information, the duty to prepare

27 accurate information? All these records were

28 prepared at or near the time of the events that were

1 recorded?

2 A. Yes.

3 Q. And you're familiar with their method and

4 mode of preparation?

5 A. Yes.

6 MR. AUCHINCLOSS: Your Honor, I'd ask that

7 Exhibits 300 through 335 be admitted at this time.

8 MR. SANGER: And I take it they're offered

9 as a business record.

10 MR. AUCHINCLOSS: They are.

11 MR. SANGER: I have no objection to that

12 foundation.

13 THE COURT: All right. They're admitted as

14 business records.

15 MR. AUCHINCLOSS: Thank you.

16 Q. Mr. Barron, you said when you were doing
17 your daily duties, conducting your daily duties as a
18 security guard, you'd have occasion to see Mr.
19 Jackson on the property?

20 A. Yes.

21 Q. Would you have occasion to see him
22 interacting with his guests?

23 A. Occasionally, yes.

24 Q. Would you have occasion to see guests when
25 they weren't interacting with Mr. Jackson on the
26 property?

27 A. Yes.

28 Q. Do you know an individual by the name of

1 Frank Tyson or Cascio?

2 A. Yes.

3 Q. Who is Frank Tyson or Cascio?

4 A. From what I originally knew, he was a friend
5 of the family -- of Mr. Jackson's family, or a
6 friend of Mr. Jackson. His family, his parents and
7 brothers and sister were friends. At some point I
8 believe he became an employee of Mr. Jackson. What
9 his exact duties were I don't really know. But he
10 was -- at some point, he became an employee.

11 Q. And do you have a time frame for when he was

12 an employee, approximate?

13 A. I would say probably around -- maybe around
14 the year 2000, right around in there.

15 Q. Okay.

16 A. And whether he still is or is not, I don't
17 know, but --

18 Q. Did Frank Cascio ever live at Neverland?

19 A. He stayed there a lot. Whether he lived
20 there or not, as far as his primary residence, I
21 don't know. But he was there quite often.

22 Q. Would he stay there longer than a month?

23 A. Yeah. At times I think he would, yes.

24 Q. Did you have occasion to observe his
25 relationship with Mr. Jackson?

26 A. Not on a real personal level, between the
27 two of them, no.

28 Q. Did you see them together?

1 A. Yes.

2 Q. Would Mr. Cascio ever spend time in Mr.
3 Jackson's bedroom?

4 A. I have no idea.

5 MR. SANGER: Objection; calls for
6 speculation, Your Honor.

7 MR. AUCHINCLOSS: I'll withdraw that
8 question. And you can strike the answer, that's
9 fine.

10 MR. SANGER: So moved.

11 THE COURT: All right. So granted.

12 Q. BY MR. AUCHINCLOSS: Do you feel that you
13 could -- you have sufficient information to describe
14 their relationship?

15 A. Yes.

16 Q. And how would you describe their
17 relationship?

18 A. I would describe it --

19 MR. SANGER: I would object as no
20 foundation. I believe he said he didn't observe
21 their relationship.

22 THE COURT: Sustained.

23 Q. BY MR. AUCHINCLOSS: When you said you
24 observed them together, where would you observe
25 them?

26 A. Generally on the ranch, in the movie
27 theater. I'd seen them riding the quads on the
28 ranch before. Just doing general activities. In

1 the park, I'd seen them in the park before, the
2 theme park.

3 Q. How many times do you think you'd seen them
4 before, approximately, if you can estimate?

5 MR. SANGER: I'm going to object as vague as
6 to time.

7 Q. BY MR. AUCHINCLOSS: During the entire

8 period of time that you were a security guard.

9 A. Maybe 75 to 100 times. I mean, in passing I
10 would see them together.

11 Q. And did you -- how many times -- if you
12 could estimate, how many nights during that period
13 of time, five-year period of time, did Frank Cascio
14 spend at Neverland?

15 A. Oh --

16 MR. SANGER: Well, I'm going to object as

17 lack of foundation.

18 THE COURT: Sustained.

19 Q. BY MR. AUCHINCLOSS: You said that you were
20 familiar with the logs in terms of who was staying
21 on the property?

22 A. Yes.

23 Q. Was that part of your daily duties?

24 A. Yes.

25 Q. When Frank Cascio visited the property,
26 would he be noted in that log as a visitor spending
27 the night?

28 A. Yes.

1 Q. On how many occasions, could you estimate,
2 did Frank Cascio spend the night during that
3 five-year period?

4 MR. SANGER: I'm going to object as lack of
5 foundation.

6 THE COURT: Overruled.

7 You may answer.

8 THE WITNESS: Hundreds.

9 Q. BY MR. AUCHINCLOSS: Who is Vinnie? Do you
10 know an individual -- let me start with that. Do
11 you know an individual who visited Neverland named
12 Vinnie?

13 A. Yes.

14 Q. Who was Vinnie?

15 A. As far as I know, Vinnie was a friend of
16 Frank.

17 Q. And do you know the period of time when
18 Vinnie visited Neverland?

19 A. No, not offhand I don't.

20 Q. Do you know approximately -- did Vinnie
21 spend the night at Neverland?

22 A. Yes, I do know that he spent the night
23 occasionally at Neverland Ranch.

24 Q. Do you know how many nights he spent?

25 A. No.

26 Q. Do you know an individual by the name of
27 Marc Schaffel?

28 A. Yes.

1 Q. How do you know Mr. Schaffel?

2 A. Just from his coming to the ranch.

3 Q. Do you know how often he would visit the

4 ranch?

5 MR. SANGER: Vague as to time.

6 Q. BY MR. AUCHINCLOSS: During the period of

7 time that you were a security guard.

8 A. Not very often, but he would come probably

9 three or four times a year maybe.

10 Q. Do you know an individual by the name of

11 Ronald Konitzer?

12 A. I know the name.

13 Q. Okay. Did you ever meet him?

14 A. Not that I'm aware of.

15 Q. How about Dieter Weizner?

16 A. Yes.

17 Q. Did you meet Mr. Weizner?

18 A. Yes.

19 Q. Where did you meet him?

20 A. At the ranch.

21 Q. And if you can characterize, again I'm

22 asking for your best estimation, if you can provide

23 it, how many times did Mr. -- did Dieter visit the

24 ranch?

25 A. Several times. He was there -- he would

26 stay sometimes for a couple of days, and then he'd

27 be gone for a while and come back. It wasn't a

28 regular thing that he was there. For a short period

1 of time it was, maybe two or three months I believe

2 he was there on a somewhat regular basis, but
3 generally it was off and on.

4 Q. Can you characterize the period of time that
5 you observed Dieter on the ranch in terms of the
6 five years you were there?

7 A. It would have been --

8 Q. Beginning time to when you left.

9 A. Probably sometime in 2002 to 2003.

10 Q. Okay. Now, did you have occasion to see
11 children visit the ranch?

12 A. Yes.

13 Q. How were children treated at the ranch?

14 A. Well.

15 Q. What do you mean by that?

16 A. It was a fun place to go. They got to do
17 pretty much whatever they wanted, for the most part.

18 Not all of them. But they were treated quite well.

19 Q. Are you familiar with some visitors to the
20 ranch who were local residents of Los Olivos?

21 A. Yes.

22 Q. Do you know their names?

23 A. Um, I can't remember right now.

24 Q. How many were there?

25 A. Three.

26 Q. Were they boys or girls?

27 A. Boys.

28 Q. What ages?

1 A. Teenage.

2 Q. Were any of them related?

3 A. Two of them were.

4 Q. And how often would they visit the ranch?

5 A. For a short period of time quite regularly.

6 MR. SANGER: Do you have numbers on those?

7 MR. AUCHINCLOSS: 45, 46, and 47.

8 Q. Mr. Barron, I show you People's 45. Does

9 that look -- can you recognize that?

10 A. Yes, I recognize that.

11 Q. And who would that be?

12 A. His name -- their names are completely --

13 Q. Is that one of the people you're talking

14 about?

15 A. Yes.

16 Q. How about 46?

17 A. Yes.

18 Q. Is that one of the boys you're talking

19 about?

20 A. Yes.

21 Q. 47?

22 A. Yes.

23 Q. Okay. Did you have occasion to see how

24 those young men conduct themselves at the Neverland

25 property?

26 A. Yes.

27 Q. How would you describe their conduct?

28 A. Destructive.

1 Q. And why do you say that?

2 A. Whenever they were there, we had broken
3 carts. Damaged carts. They at some point egged --
4 threw eggs at my security chief's car, inside,
5 outside, we're talking dozens of eggs. There just
6 always seemed to be something broken or some problem
7 when they were there.

8 Q. Do you know if they ever got in trouble for
9 this type of conduct?

10 MR. SANGER: Objection; lack of foundation.

11 THE COURT: Sustained.

12 Q. BY MR. AUCHINCLOSS: You mentioned a grease
13 board at the security office.

14 A. Yes.

15 Q. And what specifically was that grease board
16 used for?

17 A. Specifically it was for guest information,
18 names of people who were in which guest unit or
19 where they were staying on the ranch. And then a
20 pass-on board, just write notes on the board for the
21 oncoming shift or something that happened, just so
22 that it was remembered. Anything that we needed to
23 remember on a daily basis could have been put up on
24 that board.

25 Q. Who was your supervisor?

26 A. I had -- Violet Silva was the security
27 chief, and then Curtis Gordon was a supervisor and
28 Julio Magana was a supervisor.

1 Q. Did you have any supervisory capacity as
2 security guard?

3 A. Yeah, I had a shift supervisor. Curtis and
4 Julio would work generally day shift. And then when
5 I was there in the evening, I would be the shift
6 supervisor. They were supervisors to me, but I
7 would be in charge of the shift at night.

8 Q. Okay. At some point -- and let me just
9 make -- be clear. What do you mean when you say
10 "grease board"?

11 A. A white -- a white board that you use the
12 wipeable ink markers on.

13 Q. Okay. So like a chalkboard or similar but
14 you can --

15 A. Similar, yes.

16 Q. -- but you can wipe the ink off?

17 A. Yes.

18 Q. At some point during your employment at
19 Neverland, did you see a directive on that board
20 concerning Gavin Arvizo?

21 A. Yes.

22 Q. Do you know who Gavin Arvizo is?

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23 A. Yes.

24 Q. First of all, tell us how you know Gavin

25 Arvizo.

26 A. Because he was a guest at the ranch.

27 Q. Okay. So you knew him by sight?

28 A. Yes.

1 Q. And tell us what that directive was.

2 A. It simply stated, "Gavin is not allowed off

3 property."

4 Q. Can you tell me the approximate time that --

5 your best recollection as to when that -- when that

6 directive appeared on the grease board?

7 A. It was early part of 2003, January,

8 February.

9 Q. Do you know the exact date?

10 A. No.

11 Q. Do you know how long it was on the grease

12 board?

13 A. I remember it being approximately a week.

14 Q. Okay. If Gavin Arvizo appeared at the front

15 gate during this period of -- well, let me back up,

16 first of all. What did that directive mean to you

17 in terms of a security officer?

18 A. That we weren't to allow him off property

19 without some sort of permission from a supervisor.

20 Q. Okay.

21 A. That would be -- I would check first.

22 Q. Okay. So if Gavin Arvizo appeared at the
23 gate, walking out of the ranch, would you let him
24 pass?

25 A. No.

26 Q. If Gavin Arvizo appeared at the gate being
27 driven out by Jesus Salas, would you let him pass?

28 A. I would check first with the ranch manager.

1 Q. So would you say you wouldn't let him pass
2 before getting authorization?

3 A. No.

4 MR. SANGER: Well -- I'll withdraw it.

5 THE COURT: All right.

6 MR. AUCHINCLOSS: Thank you. I have no
7 further questions.

8

9 CROSS-EXAMINATION

10 BY MR. SANGER:

11 Q. Mr. Barron, how are you?

12 A. Good.

13 Q. You're a sworn peace officer; is that
14 correct?

15 A. That is correct.

16 Q. And you went to the Allan Hancock Police
17 Academy?

18 A. Yes.

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19 Q. And you have been a police officer, an
20 active duty police officer with the Guadalupe Police
21 Department for how long?

22 A. Six and a half years.

23 Q. And during the entire time that -- I'm
24 sorry, during the entire past six and a half years
25 consecutively, you have been a police officer,
26 correct?

27 A. That's correct.

28 Q. So at no time during the last six and a half
1 years have you not been a sworn peace officer?

2 A. Correct.

3 Q. You worked at Neverland while you were going
4 to the academy, correct?

5 A. That's correct.

6 Q. And then after you finished the academy, you
7 got a job with Guadalupe as a sworn peace officer,
8 correct?

9 A. Correct.

10 Q. And when was that?

11 A. The day I started with Guadalupe?

12 Q. Sure.

13 A. September 28th of 1998.

14 Q. Okay. So since September of 1998 to the
15 present, you've been a sworn peace officer?

16 A. Correct.

17 Q. And sometimes you worked at Neverland Ranch
18 as a security person as well; is that correct?

19 A. Correct.

20 Q. So you were moonlighting, as it were?

21 A. Yes.

22 Q. And at some point you were aware that there
23 was a raid on Neverland; is that correct?

24 A. Yes.

25 Q. Were you there that day?

26 A. No.

27 Q. After you learned there was a raid at
28 Neverland, did you have a discussion with your chief

1 of police at Guadalupe?

2 A. Yes.

3 Q. As a result of that discussion with the
4 chief of police, did you determine that you should
5 resign your position as a security guard?

6 A. Yes. It was more like step away from it for
7 a while.

8 Q. Okay. In other words, between you and your
9 chief, you decided there's an ongoing criminal
10 investigation, as a peace officer, you probably
11 should not also be working at the ranch; is that
12 correct?

13 A. At that time that's what I decided, yes.

14 Q. And when was that, approximately? Was that

15 right after the raid?

16 A. I was on vacation at that time, at the time
17 of the search warrant. And then so shortly after I
18 came home from vacation.

19 Q. All right. So sometime maybe end of
20 November?

21 A. What day was the raid?

22 Q. November 18th, 2003.

23 A. Yeah. Correct. I think I came home from
24 vacation the last couple days of November, so
25 shortly after that. Maybe the first week of
26 December.

27 Q. All right. And you did not cease your
28 employment -- I was going to say quit, but you

1 actually stepped away for a while, you took a leave?

2 A. Yes.

3 Q. You did not do that because you had seen
4 anything unlawful at the ranch; is that correct?

5 A. That's correct.

6 Q. And in fact, had you seen anything unlawful
7 at the ranch from 1998 to the time that you stepped
8 away from the job, you would have been duty-bound to
9 report that, correct?

10 A. Absolutely.

11 Q. And in fact, as a sworn peace officer, you
12 probably -- if you saw a criminal activity, you

13 probably would have been duty-bound to either
14 investigate or even make an arrest; is that correct?

15 A. Yes. To a point.

16 Q. Okay. At the very least report it?

17 A. Correct.

18 Q. All right. And you had no -- you found no
19 need whatsoever to do that the entire time that you
20 were there; is that correct?

21 A. That's correct.

22 Q. The people at Neverland Ranch that you
23 worked with were made aware that you were a police
24 officer; is that correct?

25 A. They all knew.

26 Q. All right. There was no secret?

27 A. No secret.

28 Q. And you were given access to every part of

1 the ranch that any other security officer was given
2 access to; is that correct?

3 A. That's correct.

4 Q. You reported, you said, to Mr. Magana and
5 Mr. Gordon?

6 A. Correct.

7 Q. And then Violet Silva was the chief of
8 security at the time; is that correct?

9 A. Correct.

10 Q. Did you have a good relationship with Violet

11 Silva?

12 A. Very good.

13 Q. And was she a professional chief of

14 security?

15 A. Yes.

16 Q. All right. Now, I know that a lot of times

17 law enforcement might look at security guards as --

18 somewhat cynically, is that true?

19 A. Absolutely.

20 Q. Did you feel that this security department

21 was run in a professional fashion?

22 A. Yes.

23 Q. To a certain extent, the security department

24 included the use of various police procedures; is

25 that correct?

26 A. To a small extent, yes.

27 Q. General radio etiquette, for instance?

28 A. Yes.

1 Q. Making sure that you logged things in

2 appropriately?

3 A. Correct.

4 Q. Did Violet Silva, for instance -- let's take

5 her. Did Violet Silva insist that the people under

6 her command, as it were, keep accurate records?

7 A. Yes.

8 Q. All right. Did Violet Silva insist that the

9 people under her make sure that the various places
10 on the ranch were secure?

11 A. Yes.

12 Q. And there was a regular detail, or a
13 regular -- let me withdraw that. There was a
14 regular procedure to go through and check the
15 various locations during the evening and the night
16 to make sure that the ranch was secure; is that
17 correct?

18 A. That's correct.

19 Q. Now, during the time you were there, was
20 there a risk that intruders would get onto the
21 ranch?

22 A. Absolutely.

23 Q. Did any intruders get onto the ranch during
24 the time that you were there?

25 A. Yes.

26 Q. Were there ever occasions that you were
27 aware of that intruders actually got to the house?

28 A. Yes.

1 Q. Did any intruders actually get into the
2 house?

3 A. Yes.

4 Q. Were law enforcement officers called
5 eventually to deal with those intruders?

6 A. Yes.

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7 Q. In fact, that was the protocol, if you found
8 somebody trespassing, to call for law enforcement?

9 A. Correct.

10 Q. Now, I understand you were law enforcement,
11 but you would call the sheriff's department at that
12 point, correct?

13 A. Yes.

14 Q. And I may be going a little fast and then
15 you're kind of stepping on the end of my questions,
16 and I may be asking too quickly. It makes it hard
17 for the court reporter.

18 A. I apologize.

19 Q. That's all right. I apologize. We'll just
20 slow down a little bit, both of us.

21 All right. Now, you explained the situation
22 out there and I just want to go over it in a little
23 more detail. There are basically two main security
24 posts, stationary posts at the ranch; is that right?

25 A. That's right.

26 Q. There's the gate, which is the little house
27 right by the big front gates, correct?

28 A. Correct.

1 Q. Now, at that little house, and the big front
2 gates, there's -- or in the -- in the little house
3 there's a computer and a desk; is that correct?

4 A. That's correct.

5 Q. Telephone?

6 A. Yes.

7 Q. Is the phone often answered by -- at that
8 phone?

9 A. Yeah. A lot.

10 Q. All right. So people calling into the
11 ranch, particularly at night, the phone will ring
12 there, and the security guard at that phone will
13 answer it; is that correct?

14 A. That's correct.

15 Q. All right. And then the phone -- the phone
16 can be -- or the call can be forwarded from that
17 phone to other phones?

18 A. Any -- basically any phone on the ranch.

19 Q. And the phone that's at the gate is a
20 regular telephone within that -- let me back up.
21 There's a system and the phones are pretty --

22 A. It's a multiline phone.

23 Q. They're pretty much identical phones
24 throughout the ranch?

25 A. Yes. I believe they're all the same.

26 Q. So this is -- this is not a big phone with a
27 lot of buttons on it. It's a smaller phone; is that
28 correct?

1 A. That's correct.

2 Q. So you get an incoming call and then you

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3 would forward it by using a code to forward it; is
4 that correct?

5 A. Transfer it to whatever extension it needed
6 to go to.

7 Q. All right. The gates at the guard house
8 there are big iron gates, is that correct, the front
9 gate?

10 A. Well, maybe on the inside. They're wood.

11 Q. Or wood gates. I'm sorry, I think you are
12 right. They're big wooden gates, in any event?

13 A. Yes.

14 Q. And they're anchored by, I think, stone
15 walls on either side; is that correct?

16 A. Yes.

17 Q. If you stand at the gates looking out to
18 Figueroa Mountain Road, to the road there, and you
19 were to go to the left of the guard house --

20 A. Okay.

21 Q. -- as you're looking out to the left of the
22 guard house, how far does the stone work extend,
23 roughly?

24 A. Maybe 20, 25 feet. 30 feet maybe at the
25 max.

26 Q. Okay. And after that 30 feet, what kind of
27 fencing protection do you have?

28 A. Very little. Two-plank ranch fencing.

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1 It's nice. It looks like -- but it's maybe about

2 four feet tall.

3 Q. And two rails?

4 A. Two rails and then posts however many feet.

5 Q. And there's no wire on that or anything

6 else, correct?

7 A. No.

8 Q. So people can pretty much hop over that if

9 they want to?

10 A. Yes.

11 Q. All right. As you go around the rest of the

12 ranch there's -- as you get farther away from the

13 gate, at some point there's some fencing,

14 cattle-type fencing; is that correct?

15 A. Cattle, barbed wire fencing.

16 Q. All right. Now, you mention that there was

17 another location which was up by the house, I think,

18 for -- another stationary location for the guards;

19 is that correct?

20 A. The house security office, correct.

21 Q. And that's not in the house itself?

22 A. No.

23 Q. It's at the end of the building that's

24 adjacent to the house; is that correct?

25 A. Correct.

26 Q. And in there, you have a -- an initial room

27 that includes a desk and the computer and so on; is

28 that correct?

1 A. That's correct.

2 Q. And there's a rack of battery chargers for
3 the portable radios?

4 A. It may be in that room, now. It was in the
5 other room before when I was there.

6 Q. Okay. In any event, there's the initial
7 room that you walk into, and then behind it is sort
8 of a break room; is that correct?

9 A. Correct.

10 Q. It's got a few lockers; is that right?

11 A. That's right.

12 Q. The break table and some chairs, right?

13 A. Yes.

14 Q. Is that where that board is that you were
15 telling us about?

16 A. No. It was in the first room.

17 Q. In the first room. All right.

18 Now, let me ask you something: The gate
19 logs that you told us about that are among the
20 documents that you authenticated from Exhibit 300 to
21 335 -- I realize there's some other documents that
22 aren't gate logs in there --

23 A. Yes.

24 Q. -- but the gate logs that are in those
25 documents, those gate logs are used to communicate

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26 information to the various guards who are on duty or
27 who come on duty; is that correct?

28 A. Yes.

1 Q. All right. Now, I realize -- or let me ask
2 you this: You had previously told law enforcement
3 that you believed that this -- what you called or
4 what Mr. Auchincloss called a directive, that this
5 note about Gavin Arvizo was on the grease board?

6 A. Yes.

7 Q. And are you aware that none of the other
8 officers recall seeing it on the grease board?

9 MR. AUCHINCLOSS: Objection. That assumes
10 facts not in evidence.

11 THE COURT: Sustained.

12 Q. BY MR. SANGER: Are you aware of any other
13 officer who claims to have seen that on the grease
14 board?

15 A. Yes.

16 Q. Okay. Is it possible that this particular
17 notation was, in fact, on a gate log instead of the
18 grease board?

19 A. I'm sure it was on a gate log.

20 Q. Okay. And in fact, it's on the gate log for
21 February the 19th; is that right?

22 A. I don't know the date that it's on there.

23 Q. You remember seeing it on the gate log; is

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24 that correct?

25 A. No.

26 Q. Okay. You said it was on the gate log?

27 A. I now know that it was on the gate log.

28 Q. Okay. All right. Do you have the book up

1 there, the --

2 MR. AUCHINCLOSS: It's right here.

3 MR. SANGER: This is the official book. All

4 right.

5 Q. Now, you say you're aware it's on the gate

6 log. Did somebody show it to you?

7 A. I was told.

8 Q. By the prosecution?

9 A. Yes.

10 Q. Okay. And who told you that?

11 A. The District Attorney.

12 Q. Which one?

13 A. Auchincloss.

14 Q. Mr. Auchincloss.

15 A. Thank you. Sorry.

16 MR. SANGER: Okay. Your Honor, what I'd

17 like to do, I'm going to take this page out of the

18 book, the entire book has been admitted, and there

19 are exhibit tabs, official court exhibit tabs on the

20 first page of each exhibit. So I am taking a page

21 out of 334. And at the bottom, this page says "MJ

22 00154." And I'd ask permission to put this up on
23 the screen, if I may.

24 THE COURT: You may.

25 MR. SANGER: Thank you.

26 Q. I'll back up, first of all. I'll represent
27 to you I just took that -- as I said to the Court, I
28 took that out of the book here. That's one of the

1 various pages. Does that appear to be a gate

2 activity log?

3 A. Yes.

4 Q. And there's a number up on the top which
5 we'll focus in on a little more. It says 2-19-03.

6 It's a little fuzzy there, but --

7 A. Correct.

8 Q. And the purpose of this gate activity log
9 would be to record pretty much contemporaneously
10 activities that occurred during the security shift;
11 is that true?

12 A. That's correct.

13 Q. And it's also for the purpose of recording
14 information that should be communicated to other
15 officers on other shifts; is that correct?

16 A. Yes.

17 Q. All right. Now, I'm going to, with any
18 luck, focus in so we can read it, but we'll see
19 about that.

20 Okay. Do you see there, it says -- three
21 lines up from the bottom, on the middle of the page,
22 it says 1752.

23 A. Yes.

24 Q. What does 1752 represent?

25 A. 5:52 p.m.

26 Q. Military time. So it's 5:52 in the
27 afternoon, correct?

28 A. Correct.

1 Q. That would be the time that somebody
2 recorded the information on that, on that line
3 adjacent to it; is that correct?

4 A. Correct.

5 Q. And the line adjacent to it says, "The kids
6 are not to leave per Joe." "Kids" meaning like
7 Gavin, Star, et cetera, correct?

8 A. Correct.

9 Q. All right. Were you aware that that
10 particular evening was the evening that these
11 children were to go down to Los Angeles?

12 MR. AUCHINCLOSS: Objection; assumes facts.

13 MR. SANGER: That's --

14 THE COURT: Foundation; sustained.

15 MR. SANGER: Well, I asked if he was aware.

16 Should I rephrase it? Let me do it this way, Your

17 Honor. I won't make that request.

18 THE COURT: The foundation's a little
19 different, too. Go ahead and rephrase it.
20 Q. BY MR. SANGER: All right. Let's do it this
21 way: A couple of questions. Just in general, if
22 children are on the ranch, are guests at the ranch
23 and they're staying there and there's not a parent
24 present, would it be the policy of the ranch not to
25 allow those children to go off of the ranch property
26 without supervision?

27 A. Correct.

28 MR. AUCHINCLOSS: I'll object as vague as to

1 "children."

2 THE COURT: Overruled.

3 You may answer.

4 THE WITNESS: Yes, we would not let them go
5 off the property by themselves.

6 Q. BY MR. SANGER: So at this time do you know
7 whether or not there was a parent at the ranch with
8 Gavin, Star -- well, it was "Gavin, Star, et
9 cetera." So we'll say with Gavin and Star.

10 A. I don't know for sure. I don't believe
11 there was.

12 Q. All right. So that would be a reasonable
13 instruction for security in general, correct?

14 MR. AUCHINCLOSS: Objection. Argumentative;
15 calls for a conclusion.

16 THE COURT: Sustained on argumentative.

17 Q. BY MR. SANGER: It would not be out of the
18 ordinary, then, to not let children such as Gavin
19 and Star leave the ranch without approval or without
20 supervision, correct?

21 A. Correct.

22 Q. And based on your experience, if children or
23 any guests were scheduled to leave as a group, would
24 it be appropriate for security to be alerted so that
25 the people would be there to leave in the vehicle
26 that was assigned to take them? Does that make
27 sense? It was a long question.

28 A. Would it be appropriate to have security

1 notified --

2 Q. Yeah.

3 A. -- if they were going to be leaving?

4 Q. Yes.

5 A. It would have been appropriate. It didn't

6 happen very often, but --

7 Q. So if there was a bus or a limousine that
8 was going to leave and certain kids were going to be
9 on it, that's something that security could well be
10 advised of, correct?

11 A. Should well be advised of. We weren't

12 always advised.

13 Q. Weren't always advised. But if you were

14 advised, you'd feel that was appropriate, right?

15 A. Yes.

16 Q. Okay. I'm going to put that page back where

17 I found it. Close the book so I don't mix things

18 up, and we'll come back to it in a moment.

19 All right. Now let's work backwards just a

20 little bit here. You were asked about Frank Cascio,

21 correct?

22 A. Correct.

23 Q. And was he also known by another name?

24 A. Frank Tyson.

25 Q. Frank Tyson. Okay. Frank?

26 A. Frank.

27 Q. As far as Frank Cascio, Frank Tyson was

28 concerned, was he there -- you said he stayed over,

1 as far as you could tell, quite a number of times,

2 right?

3 A. Right.

4 Q. And the District Attorney asked you if this

5 was logged in the logs when he might be staying

6 over.

7 A. Correct.

8 Q. Did you go back and look at the logs and add

9 up the times?

10 A. No.

11 Q. All right. So you're really not answering

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12 that question based on reviewing the logs; is that
13 right?

14 A. I reviewed the logs, but did not write down
15 or memorize how many times he'd been there.

16 Q. All right. So your general impression was
17 that he stayed overnight quite a number of times,
18 correct?

19 A. Yes.

20 Q. And did Frank Cascio have any other family
21 members who you were aware of?

22 A. Yes.

23 Q. And did they often stay over?

24 A. Yes.

25 Q. Did his father come out and visit from time
26 to time?

27 A. Yes.

28 Q. Did his brother and sister visit from time
1 to time?

2 A. Yes.

3 Q. Any other family members you can recall?

4 A. His mother had been there.

5 Q. Okay.

6 A. I think he had two brothers.

7 Q. All right.

8 A. I believe.

9 Q. Very good. So his brothers, his sister, and

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10 both of his parents would stay over from time to
11 time; is that correct?

12 A. Yes.

13 Q. All right. Now, were there times during
14 your -- your span there, when Frank Cascio or his
15 family might be there, and then there would be a
16 period of time where he wouldn't be around and he or
17 his family would come back at some later time?

18 A. Meaning that --

19 Q. That was a bad question.

20 A. I'm sorry, I don't understand the question.

21 Q. Fair enough. Just tell me.

22 In other words, you say he was there -- from
23 the time that you were employed to the time that you
24 left the ranch, you said he was there many times,
25 maybe you saw him 75 to 100 times with Michael
26 Jackson, he stayed over many times, right?

27 A. Yes.

28 Q. Was this continuously or were there periods

1 of time where the Cascios might be visiting, and
2 then months might go by before they'd come back?

3 A. Yes, that's correct.

4 Q. And did -- you were yourself gone for
5 periods of time; is that correct?

6 A. Yes.

7 Q. You next had somebody named Vinnie. Did you

8 know his last name?

9 A. No, I don't know it.

10 Q. You said, well, he spent the night

11 occasionally, I think. Do you know when that was?

12 A. The actual dates of when? Or --

13 Q. If you know them.

14 A. No, I don't know the actual dates of when.

15 Q. In general, when did you see Vinnie?

16 A. Generally I saw Vinnie when Frank was there.

17 Q. And when did you start seeing Vinnie?

18 A. Probably in 2002, right around there. I

19 don't know the exact time frame.

20 Q. Maybe late 2002?

21 A. Could have been, yes.

22 Q. All right. So you didn't really see him the

23 entire time that you were working there?

24 A. No.

25 Q. He was a more recent visitor?

26 A. Yes.

27 Q. Same with Marc Schaffel. You said he was

28 not there -- or he did not spend the night very

1 often. You recall seeing him every once in a while?

2 A. Every once in a while. Granted I worked

3 two, three days a week, so I wasn't there all during

4 the week.

5 Q. I understand.

6 A. But occasionally he was there, yes.

7 Q. And was he there continuously during a
8 period of time or off and on, or two different
9 distinct periods of time?

10 A. I remember him being there just off and on,
11 odd times. He would just come out and -- he may
12 stay the night, he may leave that day.

13 Q. You mentioned Ronald Konitzer and you said
14 you recognized the name, but you couldn't really put
15 a face to that name; is that correct?

16 A. I don't believe I could, no.

17 Q. You remember Mr. Konitzer being listed as a
18 guest; is that correct?

19 A. Yes.

20 Q. You remember seeing the name anyway --

21 A. Yes.

22 Q. -- in the context of being a guest.

23 Do you remember Mr. Konitzer's wife and
24 children being listed as guests?

25 A. I don't remember that, no.

26 Q. All right. Now, if they were guests,
27 there's a good chance they would be in the guest
28 logs; is that correct?

1 A. That's correct.

2 Q. And then you mentioned Dieter Weizner. You
3 said you saw him visiting several times; is that

4 correct?

5 A. That's correct.

6 Q. And do you know when this period of time

7 was? Was this the entire time from 1998?

8 A. No, it would have been later into when I

9 worked there, probably around, again, late -- mid,

10 late '02, end of 2002, into 2003.

11 Q. Into 2003. Okay. Now, in general, besides

12 intruders, which we talked about, actual trespassers

13 and people who intrude, were there other concerns

14 for security on the ranch?

15 A. Meaning --

16 Q. Well, for instance, was one of the concerns

17 that this was Michael Jackson's home and that his

18 privacy should be preserved?

19 A. Yes.

20 Q. So there were confidentiality agreements

21 that new visitors would sign when they came to the

22 gate; is that correct?

23 A. Correct. Correct. I'm sorry, yes.

24 Q. I didn't know if the court reporter got it.

25 A. I'm sorry.

26 Q. And one of the reasons for the

27 confidentiality agreements was -- or one of the

28 provisions was that people not take pictures when

1 they're at the ranch; is that correct?

2 A. That's correct.

3 Q. And you understood the reason for that to be
4 that people would sell pictures if they could; is
5 that right?

6 A. I understood the reason to be we were told
7 not to let them do it. What they did with them
8 is --

9 Q. You understand that -- there was a concern
10 about people getting cameras on the ranch to take
11 pictures to sell them to the tabloids?

12 A. I'm sure that there was.

13 Q. And some of the intruders that you caught
14 had cameras with them; is that correct?

15 A. Yes.

16 Q. Did you -- were you aware of an armed
17 intruder getting onto the ranch?

18 A. Armed with what?

19 Q. With a gun.

20 A. No.

21 Q. The ranch itself you understood to be Mr.
22 Jackson's home, right?

23 A. Yes.

24 Q. And one of the things that security was
25 instructed to do was to accord Mr. Jackson respect
26 as a person who is trying to live in his home,
27 correct?

28 A. Absolutely.

1 Q. So the idea was to not unduly approach him
2 or burden him, or take up his time while he's trying
3 to -- while he's trying to be at home, correct?

4 A. That's correct.

5 Q. And have you ever worked for any other
6 celebrities or people of that sort?

7 A. No.

8 Q. But that made sense to you, didn't it?

9 A. Absolutely.

10 Q. All right. When you say that when Mr.

11 Jackson was there people were on pins and needles,
12 did you mean by that to suggest that Mr. Jackson was
13 a harsh or mean boss of some sort?

14 A. No.

15 Q. Just -- the structure of the people there,
16 through the various commands and different
17 departments, made everybody aware that when Mr.
18 Jackson's on property that you need to be on your
19 best behavior, right?

20 A. Yes.

21 Q. And you didn't see anything wrong with that,
22 did you?

23 A. No. Not necessarily, no.

24 Q. Okay. And you felt personally that -- I
25 suppose you probably felt you should be on your best
26 behavior at all times; is that right?

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27 A. Yes.

28 Q. But you didn't have any objection to

1 everybody being, you know, particularly careful to
2 be prepared and ready to perform their duties when
3 the owner is on the property, right?

4 A. I had no objection to that. No.

5 Q. Now, you said people worked harder when Mr.

6 Jackson was there, right?

7 A. They worked more, for sure.

8 Q. Okay. Now, there's sometimes Mr. Jackson
9 was not there when there were big events that were
10 scheduled; is that right?

11 A. That's correct.

12 Q. There were family days?

13 A. Yes.

14 Q. And you've gone to family days, have you
15 not?

16 A. Several of them.

17 Q. Do you have family? I won't go into
18 details. But did you bring family members with you?

19 A. Yes.

20 Q. And this is something that Mr. Jackson did
21 for his employees; is that right?

22 A. That's right.

23 Q. Basically opened up the whole property, the
24 employees could bring their children, their friends

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25 or their close friends or relatives certainly, and
26 could enjoy the rides and all the other amenities at
27 Neverland; is that right?

28 A. That's right.

1 Q. Mr. Jackson would sometimes be there and
2 sometimes not; is that right?

3 A. That's right.

4 Q. And then there were other days when he would
5 have large groups of either, for instance,
6 disadvantaged children or children who were sick or
7 just children in general who would come to be his
8 guest at the ranch; is that correct?

9 A. That's correct.

10 Q. During those times, Mr. Jackson was often
11 not on the property; is that right?

12 A. Often not on the property?

13 Q. Yes.

14 A. That's right.

15 Q. And he was sometimes on the property; is
16 that correct?

17 A. Yes.

18 Q. Whether he was on the property or not, the
19 entire staff was instructed to treat all of the
20 people, adults and children, as guests, as if they
21 were guests at somebody's private home; is that
22 correct?

23 A. That's correct.

24 Q. The only difference is that there would be
25 certain boundaries, you can't go into certain parts
26 of the house and that sort of thing; is that
27 correct?

28 A. That's correct. 7050

1 Q. But other than that, if the kids want
2 something, if the adults want something, everybody
3 is there to serve; is that right?

4 A. That's right.

5 Q. Now, you mentioned that the security guards
6 often did the job of other -- let me withdraw that.
7 You mentioned the security guards worked with the
8 fire department from time to time; is that correct?

9 A. Basically they were the same department.

10 Q. All right. And you had at least one fire
11 truck there?

12 A. Yes.

13 Q. Was there a time when you had more than one?

14 A. Well, there was a time when there was --
15 when I was there, there was a time that there was
16 more than one, one was not working.

17 Q. Okay.

18 A. But there were two. And then prior to me
19 being there, yes, there was, I believe, more than
20 one.

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21 Q. Eventually they turned one of those fire
22 trucks into a water truck, I think.

23 A. Water tender, yes.

24 Q. There you go. But they have one operating
25 professional fire truck there; is that correct?

26 A. Not in the sense -- fire rescue, like a
27 brush truck. It would be not like a large city fire
28 truck. But, yes, a working -- held water, medical 7051

1 equipment.

2 Q. All right. Not a hook and ladder, but
3 something that was an emergency vehicle --

4 A. Yes.

5 Q. -- that could be used to tend to emergencies
6 on this ranch, correct?

7 A. Correct.

8 Q. And anywhere from somebody being injured,
9 to having a brush fire, to anything else that was
10 needed on an emergency basis; is that right?

11 A. Yes.

12 Q. And both the people who were assigned as
13 security officers and those assigned as firemen were
14 somewhat interchangeable in these tasks. If it
15 needed to be done, you all would respond and do it;
16 is that correct?

17 A. That is correct.

18 Q. Now, there were a number of people who were

19 in the fire department from time to time who
20 eventually became employed in other fire
21 departments; is that correct?

22 A. Yes.

23 Q. All right. So this was an area where people
24 could work, gain additional experience in order to
25 go work someplace else; is that right?

26 A. Yes.

27 Q. And did you feel -- as a professional law
28 enforcement officer, did you feel that the -- that 7052

1 the operation was run professionally?

2 A. Yes.

3 Q. All right. Now, the duties of security and
4 fire you said were pretty much merged. But in
5 addition to those duties, you also had duties to
6 attend to the needs of guests and Mr. Jackson, or
7 anybody else who required some assistance on the
8 ranch; is that correct?

9 A. Yes.

10 Q. And they were not always law enforcement
11 duties or fire duties, correct?

12 A. Generally, no.

13 Q. Generally not.

14 So, if somebody needed something, you or
15 anybody else that worked there -- say a guest needed
16 something, you or anybody else that worked there was

17 expected to respond as favorably as possible; is

18 that right?

19 A. Yes.

20 Q. All right.

21 THE COURT: Counsel? Take our break.

22 MR. SANGER: Okay. Thank you.

23 (Recess taken.)

24 --oOo--

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28 7053

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:

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15 That the foregoing pages 6992 through 7053
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 20, 2005, and thereafter
20 reduced to typewriting by computer-aided
21 transcription under my direction.

22 DATED: Santa Maria, California,
23 April 20, 2005.

24

25

26

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

28 7054

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

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19 WEDNESDAY, APRIL 20, 2005

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21 8:30 A.M.

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23 (PAGES 7055 THROUGH 7115)

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

28 BY: Official Court Reporter 7055

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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. Mesereau is listed as "M" on index. Ms. Yu is listed as "Y" on
index.

6 Mr. Sanger is listed as "SA" on index. Mr. Oxman is listed as "O" on
index.

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9 PLAINTIFF'S WITNESSES DIRECT CROSS REDIRECT RECROSS

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11 BARRON, Brian 7058-SA (Continuing)

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1 THE COURT: Go ahead.

2 MR. SANGER: Thank you.

3 Q. All right. Mr. Barron --

4 A. Uh-huh.

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5 Q. -- or Officer Barron, across the street

6 from --

7 THE BAILIFF: Can you turn your microphone

8 on?

9 MR. SANGER: Oh, sorry. There you go.

10 Q. Across the street from Neverland on Figueroa

11 Mountain Road, there are two schools; is that

12 correct?

13 A. That's correct.

14 Q. What kind of schools are they?

15 A. One is a boarding school, and one is like

16 a -- an elementary school, I believe.

17 Q. Okay. And are these private schools?

18 A. Yes.

19 Q. People are there during the day?

20 A. Yes.

21 Q. So there's activity, at least during the

22 school year; is that correct?

23 A. Correct.

24 Q. All right. February and March of 2003,

25 those schools would have been open; people would

26 have been there?

27 A. Yes.

28 Q. Parents coming and going? 7058

1 A. Yes.

2 Q. Teachers?

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3 A. Yes.

4 Q. Administrators?

5 A. Yes.

6 Q. Now, you told us about the security staff

7 that you were a member of, correct?

8 A. Correct.

9 Q. And you told us about the fire department?

10 A. Correct.

11 Q. Did Mr. Jackson also have personal security

12 or personal bodyguards?

13 A. Yes.

14 Q. And are these people who traveled with him?

15 A. Yes.

16 Q. You did not travel with Mr. Jackson; is that

17 correct?

18 A. No.

19 Q. So your duties were pretty much restricted

20 to the ranch. I shouldn't say restricted. It's a

21 big ranch, but you were there at the ranch, correct?

22 A. Yes.

23 Q. If he went to Los Angeles or Miami or went

24 on tour or anything else, you would not go with him;

25 is that correct?

26 A. No.

27 Q. And who would go with him?

28 A. Whomever was his personal security at the 7059

1 time. It did change.

2 Q. All right. So he did have people who were
3 generally experienced in going on the road and
4 protecting a celebrity under those circumstances; is
5 that correct?

6 A. There were times when he did, yes.

7 Q. Okay. There were some times when you
8 thought his personal security may not have been --

9 A. Yes.

10 Q. -- quite as -- okay. All right.

11 Now, do you remember Janet Arvizo?

12 A. I know she was there. I do not remember her
13 face until yesterday.

14 Q. All right. But you remember her being there
15 and you remember having some contact with her; is
16 that correct?

17 A. Yes.

18 Q. And you remember Gavin Arvizo?

19 A. Yes.

20 Q. You remember Star Arvizo?

21 A. Yes.

22 Q. And in general, did Janet Arvizo ever appear
23 to not want to be at the ranch?

24 A. In general, I couldn't answer.

25 MR. AUCHINCLOSS: Objection. I'm going to
26 object on the basis of foundation.

27 THE COURT: Sustained.

28 Q. BY MR. SANGER: All right. Would it be your 7060

1 opinion, based on your seeing her there at the
2 ranch, that what stood out in your mind was that
3 Mrs. Arvizo appeared that she wanted to be there?

4 MR. AUCHINCLOSS: Objection. Same
5 objection.

6 THE COURT: Sustained.

7 Q. BY MR. SANGER: All right. What kind of
8 contact did you have with Janet Arvizo?

9 A. Probably talked to her on the phone once or
10 twice. Other than that, relatively none.

11 Q. When you talked to her on the phone, did it
12 appear that she wanted to be there at the ranch?

13 A. Yes.

14 Q. And Janet Arvizo had access to the house,
15 full access to the house; is that correct?

16 MR. AUCHINCLOSS: Objection. Foundation.

17 THE COURT: Overruled.

18 You may answer.

19 THE WITNESS: I don't know.

20 Q. BY MR. SANGER: Okay. Do you recall
21 testifying before the Santa Barbara Grand Jury on
22 April the 12th, 2004?

23 A. Yes.

24 Q. Do you recall telling the grand jury that
25 Janet Arvizo was one of the people who had access;

26 she would have access to the house?

27 A. Yes.

28 Q. And when you were -- when the District 7061

1 Attorney said, "Okay," you said, "No question."

2 A. Yes.

3 Q. Is that correct? And she had full access to
4 the house because her children were there; is that
5 correct?

6 A. Yes.

7 Q. All right. Now, did you have any personal
8 observations about the behavior of Gavin and Star?

9 A. No.

10 Q. They appeared -- from what you could see,
11 they appeared to want to be at the ranch; is that
12 correct?

13 MR. AUCHINCLOSS: Objection. Foundation.

14 THE COURT: Sustained.

15 Q. BY MR. SANGER: Did you see them from time
16 to time at the ranch?

17 A. Seldom.

18 Q. Was there any indication -- from the seldom
19 times that you saw them, was there any indication
20 that they did not want to be at the ranch?

21 A. No.

22 Q. You indicated that part of the security --
23 part of security's job was to monitor who was coming

24 onto the property, correct?

25 A. Correct.

26 Q. And that was recorded, to a large extent, in

27 the gate logs; is that correct?

28 A. Yes. 7062

1 Q. Were you aware that in addition to just

2 plain interlopers, that there would be people who

3 would try to gain some kind of introduction to Mr.

4 Jackson to get into his favor?

5 MR. AUCHINCLOSS: Objection. Ambiguous;

6 foundation.

7 THE COURT: Overruled.

8 You may answer.

9 THE WITNESS: How do you mean?

10 Q. BY MR. SANGER: Well, were there people who

11 seemed to be trying to get close to Mr. Jackson?

12 A. Yes.

13 Q. And sometimes Mr. Jackson really wouldn't

14 want those people to be around him, correct?

15 A. Correct.

16 Q. So if they were allowed on the ranch, they

17 were to be treated courteously?

18 A. Yes, yes.

19 Q. But nevertheless, you were to try to help

20 Mr. Jackson not be bothered by people; is that

21 right?

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22 A. That's right.

23 Q. And Mr. Jackson, of course, during the time
24 you were there, and now, for that matter, is an
25 international celebrity, an artist, a very well-
26 known person, correct?

27 A. Yes.

28 Q. And there would be people who would 7063

1 basically be trying to get into his good graces; is
2 that right?

3 MR. AUCHINCLOSS: Objection. Foundation.

4 THE COURT: It's argumentative. Sustained.

5 Q. BY MR. SANGER: All right. Now, let me ask
6 you one other thing before we get to the gate logs
7 and some of the other documents you identified.
8 You were actually asked -- let me put it a
9 different way. You were contacted by the Santa
10 Barbara County Sheriff's Office in December of 2003;
11 is that correct?

12 A. That's correct.

13 Q. And in particular, Detective Bonner of the
14 Santa Barbara Sheriff's Department contacted you; is
15 that correct?

16 A. Correct.

17 Q. And he did an interview of you to determine
18 if you'd seen anything unlawful and so on; is that
19 correct?

20 A. That's correct.

21 Q. But then he asked that you work as an

22 informant; is that correct?

23 A. Yes.

24 Q. And you were at that time a sworn peace

25 officer of the Guadalupe Police Department, correct?

26 A. That's correct.

27 Q. And he basically wanted you to go back to

28 work for Mr. Jackson in December of 2003 to be an 7064

1 informant, correct?

2 A. That's correct.

3 Q. And at that time, you know that the raid had

4 already occurred on Mr. Jackson's house, correct?

5 A. Correct.

6 Q. You knew Mr. Jackson had a lawyer, had

7 counsel, right?

8 A. Yes.

9 Q. And you were being asked to go in as a law

10 enforcement informant into his ranch, at his home,

11 and inform for the sheriff; is that correct?

12 MR. AUCHINCLOSS: Objection. Asked and

13 answered.

14 THE COURT: Overruled.

15 You may answer.

16 THE WITNESS: Yes.

17 Q. BY MR. SANGER: And you refused to do that;

18 is that right?

19 A. Yes.

20 Q. What I'd like to do now is go through some
21 of the exhibits that you've identified and ask you,
22 based on your training and experience, to interpret
23 the documents, okay?

24 To the extent you were there, you made an
25 entry, and then you can contribute that as well and
26 say, "Yes, I actually wrote that."

27 A. Yes.

28 Q. But to the extent that you introduced these 7065
1 documents, you said they were kept in the ordinary
2 course of business, I'd like you to explain what
3 they mean, if you could.

4 A. Okay.

5 MR. SANGER: So I'm going to start with
6 Exhibit 300, and, Your Honor, if this procedure is
7 acceptable, I'd like to do this without asking each
8 time -- or I can. Whatever the Court wants me to
9 do.

10 What I propose to do is identify the
11 document by exhibit number. If there is more than
12 one page to the exhibit, I'll indicate which page of
13 the exhibit. If -- in the Exhibits 334 and 335,
14 there are hundreds of pages, so I'll refer to the
15 Bates stamp number on the bottom of the page for

16 that purpose.

17 And if that procedure is acceptable, what
18 I'd like to do then is put each of these up on
19 the -- not all of them, but each of the ones I want
20 to point out on the overhead projector, and I'll
21 just make reference to it at the time.

22 THE COURT: That's a fine procedure.

23 MR. SANGER: Okay. Thank you. In other
24 words, I won't ask leave each time. I'll just do
25 it.

26 THE COURT: That's good.

27 MR. SANGER: Thank you. Okay. In that
28 case, with the Court's permission in advance, I'll 7066

1 put Exhibit 300 up.

2 THE BAILIFF: Can you put "Input 4"?

3 MR. SANGER: Or we'll put up Mr.

4 Auchincloss's....

5 THE COURT: That was "Input 4."

6 Q. BY MR. SANGER: What I'm going to do, I
7 hope, is put it up in a way so we can show the
8 exhibit tag number, if such exists, and then I'll
9 give you an opportunity here to see what the
10 document is, best we can.

11 If you want me to -- this was printed pretty
12 large, so we can do it this way, if you want me to
13 scroll it up or down. If you'd like me to approach

14 and give it to you, if you can't read it, I'll just
15 walk up and show it to you. So just let me know.

16 A. Okay.

17 Q. This is Exhibit 300. And it appears at the
18 top to be an accident damage report, okay?

19 A. Okay.

20 Q. And I think you told us that was kept in the
21 ordinary course of business; is that correct?

22 A. Correct.

23 Q. And the accident damage report appears to
24 have been generated on a computer; is that right?

25 A. Correct.

26 Q. In other words, it's not just a form that's
27 handwritten in, but somebody generated the whole
28 thing on a computer, correct? 7067

1 A. Yes.

2 Q. And the format is such that it appears to be
3 a standard format, and then you put in particular
4 information based on the particular incident; is
5 that correct?

6 A. That's correct.

7 Q. All right. Now, what would be the purpose
8 of this particular accident damage report? Let me
9 rephrase that. What does this accident damage
10 report refer to?

11 A. One of the golf carts.

12 Q. All right. And from that report and from
13 the records, and based on your training and
14 experience, can you explain what happened and why
15 this report was written?

16 A. I can read it.

17 Q. Okay. Well, let's do it this way, because
18 we'll start this way and then the other ones will
19 speak for themselves.

20 There's a date up there at the very top,

21 right?

22 A. Yes.

23 Q. 6-21-02.

24 A. Yes.

25 Q. Would that be the date of the incident?

26 A. Yes.

27 Q. And then you have a date at the bottom.

28 Would that be the date the report was written? 7068

1 A. Yes.

2 Q. And there's a time, 1610, so 4:10 in the
3 afternoon, correct?

4 A. Correct.

5 Q. And the time at the top would be 1530, which
6 would be 3:30 in the afternoon, correct?

7 A. Correct.

8 Q. All right. So this report is designed to
9 document the fact that Gavin Arvizo was involved in

10 crashing a golf cart into the theater fountain; is
11 that correct?

12 A. That's correct.

13 Q. And the cause of the accident was recorded
14 as reckless driving; is that correct?

15 A. That's correct.

16 Q. All right. Now, you told us that you're
17 supposed to be very courteous to the guests, no
18 matter who they are, where they're from or whatever.

19 Is it appropriate, however, for security officers to
20 warn guests, particularly children, if they're
21 involved in unsafe behavior?

22 A. Yes.

23 Q. And based on this report, does it appear
24 that there was a warning given to Gavin Arvizo about
25 driving the golf cart?

26 A. Yes.

27 Q. And the warning was to slow down or the golf
28 cart would be taken away; is that correct? 7069

1 A. Correct.

2 Q. So based on your experience in these
3 records, that would indicate that an officer gave
4 that warning to Gavin Arvizo?

5 A. Yes.

6 Q. All right. Were you aware of other
7 incidents involving Gavin or Star Arvizo that

8 involves destruction of property or accidents or
9 that sort of thing?

10 A. No.

11 Q. Okay. Did you review these records to see
12 if you could find such evidence?

13 A. Not for that purpose, no.

14 Q. Okay. That's fair enough. Actually, I
15 didn't see that. I don't think it was on my copy.
16 Maybe it was.

17 On the back of 300 is a photograph. Does
18 that appear to be a Polaroid-type photograph?

19 A. Yes.

20 Q. Is that the front of a golf cart?

21 A. Yes.

22 Q. And it kind of looks like a car.

23 A. Well, you couldn't hold golf clubs on them.

24 They're more of a car.

25 Q. It's essentially the frame of a golf cart
26 and it's got a little fiberglass car body on it?

27 A. Correct.

28 Q. And this one, I think, is the Batmobile one; 7070

1 is that --

2 A. We call it "the Batman cart."

3 Q. "The Batman cart," okay. In any event, this
4 photograph is taken to show damage that was
5 associated with that report; is that correct?

6 A. That's correct.

7 Q. I'm going to go to Exhibit 301.

8 And just so nobody gets too nervous, Your

9 Honor, I'm going to try to -- I'm going to keep

10 these in order, but it's too hard to put them back

11 on the sprocket there, and I'll do that when we're

12 through, if that's all right.

13 THE COURT: Yes.

14 MR. SANGER: 301 consists of a number of

15 pages. And in the book, I would say it's page four.

16 It's the back of the second sleeved page. No, I'm

17 sorry, it's the back of the first sleeved page, so

18 it would be page two, I suppose. And let me put

19 this up, if I may.

20 Do you want to see it first?

21 MR. AUCHINCLOSS: Uh-huh.

22 Q. BY MR. SANGER: All right. Exhibit 301 is

23 the front, and then the back of the sleeve is the

24 next page. And we'll use this document for the

25 purpose of orienting everybody to the way this

26 works.

27 At that time, there was a form that looked

28 like this, correct? 7071

1 A. Correct.

2 Q. And that form was changed slightly as time

3 went on; is that correct?

4 A. Yes.

5 Q. But essentially you've got -- at the top,
6 you have the blanket "Routine Authorized Entries."
7 That's people who might be making deliveries, that
8 sort of thing; is that correct?

9 A. That's correct.

10 Q. I see up there, for instance, "Santa Barbara
11 Surfacing." Looks like somebody may have been there
12 to do some surfacing work on the roads; is that
13 correct?

14 A. I don't know what they were doing, but, yes.

15 Q. Okay. Just as an example, all right. And
16 then I see -- looks like it says "Santa Ynez Ford."
17 It is a little hard to see.

18 A. "Santa Ynez Feed."

19 Q. That would make more sense. "Santa Ynez
20 Feed." That would be, for instance, you would
21 assume somebody came on at 11:30 to deliver some
22 feed, and by 11:57, or whatever that says, they went
23 back out the gate, correct?

24 A. Correct.

25 Q. And the in-and-out times on this are
26 recorded at the time somebody comes in the gate,
27 right?

28 A. Yes. 7072

1 Q. And the time they leave, right?

2 A. Yes.

3 Q. So when somebody comes in the gate, the
4 gates are opened if they're allowed to have access?

5 A. Right.

6 Q. They stop the car or the truck right there
7 by the guard house, correct?

8 A. Right.

9 Q. And the guard comes up and greets them?

10 A. Yes.

11 Q. And will write down who the person is and
12 write down the exact time that it is at that moment;
13 is that correct?

14 A. Yes.

15 Q. And when they leave, the same thing occurs
16 in reverse. They're stopped before the gate. The
17 guard will record who's in the vehicle and the time
18 that they're leaving; is that correct?

19 A. Well, yes. We would make sure it's the same
20 person, and then we wouldn't record their name
21 again, but we would just record their time out.

22 Q. Their time out, okay.

23 So if somebody came in with three people and
24 only left with one, you'd want to know about that?

25 A. Yes.

26 Q. All right. Now, we have the guest names
27 down there. And guests would be people who are
28 guests of the owner staying at the ranch, correct? 7073

1 A. Correct.

2 Q. And they might be guests who stay all day
3 and they might be guests that are coming and going
4 that same day; is that correct?

5 A. That's correct.

6 Q. All right. Now, I don't know if it's the
7 glare or what. It's a little hard to read. Can you
8 read it from there?

9 A. For the most part.

10 Q. Okay. Right at the top of "Guests," it
11 says, "Grace"; is that correct?

12 A. Yes.

13 Q. And it says, "C/O." And that means?

14 A. Carried over. They were carried over from
15 the previous 24-hour period.

16 Q. So, in other words, there's no entry time
17 for Grace, because Grace was already there?

18 A. Already there at midnight the night before.

19 This was prepared at midnight the night before.

20 Q. And there's no indication that Grace left,
21 so one would assume that she would still be there
22 the next day?

23 A. At midnight of this day, this would be
24 completed, and that "CO," carry-over, would be put
25 in the "out" box. So she would continue to be
26 carried over for the period.

27 Q. So let's look down the list. And the third
28 person on the list appears to have gotten there at 7074

1 1205; is that correct?

2 A. Correct.

3 Q. And that would be five minutes after noon;

4 is that correct?

5 A. Correct.

6 Q. And then left at 1440 hours, which would be

7 2:40 in the afternoon; is that correct?

8 A. Yes.

9 Q. Can you tell me who that person is?

10 A. I can't read that.

11 MR. SANGER: All right. May I approach with

12 a copy?

13 THE COURT: Yes.

14 Q. BY MR. SANGER: Now that you have it in

15 front of you, can you read the name?

16 A. Yes.

17 Q. What does it say?

18 A. "M. Bashir."

19 Q. So Mr. Bashir came there at five minutes

20 after noon and left at about 2:40, or left at

21 exactly 2:40, correct?

22 A. Yes.

23 Q. Let me leave that with you just for the

24 moment, just in case you have trouble reading the

25 rest of it.

26 A. Uh-huh.

27 Q. On that same day, it appears Chris Tucker

28 arrived; is that correct? 7075

1 A. Yes.

2 Q. And Chris Tucker arrived at?

3 A. 1500, or 3 p.m.

4 Q. So 3 p.m. And it appears that at the same

5 time Chris Tucker arrived, a number of other people

6 came through the gate; is that correct?

7 A. Yes.

8 Q. And those people include Gavin Arvizo?

9 A. Yes.

10 Q. Star Arvizo?

11 A. Yes.

12 Q. There are a couple of other people there,

13 and then I think there are three other people, and

14 then there's something that says, "Gavellin." Or

15 what do you think it says?

16 A. Well, it looks like maybe "Aubrey."

17 Q. Below that. Right below that.

18 A. "Gavel" -- yeah, "Gavellin." I --

19 "Gavellin."

20 Q. "Gavellin." Do people always get the

21 spelling right at the gate?

22 A. Not always, no.

23 Q. Okay. You try your best, but sometimes you
24 just spell it the way you thought you heard it?

25 A. The way it sounds, yeah.

26 Q. All right. So those people, plus Adrian,
27 Kelly Bond and Aubrey, or Audrey, whatever that
28 says, all those people seem to have come at three 7076

1 o'clock on the dot, correct?

2 A. Yes.

3 Q. All right. Now, it appears that Mr. Tucker
4 and the Arvizos did not leave -- and I'll ask you to
5 assume, just for the sake of this question, that
6 "Gavellin" is an Arvizo. But those three people
7 came at three o'clock and they did not leave that
8 day; is that right?

9 A. Correct.

10 Q. All right. Let me retrieve my book, if I
11 may. Thank you. I guess I was asking permission of
12 the Court to approach there, to be specific.
13 I'm now going to go to Exhibit 302, and this
14 would be what appears to be the third page of 302 in
15 the exhibit, the official exhibit book. So this
16 does not have a tag on it, but the first page does.
17 And I'm sure I would be corrected if I were wrong.
18 This is 302 I'm putting up, the third page.
19 So let's start up here, first of all. This
20 is on 6-22, the date following the day that we just

21 saw; is that correct?

22 A. Yes.

23 Q. And we look down here, and we see that it
24 appears that Chris Tucker, Gavin, Star, and the
25 other people we talked about, and then this
26 "Gavellin," all show that they are carried over; is
27 that correct?

28 A. Correct. 7077

1 Q. And they're carried over not only from the
2 day before, but they appear to be carried over to
3 the next day.

4 A. Correct.

5 Q. And if we look at 303 -- and we'll take
6 page two of 303. It's on the back of the envelope
7 here. So that's 303, and I'll turn it over, and
8 that's the guest names. And once again, Chris
9 Tucker, Gavin, Star, and "Gavellin" are all carried
10 over as guests; is that correct?

11 A. Correct.

12 Q. And I'm sorry, that's the next day, 6-23; is
13 that correct?

14 A. Yes.

15 Q. We go to 304, Exhibit 304. Looking at
16 page two of 304, page two, 6-24-02?

17 A. Yes.

18 Q. And again, we show Chris Tucker, Gavin, Star

19 and "Gavellin" all carried over; is that correct?

20 A. Yes.

21 Q. And it doesn't show any check-out time for
22 them or any time they went by the gate; is that
23 correct?

24 A. No. That's correct.

25 Q. And then 305, this would be the third page,
26 6-25-02. And it shows Chris Tucker, Gavin, Star.

27 And I don't see "Gavellin" on there or "Davellin" or
28 anything else like that. But it shows that Chris 7078

1 Tucker's group left at 7:54 in the morning; is that
2 correct?

3 A. Correct.

4 Q. So they would have been there overnight and
5 then they left together?

6 A. Correct.

7 Q. Okay. Now, if we skip ahead timewise to --
8 it's Exhibit 306, and it's page two of 306, it says
9 "6-29-02" on the top, and it appears that Gavin,
10 Star, and Davellin, or Davellin, and a limo driver
11 all showed up at 46 minutes after midnight; is that
12 correct?

13 A. Correct.

14 Q. And Gavin, Star and Davellin all stayed
15 there overnight that day, correct?

16 A. Correct.

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17 Q. And the limo driver got a cup of coffee and
18 left, looks like.

19 A. Yes.

20 Q. Okay. And then going to Exhibit 307, about
21 6-30-02, we have Gavin, Star and Davellin all
22 staying overnight at the ranch, correct?

23 A. Correct.

24 MR. SANGER: All right. Excuse me just one
25 second.

26 (Off-the-record discussion held at counsel
27 table.)

28 MR. SANGER: Excuse me, Your Honor. I'm 7079

1 sorry. I just had to clear something up.

2 Q. Okay. I want to -- just because it's in
3 sequence in the exhibits, let me show you 308, and
4 this is a different kind of a form. And we'll be
5 able to go a lot quicker here. And actually, we'll
6 skip quite a ways ahead in a moment, just so
7 everybody has something to anticipate.

8 308, okay, and I'll try to get as much of a
9 wide angle as I can and still read it. Do you see
10 that? It says, "Security Clearance and General
11 Information"?

12 A. Yes. "Guest Information."

13 Q. Or, I'm sorry, I can't read it. All right.

14 I can read it here. "Guest Information."

15 And this is information about the people who
16 were arriving. And actually, this dates back a
17 little out of sequence. It dates back to 6-21-02,
18 correct?

19 A. Correct.

20 Q. And basically this is information so you
21 know how to treat the guests and what they can do;
22 is that right?

23 A. We know who's coming and what they're able
24 to do.

25 Q. Okay. So this tells you the estimated time
26 of arrival; is that correct?

27 A. Correct.

28 Q. And you never know exactly if somebody's 7080
1 going to arrive on time, but it gives you a
2 heads-up, right?

3 A. Right.

4 Q. And it shows Chris Tucker, Gavin Arvizo,
5 Star Arvizo, Adrian, Kelly, Gavellin and Aubrey, it
6 looks like.

7 So on 6-21, this was telling you these
8 people are really going to show up, right?

9 A. Yes.

10 Q. And then at the bottom, it says Mr. Jackson
11 has cleared the guests to have full access, correct?

12 A. Correct.

13 Q. So Chris Tucker and his guests are allowed
14 to have full access to all of these activities; is
15 that right?

16 A. That's right.

17 Q. And those activities include the hill house,
18 pool, spa, water fort, dance studio, and then quad
19 runners; is that right?

20 A. Yes.

21 Q. And what were the quad runners?

22 A. ATVs.

23 Q. Were people supposed to keep those on the
24 property?

25 A. They were property of the ranch.

26 Q. But, I mean, they weren't supposed to go
27 drive on Figueroa Mountain Road.

28 A. Correct. 7081

1 Q. And they definitely were not supposed to go
2 into Los Olivos.

3 A. No.

4 Q. All right. And then there's scooters,
5 right?

6 A. Uh-huh.

7 Q. Golf carts?

8 A. Yes.

9 Q. Jet skis. The main house. And written in
10 is "horseback riding"?

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11 A. Yes.

12 Q. So Mr. Jackson, according to this record,
13 kept in the ordinary course of business, had cleared
14 the guests to have full access to all of those
15 activities?

16 A. Yes.

17 Q. And those guests would be Mr. Tucker and the
18 Arvizos and his other guests; is that correct?

19 A. I believe Mr. Tucker, there, says he was the
20 driver. Whether or not he had access to that stuff
21 at the same time, probably, but --

22 Q. Do you know who Chris Tucker is?

23 A. Yes.

24 Q. Okay. Who is Chris Tucker?

25 A. He was an employee of the ranch.

26 Q. Okay. Are you thinking --

27 A. Or of Mr. Jackson.

28 Q. Are you thinking of Chris Carter? 7082

1 A. I'm sorry. Chris Tucker. Excuse me. I

2 apologize.

3 Q. Chris Tucker is the actor?

4 A. Chris Tucker is the actor, yes. I'm sorry.

5 Q. Do you remember him visiting the ranch?

6 A. Yes.

7 Q. And you would assume Chris Tucker would

8 have --

9 A. Chris Tucker, I'm sorry. Thank you.

10 Q. He would have full access to --

11 A. Yes, he would.

12 Q. All right. Now, if we go to Exhibit 309,

13 you may recall -- let's show 309. There we go.

14 You may recall that when we went through the

15 gate logs, it appeared that Gavin, Star and Davellin

16 came back and Mr. Tucker was not there; is that

17 correct?

18 A. Correct.

19 Q. Now, when they came back this time, they're

20 estimated to arrive sometime in the evening. And if

21 I'm not mistaken, I think they got there very early

22 in the morning the next day. But here, Mr. Tucker

23 is not there. They were not cleared for the quad

24 runner or the jet skis; is that correct?

25 A. Yes.

26 Q. And they were not cleared for horseback

27 riding; is that correct?

28 A. Correct. 7083

1 Q. Based on your experience and understanding

2 of these records kept in the ordinary course of

3 business, who would have given those instructions?

4 A. Those instructions there?

5 Q. Yes.

6 A. They would -- this would have come to us

7 through the administration office.

8 Q. All right. So somebody in the chain of
9 command above decided that, under these
10 circumstances, that these children should not have
11 access to the quads or the jet ski?

12 A. Correct.

13 Q. All right. We'll go to Exhibit 310. And
14 this will be the second page of 310. And it appears
15 that -- 7-1-02. And it appears that Gavin, Star and
16 Davellin stayed overnight, correct?

17 A. Correct.

18 Q. And then they left at 2114 hours, which
19 would be 9:14 in the evening, correct?

20 A. Correct.

21 Q. Now, then we skip ahead in time to September
22 the 15th, which is the next record in the exhibit
23 book which was presented to you by Mr. Auchincloss.
24 And that shows 9-15-02; is that correct?

25 A. That's correct.

26 Q. And on 9-15-02, we have Chris Tucker, Gavin,
27 Star, sister, it looks like it says Chris's nephew;
28 is that correct? 7084

1 A. Correct.

2 Q. There's a star there. What does that mean?

3 A. Probably means that the time was either not
4 written down when they came in, or it was -- at that

5 time, whomever was checking people in the gate
6 failed to write them in, or we just didn't know when
7 they came in.

8 Q. Okay. So every once in a while somebody
9 makes a mistake, true?

10 A. Yes.

11 Q. That will happen.

12 And then it shows on that day, which is
13 9-15-02, Mr. Tucker and his group, including Gavin,
14 Star, sister, and Chris's nephew, all stayed
15 overnight; is that correct?

16 A. Correct.

17 Q. I'm going to go to Exhibit 312. 9-16-02.

18 And here we have a record that Chris Tucker and his
19 group stayed overnight. It also shows "bus driver,"
20 correct?

21 A. Yes.

22 Q. Do you remember if Chris Tucker had a bus?

23 A. I don't know if he personally had a bus. I
24 don't remember.

25 Q. Well, looks like the bus driver left with
26 Chris Tucker and the rest of the party at 6:54 in
27 the morning; is that correct?

28 A. Yes. 7085

1 Q. Now, do you know if Mr. Jackson was at the
2 ranch at these various times that we've covered so

3 far?

4 A. I don't know.

5 Q. Okay. Now, 9-26 -- I'm sorry, this would be
6 Exhibit 313, the second page. 9-26 at the top, '02.

7 And I think you can read this, but if you can't,
8 just tell me.

9 I don't know if I made it better or worse.

10 Okay. All right. Looks like Martin Bashir
11 arrived at two o'clock in the afternoon and left at
12 6:13; is that correct?

13 A. Yes.

14 Q. And it looks like he probably arrived with
15 some other people there. There's three other
16 people, correct?

17 A. Correct.

18 Q. We see -- we see Gary Hearn arrived at 2:30;
19 is that correct?

20 A. Yes.

21 Q. All right. Looks like somebody adjusted
22 that, but that was the way it was entered at the
23 time; is that correct?

24 A. Correct.

25 Q. All right. And it looks like -- now, first
26 of all, Gary Hearn is who?

27 A. Gary's a driver.

28 Q. He's a driver for Michael Jackson and for 7086

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1 Neverland; is that correct?

2 A. Yes.

3 Q. He often drives a limousine or whatever car

4 is appropriate to transport people, correct?

5 A. Correct.

6 Q. And Gary Hearn seems to have arrived with

7 Gavin, Star, and "Davida" or "Davila" or something,

8 whatever that says, right?

9 A. Yes.

10 Q. All at the same time. And then it appears

11 that they were there from 2:30 and stayed overnight;

12 is that right?

13 A. Correct.

14 Q. And then I'm going to put up 314, the second

15 page. And it shows Gavin, Star, and "Davida" - I

16 think that's what it says - stayed over that night

17 as well, correct?

18 A. Correct.

19 Q. And then I'm going to put up 315, page two,

20 for 9-28, okay? I'm going to go down to the bottom,

21 and it looks like Gavin, Star, and "Davida," or

22 whatever that says - all right? - stayed overnight,

23 but they left at four o'clock in the afternoon; is

24 that correct?

25 A. That's correct.

26 Q. And it appears that Gary -- down at the

27 bottom, that's probably "Gary Hearn"; is that

28 correct? 7087

1 A. Most likely, yes.

2 Q. And Gary Hearn came and went, but he came in
3 about three o'clock, and then left at exactly four
4 o'clock; is that correct?

5 A. Yes.

6 Q. So based on that, you would assume that he
7 drove the -- Gavin, Star, and whoever Davida is; is
8 that correct?

9 A. Yes.

10 Q. And it looks like it -- it's really hard to
11 see what that says there, but it does look like
12 there's an entry, and I just want to clarify it so I
13 don't get confused. It says something like "Maxim
14 Bahit"?

15 A. Your guess is as good as mine.

16 Q. All right. It's not "Martin Bashir,"
17 though?

18 A. It doesn't look like "Martin Bashir" to me.

19 Q. All right. Now, if somebody checks out --
20 in other words, I say "checks out." If somebody
21 goes through the gate, out, and then they go to
22 dinner or to town or whatever, and they come back,
23 when they come back, they should be logged back in
24 again with the time?

25 A. Yes.

26 Q. Does that sometimes not happen?

27 A. For employees? Sometimes.

28 Q. For anybody. 7088

1 A. Yeah, I'm sure there's times when it

2 happens.

3 Q. All right. Now, I'm going to skip way

4 ahead, and you guys are going to be happy to hear

5 that, to Exhibit 331.

6 Okay. I'm sorry. Better yet, 333. And I'm

7 going to put 333 up. This is the second page of it.

8 And there's a -- wide angle here. Okay. A medical

9 report log; is that correct?

10 A. Correct.

11 Q. And that logs in various medical emergencies

12 or skinned knees or anything else that happens that

13 requires somebody to respond?

14 A. Each medical report for the year.

15 Q. And on the other side, actually the front

16 side of 333, there's a medical report for Star

17 Arvizo; is that correct?

18 A. Yes.

19 Q. Can you read that?

20 A. Not well. Actually, that really hurts my

21 eyes. If you could bring it up, that would be

22 great.

23 Q. Actually, I don't blame you.

24 May I approach, Your Honor?

25 THE COURT: Yes.

26 Q. BY MR. SANGER: I'm giving you a copy of
27 that page. Can you take a quick look at it there?

28 And what I want to ask you is, basically, 7089

1 does this document reflect that Star Arvizo
2 apparently had a fall on a scooter, slid on some
3 loose gravel or something?

4 A. Yes.

5 Q. And he had minor scrapes to his left knee,
6 right ankle and right knee?

7 A. Yes.

8 Q. So that sort of thing was documented
9 carefully at Neverland, and that's an example of it;
10 is that right?

11 A. Yes.

12 MR. SANGER: All right. May I approach to
13 retrieve that, Your Honor?

14 THE COURT: Yes.

15 Q. BY MR. SANGER: All right. I'm now going to
16 go to Exhibit 334. For the benefit of the Court and
17 everybody else, it's probably about 90 pages, and so
18 this is a part where I'm going to refer to -- I'll
19 just put the first page up so we can see it here,
20 334, and it's again one of the logs, which I believe
21 here actually starts February 1 of '03, correct?

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22 A. Yes.

23 Q. All right. And now I'm going to refer to a
24 Bates stamp number, which is a number in the lower
25 part of the document, generally the lower right
26 corner, and I believe in all of these it starts out
27 with "MJ" and two zeroes and then a number. And I
28 will refer to that so we're on the same page. 7090

1 THE COURT: Okay.

2 Q. BY MR. SANGER: And I'm going to skip to
3 page 116. That's MJ00116. And I'm going to show
4 you this here.

5 Now, this appears to be the format that was
6 being used in 2003; is that correct?

7 A. Correct.

8 Q. And I think it's a little different, at
9 least a little different than some of the forms that
10 were used because under "Guest Information" you also
11 have "Ranch Vehicle Information" --

12 A. Yes.

13 Q. -- showing when people come in and out.

14 On this particular document -- oops, sorry.

15 Let's try here. This is for February the 6th, 2003;

16 is that correct?

17 A. Correct.

18 Q. And it appears that at 2243 hours -- let's

19 see. 2245 hours, it should be 10:45 at night, it

20 says, "Owner and guests"; is that correct?

21 A. Yeah. Could I see that page? I -- I would

22 assume it does.

23 MR. AUCHINCLOSS: May I see that?

24 MR. SANGER: May I approach?

25 THE COURT: Yes.

26 THE WITNESS: Based on the paperwork that we

27 fill out, we would not have put "owner" or

28 "Mr. Jackson" or anything that would represent him 7091

1 on this paperwork. In the time that I worked there,

2 I have never done that, that I can remember.

3 It could be -- it could be, "Owner and

4 guest," which I didn't write it, but definitely

5 could be.

6 Q. BY MR. SANGER: Okay. That's fair enough.

7 I'll ask you about that a little more so it makes

8 sense.

9 MR. AUCHINCLOSS: Could I see that again?

10 MR. SANGER: Sure.

11 Q. This is Mr. Jackson's home, right?

12 A. Correct.

13 Q. And so you were not -- not only not required

14 to, but you were really not supposed to write down

15 Mr. Jackson comes and goes and log him in like

16 somebody else; is that right?

17 A. That is correct.

18 Q. Okay. You saw what you thought said, "Owner
19 and guest," may have said, "Owner and guest," you're
20 not sure --

21 A. No.

22 Q. -- but it would not be typical for you to
23 write down "Owner"?

24 A. I've never done it. The whole time I was
25 there, I'd never done it.

26 Q. That's fine. And it does -- it looks like
27 it says, "Guest."

28 A. Yes. 7092

1 Q. All right. It doesn't say who the guests
2 are?

3 A. No.

4 Q. And that's somewhat unusual, isn't it?

5 A. If someone had come in with Mr. Jackson, we
6 don't routinely stop his vehicle and look in his
7 vehicle. Again, it's privacy for him. We try to
8 bother him as little as possible.

9 So if someone had -- if that is "Owner and
10 guest" and someone had come with him, we would not
11 have just stopped his vehicle and, for the most
12 part, asked who was in there, unless we really felt
13 it was necessary.

14 MR. SANGER: Do you want to leave that on?

15 MR. AUCHINCLOSS: Yeah.

16 MR. SANGER: Okay. All right. I won't put

17 it here. I'll --

18 MR. AUCHINCLOSS: Yeah, that's fine.

19 Q. BY MR. SANGER: I want to see if we can

20 reconstruct this a little bit. Where it just says,

21 "Guests," there are no names?

22 A. Correct.

23 Q. So does that suggest to you that those

24 guests were probably in a vehicle with Mr. Jackson?

25 A. It could have -- yes, it could have been.

26 Q. All right. And now we're going to go to --

27 and I'm sorry, that was on 2-6, February 6, 2003,

28 correct? I'll put it up again if you want. 7093

1 A. Yes. That's correct.

2 Q. All right. February 6th, 2003.

3 Do you know if Mr. Jackson was returning

4 from Miami that night?

5 A. I don't know.

6 Q. Okay. All right. And you're welcome to

7 look at this whole exhibit, if you want me to bring

8 the book down so you can see it, if you feel you

9 need to look at the pages in order or anything,

10 okay?

11 I'm going to put up 2-7-03, which is

12 MJ00120. And that is still a part of Exhibit 334,

13 okay? And you can see we're referring to the "120"

14 down there on the bottom, just so we're all
15 oriented. That's what we call the Bates stamp
16 number.

17 This is for 2-7-03; is that correct?

18 A. Yes.

19 Q. All right. Now, if you look at the
20 guests -- and I'm going to bring it a little closer
21 and give everybody a headache, all right? If you
22 look at the "Guests," it appears that there's an

23 M. Nicole Cascio --

24 A. Yes.

25 Q. -- who stayed overnight; is that right?

26 A. Yes.

27 Q. And it looks like a Dr. Farshshian stayed
28 overnight; is that correct? 7094

1 A. Yes.

2 Q. Actually, I'm going backwards. He's at the
3 top of that list, right?

4 A. Right.

5 Q. It looks like he left at 8:30 in the
6 morning, right?

7 A. Right.

8 Q. And then he may have come back at 10:15?

9 A. Yes.

10 Q. Okay. So let's go down to -- to "Marie
11 Nicole," or it says, "M," something, Nicole Cascio."

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12 You assume that's Marie Nicole?

13 A. Yes, uh-huh.

14 Q. So -- it says stayed over or carried over,
15 so that would tell you she stayed overnight; is that
16 right?

17 A. Yes.

18 Q. Now that you think about that in conjunction
19 with the whatever-it-was "and guests," does that
20 suggest that Marie Nicole Cascio was probably one of
21 the guests that came in the day before?

22 A. Do you have the other pages for this?

23 Q. I have --

24 A. There's usually like three pages per day.

25 Q. Yes. Yes. You're welcome to look at them.

26 We have to be careful because we've got the book
27 apart, and I want to put it back. So we have to
28 keep it in the same order here. 7095

1 Before I do, I'll let you see the whole
2 thing, but it's safe to say you've got Gavin Arvizo,
3 Star Arvizo, looks like "Daviella" now, Arvizo, Aldo
4 Cascio, and Mom Arvizo, right?

5 A. Correct.

6 Q. And those are all carry-overs. So that
7 would mean, to you, that they were there --

8 A. The night before.

9 Q. -- the night before?

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10 A. Prior to midnight of that day.

11 Q. Of this day, which was 2-7 --

12 A. Correct.

13 Q. -- 03.

14 Okay. And it also appears that they then

15 continued to stay overnight on the 7th; is that

16 right?

17 A. Yes.

18 MR. SANGER: Okay. So now having said that,

19 if it's all right with the Court, I'll approach with

20 the book so that the witness can see everything in

21 context.

22 Q. And I'll just speak loud for a moment, if I

23 can.

24 The pages are in the exact order of the

25 exhibit, so keep them in that same order, if you

26 would.

27 A. Yes.

28 At some point they came in on the 6th and 7096

1 were there on the 7th.

2 Q. All right. And as you look at that --

3 before I come up and retrieve it, as you look at

4 that, there's no specific record where those

5 particular individuals, that is, the Cascios and the

6 Arvizos, were logged in by name as coming in.

7 A. No.

8 Q. Other than perhaps just that reference to
9 "Owner and guest," or whatever it says; is that
10 correct?

11 A. Correct.

12 MR. SANGER: All right. May I approach to
13 retrieve the book, Your Honor?

14 THE COURT: Yes.

15 MR. SANGER: Okay. Thank you, sir.

16 Q. Now, I'm going to go to page 121 of the same
17 exhibit. It will still be 334 until further notice,
18 if that's all right.

19 So it's -- it says 121, MJ00121 at the
20 bottom. And then this is -- at the top, rather than
21 "Guest," there are a number of people who are listed
22 there. And this is -- there's no date at the bottom
23 of this, correct?

24 A. Correct.

25 Q. So you need to try to ascertain the date by
26 figuring out where it falls within the context of
27 the other documents, right?

28 A. Correct. The -- it would have been, again, 7097

1 with at least one, most likely two other pieces of
2 paper that -- gate logs.

3 Q. All right. And for the purpose of -- well,
4 I'll withdraw that.

5 This shows that at the ranch, there were

6 quite a number of people; is that correct?

7 A. Yes.

8 Q. And it says, "CBS Entertainment" there; is
9 that correct?

10 A. Yes.

11 Q. Now, it appears that on that list -- I won't
12 read them all, but on that list is "Ed Bradley";
13 is that right?

14 A. Yes.

15 Q. Are you familiar with Ed Bradley of CBS?

16 A. Yes.

17 Q. And Jack Sussman, is he a producer at CBS?

18 You don't know?

19 A. I have no idea.

20 Q. That's okay. There are a number of other
21 people associated with CBS there, right?

22 A. Yes.

23 Q. And it indicates that all the people
24 associated with CBS, at least down to the point that
25 it's recorded -- let me withdraw that.

26 It looks like Jack Sussman arrived at 9:40;

27 is that right?

28 A. Yes. 7098

1 Q. Doesn't show that he was checked out?

2 A. No.

3 Q. Okay. We assume he's not still there.

4 A. Yes.

5 Q. Okay. You got Ed Bradley. Can you read
6 that?

7 A. Yes. The times?

8 Q. Yeah, the times.

9 A. 10:30 to -- it's either 18 or 1900. So
10 6 or 7 p.m.

11 Q. And then the rest of them are 10:30 to
12 7 p.m., is that correct?

13 A. Yes.

14 Q. 10:30 to 7 p.m.

15 Were you on duty that day?

16 A. I don't know.

17 Q. Do you remember there being a large group of
18 people?

19 A. I don't remember being there when CBS was
20 there.

21 Q. All right. That's fair enough.

22 All right. Now we go to page 123, which is
23 dated -- by that I mean MJ00123, which is dated
24 2-9-03, correct?

25 A. Yes.

26 Q. And here we show on the 9th of February,
27 2003, that you have Gavin Arvizo, Star Arvizo,
28 Davellin Arvizo. It shows they were all -- if you 7099

1 just look at those entries, they were all carried

2 over from the night before?

3 A. Correct.

4 Q. And then it shows that they left at about

5 1:30 --

6 A. Yes.

7 Q. -- and apparently left with the person right

8 before there, whose name is, oh, Marie Nicole.

9 A. Yes.

10 Q. That says "Marie Nicole" right above "Gavin

11 Arvizo"?

12 A. Yes.

13 Q. So they all left at 1:30. Doesn't tell you

14 where they went; is that correct?

15 A. That's correct.

16 Q. And then they came back at 4:15 in the

17 afternoon?

18 A. Yes.

19 Q. It does appear that there are two other

20 people down at the bottom, Anna Ruiz and looks like

21 Silvana Ruiz. Do you see those?

22 A. Yes.

23 Q. Looks like they left at 1330, which is 1:30,

24 and came back at 4:15, right?

25 A. Correct.

26 Q. And it says "limo" there. Does that mean

27 they went by limo?

28 A. Yes. 7100

1 Q. And you don't know how the Arvizos traveled
2 on that occasion, do you?

3 A. No.

4 Q. You would assume that somebody gave them a
5 ride, though?

6 A. Yes.

7 Q. Okay. And then it shows next they're
8 carried over -- that being the Arvizos -- they're
9 carried over. They stayed overnight; is that

10 correct?

11 A. Yes.

12 Q. And then we have page MJ00126, which shows
13 2-10-03, correct?

14 A. Correct.

15 Q. And here we see the Arvizos and Marie Nicole
16 staying overnight; is that correct?

17 A. That's correct.

18 Q. And it shows there "Mrs. Arvizo," as well,
19 under "Anna Ruiz," correct?

20 A. Yes.

21 Q. And it appears that they stayed overnight.

22 Not only were they overnight the night before, but
23 they're staying overnight the next night; is that
24 correct?

25 A. Yes.

26 Q. So that's the 10th.

27 Now, did the -- did the procedures change at
28 some point to where you would start logging in where 7101

1 people were staying at the ranch?

2 A. Yes.

3 Q. All right. I want to show you 2-11-03,
4 which is 00129, Bates stamp number 129. Okay,
5 2-11-03, correct?

6 A. Yes.

7 Q. And here on 2-11 -- oops, sorry -- it
8 appears that Dieter Weizner was staying in Guest
9 Unit No. 4.

10 A. Yes.

11 Q. And he stayed overnight?

12 A. Yes.

13 Q. If you go down to the next, it shows Janet

14 Arvizo.

15 A. Yes.

16 Q. All right. I'm sorry, when I said "the
17 next," I meant to say skip one. It goes down to
18 Janet Arvizo, Guest Unit No. 2.

19 A. Yes.

20 Q. Stayed overnight, or she was staying
21 overnight, correct, from the night before?

22 A. Yes.

23 Q. But on this day, and again, "this day" being
24 February the 11th, then Arvizo leaves at 5:04 in the

25 afternoon, correct?

26 A. Correct.

27 Q. And she comes back at three minutes to 8:00?

28 A. Correct. 7102

1 Q. Okay. It shows, "Gavin and Star, house"?

2 A. Yes.

3 Q. That means they're staying at the house,

4 according to this?

5 A. Yes.

6 Q. And then it shows -- now, what does that say

7 now?

8 A. It looks like "Daniella."

9 Q. Okay. Seems this name changes continuously.

10 But anyway, whoever that is, D. Arvizo, whatever it

11 says there, is staying in Unit No. 2; is that

12 correct?

13 A. Yes.

14 Q. And then Marie Nicole is staying in the doll

15 room, right?

16 A. Yes.

17 Q. That's in the house?

18 A. Correct.

19 Q. And Aldo, her brother, is staying in the

20 house; is that correct?

21 A. Yes.

22 Q. Now, Ronald Konitzer is there in Unit No. 1,

23 correct --

24 A. Yes.

25 Q. -- is that right?

26 And his wife and two children are also

27 staying there at the ranch in Unit No. 1; is that

28 correct? 7103

1 A. Yes.

2 Q. Now, Units 1, 2, 3 and 4 are the four guest

3 units that are right by the lake; is that correct?

4 A. That's correct.

5 Q. And they're just across the front --

6 A. Grass.

7 Q. Yeah, the front entrance.

8 A. The driveway.

9 Q. The driveway for the entry of the house.

10 They're right across from the front of the house in

11 a building that has four units in it?

12 A. Yes.

13 Q. All right. So according to this, Ronald

14 Konitzer, his wife and children, are staying in 1.

15 Davellin's in 2 with Janet. And there are these

16 other two people. Dieter's in 4. And this Mark

17 Lester, whoever that is, is in 3, right?

18 A. Right.

19 Q. Now, excuse me one second. I think it got

20 cut off here. Hold on.

21 Yeah, okay. On this -- at the bottom here,
22 same page, we're still on 129 for February 11th,
23 '03, at the very bottom, you have "Ranch Vehicles,"
24 right?
25 A. Yes.
26 Q. And I'm going to direct your attention to
27 the one just before the bottom. It says "Katie,"
28 and it's kind of cut off, but it's Katie Bernard; is 7104

1 that correct?

2 A. Yes.

3 Q. Do you know who Katie Bernard is?

4 A. Yes.

5 Q. Who is she?

6 A. She's a secretary for the ranch.

7 Q. Works at the ranch?

8 A. Yes.

9 Q. Is she a nice person?

10 A. Very nice.

11 Q. It says, "Black van," right?

12 A. Yes.

13 Q. And what is the black van?

14 A. Black van. It would be the -- it's a ranch
15 vehicle that usually Gary drives.

16 Q. Okay. So it's a vehicle that's used to
17 drive people places, if the guests want to go to
18 town or do something else, or go to the airport or

19 whatever, it can be used for that, correct?

20 A. Yes.

21 Q. All right. Now, it looks like Katie Bernard
22 checks the black van out and then she leaves at four
23 minutes -- at 5:04; is that correct?

24 A. Correct.

25 Q. So it appears that she is taking Janet
26 Arvizo off the ranch, correct?

27 A. They at least left at the same time.

28 Q. If it's down to the minute, they're either 7105

1 right in the same car or one right behind the other.

2 A. Yes.

3 Q. But usually it's the same car, right?

4 A. Yes.

5 Q. It would be 1705 by the time you get to the
6 next car, probably, right?

7 A. Yes.

8 Q. Now, it looks like Katie Bernard was gone
9 long enough to, say, go to town, drop somebody off
10 and come back, right?

11 A. Yes.

12 Q. All right. Now we go to 2-12. And this is
13 page 132, 00132, and it shows February the 12th,
14 2003; is that correct?

15 A. That's correct.

16 Q. All right. Now, here, let's start with the

17 guests. And I take it -- I think it's obvious to
18 everybody, the Xerox machine evidently cut off the
19 edge of the page there, correct?

20 A. Yes.

21 Q. Here it appears that there are a number of
22 guests overnight, including Gavin, Star, and
23 Davellin, however her name is spelled, all right?

24 A. Yes.

25 Q. We'll call her Davellin, all right?

26 A. Okay.

27 Q. It appears that they stayed overnight,
28 correct? 7106

1 A. Yes.

2 Q. And then it appears -- and Janet as well,
3 correct? It says Janet, Gavin, Star, Davellin?

4 A. Yes.

5 Q. They all stayed overnight, and then they all
6 left at 1:38 in the morning; is that right?

7 A. That's right.

8 Q. So when they went to the gate, whoever was
9 driving them stopped the vehicle and said, "We're
10 leaving. And we have Janet, Gavin, Star and
11 Davellin here," correct?

12 A. Yes.

13 Q. So the person at the gate, the guard at the
14 gate, could check all these people out at that date?

15 A. Yes.

16 Q. There was no secret spiriting of people
17 away. This was checking right out at the gate?

18 MR. AUCHINCLOSS: Objection; argumentative.

19 MR. SANGER: That probably was. I'll
20 withdraw it.

21 THE COURT: All right. I'll sustain the
22 objection.

23 MR. SANGER: There we go.

24 Q. In other words, this is done according to
25 procedure. A car comes up; the driver identifies
26 the people in the car?

27 A. Either the driver or the security officer.

28 Q. Or the security officer looks in and sees 7107

1 who it is, and he opens the gate and they go, right?

2 A. Correct.

3 Q. All right. If you look at the bottom here,
4 we also have something that says, "Salas," and it
5 just says, "u-s Salas," but your bet would be that's
6 "Jesus Salas," correct?

7 A. Yes.

8 Q. Just got cut off by the Xerox machine.

9 And he checks out the Rolls Royce, right?

10 A. Correct.

11 Q. Do you know what kind of Rolls Royce that
12 is?

13 A. I don't know which one exactly that is.

14 There was a couple. They were older.

15 Q. Nice car?

16 A. Nice, yes.

17 Q. Nice car, all right. And he checked it out

18 according to the ranch procedures, correct?

19 A. Correct.

20 Q. And he checks out -- it goes out at 1:38,

21 correct?

22 A. Yes.

23 Q. He does whatever he does, and he gets back,

24 in the Rolls Royce, by 9:08 in the morning, correct?

25 A. Yes.

26 Q. Now, Gary Hearn was there. He's a driver,

27 correct?

28 A. Yes. 7108

1 Q. And he was staying overnight; is that right?

2 A. Yes.

3 Q. Okay. I think I'm going to go to 135. Hold

4 on one second. Excuse me, Your Honor. I'm sorry.

5 Let me skip ahead a little bit.

6 Okay. I'm going to go to 149. Show the

7 bottom first. 149.

8 Now, it says 2-17 through 2-26-03. Is that

9 a typical way to do this?

10 A. It has -- I've seen it done. I think it

11 says 2-20, but --

12 Q. 2-20, you're right, I'm sorry. 2-17 through

13 2-20?

14 A. The reason we would do something like this

15 would be if we knew we were going to have guests for

16 a certain period of time.

17 Q. So you have here -- and let me do this,

18 first of all, so we can see it, and then I'll focus

19 in a little better for you.

20 At the top where it says -- ordinarily you'd

21 put your service people and whatnot up there, that's

22 crossed out and it just says, "Guest List" and the

23 whole page is used for "Guest List"?

24 A. Yes.

25 Q. Down through the first two parts of it, in

26 any event; is that right?

27 A. Yes.

28 Q. And on the guest list -- let me see if we 7109

1 can get closer and read it.

2 Can you find the one that I did?

3 MS. YU: Yeah.

4 MR. SANGER: Let me borrow that.

5 Q. 2-17 through 2-20, it shows -- well, it

6 looks like Davidia Arvizo was staying overnight, had

7 been staying overnight; is that correct?

8 A. Stayed overnight at least once.

9 Q. All right. And then it shows "out" at 1951;

10 is that correct?

11 A. Yes.

12 Q. Do you know what day she left at 1951, 7:51

13 in the evening?

14 A. No.

15 Q. All right. And then you have Gavin is also

16 staying overnight and leaves at 1951, correct?

17 A. Yes.

18 Q. And you have Janet, who leaves at 2145?

19 A. Yes.

20 Q. And then, again, Star is 1951?

21 A. Yes.

22 Q. And here it shows that the Arvizos are

23 staying -- it says --

24 A. I would assume it's "Dance Studio."

25 Q. Staying at the dance studio?

26 A. Yes.

27 Q. All right. And it shows the Cascios, Aldo

28 and Marie Nicole, are staying at the main house; is 7110

1 that correct?

2 A. Yes.

3 Q. And then there's a number of other people

4 there who are staying in the guest units down there.

5 We don't have to go through all of the names, but I

6 see Ann Konitzer and kids is in one.

7 A. Yes.

8 Q. With Ronald Konitzer?

9 A. Yes.

10 Q. And there are other people staying in the
11 other units, right?

12 A. Yes.

13 Q. Okay. Now, if we go to MJ00151, it says
14 2-18. And it doesn't show all those guests that you
15 showed -- I'm sorry, it does not show all the guests
16 that were shown on page 149 that we just looked at;
17 is that right?

18 A. Correct.

19 Q. So since the other one said 2-17 through
20 2-20, you would assume that some or all of those
21 people were continuing to stay overnight; is that
22 correct?

23 A. Yes. We most likely had that one that you
24 just showed without the guests, we had that for
25 every day --

26 Q. Okay.

27 A. -- up through that period, because we would
28 still need to have written down somewhere where 7111

1 those people, or general deliveries, contractors or
2 whatever, were still coming in.

3 Q. If we go to 155, which is for 2-19, it
4 doesn't show all those other guests that were

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5 listed, correct?

6 A. Correct.

7 Q. But it does show some new guests, for

8 instance, fan club people there?

9 A. Yes.

10 Q. Who apparently came onto the ranch for a

11 while; is that correct?

12 A. For the day, it looks like.

13 Q. Okay. Now, I'm going to go to 2-20-03,

14 which is 157. And again, if you want to look at any

15 of the pages in between, you're welcome to do it.

16 I'm trying to pick out the ones that count here, but

17 you can look at anything you want.

18 So this is 2-20-03, and this shows guests as

19 of 2-20. It shows Aja Pryor coming in at 1420

20 hours.

21 A. Yes.

22 Q. Along with Dustin Tucker. Is that her son?

23 A. I don't know.

24 Q. Okay. Aja Pryor is Chris Tucker's

25 girlfriend? Or you don't --

26 A. I have no idea.

27 Q. Okay. Do you know who Aja Pryor is at all?

28 A. No. 7112

1 Q. In any event, whoever they are came in at

2 1420. At the same time, Gavin, Star and Davellin

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3 came in at 1420 hours; is that correct?

4 A. Yes.

5 Q. So evidently they left sometime before the
6 time that they returned on 2-20, right?

7 A. Yes.

8 Q. And I showed you that other page where it
9 said 2-17 to 2-20; is that correct?

10 A. Yes.

11 Q. And it showed some "out" times, but it
12 didn't tell you the day?

13 A. Right.

14 Q. So if somebody were to have left, say, on
15 the 19th, the time was there, but you wouldn't have
16 the day to determine whether it was the 19th, the
17 17th, or what?

18 A. If that's how that particular paper was
19 kept, yes. I don't know exactly what was going on,
20 why -- I'm sure we had the extra sheet because we
21 had so many people.

22 Q. All right.

23 THE COURT: One thing you need to do is to
24 keep referring to the page number.

25 MR. SANGER: Did I fail to do that on the
26 last one?

27 THE COURT: I don't -- I don't think you did.

28 Maybe I missed it, but -- 7113

1 MR. SANGER: Okay. I'm sorry. The one that

2 I just put up was 00157.

3 THE COURT: Yes.

4 MR. SANGER: And that is for 2-20-03.

5 THE COURT: You did refer to it. I just

6 missed it. I'm sorry.

7 Is this a good place to stop?

8 MR. SANGER: Fine, Your Honor.

9 THE COURT: All right. We'll reconvene

10 tomorrow morning at 8:30. Remember the admonition.

11 (The proceedings adjourned at 11:30 a.m.)

12 --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 7058 through 7114

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 20, 2005, and thereafter

20 reduced to typewriting by computer-aided

21 transcription under my direction.

22 DATED: Santa Maria, California,

23 April 20, 2005.

24

25

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26

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

28 7115

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