

10596

1 SUPERIOR COURT OF THE STATE OF CALIFORNIA

2 IN AND FOR THE COUNTY OF SANTA BARBARA

3 SANTA MARIA BRANCH; COOK STREET DIVISION

4 DEPARTMENT SM-2 HON. RODNEY S. MELVILLE, JUDGE

5

6

7 THE PEOPLE OF THE STATE OF)

8 CALIFORNIA,)

9 Plaintiff,)

10 -vs-) No. 1133603

11 MICHAEL JOE JACKSON,)

12 Defendant.)

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17 REPORTER'S TRANSCRIPT OF PROCEEDINGS

18

19 TUESDAY, MAY 17, 2005

20

21 8:30 A.M.

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23 (PAGES 10596 THROUGH 10656)

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28 BY: Official Court Reporter 10596

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2

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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.

7

8

9 DEFENDANT'S

10 WITNESSES DIRECT CROSS REDIRECT RECROSS

11 VIVANCO, Angel 10601-SA 10604-Z 10610-SA 10611-Z

12 (Contd.)

13 PETERS, Irene

14 Lavern 10614-M

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1 Santa Maria, California

2 Tuesday, May 17, 2005

3 8:30 a.m.

4

5 (The following proceedings were held in
6 open court outside the presence and hearing of the
7 jury:)

8

9 THE COURT: Good morning.

10 COUNSEL AT COUNSEL TABLE: (In unison)

11 Good morning, Your Honor.

12 THE COURT: Yesterday I made a ruling on the
13 impeachment testimony. I gave the opportunity to
14 the defense to provide specific impeachment
15 citations that they were interested in impeaching
16 with this testimony, and I've reviewed that. I
17 received it this morning. I'm not going to change
18 my ruling. The impeachment that is requested is to
19 collateral issues, and so the ruling will stand.
20 Let's bring in the jury.

21 MR. SANGER: Your Honor, before you do, we
22 had asked to just address the Court on scheduling --

23 THE COURT: Yes.

24 MR. SANGER: -- scheduling matters.

25 Could we do that up at the bench? Could we
26 do that up at the bench?

27 THE COURT: All right. Approach the bench,

28 so the jury doesn't hear. 10599

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1 MR. MESEREAU: Your Honor, may I join? I

2 think it will help.

3 THE COURT: All right.

4 (Discussion held off the record at sidebar.)

5 THE COURT: All right. I'm going to have the

6 jury come in. I'm sorry for the conference there.

7 But what we were able to achieve in that conference

8 at bench here was the schedule for the Court for the

9 next few days, so I appreciate the fact that you had

10 to sit here and wait without hearing that, but it's

11 going to help me in the long run.

12 We'll bring in the jury.

13

14 (The following proceedings were held in

15 open court in the presence and hearing of the

16 jury:)

17

18 THE COURT: Good morning.

19 THE JURY: (In unison) Good morning.

20 THE COURT: Counsel? You may proceed.

21 MR. SANGER: Yes. We had Mr. Vivanco on the

22 stand.

23 THE COURT: Come forward, please. When you

24 get to the witness stand, you may be seated. You're

25 still under oath.

26 //

27 //

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1 ANGEL VIVANCO

2 Having been previously sworn, resumed the
3 stand and testified further as follows:

4

5 DIRECT EXAMINATION (Continued)

6 BY MR. SANGER:

7 Q. Okay. Mr. Vivanco, how you doing?

8 A. Good. How are you?

9 Q. Fine, thank you.

10 All right. I just have a little bit more
11 for you here.

12 Yesterday, you told us that you had -- I
13 believe you said you had started to talk with
14 Davellin; is that right?

15 A. Yes.

16 Q. And how did -- how did this all start?

17 Well, let me ask you this first.

18 As an employee at Neverland, were you
19 supposed to have personal conversations with the
20 guests, or not?

21 A. No.

22 Q. Okay. How did it happen that you started to
23 have personal conversations with Davellin?

24 A. She would ask me questions, and I would
25 answer as -- as a worker there, I would answer her.

26 Q. Okay. You would answer her. Did you
27 eventually develop a friendship?

28 A. Yes. 10601

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1 Q. And can you -- let me withdraw that.

2 Other than during the work hours, did you

3 have occasion to see her?

4 A. Yes.

5 Q. And where would you generally meet with her?

6 A. After work at the parking area.

7 Q. And where is the parking area?

8 A. On the -- where the fire department is at.

9 Q. Okay. Do you mean the administration

10 building?

11 A. Yes.

12 Q. Up on the hill, outside the manicured lawn

13 area; is that right?

14 A. Yes.

15 Q. All right. And about what time of night

16 would you generally see her?

17 A. After work at around maybe 10:00, 10:30.

18 Q. Okay. And about how long would you spend

19 together in the evening?

20 A. Probably half an hour.

21 Q. Okay. And during -- this -- at some point,

22 Davellin and her family left Neverland for the last

23 time. Do you remember that?

24 A. No, I don't remember that day, but she told

25 me about it.

26 Q. Okay. So there's some point at the end

27 where she's at Neverland and then she's not there

28 anymore? 10602

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1 A. Yeah.

2 Q. And you weren't there that exact night when
3 she left; is that right?

4 A. Yes.

5 Q. All right. So about how many evenings did
6 you spend on a personal basis with Davellin?

7 A. Around five or six.

8 Q. Okay. And was this closer to the beginning
9 of her visits there or the end?

10 A. Towards the end.

11 Q. Okay. And then one day she just wasn't
12 there anymore; is that it?

13 A. Yeah.

14 Q. All right. Now, during the course of your
15 visiting with her, did you, in fact, have personal
16 conversations with her?

17 A. Yes.

18 Q. All right. Then after she left -- we saw
19 that phone record yesterday, and I'm not going to
20 put them up again, but you saw your telephone number
21 up there. Do you recall if she telephoned you after
22 she left?

23 A. I think it was the day she left, like that
24 night.

25 Q. Okay. And did she keep calling you after
26 that for a while?

27 A. Yes.

28 Q. And then at some point, you stopped getting 10603

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1 telephone calls from her; is that right?

2 A. Yes.

3 Q. Okay. Did you continue to have personal

4 conversations during those phone calls over the next

5 two weeks or whatever it was?

6 A. Yes.

7 Q. All right. Now, during that entire time

8 that you had personal conversations with Davellin,

9 did she ever complain to you that Michael Jackson

10 had treated her or her family in a bad way?

11 A. No.

12 Q. Did she ever claim to you that she was being

13 falsely imprisoned?

14 MR. ZONEN: I'm going to object as leading.

15 THE COURT: Overruled.

16 You may answer.

17 MR. SANGER: Thank you.

18 THE WITNESS: No.

19 Q. BY MR. SANGER: Did she ever complain to you

20 that any of her family members had been mistreated

21 by anybody at Neverland?

22 A. No.

23 MR. SANGER: All right. I have no further

24 questions.

25

26 CROSS-EXAMINATION

27 BY MR. ZONEN:

28 Q. Mr. Vivanco, good morning. 10604

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1 A. Good morning.

2 Q. Did you say yesterday that you used to work

3 there from seven o'clock in the morning until 10 p.m.?

4 A. Yes.

5 Q. Every day?

6 A. Yes.

7 Q. Monday through Friday?

8 A. Yes.

9 Q. And sometimes on Saturday, sometimes on

10 Sunday?

11 A. Yes.

12 Q. Were you getting overtime during that time?

13 A. Yes.

14 Q. Did you see the documentary "Living with

15 Michael Jackson"?

16 A. Yes.

17 Q. When did you see it?

18 A. Two nights after it aired.

19 Q. Two nights after it aired?

20 A. Yes.

21 Q. How did you happen to see it two nights

22 after it aired?

23 A. On my day off. I think that was the same

24 night maybe. I'm not sure, but I seen it all.

25 Q. You thought it was playing two nights later?

26 A. Yeah.

27 Q. Okay. Did you recognize any of the people

28 who were in that documentary? 10605

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1 A. Yes.

2 MR. SANGER: Objection. That's beyond the
3 scope, Your Honor.

4 THE COURT: Sustained.

5 Q. BY MR. ZONEN: All right. Did you know who
6 Martin Bashir was?

7 A. Yes.

8 Q. Did you see him when he was on the property
9 at Neverland?

10 A. Yes.

11 Q. All right. When was it that the Arvizo
12 family was there at Neverland? Before or after
13 Martin Bashir was there?

14 A. Before.

15 Q. So the Arvizos came after Martin Bashir was
16 there?

17 MR. SANGER: Objection. Misstates the --
18 well, it's confusing. It's ambiguous, let's put it
19 that way.

20 THE COURT: I'll allow the question.

21 Do you understand the question?

22 THE WITNESS: No.

23 MR. ZONEN: All right. Let me ask it again.

24 Q. Do you remember seeing the Arvizo family
25 present at Neverland while Martin Bashir was there?

26 A. No.

27 Q. You saw -- you never saw the Arvizos at any

28 time while Martin Bashir was there? 10606

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1 A. Yes -- yes, I remember. Yes.

2 Q. I'm sorry?

3 A. Yes.

4 Q. On how many occasions was Martin Bashir at

5 Neverland?

6 A. Maybe I've seen him five times.

7 Q. Five times. Over what period of time?

8 A. Over the -- a month maybe.

9 Q. Over one month?

10 A. Yes.

11 Q. Okay. And during that time, on how many of

12 those occasions that he was there was the Arvizo

13 family there as well?

14 A. I don't remember.

15 Q. Was it more than once?

16 A. I think so.

17 Q. When Star was playing around with the knife

18 in the kitchen, did you report that to anybody?

19 A. No, I didn't.

20 Q. Did you call the police?

21 A. No.

22 Q. You didn't call the police because you

23 didn't think he was serious, right?

24 A. I thought he was playing around.

25 Q. You thought he was joking?

26 A. Yes.

27 Q. Did you tell him that wasn't the right thing

28 to do? 10607

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1 A. Afterwards, yes.

2 Q. He was a 12-year-old kid at the time, right?

3 A. Yes.

4 Q. And afterwards, you said that wasn't the
5 right thing to do?

6 A. Yes.

7 Q. What do you mean "afterwards"? Right after
8 it happened or a day later, two days later; what?

9 A. Right after it happened.

10 Q. Right after it happened?

11 A. Yeah, like two hours later, after I seen him
12 again.

13 Q. All right. So you told him to put the knife
14 down and he did?

15 A. Yes.

16 Q. You never felt threatened by that?

17 A. No, not really.

18 Q. And you never felt scared of him?

19 A. No.

20 Q. He was a 12-year-old kid playing around,
21 right?

22 A. Yes.

23 Q. Did you report that incident to Michael
24 Jackson?

25 A. No.

26 Q. Did you report the incident to Michael
27 Jackson of Gavin using an obscene word?

1 Q. Did you report it to anybody?

2 A. I told my co-workers about it.

3 Q. Did you report to Michael Jackson that the
4 kids were drinking alcohol?

5 A. No.

6 Q. When you were initially interviewed by the
7 sheriff's office, you told them that you didn't know
8 who the Arvizo family was, right?

9 A. Yes, at that time I didn't recognize their
10 last name. I didn't know them by the Arvizos.

11 Q. They gave you all the names, didn't they,
12 Star, Davellin, Gavin?

13 A. Just the first names, yes.

14 Q. And you told them you didn't recognize any
15 of them, right?

16 A. Just the last name, I didn't recognize the
17 last names.

18 Q. And he had to show you photographs. And
19 then after he showed you photographs you said, "Oh,
20 yeah, I remember them," right?

21 A. Yes.

22 Q. You didn't tell them anything about a knife
23 incident, did you?

24 A. No.

25 Q. You didn't tell them anything about them
26 drinking alcohol, did you?

27 A. No.

28 Q. You didn't tell them anything about Gavin 10609

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1 swearing at you, right?

2 A. No.

3 MR. ZONEN: No further questions.

4

5 REDIRECT EXAMINATION

6 BY MR. SANGER:

7 Q. Okay. Mr. Vivanco, was it your job to

8 report things directly to Michael Jackson?

9 A. No.

10 Q. So if something went wrong with guests or

11 with anything at the ranch, who would you ordinarily

12 go to if it was serious enough?

13 A. The supervisor of the ranch.

14 Q. All right. And if you felt that you could

15 handle the situation, did you feel a need to report

16 everything that happened?

17 MR. ZONEN: Objection; leading.

18 THE COURT: Overruled.

19 THE WITNESS: Yes.

20 Q. BY MR. SANGER: Okay. Now, you said -- this

21 knife incident. Mr. Zonen asked you if you were

22 scared. Did you think it was funny?

23 A. Not really.

24 Q. And was it a sharp knife or a dull knife?

25 A. It was sharp.

26 Q. Had any other guests ever done anything like

27 that to you in the time you worked there?

28 MR. ZONEN: Objection; irrelevant. 10610

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1 THE COURT: Overruled.

2 THE WITNESS: No.

3 Q. BY MR. SANGER: Now, Mr. Zonen asked you
4 about talking to the police. Do you remember
5 talking to the police?

6 A. Yes.

7 Q. Did you try to be cooperative?

8 A. Yes.

9 Q. Were you nervous?

10 A. Yes.

11 Q. Now, did they ever ask you anything about a
12 knife?

13 A. No.

14 Q. Did they ever ask you anything about Gavin
15 or Star swearing?

16 A. No.

17 Q. Did they ever ask you about Gavin or Star
18 asking you for alcohol?

19 A. No.

20 MR. SANGER: All right. Okay. Thank you.

21 No further questions.

22

23 RE-CROSS-EXAMINATION

24 BY MR. ZONEN:

25 Q. Who is the supervisor you reported these
26 incidents to?

27 A. Jesus Salas.

28 MR. SANGER: Objection, miss -- oh, I'm 10611

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1 sorry. It's either beyond the scope of direct -- I
2 mean of redirect, or misstates the evidence.

3 THE COURT: Well, the question was vague. We
4 have an answer, but I'll strike the answer and let
5 you reask the question.

6 Q. BY MR. ZONEN: Did you report any of these
7 events to any supervisor?

8 A. Yes.

9 Q. All right. Who was the supervisor?

10 A. First it was Rudy Lozano, my --

11 Q. Rudy who?

12 A. Rudy Lozano.

13 Q. Say the last name again slowly.

14 A. Lozano.

15 Q. Lozano? Okay. What did you tell Rudy?

16 A. About what Star did.

17 Q. Which --

18 A. Which is when he stuck the knife to my neck.

19 Q. What else? What else did you tell Rudy?

20 A. About the alcohol incident.

21 Q. What else did you tell Rudy?

22 A. And about the swearing.

23 Q. When was that?

24 A. Right after it happened, I would tell him.

25 Q. What?

26 A. Right after the incidents would happen I
27 would tell him, right after.

28 Q. What month was that? 10612

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1 A. I don't remember the month.

2 Q. What year was it?

3 A. 2003.

4 Q. Sometime in 2003?

5 A. Yes.

6 Q. Did you tell somebody else about these
7 events?

8 A. No.

9 Q. Didn't you just say you told Jesus Salas?

10 A. Oh, yes, Jesus Salas.

11 Q. What did you tell Jesus Salas?

12 A. The same thing.

13 Q. Each of these?

14 A. Yes.

15 MR. ZONEN: No further questions.

16 MR. SANGER: No further questions, Your
17 Honor.

18 THE COURT: All right. Thank you. You may
19 step down.

20 MR. MESEREAU: Your Honor, the defense will
21 call Ms. Irene -- excuse me, Ms. Irene Peters.

22 THE COURT: When you get to the witness
23 stand, I'd like you to remain standing.

24 Face the clerk here and raise your right
25 hand.

26 //

27 //

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1 IRENE LAVERN PETERS

2 Having been sworn, testified as follows:

3

4 THE WITNESS: I do.

5 THE CLERK: Please be seated. State and

6 spell your name for the record.

7 THE WITNESS: My name is Irene Lavern

8 Peters. I-r-e-n-e; L-a-v-e-r-n; P-e-t-e-r-s.

9 THE CLERK: Thank you.

10

11 DIRECT EXAMINATION

12 BY MR. MESEREAU:

13 Q. Good morning, Miss Peters.

14 A. Good morning.

15 Q. Miss Peters, my name is Tom Mesereau and I

16 speak for Mr. Jackson.

17 Miss Peters, how are you employed?

18 A. I'm employed as a social worker with the

19 Department of Children & Family Services.

20 Q. And is that in Los Angeles?

21 A. Yes, it is.

22 Q. And how long have you worked for the

23 Department of Children & Family Services in Los

24 Angeles?

25 A. 30 years.

26 Q. Okay. And what do you do with the

27 department?

28 BAILIFF CORTEZ: Would you move closer. 10614

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1 THE WITNESS: I investigate child abuse
2 referrals for neglected, abused and abandoned
3 children and exploited children. I work in a
4 sensitive case unit which deals with
5 high-profile-type cases. I've been working in there
6 for maybe seven years.

7 I also have numerous experiences in
8 emotional abuse, sexual abuse, physical abuse, you
9 name it, after 30 years.

10 Q. BY MR. MESEREAU: And to have a position
11 like this, what kind of training do you have to go
12 through?

13 A. Well, I have extensive training. I've
14 graduated from Cal-State Los Angeles years ago. It
15 was 25 years ago. I also get extensive training
16 from our department in different areas on a monthly
17 basis, or whatever.

18 Q. And is there a particular office that you
19 operate out of in Los Angeles?

20 A. Yes, it is.

21 Q. And where is that?

22 A. It's on Wilshire and Vermont, in that area.

23 Q. Are there other offices that DCFS has in Los
24 Angeles?

25 A. Yes, there is.

26 Q. And is there any particular reason why
27 you're located at that office?

28 A. Well, that's the region that we're in. 10615

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1 We're in different regions, and the particular unit
2 that I'm in is housed in that particular building.

3 Q. Now, have you taken courses periodically
4 during your 30 years?

5 A. Yes, I have.

6 Q. What courses have you taken?

7 A. Oh, wow.

8 Q. If you could just summarize them.

9 A. Interviewing exploited children.

10 Interviewing sexually abused children.

11 Interviewing -- oh, wow. Let me see. I've also
12 done child's play. You know, it's so many, I
13 can't -- right off the hand, I just can't.

14 Q. As part of your job, are you asked to
15 periodically take courses like this?

16 A. Yes. Maltreatment of children. So
17 numerous, I just can't remember all of them.

18 Q. As part of your responsibilities, do you get
19 periodic updates on the latest information about
20 your field?

21 A. Yes, I do. Yes.

22 Q. How is that done?

23 A. We're asked if we need training in certain
24 things. They give us an opportunity to participate
25 in the trainings.

26 Q. Do you get lectures from various researchers
27 about information they've developed in your field?

28 A. Yes, I do. 10616

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1 Q. Is continuing education a part of your job?

2 A. Yes, it is.

3 Q. And to become a social worker like you are,
4 do you have to obtain a certificate or any type of
5 diploma?

6 A. Most of the social workers have masters in
7 social work, yes.

8 And I came up from the bottom up, as -- with
9 a BSW in social work, and worked myself up.

10 Q. And does a social worker like you have a
11 particular certificate or a license or anything of
12 that sort that you obtain with --

13 A. I don't have a license, no.

14 Q. Have your responsibilities at that agency
15 pretty much been the same since you started?

16 A. Well, they've changed, because I work
17 different positions.

18 Q. Just summarize your different positions, if
19 you would.

20 A. I worked at the MacLaren Children's Center,
21 which is used for temporary shelter for children. I
22 worked there for over 12 years, working with kids
23 for various problems. Most of the kids just
24 directly came from their homes and were placed in
25 the shelter care there. I was what you call the
26 team leader of the unit where the children were
27 housed, so I deal with a variety of various children

28 with different problems. 10617

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1 Q. Now, in the unit you're in currently, were
2 you in that unit in 2003?

3 A. Yes, I was.

4 Q. Okay. When did you begin working in this
5 particular unit?

6 A. Let me see. About maybe three or four years
7 ago. I had multiple units. I was dealing with
8 three different units at the time. I deal with
9 children who have special needs, health issues.

10 Also was dealing with minor parents, pregnant
11 mothers, and I was dealing with a sensitive case
12 unit. So it was three different units, basically.

13 Q. And does your current unit, which was the
14 unit you were in in 2003, have a particular purpose?

15 A. Yes. We deal with those cases that are
16 high-profile cases, cases that you see on the news,
17 the media cases. We also deal with a lot of police
18 officers, sheriffs, of some sort.

19 Q. And does the fact that a case might be
20 high-profile affect the nature of your work?

21 A. Yes, it does.

22 Q. How does it?

23 A. High-level degree of confidentiality, the
24 way we handle the case. I think this case was
25 started about 10 or 11 years ago because of some
26 things that were happening, and so a special unit
27 handles those cases.

28 Q. And if someone is high-profile, let's say 10618

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1 they're a celebrity that's well known, is it your
2 understanding that they may be more of a target for
3 complaints?

4 A. Well, not more of a target. I think that
5 when those cases do come through the child abuse
6 hotline, that those cases are put in a certain unit
7 so that they would not have any leakage going on or
8 anything that would get out.

9 Q. Are you familiar with someone named Gloria
10 Allred?

11 A. Yes, I am.

12 Q. And who is she, to your knowledge?

13 A. She's an attorney.

14 Q. And is she known to appear on T.V. a lot?

15 A. Yes, she is.

16 Q. Is she known to generate a lot of
17 controversy?

18 A. Yes, she is.

19 Q. And have you ever received reports from her
20 that you know of?

21 A. The existing report that we got, the first
22 report from -- I think it was February the 14th,
23 2002 -- '3, we're talking about, on the referral,
24 her name is mentioned on the referral.

25 Q. Okay. And she made a report about Michael
26 Jackson to your agency, right?

27 A. It was mentioned in the report. There is

28 another report I think that she did make a report. 10619

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1 Q. Okay.

2 A. But the report I went out on, 2-14, her name
3 was just mentioned in the report.

4 Q. Okay. Let's talk about what you did on
5 February 14th, 2003, okay?

6 A. Okay.

7 Q. Let me begin by asking if you know someone
8 or have ever met someone named Janet Arvizo?

9 A. Yes, I have.

10 Q. And how did you first meet Janet Arvizo?

11 A. To give you just a little background on how
12 it happens, you get a child abuse referral from the
13 hotline, and then it's framed out to certain units.

14 And the unit that this particular referral
15 was framed out to was our unit, sensitive case unit
16 due to the nature of the case.

17 From there, you go out and make -- you go
18 out and attempt to make contact with that person.

19 So that's what I was doing, I received it on
20 2-14, and at that point I read the referral and the
21 allegations.

22 From there, I decided to call the Los
23 Angeles Police Department, because of the nature of
24 the case, because they said it was sexual abuse.

25 And anytime there's a sexual abuse, that could be a
26 criminal, so we have to have the police involved,
27 because they would be the one that would make the

28 decision whether or not to detain the children. 10620

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1 Q. Let me just go step by step, if I can.

2 A. Uh-huh.

3 Q. You have received a hotline referral, right?

4 A. Yes. Yes.

5 Q. And the hotline is a number that's public?

6 A. It's -- yes, it's public knowledge.

7 Q. Anybody can call it and make an accusation

8 if they want, correct?

9 A. Yes. Yes.

10 Q. They don't have to reveal their name, right?

11 A. No, they do not. No.

12 Q. They can simply call up any time of day and

13 say, "Yeah, I believe somebody might be doing

14 something improper," right?

15 A. Yes.

16 Q. The complaints can be legitimate ones or

17 they can be totally frivolous, right?

18 A. Exactly.

19 Q. But it's a number that's available to the

20 public so they can make reports if they choose,

21 right?

22 A. Right.

23 Q. And very often, on that hotline, people

24 remain anonymous, right?

25 A. Yes, they do.

26 Q. So you never have a chance to investigate

27 the background of the person who made the complaint,

28 right? 10621

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1 MR. SNEDDON: I'm going to object as

2 leading.

3 THE COURT: Sustained.

4 Q. BY MR. MESEREAU: If an anonymous complaint

5 comes in, what is the first thing that you, as a

6 social worker in your particular unit, will do with

7 that particular complaint?

8 A. I'm not the one that receives the referral,

9 so this is anonymous. It comes through a telephone.

10 Q. Right.

11 A. There's a hotline number. You call and say,

12 "I want to be anonymous." So at that point we don't

13 do anything.

14 When we do get people who want to not remain

15 anonymous, we can, in fact, call them as a

16 collateral contact to get information, yeah.

17 Q. So basically, generally speaking, you

18 learned there was a referral?

19 A. Yes.

20 Q. You don't necessarily know if it's a good

21 referral or a bad referral, right?

22 A. No, we don't.

23 Q. And you just follow up on the referral?

24 A. Exactly.

25 Q. That's part of your job, right?

26 A. Yes, it is.

27 Q. Let's get to Janet Arvizo.

28 You learned that somebody had made a 10622

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1 referral questioning Janet Arvizo and Michael

2 Jackson, right?

3 A. Yes.

4 Q. And you learned that somebody had made a

5 referral because they saw a documentary on

6 television, right?

7 A. Yes.

8 Q. The documentary was now known as the Bashir

9 documentary, right?

10 A. Yes.

11 Q. And somebody made a referral saying that

12 they had seen the documentary and they wanted you to

13 look into Janet's actions and Michael Jackson's

14 actions, right?

15 A. Right.

16 Q. Okay. And you then were assigned to that

17 particular case, correct?

18 A. Yes.

19 Q. Was anyone else assigned to it with you?

20 A. No.

21 Q. Okay. And your first action was to study

22 what information you had and then call the police,

23 right?

24 A. I read the referral of the allegations. The

25 allegations were for general neglect.

26 Q. By Janet Arvizo?

27 A. Janet Arvizo, yes.

28 Q. So what did you do after you saw this 10623

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1 referral that suggested there might be some general
2 neglect by Janet Arvizo?

3 A. I had to go out and investigate the
4 referral.

5 Q. Okay. And how did you do that?

6 A. I went to the home of the address that was
7 listed on the referral, and from there -- first I
8 called the LAPD, and I talked to the child abuse
9 unit, and they sent two officers out there with me.

10 Q. Okay. And where did you go with the two
11 officers?

12 A. We went to the address that was listed on
13 the referral.

14 Q. Okay. And do you remember approximately
15 where that?

16 A. 415 -- I think it's 450, it's like off of
17 Wilshire. It wasn't that far from my office.

18 Q. And was that St. Andrews?

19 A. St. Andrews, that's it.

20 Q. Now, did you get that address from the
21 person who made the referral?

22 A. I got the address from the referral that
23 came to my desk, yes.

24 Q. And did you learn that that was the address
25 of a Major Jay Jackson?

26 A. I only learned that after I got there.

27 Because I was looking on the roster to see whether

28 or not her name was on there. So when I looked on 10624

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1 the roster, I didn't see -- but I did see "Jackson,"
2 so I connected -- I said, "Well, maybe perhaps this
3 is Jackson and she's" -- you know.

4 But I talked to the superintendent of the
5 apartment and he said there was no African-Americans
6 or Mexican-Americans living in that particular
7 complex.

8 Q. So did you determine that there was no
9 connection between Jay Jackson and --

10 A. No, I didn't. I did not know.

11 Q. Okay. What did you do next?

12 A. After that, I talked to the police officers,
13 and they told me that they didn't have any
14 jurisdiction in Los Angeles, because the incident
15 happened in Santa Barbara, and that was the end of
16 that.

17 And so from there, I think the next -- it
18 was like a Friday -- and I went to work on a
19 Tuesday, and I tried to contact the school that the
20 children were going to. And I went over to the
21 school and talked to a counselor there, and it was
22 just coincidental that she happened to call, Janet
23 happened to call the school while I was sitting
24 there. And I told her that I needed to come and
25 talk to her and interview her, and I had an
26 allegation that I need to talk to her about.

27 Q. And did you do that?

28 A. Yes, I did. 10625

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1 Q. And just to clarify, where was that
2 interview?

3 A. The interview took place on St. Andrews.

4 Q. Okay. So that was Major Jay Jackson's
5 home --

6 A. Yes, it was.

7 Q. -- right?

8 Now, who did you go there with for the
9 actual interview?

10 A. I requested that my supervisor go with me
11 and another co-worker.

12 Q. And do you know what their names were?

13 A. Yes. Jackie Bowen and Karen Walker.

14 Q. And what is your typical procedure when you
15 interview someone about a referral like this?

16 A. What I do is I read the referral, the
17 allegations, first to them. And then I start to ask
18 questions regarding the referral.

19 Q. Now, did you believe that Janet Arvizo lived
20 at that address?

21 A. I knew she didn't live there. Because she
22 told me.

23 Q. And why was the interview being conducted
24 there?

25 A. Because she did not -- I didn't have an
26 address for her, and this is an address was given, I
27 think because the kids were going to the school in

28 that area, and this is the address that they were 10626

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1 using.

2 Q. Did you know whether or not Janet Arvizo and
3 the children lived at that address from time to
4 time?

5 A. I think they -- yes, she did tell me that
6 they lived there periodically, yeah.

7 Q. And to your knowledge, did she choose that
8 address to be interviewed at?

9 A. Yes, she did.

10 Q. Okay. And did you wonder why she wanted
11 that address, or was it just okay for her to pick
12 whatever location she wanted?

13 A. No, she told me that she was hiding out from
14 the media because of the Bashir interview, and the
15 kids had been getting into a lot of squabbles and
16 things with people on the streets. And she lived in
17 East Los Angeles, and she lived in a small
18 apartment, studio apartment, and she paid only \$700
19 a month for rent. She was on welfare, and that she
20 thought this was the best place for her to be at
21 this time.

22 Q. Okay. Now, she told you she was on welfare?

23 A. Yes, she did.

24 Q. And was it your obligation to check out
25 whether or not she was properly on welfare?

26 A. Well, we have a computer system that does
27 reflect if a person's getting what they call

28 Cal-Works or not. We know that information. 10627

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1 Q. Okay. But you didn't know whether or not
2 she had told the truth when she applied for welfare?

3 A. No, I didn't --

4 MR. SNEDDON: Objection, Your Honor. Lack
5 of foundation; hearsay.

6 THE COURT: Sustained.

7 Q. BY MR. MESEREAU: Your job at your agency
8 was not to determine whether she was properly
9 receiving any public assistance, right?

10 A. No, because I don't deal with that aspect of
11 it. I deal with abused children.

12 Q. Right.

13 A. Yes.

14 Q. She told you what her rent was at the
15 apartment in East Los Angeles, right?

16 A. She told me how much money she was receiving
17 from welfare.

18 Q. Okay. And did she tell you she had some
19 financial problems?

20 A. Yes, she did.

21 Q. Okay. What did she tell you they were?

22 A. Well, she said since the -- her separation
23 and past domestic violence issues with her husband,
24 she's living on a medium income. She only has,
25 like, \$700. She was very emphatic about it. And
26 that they were sleeping on the floor. She barely
27 had enough money to make it.

28 Q. Okay. And again, this is -- she tells you 10628

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1 this on February 14th, 2003?

2 A. No, it was February 20th.

3 Q. February 20th, 2003?

4 A. I went to the home on February 14th. I

5 didn't get in touch with her until the 20th.

6 Q. So February 20th, 2003, she is at St.

7 Andrews Place with her children, right?

8 A. Yes, she is.

9 Q. Do you recall anyone else being there with
10 her?

11 A. When I walked in, there was several people
12 that were there, which was kind of unusual. But it
13 was two -- two guys, a young lady and her son, and
14 of course the children and her. And the three
15 people that were with me, my social -- my supervisor
16 and also one of my co-workers. So there was quite a
17 few people there.

18 Q. Do you know approximately what time of day
19 this was?

20 A. Like 12:00.

21 Q. Twelve noon?

22 A. Yeah, around that. I can't remember what
23 exact time it was. Yeah.

24 Q. And you saw another woman with her child,
25 right?

26 A. Yes.

27 Q. Did you learn that her name was Aja Pryor?

28 A. Well, I did. I mean, back to memory, I 10629

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1 think it was Chris Tucker's girlfriend and his
2 child. And someone from Michael Jackson's -- I
3 don't know if he was a security guard or what.

4 Q. And anyone else you remember seeing besides
5 the Arvizo family?

6 A. There was another guy there. Can't remember
7 his name.

8 Q. Okay. Now, did you have to walk up the
9 stairs --

10 A. Yes, we did.

11 Q. -- to get into this apartment?

12 A. Yes.

13 Q. And the three of you arrived together?

14 A. Yes, we did.

15 Q. All of you from the social agency, right?

16 A. Children's Services, yes.

17 Q. Were the other two people with you part of
18 your unit as well?

19 A. Yes, they were.

20 Q. Now, would it be normal to bring three of
21 you for an interview?

22 A. Not normally.

23 Q. Why did you do it this time?

24 A. Why did I do it? I just thought I needed
25 some support.

26 Q. Okay.

27 A. Yes.

28 Q. You knocked on the door, right? 10630

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1 A. Yes, I did.

2 Q. You were allowed in?

3 A. Yes, I was.

4 Q. And what is the next thing you saw?

5 A. Immediately when I walked into the room, I

6 noticed all the people sitting there. And Miss

7 Arvizo -- at the time I thought her name was Janet

8 Ventura. Am I correct?

9 Q. Uh-huh.

10 A. She came over to me and says, "Oh, please,

11 sit down. Sit down. I want you to come over to the

12 video" -- "the T.V. and watch a video." And I

13 thought it was kind of odd, but I did it.

14 And we all sat down. And it was a video of

15 Michael Jackson and Gavin walking around Neverland

16 looking at the swans and just basically riding on

17 the train or something like that, of that nature.

18 Q. So "she" meaning Janet?

19 A. Yes.

20 Q. Wanted to start off the meeting by you

21 seeing a video?

22 MR. SNEDDON: I'm going to object to that

23 question with the editorial comment. Move to

24 strike.

25 THE COURT: Sustained. Stricken.

26 Q. BY MR. MESEREAU: Was there any discussion

27 that you had with Janet before she showed you this

28 video of Michael Jackson and Gavin at Neverland? 10631

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1 A. Not really.

2 Q. Okay.

3 A. That was the first thing she did

4 immediately upon my arrival.

5 Q. Did she show the video to the three of you?

6 A. All of us that were there, yeah.

7 Q. And did you talk to her during the video or

8 did everybody just watch it?

9 A. No, we just watched it.

10 Q. Okay. What happened after the video was

11 completed?

12 A. Okay. After the video was completed, my

13 supervisor requested that all the people that were

14 not involved in the referral, that they had to leave

15 the premises.

16 Q. And --

17 A. And she was --

18 Q. -- what happened?

19 A. She was a little -- she objected to it,

20 because she felt that those people were there to

21 support her through this whole ordeal, and they were

22 her friends.

23 And we explained to them the level of

24 confidentiality, and that they were not to be there,

25 so we asked them to leave.

26 Q. And you asked Janet to have them leave?

27 A. We asked them to leave.

28 Q. And when you say, "We asked them to 10632

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1 leave" --

2 A. The supervisor did.

3 Q. And when you say you wanted them to leave,

4 who are you referring to?

5 A. I'm referring to the two guys from Michael

6 Jackson's camp or whatever, and Aja was her name,

7 and the child.

8 Who else was there?

9 And that was it.

10 Q. And did they leave when you made that

11 request?

12 A. Yes, they did.

13 Q. Did they leave the premises?

14 A. Yes.

15 Q. Okay. So these people left, and who were

16 you then with in the apartment?

17 A. It was Star, Gavin, Davellin -- Davellin I

18 think was her name -- and Karen Walker, which is the

19 supervisor, Jackie Bowen, which is another social

20 worker, and myself.

21 Q. So at that point, just the three social

22 workers, including you and the Arvizo family?

23 A. Yes.

24 Q. No one else was there at that point?

25 A. No one else.

26 Q. Okay. And what did you do after that?

27 A. I proceeded to talk to the mother and I read

28 the allegations to her. 10633

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1 Q. Okay.

2 A. Okay.

3 Q. And were the children present when you did
4 that?

5 A. Yes, they were.

6 Q. Was that standard procedure?

7 A. Yeah. I made the -- I just read the
8 allegations. What I did was I took Gavin into
9 another room, and then I was -- I had -- the other
10 worker was going to interview Star and the other one
11 was going to interview Davellin.

12 But when I started to talk to Gavin, the
13 mother came into the room and knocked on the door,
14 and she asked me whether it was okay if she would be
15 present, which if a parent wants to be present
16 during the interview, they are allowed to be
17 present.

18 Q. Okay. Did you interview Gavin?

19 A. Yes, I did.

20 Q. Did you interview Star?

21 A. Yes, I did.

22 Q. Did you interview Davellin?

23 A. Yes, I did.

24 Q. And did you interview Janet?

25 A. Yes.

26 Q. Approximately how long did it take to do all
27 these interviews, if you remember?

28 A. Maybe two and a half hours. 10634

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1 Q. Okay.

2 A. Three hours.

3 Q. And to your knowledge, was anything

4 recorded?

5 A. Yes, I recorded it -- no, not recorded -- do

6 you mean like tape-record something?

7 Q. Yeah.

8 A. No, we're not allowed to tape-record.

9 Q. Okay. Do you just take notes?

10 A. I have to take notes.

11 Q. And typically, after you conduct an

12 interview like this, what do you do with your notes?

13 A. I keep them.

14 Q. Do you make a report?

15 A. Well, I have to write a report, yes, I do.

16 Q. And did you write a report in this case?

17 A. Yes, I did.

18 Q. Okay. Let's start with the interview you

19 did with Janet. Have you looked at your report

20 recently?

21 A. Yes.

22 Q. What did you ask Janet?

23 A. I asked her -- when I read the allegations

24 to her, I wanted to hear her comments. And she

25 said, "Well, absolutely that is not true," because I

26 was interviewing her for general neglect.

27 Q. What is general neglect?

28 A. When you are neglecting your children. Like 10635

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1 inadequate supervision, maybe you're not taking them
2 to any medical or dental appointments. You're
3 not -- they are not going to school. They're in
4 poor environmental conditions. Things of that
5 nature.

6 Q. When you read Janet the allegation of
7 general neglect, did you tell her where the
8 allegation came from?

9 A. No, I did not.

10 Q. Okay. You just said there had been an
11 allegation?

12 A. Yes.

13 Q. Did you tell her anything to suggest the
14 allegation had been ever proven?

15 A. No, that's why I'm there. My role is to
16 investigate it.

17 Q. Your role is to investigate it?

18 A. Investigate, uh-huh.

19 Q. Did she respond to your description of the
20 allegation?

21 A. Yes, she did.

22 Q. What did she tell you?

23 A. She said that Michael's been like a father
24 to her children; that she was very upset about it;
25 that he has been very good to her children. He's
26 more like a -- more than their father had ever been.
27 She said she was totally appalled by all the

28 negative attention that her children had been 10636

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1 receiving since the Bashir document, tape, uh-huh.

2 And she was upset -- excuse me. She was

3 upset because she was saying that she doesn't have

4 any consent to have her children be on T.V., and she

5 was upset with Mr. Bashir.

6 Q. Okay. Did she ever say anything negative

7 about Michael Jackson?

8 A. No, she didn't.

9 Q. Did she say anything about her ex-husband?

10 A. Yes, she did.

11 Q. What did she say?

12 A. She talked about the past domestic violence

13 issues and the anger and the frustration that she

14 had been experiencing. And they had a -- what is

15 it? -- a restraining order against him until 2004,

16 and that he had been physically abusing her

17 children, and the grandparents had deserted the

18 children practically.

19 Q. Okay.

20 A. Yes.

21 Q. Did she ever say anything that suggested

22 Michael Jackson had abused her children?

23 A. No, she did not.

24 Q. Okay. She only praised him, right?

25 A. Yes.

26 Q. Now, what other questions did you ask Ms.

27 Arvizo during your interview?

28 A. I asked, "What usually happens when you go 10637

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1 to Neverland?" And she told me that when she goes
2 to Neverland, that the kids are usually in the
3 big -- in the house, and sometimes she's in the --
4 this is another house that she's in. And she's
5 usually very aware of what always goes on there,
6 because she's very vigilant, she has a vigilant eye.
7 And the kids play video games and watch T.V.

8 And I asked her had the kids ever been in
9 Michael Jackson's room on his bed. She said, "Yes,
10 they have," she said, "because the room" -- "the
11 house is really big. The room is really big, and
12 the kids all play in the room." But she's aware of
13 what goes on there.

14 Q. Okay. And did she complain about anything
15 that went on in Mr. Jackson's room?

16 A. No, she did not.

17 Q. Did she ever say anything bad went on in Mr.
18 Jackson's room?

19 A. No, she did not.

20 Q. And did she tell you how she supervises her
21 kids at Neverland?

22 A. She said that she's always aware of what the
23 children were doing, that she's usually there.
24 She's usually walking, up all night long. That's
25 what she said.

26 Q. And were you concerned about anything she
27 told you about what happens at Neverland?

28 A. Not really. 10638

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1 Q. Okay. Did you ask her any questions about
2 her kids' schooling?

3 A. Yes, I did.

4 Q. And what did you ask in that regard?

5 A. I asked, "What school do they attend?"

6 "They attend John Burroughs Junior High

7 School," Stan -- I mean Star and Gavin. I think

8 Star was in the -- Gavin was in the fourth

9 percentile of the standard tests.

10 She also told me that Gavin -- Star was

11 having a few problems with a cyst on his brain or

12 something like that, of that nature. She said they

13 were doing well in school.

14 The daughter was doing well in school. She

15 went -- she attended school over in East Los

16 Angeles. She said she was doing good in school.

17 And -- basically.

18 Q. Would it be accurate to say that Janet

19 Arvizo denied the allegations of general neglect?

20 A. Oh, yeah.

21 I was going to get to that.

22 She denied all allegations of general

23 neglect. And one of the things we said, the kids

24 are in school, they were neat, dressed clean, they

25 were in a proper environment, so that's what I'm

26 investigating, the general neglect of her.

27 Q. Any other questions that you asked her that

28 you haven't identified? 10639

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1 A. I asked her -- I asked her about the
2 relationship between she and Michael Jackson, and
3 that's when she went on to say that he was like a
4 father to her children, and that she thinks that he
5 was responsible for helping Gavin to survive his
6 cancer, for his cancer to be in remission.

7 Q. Anything else you recall asking her in that
8 interview?

9 A. I asked -- I asked basically the same
10 questions to each one of them.

11 Q. Okay. Let's move --

12 A. When she -- I did -- excuse me.

13 I did ask her was she aware that Michael --
14 that the kids ever slept in the bed with Michael
15 Jackson. And she told me no, that that never
16 happened.

17 Q. Okay. And did she tell you what she does at
18 Neverland when she stays there?

19 A. She says watch movies and be in the park and
20 sometimes she's in the house. And she's usually --
21 usually walking up all night long, she says, kind of
22 busy.

23 Q. Okay. Did you have any suspicions about
24 anything she told you?

25 A. Well, based on what she was saying, what she
26 was reporting, I didn't have any suspicions about
27 it, no, because this is an interview that we do in

28 less than two or three hours. It's not like a 10640

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1 police investigation.

2 Q. Did she seem fairly confident about what she
3 was saying?

4 A. Pretty confident. Very anxious, very
5 loquacious.

6 Q. Did she seem like she wanted to talk to you?

7 A. Yes, very much so. Very touchy-feely, kind
8 of, warm kind of person.

9 Q. When you say "touchy-feely," what do you
10 mean?

11 A. Touchy, huggy, you know, overly, like a --
12 overly affectionate.

13 Q. Did she seem very spontaneous in her answers
14 to your questions?

15 MR. SNEDDON: Object. Calls for a
16 conclusion. No foundation.

17 THE COURT: Overruled.

18 You may answer.

19 THE WITNESS: What was the question?

20 Q. BY MR. MESEREAU: Did she seem very
21 spontaneous in her answer?

22 A. Yes, she's witty.

23 Q. She's witty?

24 Okay. How long do you think your interview
25 of Janet lasted?

26 A. Probably about 30, 40 minutes.

27 Q. Okay. And were her children present during

28 the entire interview? 10641

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1 A. They were there.

2 Q. All three?

3 A. All three.

4 Q. Okay. And when you interviewed Janet, would
5 the children sort of speak out, or were they silent
6 and you just questioned her, if you remember?

7 A. They would say -- when she started to speak
8 about Michael, they kind of interjected some things,
9 yes.

10 Q. The children did?

11 A. Yes, they did.

12 Q. Did they all seem to be in agreement?

13 A. Yes, they did.

14 Q. About what she said to you?

15 A. Yes, they did.

16 Q. Now, when you have an investigative
17 interview like this, and you tell someone what the
18 allegation is, in this case of course it was general
19 neglect, do you tell the person you're talking to
20 what the possible consequences could be of your
21 investigation?

22 A. No, I don't. I mean -- if -- if I felt that
23 I had to -- that something was said during that
24 interview, I would probably stop the interview. And
25 that's why I said, because it was a sexual abuse
26 issue here, that's when I would call the police
27 department.

28 Q. Okay. Now -- 10642

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1 A. She's aware of that. She was aware of that,
2 that those kids could possibly be detained if I
3 thought in any way that those kids were being
4 neglected.

5 Q. So you told her that you had called the
6 police department, right?

7 A. No, I didn't tell her that.

8 Q. You didn't tell her that?

9 A. No, I didn't tell her that. But this is one
10 of the possibilities, had we gotten to that point,
11 that's what I would have told her.

12 Q. But the first time you went to see her, you
13 were with some police officers, correct?

14 A. Yes, I was.

15 Q. And you didn't find her that particular day?

16 A. No, I didn't.

17 Q. And that's the 14th?

18 A. Yes, that's the 14th.

19 Q. Did the police officers leave their card at
20 that address?

21 A. Yes. No, they left it with me.

22 Q. Left it with you?

23 A. Detective Brown and Barclauf, or something
24 like that.

25 Q. Now, when you went to the location on the
26 14th and you didn't find Janet there --

27 A. Right.

28 Q. -- did you leave any message that you had 10643

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1 been there?

2 A. No, I didn't, because I wasn't aware that
3 was the correct address, because I didn't see her
4 name listed on the directory.

5 Q. Okay. Now, when you spoke to Janet and the
6 children on the 20th at Major Jay Jackson's home --

7 A. Yes.

8 Q. -- did anyone tell you that they were being
9 held against their will by Michael Jackson?

10 A. No, they did not.

11 Q. During that interview did any of the family
12 say they were being abused by Michael Jackson in any
13 way?

14 A. No, they did not.

15 Q. Did any member of the family say they were
16 being falsely imprisoned at Neverland?

17 A. No, they did not.

18 Q. Did they say anything about their even
19 wanting to go back to Neverland; if you know?

20 A. You know what? She did ask me -- she wanted
21 to know if I could have the interview at Neverland,
22 the interview we were having, because she had
23 requested that prior to me speaking to -- actually
24 talking to her.

25 Q. She wanted you to travel with the family to
26 Neverland for the interview?

27 A. She did suggest that.

28 Q. Okay. And what was your reaction to that? 10644

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1 A. No, no, I need to see where they were
2 living.

3 Q. Okay. Did Ms. Arvizo or any of the children
4 ever say anything that suggested they were being
5 extorted or hurt by Mr. Jackson on that day, the
6 20th?

7 A. No, she did not. The main complaint was she
8 felt that the kids were being taped without her
9 consent, and what could she do about it, because I
10 did have some conversations with her after leaving
11 her home.

12 Q. When you say "taped without her consent,"
13 let me talk --

14 A. She means the Bashir tape.

15 Q. Okay.

16 A. Yes.

17 Q. She didn't seem to have any problem with the
18 videotape she showed you of Michael Jackson with
19 Gavin?

20 A. No.

21 Q. She wanted you to see that, right?

22 A. Yes. Yes.

23 Q. She never complained about that tape, did
24 she?

25 A. No, she said she wanted to show me how
26 caring and loving Michael was.

27 Q. Okay. Let me ask you about your interview

28 on that day with Gavin. He was 13 years old, right? 10645

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1 A. At the time, yes.

2 Q. What did you ask him?

3 A. I asked him very point-blankly, had he ever
4 slept in the bed with Michael Jackson.

5 Q. And what did he say?

6 A. He told me, "No."

7 Q. And what else did you ask him?

8 A. I asked him what was his relationship with
9 Michael Jackson. He told me how he met him; that he
10 was at The Laugh Factory -- I mean, with Jamie
11 Masada, and he wanted to grant a wish, and the wish
12 was that he would meet Michael Jackson. He was in
13 the hospital suffering with cancer. And his wish
14 was granted, and they've had a relationship ever
15 since. He was very fond of him. That he treated
16 him like a father, and he really cared about him.

17 Q. How long do you think your interview with
18 Gavin lasted?

19 A. About 30 minutes.

20 Q. Are there typical questions that you would
21 ask a 13-year-old in your work?

22 A. Yes. I did ask him had he ever been touched
23 sexually inappropriately at any time.

24 He says -- and he became a little upset. He
25 says, "Everybody thinks that Michael Jackson
26 sexually abused me. He's never touched me." And he
27 was just very upset about it.

28 Q. Okay. Did he ever complain about anything 10646

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1 Michael Jackson had ever done?

2 A. No, he did not.

3 Q. Okay. Did he continually praise Michael

4 Jackson to you?

5 A. Yes, he did.

6 Q. Did he ever complain about anything that was

7 going on at Neverland?

8 A. No, he did not.

9 Q. Okay. And what was his demeanor as you were

10 interviewing him?

11 A. Kind of playful. Appeared to enjoy the

12 attention. Very articulate. Very smart kid.

13 Q. Was Gavin present when Janet showed you the

14 video of Michael Jackson and Gavin at Neverland?

15 A. Yes, he was.

16 Q. Did he ever say anything about that video to

17 you?

18 A. No, he did not.

19 Q. Okay. When you watched the video, was

20 anybody speaking?

21 A. No.

22 Q. Was everybody silent, just watching this?

23 A. Was silent, yeah.

24 Q. Okay. Did anybody tell you how that video

25 was made?

26 A. No. No. Huh-uh.

27 Q. But was it your impression that Janet,

28 Gavin, Star and Davellin all wanted you to see a 10647

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1 video?

2 A. Yes.

3 Q. Was it your impression that they were all

4 happy about that video?

5 A. Yes.

6 Q. It's only the Bashir video they complained

7 about, right?

8 A. Yeah, they did complain about that.

9 Q. Okay. All right. Now, when you finished

10 your interview with Janet, just based on what you

11 knew at that point, what was your conclusion, if

12 any?

13 A. What I do is I -- I interview all the people

14 involved.

15 Q. Okay.

16 A. Then I go and I write a report, and I do --

17 I do the conclusion on the report.

18 Q. So you hadn't formed any conclusion --

19 A. Not at that time.

20 Q. -- until you had done all the interviews,

21 right?

22 A. Until I did all the interviews.

23 Q. Okay. You also interviewed Star Arvizo,

24 right?

25 A. Yes, I did.

26 Q. And what kind of questions did you ask Star?

27 A. All the same questions.

28 Q. Okay. 10648

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1 A. What was his relationship with Michael
2 Jackson. "Has Michael Jackson ever sexually abused
3 you or touched you inappropriately?" I asked, "What
4 usually happens when you go to Neverland?" Three
5 basic questions.

6 Q. Uh-huh.

7 A. I asked him about their mother, how she
8 takes care of them, you know.

9 Q. What did Gavin tell you about how his mother
10 takes care of him?

11 A. He praised his mother and talked about how
12 good she takes care of him, and, you know, she's
13 been by him through the cancer and the chemotherapy
14 that he was going through.

15 Q. Let me ask you about what Star told you.
16 You asked him the same kinds of questions you asked
17 Gavin, right?

18 A. Yes, I did.

19 Q. What did Star tell you?

20 A. He praised Michael Jackson, said that he's
21 been like a father to him, and he met him through
22 his brother at the -- I mean, met him through his
23 brother, after he was introduced by Jamie Masada,
24 you know, to Michael Jackson.

25 And he said they have fun when they go to
26 Neverland, they usually do s'mores, be by the
27 fireplace, they play around a lot. They said they

28 had nicknames for each other. Michael had a 10649

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1 nickname for him. His name was "Blowfish" And he
2 said, "Michael can get loud, too, at some times."

3 You know, very 12 year-old.

4 Q. Did Star say anything negative about Michael
5 Jackson at any time?

6 A. No, he did not.

7 Q. Did he continually praise him?

8 A. Yes, he did.

9 Q. Okay. What was Star's demeanor when you
10 questioned him?

11 A. He was a happy kid. He was --

12 Q. Did Star seem spontaneous in his responses
13 to you?

14 MR. SNEDDON: Object. Calls for a
15 conclusion. Lack of foundation.

16 THE COURT: Overruled.

17 You may answer.

18 THE WITNESS: How did he seem?

19 MR. MESEREAU: Let me rephrase the question.

20 Q. How many interviews do you think you had
21 conducted of mothers and children at this point in
22 your career? Would it be thousands?

23 A. Oh, yeah.

24 Q. Thousands?

25 A. Thousands.

26 Q. Okay. And when you were interviewing Janet
27 and these children, did they appear like they had

28 memorized their answers or that they were following 10650

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1 scripts to you, or did they seem like they were
2 natural and spontaneous?

3 MR. SNEDDON: Same objection, Your Honor.

4 THE COURT: Overruled.

5 You may answer.

6 THE WITNESS: It seemed spontaneous.

7 Q. BY MR. MESEREAU: Okay.

8 A. The family, very interactive with each
9 other. Seemed like they had a good relationship
10 with their mom.

11 Q. And when -- you said that when you
12 interviewed Janet, the children would sometimes
13 interject and speak up, right?

14 A. Yes. Like in agreement.

15 Q. Okay. And when you were interviewing each
16 child, Gavin, Star, Davellin, would others interject
17 as well during those questions?

18 A. Not much. No.

19 Q. Well, for example, when you asked Gavin
20 questions about Michael Jackson, do you recall the
21 mother interjecting and saying?

22 A. No, she didn't say anything.

23 Q. How about the other kids?

24 A. No.

25 Q. Did they allow you to interview --

26 A. Yes.

27 Q. -- interview each person separately --

28 A. Yes. 10651

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1 Q. -- even though they were there?

2 A. Yes.

3 Q. Do you recall anything else that Star had to
4 say?

5 A. Basically just little fun things, what goes
6 on. He plays video games. He does that. Nothing
7 else, no.

8 Q. And did he ever say anything bad about
9 Michael?

10 A. No, he did not.

11 Q. Okay. You interviewed Davellin, right?

12 A. Yes, I did.

13 Q. And what kind of questions do you recall
14 asking Davellin?

15 A. I asked her the same questions.

16 Q. Okay.

17 A. Relationship she had with Michael Jackson;
18 what did she usually do when she goes into
19 Neverland. And I also asked her the same questions,
20 "Did anybody ever touch you inappropriately or make
21 you feel uncomfortable?"

22 Q. And what did she say?

23 A. She said, "No."

24 Q. Okay. Did she praise Michael Jackson?

25 A. Yes, she did.

26 Q. Okay. Now, who told you that the family
27 would prefer that you come to Neverland with them

28 for the interview? 10652

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1 A. Janet did.

2 Q. Were the children with Janet when she said
3 that?

4 A. No, she told me that over the telephone.

5 She had my cell phone number.

6 Q. Okay. And how did she get your cell phone
7 number?

8 A. Because when she called the school, I called
9 her back on my cell phone number, so she had it.

10 Q. Okay.

11 A. You know, so --

12 Q. Would this have been after the 14th?

13 A. No, that was -- yeah, right, it was like
14 maybe the 19th.

15 Q. The 19th?

16 A. I can't remember the exact day. I think the
17 20th was on a Tuesday. I'm not really sure. But it
18 was prior to that when I went to the school and I
19 spoke to the counselor.

20 Q. Okay.

21 A. She did have my cell phone number. She did
22 call me several times.

23 Q. On the cell phone?

24 A. Yes.

25 Q. Do you know approximately when Janet called
26 you on the cell phone?

27 A. Daily.

28 Q. Daily? 10653

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1 A. You know, I can't really recall, because
2 it's been two years ago. But I do think it was like
3 every other day or -- because I was investigating.

4 Q. Right.

5 A. And she was really anxious to find out what
6 I was going to say or whatever.

7 I told her at that point if anything was
8 going to happen, I would have done it the day of the
9 initial interview, which would have been the 20th.

10 Q. Did she call you on your cell phone before
11 the 20th?

12 A. Yes.

13 Q. Okay.

14 A. She called me so we could make arrangements
15 to have the interview.

16 Q. Okay. Do you know approximately when she
17 first called you on your cell phone?

18 A. We'll say the day of -- when I went to the
19 school -- no, she called me maybe the next day. And
20 so we can get the schedule together for the
21 interview.

22 Q. Sure. Is that between the 14th and the
23 20th?

24 A. Yes, it is. I think the 14th was on a
25 Friday, and the Monday I was off, and Tuesday I
26 think is when I finally got in touch with her.

27 MR. MESEREAU: Okay.

28 THE COURT: All right. We'll take our break. 10654

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1 (Recess taken.)

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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 10599 through 10655

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 May 17, 2005, and thereafter

20 reduced to typewriting by computer-aided

21 transcription under my direction.

22 DATED: Santa Maria, California,

23 May 17, 2005.

24

25

26

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

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

5

6

7 THE PEOPLE OF THE STATE OF)

8 CALIFORNIA,)

9 Plaintiff,)

10 -vs-) No. 1133603

11 MICHAEL JOE JACKSON,)

12 Defendant.)

13

14

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16

17 REPORTER'S TRANSCRIPT OF PROCEEDINGS

18

19 TUESDAY, MAY 17, 2005

20

21 8:30 A.M.

22

23 (PAGES 10657 THROUGH 10845)

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26

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

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1 I N D E X

2

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

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

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

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

7

8

9 DEFENDANT'S

10 WITNESSES DIRECT CROSS REDIRECT RECROSS

11 PETERS, Irene

12 Lavern 10680-SN 10730-M 10751-SN

13 10754-M (Further)

14 WALKER,

15 Karen 10756-SA 10797-SN 10816-SA 10820-SN

16 JACKSON, Simone

17 Pech 10823-M

18

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1 MR. MESEREAU: Thank you, Your Honor.

2 Q. Miss Peters, when we left off, you mentioned
3 that Janet Arvizo had your cell phone number in
4 February of 2003, right?

5 A. Yes, she did.

6 Q. Okay. And I believe you said she got your
7 cell phone number sometime after you and the police
8 officers tried to find her on the 14th; is that
9 correct?

10 A. That's correct.

11 Q. And I think you said this, but I apologize,
12 I can't remember. How do you think she got your
13 cell phone number?

14 A. Because I called her back on my -- when I
15 went to the school, the school gave me her phone
16 number.

17 Q. Okay.

18 A. And I called her on my cell number.

19 Q. Okay. And she had your cell phone number
20 after that particular call?

21 A. Yes, she did.

22 Q. And you said she called you a number of
23 times, right?

24 A. Yes, several times. I don't know how many
25 times, but I talked to her several times.

26 Q. And I believe you said sometime before your
27 interview on the 20th, she called you and said, "Why

28 don't we have the interview at Neverland?" Right? 10660

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1 A. Yes.

2 Q. And you refused, right?

3 A. Yes.

4 Q. And why is that?

5 A. Because I have to interview where the
6 children supposedly are staying. But I could not go
7 to the address in East L.A., because, first of all,
8 I didn't know it, and that was the address that was
9 listed on the referral.

10 Q. Okay. All right. Now, how many times
11 before your interview on the 20th do you think Janet
12 Arvizo called your cell phone number?

13 A. Maybe two or three times.

14 Q. Okay. In any of those calls, did Janet
15 Arvizo ever tell you she was being held against her
16 will?

17 A. No.

18 Q. In any of those calls, did Janet Arvizo tell
19 you that she was being falsely imprisoned by anyone
20 connected to Michael Jackson?

21 A. No, she did not.

22 Q. In any of those calls, did Janet Arvizo tell
23 you that her children were being held against their
24 will by Michael Jackson?

25 A. No, she did not.

26 Q. In any of those calls, did Mrs. Arvizo ever
27 say that her children were being held against their

28 will by anyone associated with Michael Jackson? 10661

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1 A. No, she did not.

2 Q. In any of those calls, did Janet Arvizo tell
3 you that she was the victim of extortion?

4 A. No, she did not.

5 Q. In any of those calls, did Janet Arvizo say
6 that her children were the victim of extortion?

7 A. No, she did not.

8 Q. In any of those calls, did Janet Arvizo ask
9 you to call the police --

10 A. No.

11 Q. -- because she was --

12 A. No.

13 Q. -- the victim of crime?

14 A. No.

15 Q. In any of those calls, did Janet Arvizo say,
16 "Our family is being kidnapped"?

17 A. No, she did not.

18 Q. Okay. Now, after your interview with the
19 Arvizo family on the 20th at Jay Jackson's
20 apartment, did Janet continue to call you on the
21 cell phone?

22 A. She called the office several times. She
23 also spoke to the supervisor. I talked to her maybe
24 a few more times on the cell phone.

25 Q. Okay. And in any of those calls on the cell
26 phone, did Janet Arvizo tell you, "My family is the
27 victim of crime"?

28 MR. SNEDDON: Object. Asked and answered, 10662

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1 Your Honor.

2 MR. MESEREAU: This is after the 20th, Your
3 Honor.

4 THE WITNESS: After the 20th?

5 THE COURT: Overruled.

6 You may answer.

7 THE WITNESS: But I did see her.

8 Q. BY MR. MESEREAU: We'll get to that. But

9 I'm asking you about these cell phone calls.

10 A. No, she did not.

11 Q. In any of those cell phone calls after the
12 20th, did Janet Arvizo say, "My family is being held
13 against their will"?

14 MR. SNEDDON: Object as leading.

15 THE WITNESS: No.

16 THE COURT: Overruled.

17 Q. BY MR. MESEREAU: You --

18 A. No.

19 Q. And in any of those cell phone calls after
20 the 20th, did Janet Arvizo tell you words to the
21 effect, "Please call the police. My family is being
22 falsely imprisoned"?

23 A. No, she did not.

24 Q. Okay. In any of those cell phone calls
25 after the 20th, did Janet Arvizo say Michael Jackson
26 is doing anything improper?

27 A. No.

28 Q. All right. Would it be correct to say that 10663

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1 the cell phone calls that Janet Arvizo made to you
2 after the 20th were primarily concerned with what
3 your report was going to be?

4 A. Yes. Basically. And she was complaining
5 about -- she was complaining about what could she do
6 to try to -- with not being -- what could she do
7 about the Bashir document being seen without her
8 consent --

9 Q. Okay.

10 A. -- basically.

11 And she asked me, and I told her I was not a
12 lawyer, I was a social worker, and maybe she should
13 get a lawyer if you want to pursue it. That's what
14 I told her.

15 Q. Did she ever suggest to you that she or her
16 children should have been paid for appearing on the
17 Bashir interview?

18 A. Mainly concerned about the fact that they
19 did not have her consent.

20 Q. Okay. Did she ever say anything about they
21 should have been paid?

22 MR. SNEDDON: Object. Asked and answered.

23 THE WITNESS: No.

24 THE COURT: Sustained.

25 Q. BY MR. MESEREAU: Do you recall yourself
26 discussing anything with Janet Arvizo about whether
27 her kids should be compensated?

28 MR. SNEDDON: Object. Asked and answered. 10664

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1 THE COURT: Overruled.

2 You may answer.

3 THE WITNESS: She did not say "compensated."

4 She wanted to know what could she do, what
5 grounds -- what legal grounds did she have against
6 it if she did not have consent, did not give her
7 kids consent. She didn't have her consent to have
8 her kids shown on T.V.

9 Q. BY MR. MESEREAU: Okay. All right. Just
10 one point about the beginning of the interview at
11 the Jackson apartment on the 20th.

12 Did Janet Arvizo show you pictures of her
13 family with celebrities on that day?

14 A. I don't think so. No.

15 Q. You don't recall her bringing out photos?

16 A. I don't recall. Maybe she did.

17 Q. But you do recall the video she showed you,
18 of course?

19 A. Yeah, the video.

20 Q. You don't recall her showing you photos of
21 celebrities?

22 A. You know, maybe she did. I can't remember.

23 Q. Okay. All right.

24 A. That I cannot remember.

25 Q. Is it possible she did that after the tape
26 was played?

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

28 object as asked and answered. Calls for 10665

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1 speculation.

2 THE COURT: Sustained.

3 Q. BY MR. MESEREAU: After the tape of Michael
4 Jackson and Gavin was played at that apartment, did
5 Janet Arvizo ever tell you the names of any
6 celebrities she knew?

7 A. Yeah, she did.

8 Q. What did she say?

9 A. She talked about Chris Tucker and his coming
10 over to the house, and I think they were having --
11 making s'mores or something, and they were around
12 the fireplace. And she talked about a few other
13 people. I can't really remember. I was there to
14 investigate the general neglect. I got, you know --

15 Q. Did it appear to you that she was trying to
16 impress you about the celebrities she knew?

17 A. In what way? Do you want my observation?

18 Q. Yes.

19 A. Yes.

20 Q. Okay. Now, you mentioned that Janet talked
21 to you about her son Star having a cyst on his
22 brain.

23 A. Yeah.

24 Q. Do you remember what she said about that?

25 A. That's all she said. And I asked her the
26 doctor's name. She told me Kaiser. I called the
27 hospital. I tried to call the doctor. I never did

28 get any response from them. 10666

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1 Star's -- not "Star's." Gavin's doctor, the
2 oncologist, I think it is. Oncologist. I think it
3 was Dr. Cooper. I did attempt to get in touch with
4 him.

5 THE COURT: They're having trouble hearing.
6 You need to lean into the microphone.

7 THE WITNESS: I'm sorry.

8 I did attempt to get in touch with him.

9 THE COURT: No, that's the wrong microphone.

10 THE WITNESS: The wrong one?

11 THE COURT: Yeah.

12 There you go.

13 THE WITNESS: I did attempt to get in touch
14 with him. I didn't get any response.

15 We have so many days to respond to a
16 referral.

17 Q. BY MR. MESEREAU: Okay. How many days do
18 you have to respond to a referral?

19 A. 30.

20 Q. 30?

21 A. Yeah.

22 Q. Okay.

23 A. And it took me a little while to get in
24 touch with her. About eight, seven days.

25 Q. Okay. Now, typically, after you conduct the
26 interview with the family, which you of course did
27 on the 20th of February, 2003, what do you typically

28 do next in your investigation? 10667

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1 A. I make a decision based on the information
2 that's gathered.

3 Q. And did you make a decision at some point?

4 A. I had to, yeah. I made a decision.

5 Q. What was your decision?

6 A. On the 27th of February. That the
7 allegations for general neglect of mother, Janet
8 Ventura, the allegations of sexual abuse by Michael
9 Jackson were unfounded at that time --

10 Q. Okay.

11 A. -- based on the information received.

12 Q. Now, what are some of the factors that went
13 into your conclusions?

14 A. For general neglect, as I explained to you
15 earlier, the kids were in school. They were all
16 medically being treated. They had supervision.
17 They had shelter, food, clothing. They were not in
18 any way in an unsafe environment. Those are the
19 factors that went into that.

20 Q. Okay. And when you formed your conclusions,
21 what did you do with them?

22 A. Well, I have to write them. I write what
23 they call an Allegation and Investigation Narrative
24 of the referral, the allegations.

25 And I went through all of the above things
26 that we've been speaking about or what -- the
27 questions that I asked them and what were the

28 answers in response to them. 10668

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1 After that I write what they call a
2 Conclusion based on the information gathered and
3 received.

4 Q. And you put your conclusions in written
5 form?

6 A. Yes, I did.

7 Q. And what did you do with the written report?

8 A. It is turned in to the supervisor. It was
9 via our computer. It goes directly to the
10 supervisor, and she reviews it.

11 Q. Okay. And how long do you think Janet
12 continued to call you on your cell phone?

13 MR. SNEDDON: Your Honor, I'm going to
14 object. Vague as to time.

15 MR. MESEREAU: I'll rephrase it.

16 THE WITNESS: She called the job also.

17 Q. BY MR. MESEREAU: I have to rephrase the
18 question. I'm sorry.

19 A. Okay.

20 Q. After your interview on February 20th, 2003,
21 you've indicated that Janet continued to call you on
22 your cell phone, right?

23 A. Yeah.

24 Q. For how long after February 20th do you
25 think she called you on your cell phone?

26 A. Just a few times. She also called the job a
27 lot, and she was calling my supervisor a lot.

28 MR. SNEDDON: I'm going to object to that. 10669

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1 Hearsay; lack of foundation.

2 THE COURT: Sustained.

3 BAILIFF CORTEZ: Your microphone's off, sir.

4 Q. BY MR. MESEREAU: Do you know whether or not

5 Janet was calling your supervisor after February

6 20th?

7 A. Yes.

8 MR. SNEDDON: Objection. Lack of

9 foundation; calls for hearsay.

10 THE COURT: Sustained.

11 Q. BY MR. MESEREAU: Did you keep in touch with

12 your supervisor about Janet Arvizo after the

13 interview on February 20th?

14 A. Yes, I did.

15 Q. And how often would you talk to your

16 supervisor about the investigation into the Arvizos?

17 A. While I was writing the report, after I

18 wrote the report, I talked to her about it, and if

19 there's anything that she sees that maybe need to be

20 changed or make some corrections, she would do it at

21 that particular time.

22 We also took it to what they call -- the

23 assistant regional administrator had to look at it

24 also.

25 Q. Now --

26 MR. SNEDDON: Move to strike as

27 nonresponsive.

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1 Q. BY MR. MESEREAU: If someone who's under
2 investigation calls your agency on the phone, is a
3 record made of that call?

4 A. Repeat the question.

5 Q. Sure. If someone who is being investigated
6 by your agency for allegations of general neglect
7 calls your office on the phone --

8 A. Right.

9 Q. -- are records kept of those calls?

10 A. Yes.

11 Q. How are those records kept?

12 A. The contact is made on the phone. I am to
13 put it in the computer. We have a tracking system.
14 Sometimes it's not done. Sometimes it's done on
15 paper and later entered into what is called CWCMS,
16 which is our computer system.

17 Q. If you're responsible for investigating
18 someone for allegations of general neglect, is one
19 of your responsibilities to know whether or not that
20 person is calling your agency?

21 A. That's just record-keeping, you know.
22 Telephone contacts, personal contacts, visits, it's
23 all part of the report.

24 Q. And when you did your report on your
25 investigation into the Arvizos, did you take into
26 account contacts between the Arvizos and your
27 agency?

28 A. No, it's just a record. It's 10671

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1 record-keeping.

2 Q. To your knowledge, did Janet Arvizo ever
3 call you at your agency?

4 A. Yes.

5 Q. How many times do you think she did that
6 after February 20th, 2003?

7 MR. SNEDDON: Your Honor, that's been asked
8 and answered.

9 THE COURT: Sustained.

10 Q. BY MR. MESEREAU: Did you ever -- did you
11 have any knowledge of Janet calling your supervisor
12 after February 20th?

13 A. Yes, she did.

14 MR. SNEDDON: Your Honor, I'm going to
15 object. Lack of foundation; calls for hearsay; and
16 it was asked and answered.

17 THE COURT: Overruled. Next question.

18 Q. BY MR. MESEREAU: Okay. Did you discuss
19 with your supervisor conversations your supervisor
20 had had with Janet Arvizo after February 20th, 2003?

21 A. Yes, I did.

22 Q. Did your supervisor ever tell you that Janet
23 complained she was being falsely imprisoned?

24 MR. SNEDDON: Your Honor, I'm going to
25 object. It's hearsay.

26 THE COURT: Sustained.

27 MR. SNEDDON: And --

28 Q. BY MR. MESEREAU: During the period of time 10672

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1 that you were investigating Janet Arvizo and her
2 family, did you have the ability to immediately get
3 in touch with police officers if you had to?

4 A. Oh, yeah.

5 Q. And how would you have done that?

6 A. We would call. If I thought there was any
7 doubt in my mind that there was any abuse going on,
8 we would be in children's court.

9 Q. Okay. Okay. And at no time during your
10 investigation into Janet Arvizo did you ever call
11 the police in Los Angeles and report that any crime
12 was being committed on the Arvizos, right?

13 A. No, I did not.

14 Q. In fact, you're not aware of anyone at your
15 agency ever contacting the Los Angeles Police
16 Department because they had gotten a report that
17 Janet and her children were the victim of criminal
18 conduct, right?

19 MR. SNEDDON: I'm going to object as
20 leading.

21 THE COURT: Sustained.

22 Q. BY MR. MESEREAU: Do you know whether or not
23 your supervisor at any time ever called the Los
24 Angeles Police Department to get the police involved
25 in any false imprisonment of the Arvizo family?

26 MR. SNEDDON: Your Honor, I object to the
27 question as being a lack of foundation.

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1 MR. SNEDDON: And calling for hearsay.

2 THE COURT: Sustained.

3 Q. BY MR. MESEREAU: Do you recall running into

4 Janet Arvizo around April 1st, 2003?

5 A. Yes, I do.

6 Q. And where did you see Janet Arvizo on that

7 day?

8 A. Can I say the Fatburger?

9 At Fatburger.

10 Q. Okay. All right. And where was the --

11 excuse me. Where was the Fatburger located?

12 A. On Wilshire and Highland.

13 Q. Okay. Now, Wilshire is a main thoroughfare

14 through Los Angeles, right?

15 A. It's down the street from where I work.

16 Q. Okay.

17 A. Yeah.

18 Q. And had you walked from where you worked to

19 the Fatburger?

20 A. Oh, no, I couldn't walk.

21 Q. Okay. Was this around lunchtime?

22 A. Yeah, it was lunchtime.

23 Q. And did you see Janet and her children at

24 the Fatburger?

25 A. To my amazement I did.

26 Q. Okay. And what were they doing at the

27 Fatburger, to your knowledge?

28 A. I was going to Fatburger to eat. And she 10674

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1 was going to take the kids to tutoring.

2 Q. Did she tell you where the tutoring was?

3 A. It was upstairs. She showed me where it
4 was.

5 Q. When you say "upstairs" --

6 A. Upstairs in the complex.

7 Q. Now, which complex is this?

8 A. It's a little complex with Fatburger, a
9 Subway, and El Pollo Loco and some other things.

10 Q. Is this like an office-type building?

11 A. No, it's a -- a bunch of little stores.

12 Q. So do you mean on a second level?

13 A. Yeah, on the second level.

14 Q. And she told you there was a tutoring center
15 there?

16 A. Yeah. She was taking them to tutoring, yes.

17 Q. And did she tell you anything about the
18 tutoring that was going on?

19 A. She just said she had to go to tutoring
20 because the kids had missed so much school dealing
21 with the whole issue with the video -- I mean, the
22 broadcast and everything about the Bashir, that they
23 missed so much school, and she didn't have any
24 money, and that she did tell me that Michael wanted
25 to send them to Brazil somewhere.

26 Q. Okay.

27 A. And she didn't want to go. She didn't know

28 any people there. And she was disgusted. And she 10675

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1 hadn't -- as a matter of fact, she told me she
2 hadn't seen him.

3 Q. Did she say words to the effect, "I don't
4 want to go to that dump," meaning Brazil?

5 A. Yes.

6 Q. Did she tell you where she was living at the
7 time?

8 A. We didn't get into that. I didn't ask her
9 where she was living. I think my supervisor might
10 have asked her, because I was trying to distance
11 myself.

12 Q. From her?

13 A. Yeah. Because most of the time I see
14 clients on the streets, because, you know, it's
15 local. I try not to engage conversation.

16 Q. Okay. When you saw Janet and the children
17 at Fatburger, did it look like they were being
18 restrained?

19 A. No.

20 Q. When you saw Janet at the -- and the
21 children at the Fatburger, did it look like they
22 were being held against their will?

23 MR. SNEDDON: Your Honor, I'm going to
24 object to these questions. This is April of 2003.
25 It's irrelevant.

26 THE COURT: Overruled.

27 THE WITNESS: No, they did not.

28 Q. BY MR. MESEREAU: Did she tell you whether 10676

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1 or not any plane tickets had ever been purchased for
2 any Brazil trip?

3 A. No, she just mentioned it. She mentioned
4 that he wanted them to go to Brazil.

5 Q. And she said she wouldn't go?

6 A. No.

7 Q. Is that what she said?

8 A. Yeah.

9 Q. She said she won't go to that dump?

10 A. Yeah, right. Basically, yeah.

11 Q. Okay.

12 A. We talked a little bit more, but I asked how
13 the children were doing. Said they were doing okay,
14 except they missed a lot of school, you know.

15 Q. When you saw Janet and the kids at the
16 Fatburger, did Janet ever ask you to call the
17 police?

18 A. No, she did not.

19 Q. Going back just a little bit and then I'll
20 finish, when you first made contact with Janet
21 Arvizo, did you tell her that you had gone to the
22 address with some police officers on the 14th?

23 A. To be very honest, I'm not really sure if I
24 mentioned to her, but I'm quite sure I did, knowing
25 how I am. I'm quite sure I did.

26 Q. You typically will tell --

27 A. Yeah, I told her I came there looking for

28 her with the police, uh-huh. 10677

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1 Q. Okay.

2 A. Uh-huh.

3 Q. And when you said that, she never said,

4 "Call the police. We're in trouble"?

5 A. No, that was the first -- that was on the

6 20th -- on the 14th when I first went to the home --

7 Q. Right.

8 A. -- of Major Jackson.

9 Q. Yeah.

10 A. I just kind of mentioned it to her, that I

11 did try to contact her there at that particular

12 address.

13 Q. Did you tell her you tried to contact her at

14 that address with some police officers?

15 A. Yes, I did.

16 Q. Okay.

17 A. Uh-huh.

18 Q. Did she ever tell you words to the effect,

19 "Please call those police officers. We're being

20 held against our will"?

21 A. No, she did not.

22 Q. Let me rephrase that. Let's go back to the

23 20th.

24 Did you ever ask any of the Arvizo children

25 in that interview about their father?

26 A. We spoke of their father briefly.

27 Q. Okay.

28 A. With the domestic violence issues and -- 10678

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1 Q. You talked about all that?

2 A. Yes.

3 Q. Okay. Before you arrived to interview the
4 Arvizos on the 20th, had you done any search to see
5 if they'd had prior contacts with your agency?

6 A. Yes, I did.

7 Q. And what did you do in that regard?

8 A. When the referrals come through, we know
9 that if -- if there has been another referral, so
10 what I did was I researched it. I looked it up.

11 Q. And what did you find?

12 A. I found that there was an allegation of
13 domestic violence against the father of the family.
14 And then we tried to do voluntary family maintenance
15 services with our department, which is done for six
16 months with supervision by the Department of
17 Children & Family Services.

18 Q. Did you learn whether or not, in 1996, Gavin
19 had accused his mother of molesting him?

20 A. You know what? I think that was pre our
21 computer system and everything was on hard copy, so
22 that information was not made privy to me.

23 Q. But you did obtain the information at some
24 point?

25 A. I'm not aware of that one, no.

26 Q. Okay. Are you aware of any contact between
27 Janet, Gavin and your agency in 1996?

28 A. No, I'm not. 10679

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1 MR. MESEREAU: Okay. Thank you. No further
2 questions.

3 THE WITNESS: Thank you.

4 THE COURT: Cross-examine?

5

6 CROSS-EXAMINATION

7 BY MR. SNEDDON:

8 Q. Good morning.

9 A. Good morning.

10 Q. Is it Mrs. Peters?

11 A. Ms.

12 Q. Ms.? Okay. I just want to ask you a few
13 questions about the unit you worked in, if we can,
14 and a little bit about your background.

15 A. Uh-huh.

16 Q. With regard to the unit, I believe you --
17 you indicated that that unit was formed shortly
18 after 1994; is that correct?

19 A. Yeah.

20 Q. And it was formed as a result of prior
21 allegations made against the defendant in this case,
22 Mr. Jackson, because information was leaked,
23 correct?

24 A. That's what I hear, yeah.

25 Q. Okay.

26 A. That's what I understand.

27 Q. And prior to that time, when information

28 came in on the hotline, was there a working 10680

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1 relationship at that time between the Los Angeles
2 Police Department and your department to jointly
3 investigate allegations that come off the hotline?

4 A. Allegations of sexual abuse --

5 Q. Yes, ma'am.

6 A. -- which is criminal.

7 Q. There was a partnership, correct?

8 A. That's always been, yeah.

9 Q. And in fact, some of those officers who
10 worked that unit are located at the same -- some
11 co-located with your workers?

12 A. No, they're not.

13 Q. They're at different locations?

14 A. Yeah.

15 Q. But you work together?

16 A. Yeah. We work with the police department,
17 yes.

18 Q. Okay. Now, with the formation of this unit,
19 do you no longer work with the LAPD on sensitive
20 case information, in other words?

21 A. Rephrase the question.

22 Q. Yeah, maybe it's a bad question. Let me ask
23 it this way: If an allegation had come in back in
24 1994 of the type that you got in this particular
25 case, a member from your department and a member
26 from the police department, Los Angeles Police
27 Department, would have been working on the case,

28 correct? 10681

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1 A. No. We would have to request that.
2 If we felt at the time of the interview,
3 that we were having an interview, and a referral
4 came in, and there was allegations of sexual abuse,
5 at that point what we would do, if I'm investigating
6 someone at that time, I would call the police. Not
7 on all occasions do I actually go out there with a
8 police officer.

9 Q. Maybe I misspoke. I was asking about what
10 the procedure was back in 1993.

11 A. 1994, which is 11 years ago, the procedures
12 are still the same, basically. If there's
13 allegations of sexual abuse, which is criminal, we
14 are to call the police department if, in fact, the
15 allegations are true.

16 Q. So it would be your testimony, then, that
17 back in '94, the original interview would have been
18 done by somebody from your department, and then Los
19 Angeles Police Department would be called in?

20 A. Only if --

21 MR. MESEREAU: Objection; beyond the scope.

22 THE COURT: Just a minute.

23 Overruled.

24 You may answer.

25 THE WITNESS: I can answer?

26 MR. SNEDDON: Sure. Go ahead.

27 THE WITNESS: Only if the allegations were

28 deemed to be true. We don't take them out every 10682

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1 case.

2 Q. BY MR. SNEDDON: But on some cases you do?

3 A. Yes, we do. You know, it just depends.

4 Q. All right. And I think you told the jury

5 that one of the options that you have available to

6 you when you go out to investigate allegations of

7 neglect or abuse is to -- after the interview, if

8 you conclude that the children are not in a safe

9 environment, is to remove those children immediately

10 from that environment, correct?

11 A. Exactly.

12 Q. And you've done that on several occasions?

13 A. Oh, yeah.

14 Q. Many occasions?

15 A. Many occasions.

16 Q. Now, with regard to your training, I think

17 you -- in response to Mr. Mesereau's questions, you

18 indicated that you had a lot of ongoing training in

19 the department on a regular basis?

20 A. Yes, we have mandatory training.

21 Q. That deals with emotional abuse?

22 A. All kind of issues, yeah.

23 Q. Child sexual abuse?

24 A. Yes. I mean, I can't even run them off, all

25 the names, but mostly everything.

26 Q. Okay. And --

27 A. New procedures --

28 Q. -- as a result of -- go ahead. I didn't 10683

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1 mean to cut you off.

2 A. No, I was just saying policy, procedures and
3 new things, and --

4 Q. I think what I'd like to do is just focus a
5 little bit about the training that you've had with
6 regard to interviewing children who may have been
7 the victims, alleged victims, of a sexual abuse,
8 okay?

9 A. Yeah.

10 Q. Okay. And I know it's difficult, because
11 you're a very experienced person. You've been in
12 this business a long time. But you did, I believe,
13 based on your testimony, indicate that you had
14 received specialized training with regard to --

15 A. I have training in that, but I'm not a
16 specialist in sexual abuse, if that's what you
17 wanted to know. No, I'm not.

18 Q. Okay.

19 A. Based on my experience, yeah.

20 Q. Okay. In your training, did they educate
21 you about the difference between disclosures by boys
22 and disclosures by girls?

23 A. Yes.

24 Q. And different approaches to take?

25 A. Yes.

26 Q. And different concerns about the
27 individuals?

28 A. Yes. 10684

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1 Q. And did they talk to you about the
2 differences between younger children and teenaged
3 children?

4 A. Yes.

5 Q. And the differences between teenaged boys
6 and teenaged girls?

7 A. Yes.

8 Q. And did they educate you and did you learn
9 that, in fact, it's very unusual for a teenaged boy
10 to admit that he's been molested by an adult?

11 MR. MESEREAU: Objection. No foundation;
12 misstates the facts.

13 MR. SNEDDON: I'm --

14 THE COURT: Overruled.

15 You may answer.

16 THE WITNESS: That's one of the --

17 Q. BY MR. SNEDDON: It's been your experience,
18 has it not, as a person with over 30 years
19 experience, for a teenaged boy to admit that he's
20 been molested by an adult is a very, very difficult
21 thing to do, isn't it?

22 MR. MESEREAU: Objection. Vague; no
23 foundation.

24 THE WITNESS: Am I to answer?

25 THE COURT: Overruled.

26 You may answer.

27 THE WITNESS: I can answer that?

28 THE COURT: I can have the question read 10685

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1 back.

2 THE WITNESS: Yeah, please read that back to
3 me.

4 THE COURT: Okay.

5 (Record read.)

6 THE WITNESS: Yes. That's one of the things.
7 That's not all of the things. But that's one of
8 them, yes.

9 Q. BY MR. SNEDDON: And I assume, during the
10 course of your training, that you've become
11 familiar with the term "Child Sexual Assault
12 Accommodation Syndrome"?

13 A. Oh, wow. I won't repeat this again. I am
14 not a sexual abuse therapist. I do deal with sexual
15 abuse cases. I do deal with physical abuse. I
16 deal -- I do deal with emotional abuse, medical
17 neglect.

18 When it comes to the specialist, I would
19 have referred a child who was in sexual -- possible
20 sexual abuse to a sexual abuse therapist. I do know
21 some of the things about sexual abuse, some of them,
22 but I'm not a therapist. At that point I am a
23 social worker evaluating and investigating
24 allegations of abuse.

25 Q. Yes, ma'am. I think all I asked was are you
26 familiar?

27 A. No. I'm not familiar with that, no. I can

28 answer that. No. 10686

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1 Q. Let me try it under another phrase, then.

2 Are you familiar with the fact -- as a

3 result of your training with the department to

4 investigate allegations of child abuse, are you

5 familiar with the fact that children don't always

6 disclose --

7 A. Oh, yeah. Sure.

8 Q. -- on the first visit by somebody?

9 A. Of course. Oh, yeah.

10 Q. And sometimes it comes in a serial fashion,

11 correct?

12 A. Yes. Yes.

13 Q. Okay. So -- and you're also familiar, from

14 the same training, that it's unlikely that a

15 teenaged boy is going to tell another female adult

16 that he's been molested in the presence of his

17 mother, correct?

18 A. That could be one of the things, yeah.

19 Q. That was one of the things you were taught,

20 wasn't it?

21 A. Yeah.

22 Q. So, in fact, the day that you were there

23 talking to Gavin Arvizo and asking him questions

24 about whether he was inappropriately touched by Mr.

25 Jackson, other than his younger brother Star,

26 everybody in the room was a female, correct?

27 A. Yes. Uh-huh.

28 Q. Let's talk a little bit about when you first 10687

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1 arrived there. You described the situation as very
2 friendly, correct?

3 A. Yes, I did.

4 Q. And that Janet Arvizo, I think you
5 mentioned, may have been, to you, overly friendly
6 because she hugged you?

7 A. That's my observation.

8 Q. Yes, ma'am. Okay. And when you went to the
9 Arvizo -- or the apartment where you thought the
10 meeting was to take place on the 20th, when you
11 first got there, I believe in response to Mr.
12 Mesereau's questions, you said that there was
13 about -- there was -- she immediately wanted you to
14 watch this video, correct?

15 A. Yes.

16 Q. Okay. And I want to ask you a couple
17 questions about this.

18 A. All right.

19 Q. In preparation for your testimony today, did
20 Mr. Mesereau allow you to listen to a tape-recording
21 that was made of the events that occurred when you
22 arrived at the house on the 20th and went for about
23 20 minutes?

24 MR. MESEREAU: Objection; foundation.

25 THE COURT: Sustained.

26 Q. BY MR. SNEDDON: Were you aware of the fact
27 that your meeting with Janet Arvizo had been

28 surreptitiously tape-recorded? 10688

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1 A. No.

2 Q. Not at that point in time. Are you aware of
3 that now?

4 A. Through the media.

5 Q. Yes, ma'am. Through the media.

6 A. That's the only way I knew.

7 Q. Okay. And you heard your voice?

8 A. Yes, I did.

9 Q. And it was your voice?

10 A. It was me.

11 Q. Okay. And before you testified here today,
12 did Mr. Mesereau ask you to listen to the tape with
13 your voice on it?

14 A. That's the first time I've ever seen him.

15 Q. Did an investigator for Mr. Mesereau ask you
16 to do that?

17 A. No.

18 Q. Okay. Did they ask you to look at the
19 transcript that had been prepared of that particular
20 meeting?

21 A. No.

22 Q. And so basically what you're telling us is
23 based on your recollection of what happened several
24 years ago, or a year and a half ago?

25 A. Yes. 2003, right?

26 Q. Okay. And isn't it a fact that the first
27 two and a half minutes of that tape you can hear

28 everybody just making introductions and talking in 10689

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1 general before anybody puts anything into the
2 machine?

3 A. I never heard the tape.

4 Q. Okay. Well, I'm asking you your
5 recollection. Does that refresh your recollection
6 with regard to what happened?

7 A. Yes.

8 MR. MESEREAU: Objection; no foundation.

9 MR. SNEDDON: It does.

10 MR. MESEREAU: Calls for speculation.

11 THE COURT: Overruled. The answer was,

12 "Yes." Next question.

13 Q. BY MR. SNEDDON: Now, when you went out
14 there on the 20th, you had actually attempted to
15 find Mrs. Arvizo and the children on the 14th,
16 correct?

17 A. Yeah.

18 Q. Okay. And when you did that, you went to
19 the location that you have told us about with the
20 police officers --

21 A. Right, I did.

22 Q. -- correct?

23 A. Yes, I did.

24 Q. And then you went over to the school?

25 A. No, not the same day.

26 Q. No.

27 A. Later on.

28 Q. The next day? 10690

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1 A. No, it was a Friday.

2 Q. It was a Friday.

3 A. So, let's see. Monday was my day off.

4 Probably was Tuesday.

5 Q. So how many days in between?

6 A. Four.

7 Q. So that would have been around the 18th,

8 then?

9 A. Right.

10 Q. So you went to the school, you contacted the

11 principal of the school?

12 A. Excuse me. I talked to a counselor there.

13 Mrs. Heiss.

14 Q. With regard to the original allegation that

15 had come into your department, you had received,

16 actually, multiple referrals, had you not?

17 A. No.

18 Q. There weren't several people who had

19 actually complained and asked for an investigation?

20 A. No, I only received the one referral.

21 Q. From the principal of the school?

22 A. Am I to say who the caller was?

23 Q. Well, I'm asking you --

24 A. Is it okay?

25 Q. I'm asking you if it was the principal of

26 the school complaining that they weren't in school.

27 A. No.

28 Q. Now, you mentioned before in your 10691

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1 examination with Mr. Mesereau that records are kept
2 of contacts that come in about allegations; is that
3 correct?

4 A. Yes, they are. There's a referral number on
5 all allegations.

6 Q. Okay. What is CAHL?

7 A. Child Abuse Hotline.

8 Q. Okay. And do not your records reflect the
9 fact that the director of the school called in an
10 alleged allegation to the hotline on the 14th of
11 February, 2003?

12 A. You're right. But those calls come from the
13 Child Abuse Hotline, as you -- the CAHL.

14 Q. Yes, ma'am.

15 A. Those cases, from there, they go to certain
16 districts and regions that are located in --
17 depending on the address of the mother or father or
18 whatever. And that's how they are framed out.

19 And once they do that, if they see that it's
20 a case that has high profile, or -- like I say, we
21 do a lot of media cases. We also do law
22 enforcement, judges, lawyers, doctors. I mean, not
23 doctors, but judges and lawyers. We do those cases
24 for confidentiality.

25 So what I'm saying to you is that I only
26 know that until I get the referral, where the actual
27 allegation came from, who was the reporter, and I do

28 think -- I do remember -- recall that it was Tesh, 10692

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1 Dr. Tesh.

2 Q. Dr. Tesh?

3 A. Dr. Tesh from the school who called and
4 reported that. Based on the information that
5 there -- was received and the airing of that
6 particular tape, an allegation was called in.

7 Q. Did you determine, when you went to the
8 school on the 18th, at that point, that one of the
9 problems that had motivated the school to contact
10 the hotline was the fact that the children were not
11 in school?

12 A. Well, after speaking to the counselor at the
13 school, she told me she was in contact with Ms.
14 Arvizo, and that she had arranged for the children
15 to have homework taken. And that's why she happened
16 to be calling that day when I was sitting in her
17 office and that's how I made contact with her. It
18 was just a coincidence that I was there.

19 Q. Okay. But -- so the answer to the question
20 is no, they were not in a regular school?

21 A. They were at John Burroughs Middle School.
22 They had missed some days out of school after the
23 airing, which was on 2-6, I think, if I can
24 remember. 2-6-03 was the airing of the tape. They
25 had not been to school because of some of the
26 harassment and some of the things the children were
27 saying about them.

28 Q. So it's your understanding that the reason 10693

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1 they weren't attending school was because of the

2 fallout from the --

3 A. Yes.

4 Q. -- showing of the video?

5 A. Yes.

6 Q. Had you seen the video, the Bashir video?

7 A. A little bit of it.

8 Q. Prior to the time that you went out to

9 interview Mrs. Arvizo on the 20th --

10 A. No, I hadn't seen it. No.

11 Q. You hadn't?

12 A. Huh-uh.

13 Q. Had you seen excerpts from it at all?

14 MR. MESEREAU: Objection; relevance.

15 MR. SNEDDON: It goes to --

16 THE COURT: Overruled.

17 You may answer.

18 THE WITNESS: Yes, uh-huh.

19 Q. BY MR. SNEDDON: Had you seen the picture of

20 Gavin sitting next to the defendant, Michael

21 Jackson?

22 A. Yes, I did.

23 Q. With his head on his shoulder?

24 A. Yeah.

25 Q. Had you seen the excerpts in which Mr.

26 Jackson admitted that he slept with little boys in

27 his bed?

28 A. Yes. 10694

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1 Q. Okay. So you were aware of all that before
2 you went out to interview the Arvizos on the 20th?

3 A. No, I didn't see the interview. This was
4 after.

5 Q. Okay. Then in fairness to you, I think we
6 should clear that up.

7 Before you went to see the Arvizos on the
8 20th of February --

9 A. Right.

10 Q. -- okay? - had you seen any part of the
11 Bashir video?

12 A. No, I didn't.

13 Q. Okay. So you were unaware of what the
14 allegations were? Let me ask it a different way.

15 Did you read any media accounts other
16 than --

17 A. Of course. I saw it all over T.V.

18 Q. Okay.

19 A. Yes.

20 Q. That's all I'm trying to do is see what you
21 knew when you went out there.

22 A. I live in America. I saw it, yes. I did.

23 Q. All right. Were you aware of the fact, when
24 you went out there on the 20th of February, that the
25 allegation was that Mr. Jackson had admitted in this
26 program to sleeping with young boys --

27 A. Yes.

28 Q. -- in his bed? 10695

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1 A. Yes, I was. Yeah.

2 Q. And you were aware of the fact that one of
3 the people who had been portrayed on that video was
4 one of the children of Mrs. Arvizo, Gavin?

5 A. Right.

6 Q. Okay. So you knew that when you went out
7 there?

8 A. Yes, I did. Yes.

9 Q. And you mentioned that you also checked --
10 you also checked some files and confirmed that there
11 was a domestic violence history in the family,
12 correct?

13 A. Yes, I did.

14 Q. And you confirmed that, in fact, your
15 department had substantiated those claims, correct?

16 A. Yes, they did.

17 Q. And I think you said to us that, to your
18 knowledge, Mrs. Arvizo was aware of the fact, during
19 the meeting on the 20th, that you had the power to
20 take her children away from her immediately,
21 correct?

22 A. Oh, yeah. Having previously dealt with the
23 Department of Children & Family Services, I'm quite
24 sure she knew.

25 Q. In response to Mr. Mesereau, you indicated
26 that you thought that she knew that?

27 A. Yes, she knew.

28 Q. She knew? 10696

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1 A. Uh-huh.

2 Q. And so part of the information, or part of
3 the focus of your investigation when you went out
4 there on the 20th was -- basically there were two
5 parts to it, correct? One, to see whether the kids
6 were well-kempt and whether she was a good mother.

7 A. Exactly.

8 Q. And the second part was neglect, lack of
9 supervision and whether any molestation had
10 occurred.

11 A. Yes.

12 Q. So there were two things?

13 A. Two things.

14 Q. Okay. Now, with regard to the first aspect
15 of the investigation, that Mrs. Arvizo -- whether
16 she was a good mother or not, all right?

17 A. All right.

18 Q. And I just want to try to make it so it's
19 easy for us.

20 A. Okay.

21 Q. With regard to the first part, you
22 determined, after your conversation with Mrs. Arvizo
23 and your personal observations of the kids, that you
24 didn't -- you didn't worry about that; that
25 everything was fine, correct?

26 A. Exactly. The kids were safe. The mother
27 was taking good care of her kids properly, and

28 that's what it's based on. 10697

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1 Q. Okay. And you knew that she was a welfare
2 mother?

3 A. Yes.

4 Q. She had very few resources, economic
5 resources?

6 A. Yes.

7 MR. MESEREAU: Objection; misstates the
8 evidence.

9 THE COURT: Overruled.

10 Q. BY MR. SNEDDON: And so in your opinion, in
11 finding the allegation unfounded, you determined
12 that she, with the meager resources she had, took
13 good care of her children, correct?

14 A. Of course. I mean, money has nothing to do
15 with how a parent takes care of their child. It's
16 not economics.

17 Q. Okay.

18 A. You know.

19 Q. So you were impressed by the way that she
20 took care of those kids?

21 A. Yes, she was fine about her children, taking
22 care of them properly. She was not neglecting her
23 children.

24 Q. And just the fact that when you saw her in
25 April, that she was very concerned about her
26 children's education, that she had taken them and
27 put them into tutoring to make sure they didn't fall

28 behind, correct? 10698

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1 A. Yeah, I think she told me that Major Jackson
2 was paying for it or something.

3 Q. Yes, ma'am.

4 A. Yes.

5 Q. And as a matter of fact, they had missed
6 some school?

7 A. Yes, she did tell me that.

8 Q. And they were trying to catch up so that
9 they could get caught up in their schooling?

10 A. Uh-huh. That was after the case was closed.

11 Q. Yes, ma'am.

12 A. So that's off the record. What I mean is,
13 it's just a conversation.

14 Q. It's on the record.

15 A. This was a conversation that I was having
16 with her. She did tell me that, yeah.

17 Q. I'm just saying that nothing that occurred
18 afterwards was inconsistent with your opinion that
19 she did a good job of raising those children?

20 A. Oh, no problem. She did a well job, a good
21 job.

22 Q. Okay.

23 A. Yeah.

24 Q. Now, when you arrived -- I want to talk
25 about what happened on the 20th at the apartment.

26 A. Okay. All right.

27 Q. So we can just -- when you arrived there, I

28 think you said that there were two gentlemen, or men 10699

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1 inside, correct?

2 A. Yes, I did.

3 Q. Okay. And could you describe those two

4 people to me?

5 A. Big.

6 Q. Both of them?

7 A. I don't -- yes.

8 Q. Both of them big?

9 A. Yes. I mean --

10 Q. Buffed out?

11 A. You know, off -- all of them was big.

12 Q. Pardon?

13 A. All I remember, they were big.

14 Q. Do you remember what race they were?

15 A. Oh, God, I can't remember. Maybe one was

16 black and --

17 Q. Do you recall telling officers that you

18 thought they were African-American?

19 A. Yeah, but I don't think they were. I can't

20 really remember because I wasn't focusing on that.

21 I do remember them being there. I knew they were

22 big, you know. I can't remember.

23 Q. And one of them was introduced to you as

24 Michael Jackson's security guard, correct?

25 A. Yeah, I think. Yeah, I think that's what he

26 said.

27 Q. And the young lady that was introduced to

28 you, the Aja Pryor young lady, she was introduced as 10700

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1 a friend of the family, correct?

2 A. Yes, she was.

3 Q. She was the lady with the baby?

4 A. Yeah.

5 Q. Okay.

6 A. Little boy.

7 Q. Now, have you ever had a case before where

8 you went out, in your 30 years of experience, to do

9 an investigation into an allegation and you had a

10 security person there for the person that you were

11 investigating?

12 A. You know, I don't know how to answer that

13 question. I mean, I've been to a lot of homes.

14 They might have been security guards. They might

15 have been -- I don't know. To be fair with that

16 particular question, the answer probably would be

17 no, not really knowingly knowing who they were. I

18 mean --

19 Q. All right.

20 A. -- that's the best way I can answer that

21 question for you.

22 Q. Would you agree with me that it's highly

23 unusual, in your experience, to have a security

24 guard present representing the person who you are

25 personally investigating?

26 A. Knowing the nature of the case and what I

27 deal with, and I do deal with the Sensitive Case

28 Unit, a lot of things are probable, in that sense. 10701

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1 If it's a security guard -- I've been to homes and
2 I've had five police officers there.

3 Q. No, I'm talking about a person working for
4 the person that you're investigating. This would be
5 a first, wouldn't it?

6 A. Probably so. Probably so. I'll answer yes
7 to that.

8 Q. Did it cause you any concern at all that
9 there was a security person there representing the
10 person that you were investigating?

11 A. Did it concern me?

12 Q. Yes, ma'am.

13 MR. MESEREAU: Objection. Objection;
14 misstates the evidence.

15 THE COURT: Overruled.

16 You may answer.

17 THE WITNESS: I wasn't overly concerned.

18 Q. BY MR. SNEDDON: But it did set off a little
19 bit of a question mark in your mind?

20 A. I was wondering why.

21 Q. All right.

22 A. That was all. I'm not starstruck or
23 anything like that, you know. I was wondering why
24 all the hoopla? Why all the people? Why all the --
25 you know, I come here to investigate her.

26 Q. Seemed like an awful lot for just what you
27 were there to do was routine?

28 A. Yeah. Well, like I said, I've been around 10702

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1 for a while, so I've seen a lot of things.

2 Q. Okay. Now, I want to talk a little bit
3 about the video.

4 A. Okay.

5 Q. The video that you saw that Mrs. Arvizo put
6 into the machine, that video was not the Bashir
7 tape, was it?

8 A. No, it wasn't.

9 Q. And it was a video that showed Gavin Arvizo
10 when he had cancer, correct, was recovering from
11 cancer?

12 A. Yeah, I would assume that would -- yeah.

13 Q. He looked very frail?

14 A. Well --

15 Q. Didn't have very much hair?

16 A. Not much hair, yeah. I think that's the
17 same one where they were riding around on a train,
18 and they were going through Neverland and there's
19 some swans or something.

20 Q. And he was a good deal younger than the
21 Gavin that you saw at the apartment that day,
22 correct?

23 A. He was 13 when I -- I think he was 13.

24 Q. Uh-huh. He looked younger and smaller?

25 A. He was younger. Maybe, what, 11? 11, 12.

26 Q. Do you know whether that particular video
27 that you saw that day on the 20th that Mrs. Arvizo

28 showed you had ever been shown publicly anywhere? 10703

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1 A. I don't know. Maybe so. I don't know.

2 Q. Did you ever see it?

3 A. Do you mean like on television or --

4 Q. Yes, ma'am.

5 A. Is that what you're saying?

6 Q. Yes, ma'am.

7 A. I'm not aware of that. I mean, I'm not

8 aware of that.

9 Q. Okay. All right. Let's talk a little bit

10 about the process. Ordinarily when you interview

11 somebody, it's confidential, correct?

12 Let me go back. Let me just start over

13 again.

14 When you go out to investigate an allegation

15 of neglect --

16 A. Uh-huh.

17 Q. -- for child abuse - okay? --

18 A. Right.

19 Q. -- child sexual abuse particularly in this

20 case --

21 A. All right.

22 Q. -- you have certain procedures that you try

23 to follow in the way that you do your work, correct?

24 A. Exactly.

25 Q. And one of the things that -- the reasons

26 that your unit was created was because there had

27 been leaks in the past when information came into

28 your office in high-profile cases about the facts 10704

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1 and circumstances of an alleged molestation,

2 correct? That's why you have your unit?

3 A. I understand that's why it was created.

4 Q. Okay.

5 A. Actual documentation, in actual policy and
6 procedure, I don't know how this unit got created.

7 But I do understand that that was one of the reasons
8 why it was created, because there was too many
9 people handling other cases.

10 And so what they did was centralize it,
11 localize it, rather, and put it in one spot so we
12 knew who -- the social workers who had that
13 particular case.

14 Q. And one of the reasons for that was to
15 provide accountability in case anything leaked out,
16 correct?

17 A. Leaked out. Well, all our cases are high
18 confidentiality. All our cases.

19 Q. So the goal --

20 A. How that is treated any different -- not
21 that the case is treated any different, but --

22 Q. I'm not suggesting that, ma'am.

23 A. Okay.

24 Q. I'm just trying to find out in your opinion,
25 based on your experience --

26 A. In my opinion --

27 Q. -- that one of the things that your unit

28 tries to accomplish is to make sure that the 10705

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1 information you obtain remains confidential?

2 A. You're correct.

3 Q. And it does not get out to the public?

4 A. You're correct.

5 Q. I'm sorry if I was too hard getting there.

6 And so that is one of the reasons why, on

7 the morning of this interview, that your supervisor,

8 Mrs. Walker, requested that the people who were in

9 the room leave, the two -- the security person and

10 the other one, and Mrs. -- Miss Pryor and the baby,

11 correct?

12 A. Yes. But I will tell you this --

13 Q. Okay.

14 A. -- that if a parent decides they want

15 someone else to hear what we're saying, they have

16 that right.

17 Q. Okay. So if she wanted to have an attorney

18 present, she could have?

19 A. She has that right, yes.

20 Q. And if she had wanted to insist on the fact

21 that Aja Pryor stay, she could have done that?

22 A. Yes, she could have.

23 Q. And if she had wanted to insist upon having

24 the big guy stay, she could have done that?

25 A. Yes, she could have. But it was our

26 intentions to try to give us as much confidentiality

27 as we can.

28 Q. Okay. And you told her that, and she went 10706

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1 along with it, correct? She asked them to leave?

2 A. Yeah, she did.

3 Q. In fact, she even apologized for the fact
4 that they were there, and that it was her fault that
5 she'd invited them, correct?

6 A. I don't remember her apologizing for it.

7 She may have said something to that effect, that,
8 "I'm sorry I did" -- you know, but I can't really
9 remember that.

10 Q. But in any case, the reality is, what you're
11 trying to do is create as much confidentiality about
12 these meetings as you can?

13 A. Exactly.

14 Q. Now, obviously if anybody tape-recorded any
15 of those conversations, that would be a breach of
16 that confidentiality?

17 A. It's illegal.

18 Q. All right. That would be a breach of the
19 confidentiality?

20 A. Yes, it is.

21 Q. And you did not know that at the time that
22 you were -- you arrived at the apartment, that you
23 were being tape-recorded, did you?

24 A. No, I did not.

25 Q. Now, did you see a tape-recorder any time
26 while you were there that morning?

27 A. No. I would have said something.

28 Q. And wasn't one of the things that Mrs. 10707

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1 Arvizo said to you during the course of your
2 conversation before you began the interview was that
3 she was afraid that the report would not be
4 confidential and that like her name would end up on
5 a billboard as a bad mother; isn't that what she
6 said?

7 A. You know, I think she did say something to
8 that effect.

9 Q. So she was worried about the confidentiality
10 issue, correct?

11 A. Of course she was. And we reassured her
12 that everything was confidential, you know. We had
13 a pretty good rapport, you know.

14 Q. And when you -- when you talked to Mrs.
15 Arvizo, did you -- did you ever take her separately
16 into another room and talk to her?

17 A. I went into a room, yes, I did.

18 Q. And talked to her?

19 A. I -- yes, I did.

20 Q. Okay. And you were sort of explaining to
21 her why you were there?

22 A. Yes, I did.

23 Q. And when you did that, the other people were
24 still out in the other room?

25 A. Yes, I did. I did do that.

26 Q. Now, did you at some point see Mrs. Arvizo
27 go into a room with the big guy, one of the big guys

28 who was there, before you commenced your interviews? 10708

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1 A. No, I didn't. I don't recall.

2 Q. You don't recall?

3 A. No. Huh-uh.

4 Q. Is it possible?

5 A. It's possible.

6 Q. Well, at some point I think you told a

7 defense investigator that you didn't think that Mrs.

8 Arvizo was out of your presence from the time that

9 you arrived till the time you commenced your

10 interview. Did you not say that?

11 A. No, she was not out of my sight. She was --

12 we were in a one-bedroom apartment, small apartment.

13 Q. So if you saw her walk into a bedroom,

14 you --

15 A. Yeah, if I saw her, she did not walk into a

16 bedroom with -- since we're talking, she did not

17 walk into a bedroom with anyone else.

18 Q. And do you recall a time when actually Mrs.

19 Arvizo excused herself and went into the rest room

20 for a while, before the conversation occurred?

21 A. In the beginning?

22 Q. Yes, ma'am.

23 A. When we first started talking?

24 Q. After the video.

25 A. After the video?

26 Q. Yes, ma'am.

27 A. Perhaps she did.

28 Q. Isn't it maybe -- isn't it true that 10709

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1 actually after the video was completed, you took her
2 into another room and you talked to her about what
3 you were trying to do, and to ease her -- she was
4 anxious, and you were very nice to her, and you were
5 trying to tell her what it was all about, and you
6 kept saying it was your higher-ups that told you you
7 had to go do this and things like that, right?

8 A. Yes, that's part of my job.

9 Q. Yes, ma'am. And right after that, when you
10 came out, you said people had to leave, correct?

11 A. I think they were gone after that -- before
12 I did that.

13 Q. But at some point before they left, Mrs.
14 Arvizo and one of the big guys went into a room
15 separately, correct?

16 A. I could not answer that. I could not be
17 very sure of that, if that happened or not.

18 Q. All right. Now, one of the other things
19 that you have a procedure about, that's a general
20 procedure - not in all cases, but a general
21 procedure - is that when you interview families, and
22 particularly children, where you believe there may
23 be an allegation of sexual misconduct, that you
24 attempt to try to do the interview separately,
25 correct?

26 A. Yes.

27 Q. In other words, you separate each of the

28 children, and you separate the parent and then you 10710

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1 interview each person individually?

2 A. You attempt to.

3 Q. Yeah. And that was your plan on this day?

4 A. Yes.

5 Q. And it didn't work out because Mrs.

6 Arvizo --

7 A. Because she requested that she be present.

8 Q. -- insisted that she be present?

9 A. Yes.

10 Q. Okay. And as I understand it, that then the

11 follow-up to that is that you have a procedure that,

12 where that occurs, that you attempt to go out and

13 contact the child either at school or at another

14 location to independently interview them again, with

15 the parent not present; is that correct?

16 A. That's if I have any kind of observation

17 that this may have occurred. What I'm saying,

18 it's -- had they said anything that would warrant me

19 going to another interview, I would have done it.

20 Q. Well --

21 A. You attempt to try to do that, yes. Yes,

22 you do. You're correct. But I was -- I didn't get

23 in contact with them about this.

24 Q. You didn't attempt to do that?

25 A. I did call a couple times, but, no, I

26 didn't, no. Huh-uh.

27 Q. And you told us before that you wouldn't

28 necessarily expect a teenaged boy to reveal an 10711

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1 allegation to you on a first meeting, didn't you?

2 MR. MESEREAU: Objection. Misstates the
3 evidence; no foundation.

4 THE COURT: Asked and answered. Sustained.

5 THE WITNESS: Do you want me to answer it?

6 MR. SNEDDON: No. I guess I've already
7 asked it. You already answered it. That's fine.

8 THE WITNESS: Okay.

9 Q. BY MR. SNEDDON: All right. Let's talk a
10 little bit about the second part of your interview
11 process, if we can.

12 The second part dealt with the family's
13 relationship with Mr. Jackson, correct?

14 A. Uh-huh. Yes, it does.

15 Q. She has to hear you say that.

16 A. I'm sorry. Yes, she did. I mean -- uh-huh.

17 Q. And you had a little script of questions
18 that you asked to make sure that you asked everybody
19 the same question consistently, correct?

20 A. Yes, I did.

21 Q. And the first question that you asked was
22 what was the nature of the relationship between
23 whoever you were talking to, let's start with Janet,
24 and Michael Jackson, correct?

25 A. Yes.

26 Q. Okay. And when you asked that question,
27 Mrs. Arvizo said to you, "Michael is like a father

28 to my children," correct? 10712

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1 A. Yes.

2 Q. And when you asked that same question to
3 Gavin, which was the very first question you asked
4 in the interview of each of these people, what was
5 his relationship with Michael Jackson, he said,
6 "Michael has been like a father to me," correct?

7 A. Yes.

8 Q. Isn't that what your report says?

9 A. Yes.

10 Q. And when you asked that very same first
11 question to Star, Star said, "Michael is like a
12 father to me." He said the same thing, correct, as
13 his brother?

14 A. Yes.

15 Q. And when you asked that question to
16 Davellin, the first question you asked her, what was
17 the nature of the relationship, she said, "Michael
18 is like a father to all of us," correct?

19 A. Yes.

20 Q. Did that not concern you, that each one of
21 them began their description of the relationship
22 with Mr. Jackson exactly the same way that the one
23 before them did?

24 A. No, it didn't.

25 Q. Now, you were aware, when you went out
26 there, that part of the allegations against -- that
27 you were to investigate was whether or not Gavin was

28 sleeping in the same bed with Michael Jackson, 10713

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1 correct?

2 A. Allegations of sleeping in the same bed with
3 Michael Jackson. That's what's on the referral.

4 Q. Yes, ma'am. That's what I said.

5 A. Okay.

6 Q. That was it, correct?

7 A. Right.

8 Q. Now, when you were talking to Janet Arvizo
9 about the second part of that interview, which was
10 the relationship with Mr. Jackson, she told you that
11 the children were never alone with Mr. Jackson,
12 correct?

13 A. That's what she said.

14 Q. Okay. Yes, ma'am. And she told you that
15 there was always somebody around when they go to
16 Neverland, correct?

17 A. Correct.

18 Q. And actually, she said sometimes they stay
19 in the visitors' quarters, "But mostly I'm in the
20 main house." Isn't that what she told you?

21 A. She said she was in the main house.

22 Q. Didn't she say in your report, "Mostly in
23 the main house"?

24 A. "Mostly in the main house." I wrote it like
25 she said it.

26 Q. Okay. That's fine.

27 A. Okay.

28 Q. But by that statement, did you assume that 10714

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1 Mrs. Arvizo was in the main residence occupied by

2 Mr. Jackson?

3 A. Say that again. What are you saying?

4 Q. Yeah. When she told you that, what you

5 thought was she was in the same house. Not the same

6 room, but in another part of the house?

7 A. I don't know the setup, so "main house"

8 would mean where the living quarters are. Am I

9 correct? I mean --

10 Q. Okay. You said mostly --

11 A. That's what I was thinking. That's what I

12 was thinking, yeah.

13 Q. And she also told you that one of the

14 reasons that she felt that nothing could have

15 happened in this case was because she was up

16 wandering around the house late at night?

17 A. She did tell me that, yes.

18 Q. Didn't it strike you as a little strange

19 that this woman is walking around this house late at

20 night?

21 A. No. Not for her, no. I'm sorry.

22 Q. Not for her?

23 A. No. Scratch that. No.

24 Q. It's "strike it" in our vernacular.

25 A. Strike that.

26 THE COURT: I like "scratch it" better.

27 (Laughter.)

28 MR. MESEREAU: Objection. She's not 10715

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1 completed her response.

2 THE WITNESS: It just did not. It just
3 didn't.

4 Q. BY MR. SNEDDON: And from the conversation
5 with Mrs. Arvizo, did you draw the conclusion that,
6 in your opinion, the boys were never alone with Mr.
7 Jackson in his bedroom?

8 A. That's the picture that was painted to me.

9 Q. There was always an adult around?

10 A. That's exactly what she said. She say she
11 was aware of everything that was going on. She has
12 a vigilant eye over her children. She would never
13 put them in harm's way.

14 Q. Okay. And she also told you that the
15 defendant's room had no doors and was always open,
16 correct?

17 A. Yes. She tried to give me a visual
18 description of it.

19 Q. Okay.

20 A. And it was as if it was just wide open. It
21 was huge, big bed, and -- and I did the best I could
22 with my visual.

23 Q. You envisioned a situation where people
24 could come and go with easy access, and if they
25 wanted to check on what's going on, that was fine,
26 there was no problem getting in or out of the place
27 at all?

28 A. Yes, that's what I envisioned. 10716

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1 Q. You've never been to Neverland Ranch, right?

2 A. No.

3 Q. Did you, in the course of your
4 investigation, before you wrote your final report,
5 attempt to verify what the sleeping arrangements
6 were like at Neverland Valley Ranch?

7 A. That's out of our jurisdiction.

8 Q. Well, the issue you were investigating was
9 whether or not there had been some allegations about
10 Mr. Jackson's sleeping in bed with Gavin Arvizo,
11 correct?

12 A. The incident happened in Santa Barbara
13 County. It was out of our jurisdiction. We go to
14 the address that is listed on the referral, which
15 was in Los Angeles. That's when I came to the
16 Department of Children & Family Services in Los
17 Angeles.

18 Q. Well, I guess what I'm just asking you is,
19 you created a report based upon statements given to
20 you by the family into allegations about whether
21 anything inappropriate happened to the children,
22 correct?

23 MR. MESEREAU: Objection; unintelligible.

24 MR. SNEDDON: I'll rephrase it.

25 Q. Was the focus of your investigation whether
26 anything inappropriate had happened with those
27 children and Mr. Jackson?

28 A. The focus is on -- is whether the mother was 10717

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1 generally neglecting the children by putting them in
2 a situation that would be unsafe.

3 Q. And "unsafe" meaning sleeping in the same
4 bed with Mr. Jackson?

5 A. Yes. You're correct.

6 Q. Okay.

7 A. Correct.

8 Q. And whether anything -- and that's why you
9 asked them in the very last question whether
10 anything inappropriate happened, right?

11 A. Yes.

12 Q. Okay. And was it your impression -- well,
13 I've already asked that, so let's put it this way --

14 A. Okay.

15 Q. -- you were given information from Mrs.
16 Arvizo. Did you attempt to verify the accuracy of
17 the information that she was giving you, whether, in
18 fact, Mr. Jackson's room was wide open and
19 easy-come/easy-go access?

20 A. That's not part of my job.

21 Q. Okay. So you accepted the information, but
22 you don't go out to independently verify it?

23 A. No.

24 Q. That's not part of your job?

25 A. I'd still be there.

26 Q. Were you aware of the fact that Neverland
27 Valley Ranch had some guest cottages?

28 A. She told me about -- is it a media room or 10718

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1 something? There's a room, I guess, that they may
2 stay in. I think her daughter told me something
3 about that. There was another arrangement or
4 something. I'm not sure.

5 Q. So you didn't do any independent
6 verification of what the sleeping arrange -- whether
7 there were any guest cottages or other locations
8 where this family could have been staying at the
9 time?

10 A. She did tell me she stays sometimes in other
11 quarters. Is that the guest -- is that the
12 guesthouse? Or -- I would assume that it had a
13 guesthouse.

14 Q. Okay. And -- but you didn't independently
15 investigate that?

16 A. No, I did not.

17 Q. Thank you.

18 Now, when you talked to Gavin, you also
19 asked Gavin whether or not he was ever left alone
20 with Mr. Jackson, correct?

21 A. Yes, I did. I asked him if he ever slept in
22 a bed with Michael Jackson. He told me no. But he
23 had slept in the bed.

24 Q. Well, before you asked him about sleeping in
25 the bed, didn't you ask the question whether he was
26 ever alone with Mr. Jackson?

27 A. Yes.

28 Q. Okay. And he told you, "No"? 10719

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1 A. Right.

2 Q. There was always somebody around?

3 A. Yes.

4 Q. And he indicated to you that his mother,

5 Janet Arvizo, would go in and out of the room

6 whenever she wanted, correct?

7 A. Yes.

8 Q. In other words, she had easy access to go

9 and check on the kids anytime she wanted. That was

10 your impression, correct?

11 A. That was my impression.

12 Q. Yes, ma'am. And that she was always around

13 when the kids were around Mr. Jackson?

14 A. Yes.

15 Q. Now, when you interviewed Star, Star also

16 told you that he was never alone with Mr. Jackson,

17 correct?

18 A. Yes, he did.

19 Q. And he told you this incident where they

20 would make s'mores around the fireplace and laugh

21 and have fun, correct?

22 A. Yes, he talked to me about that. He spoke

23 about that.

24 Q. And he said his mother is there "when we're

25 in Michael room. We're never left alone"?

26 A. That's exactly what he told me.

27 Q. Did you ever interview anybody at the ranch,

28 any of the employees or any of the house staff, to 10720

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1 see whether or not that statement was correct or
2 not?

3 A. No, I did not.

4 Q. Then you interviewed Davellin, correct? The
5 last one was the sister.

6 A. The 16-year-old?

7 Q. Yeah.

8 A. Yeah, uh-huh.

9 Q. And Davellin told you that she took a friend
10 with her to the ranch, correct?

11 A. She did.

12 Q. Okay. And she said that most of the time
13 that she was with this friend, who would keep her
14 company, and they would stay in the room down the
15 hall in the main house. Isn't that what she told
16 you?

17 A. Yes.

18 Q. And that her mother always knows what's
19 going on at Neverland, correct?

20 A. Yes.

21 Q. That's what she told you?

22 A. Yes, that's what she told me.

23 Q. Now, did you ever ask for the name of the
24 friend?

25 A. Perhaps I did. Like I say, our
26 conversations, our interviews are not taped. So I'm
27 doing it, you know, on --

28 Q. On notes? 10721

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1 A. On notes. And I don't recall if she gave me
2 the name or not.

3 Q. If she would have, you probably would have
4 put that in your report?

5 A. Yes, I would have.

6 Q. You didn't see it in your report when you
7 reviewed it?

8 A. No, I didn't. I would have put it in my
9 report.

10 Q. So you never -- you didn't ask for the name,
11 so I'm assuming you never contacted this person to
12 see whether she was ever at Neverland, this friend?

13 A. Are you talking about collateral contacts?

14 Q. I'm talking about --

15 A. That's what we call it. We call it
16 collateral contacts. Other people.

17 Q. For us it's just, did you contact the friend
18 to see whether or not what Davellin was telling you
19 was truthful?

20 A. No, I didn't.

21 Q. Okay. Now, you -- you told us that you
22 concluded in your report that you made on the 27th,
23 if I have that right, the 27th of February --

24 A. Uh-huh.

25 Q. Okay. Now, if my calculations are correct,
26 the referral came in on the 14th of February?

27 A. That's the day we received it, yes.

28 Q. So the 30 days starts ticking on the 14th? 10722

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1 A. Yes. I'm not really sure if it came in
2 earlier and we had just gotten a report, because it
3 goes by the age of the children, if it's immediate.
4 It depends on what the allegations are on the sexual
5 abuse. I think it was the same day. It came in on
6 the 14th, which is the day I actually went out,
7 which was a -- an immediate referral, yeah.

8 Q. So -- and I think you told us there's a
9 30-day ticker on this. You have to get it done in
10 30 days?

11 A. It's a turn-around time, yeah. Uh-huh.

12 Yeah.

13 Q. And so on the 20th you had the interview,
14 and on the 27th you completed your report?

15 A. Yeah.

16 Q. So you had two more weeks you could have had
17 to complete it if you had wished to do that?

18 A. 29 days -- 28 days in February. I had one
19 day.

20 Q. It came out on February 14th, and you wrote
21 your report 13 days later, on the 27th.

22 A. I went out on the 20th.

23 Q. And you went out on the 20th.

24 A. Uh-huh.

25 Q. So you had at least -- I'm not trying to
26 quibble with you, but you had at least two weeks,
27 didn't you, left?

28 A. Seven days. 10723

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1 Q. All right.

2 A. There's 28 days in February.

3 Q. Yes, ma'am.

4 A. So --

5 Q. So you had till --

6 A. Give or take a little. It was -- the 20th
7 was on what day? I'm just looking at the time
8 frame. I work only four days a week.

9 I might have been off that Monday. I
10 probably had really two days to do it. And I could
11 have kept it open if I thought it was -- you can
12 keep cases open, yes. Of course.

13 Q. And you got the referral on the 14th. 30
14 days from then would be approximately, give or take
15 a day or two --

16 A. Oh, do you mean in terms --

17 Q. Yes, ma'am. It would have been March 12th,
18 because it's a short month.

19 A. I think the deadline -- I'm not really sure.
20 I think the deadline was the -- it was not until
21 March, though. It didn't go until March.

22 Q. All right. In your report that you filed,
23 you indicated, in response to Mr. Mesereau's
24 questions, that you used the word "unfounded,"
25 correct?

26 A. That's the words we used, yeah.

27 Q. Now, isn't it more correct that your report

28 reflects that the allegations against Mrs. Arvizo 10724

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1 for being neglectful as a parent, that you wrote in
2 your report those were unfounded, correct?

3 A. Yes.

4 Q. And that actually you concluded your report
5 on the part dealing with Mr. Jackson with a simple
6 statement that, "The children denied any
7 inappropriate touching"?

8 A. That's right.

9 Q. Okay. So you didn't use "unfounded" as to
10 the second part of your findings. You just said
11 they denied it?

12 A. I didn't. You're correct. You're correct.

13 Q. Okay. Now, just a few more questions and
14 we'll be done.

15 With regard to the cell phone calls - I just
16 wanted to get this clear - the cell phone was your
17 cell phone, correct?

18 A. My personal cell phone, right.

19 Q. That she was calling you on your cell phone?

20 A. Yeah.

21 Q. Okay.

22 A. Yes.

23 Q. Now, one of the things that Mrs. Arvizo told
24 you at the meeting at Fatburger was that she
25 described her situation while she was at the ranch
26 as horrible, didn't she?

27 A. Excuse --

28 Q. Do you recall that? 10725

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1 A. Horrible?

2 Q. Horrible.

3 A. No.

4 Q. You don't recall that?

5 A. She did not say that.

6 Q. Okay. So you're sure she never said that?

7 A. She did not say that.

8 Q. Okay. And it's pretty clear from your

9 questions (sic) to Mr. Mesereau that the thing that

10 was on Mrs. Arvizo's mind was, one, the impact the

11 Bashir video had had on the children's ability to go

12 to school; correct?

13 A. That seemed to be the main concern.

14 Q. Did she tell you the children had been

15 taunted at and yelled at as fags and homosexual and

16 things like that?

17 A. She told me some kids saw him at a gas

18 station and said, "Oh, you're the one that was on

19 the T.V. that slept with Michael Jackson." She did

20 tell me that.

21 Q. And then -- I'm sorry.

22 A. I guess they were having problems going to

23 school, you know.

24 Q. And that from your recollection, the

25 thing -- the other thing that she was most concerned

26 about was the fact that her children had fallen

27 behind in school?

28 A. That was one of the things, yeah. 10726

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1 Q. Now, when you were interviewing the Arvizos

2 on the 20th of February - okay? --

3 A. Uh-huh.

4 Q. -- did you believe that they had been

5 staying at Neverland Valley Ranch for an extended

6 period of time?

7 A. On the 20th? When I actually got in contact

8 with them?

9 Q. Yes, ma'am.

10 A. That was prior to me interviewing them,

11 right.

12 Q. Prior -- no, that's the day of the

13 interview, ma'am.

14 A. It was prior -- what are you asking?

15 Q. Yes. Was it your information or belief at

16 the time that you were conducting this interview on

17 the 20th that they had actually been staying at the

18 ranch for, let's just say, two weeks at least?

19 A. I don't know the time period, but I was

20 under the impression that she had been backwards and

21 forwards to the ranch.

22 Q. Back and forth?

23 A. Back and forth to the ranch. They were in

24 school prior to that, prior to the Bashir document.

25 Q. So it was your understanding or belief that

26 prior to the time that the Bashir video was shown

27 that the children were not in school?

28 I'm not trying to put words in your mouth. 10727

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1 A. Oh, no, you're not. You're not.

2 The actual last time they were at school, it
3 was prior to the Bashir document.

4 Q. That was your understanding?

5 A. Yeah, that was my understanding. As I was
6 speaking to the counselor at the school, yeah.

7 Because she was sending homework to them. Because I
8 asked her, and she said, "I've been in constant
9 contact with Mrs." -- I was calling her Mrs.

10 Ventura -- "Ms. Arvizo, and we've been sending
11 homework there."

12 Q. And it was your understanding that you
13 thought that they were coming and going from

14 Neverland Ranch --

15 A. Well --

16 Q. -- or staying there? I'm --

17 A. No, I don't know. I can't answer that.

18 Q. Well, you were asking about situations where
19 the children would have been exposed to the
20 possibility of sleeping in Mr. Jackson's bed,
21 correct?

22 A. I thought it was on visitation. They did
23 tell me they visit there quite often. That's what I
24 thought was going on, the visitations while they
25 were at Neverland.

26 Q. All right. So then your understanding was
27 that Mrs. Arvizo had been there on more than one

28 occasion? 10728

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1 A. Oh, yeah. My understanding was that they
2 visit quite often.

3 Q. And that Mrs. Arvizo had been there quite
4 often?

5 A. Yes.

6 Q. That was --

7 A. That's the picture that was painted.

8 Q. Okay. And then lastly, Mrs. Arvizo was
9 pretty emphatic in the conversation at Fatburgers
10 that she did not want to go to Brazil, correct?

11 A. Yes, she said that.

12 Q. And that it was -- Mr. Jackson wanted to
13 send her to Brazil, correct?

14 A. Yes. She said she --

15 Q. That's what she said?

16 A. Yeah, she said that.

17 MR. SNEDDON: Nothing further, Your Honor.

18 Thank you.

19 THE COURT: I'm thinking of taking a break
20 now. Are you going to redirect?

21 MR. MESEREAU: I will do redirect, Your
22 Honor.

23 THE COURT: We'll take our break now.

24 (Recess taken.)

25 MR. MESEREAU: Thank you, Your Honor.

26 //

27 //

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1 REDIRECT EXAMINATION

2 BY MR. MESEREAU:

3 Q. Miss Peters, Prosecutor Sneddon asked you
4 questions about whether or not it's difficult for a
5 teenaged young man to report molestation. Do you
6 remember those questions?

7 A. Yes. I remember them. Uh-huh.

8 Q. You've had teenaged young men report to you
9 that they've been improperly touched, have you not?

10 A. Yeah. On occasion, yeah.

11 Q. What if you knew the particular teenaged
12 young man that you were investigating had previously
13 reported his mother for molesting him?

14 MR. SNEDDON: Your Honor, I'm going to
15 object to that. That's an improper question.
16 Assumes facts not in evidence.

17 MR. MESEREAU: He opened it up, Your Honor.

18 THE COURT: Sustained.

19 Q. BY MR. MESEREAU: Would a prior history of
20 allegations of molestation in a family suggest that
21 children in the family have an easier time admitting
22 they've been molested if they really have?

23 MR. SNEDDON: Same objection, Your Honor.
24 Calls for a conclusion. No foundation.

25 THE COURT: Sustained.

26 Q. BY MR. MESEREAU: When you interviewed Janet
27 Arvizo on February 20th, 2003, I believe you

28 indicated you had looked into prior involvement with 10730

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1 your agency and the Arvizo family, correct?

2 MR. SNEDDON: Your Honor, asked and

3 answered.

4 MR. MESEREAU: He opened that issue up as

5 well, Your Honor.

6 THE COURT: The objection is overruled.

7 Q. BY MR. MESEREAU: You can answer the

8 question.

9 You said you had looked into their prior

10 involvement with DCFS, right?

11 A. Yes, I did.

12 Q. And were you aware that Davellin had

13 previously accused her father of molesting her?

14 A. I was not aware of that.

15 Q. Were you aware that Gavin had previously

16 accused his mother of molesting him?

17 A. No, I was not.

18 Q. Was that because you didn't have that

19 computer system in the mid '90s?

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

21 object and ask the Court to admonish counsel.

22 Please. Object. It's hearsay; it's improper; it's

23 been asked and answered.

24 THE COURT: The objection as to vague on the

25 last question is sustained.

26 Q. BY MR. MESEREAU: Well, the prosecutor asked

27 you hypothetically about the difficulty some

28 teenaged young men have admitting they've been 10731

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1 molested, right?

2 A. Yes, he did.

3 Q. And you've indicated, in your experience,
4 certain teenaged young men have admitted to you
5 they've been molested, right?

6 A. Very few.

7 Q. What if you learned there were other
8 issues -- excuse me. If a child in a family,
9 theoretically, has made allegations of molestation
10 before, would that suggest that that particular
11 child may have an easier time admitting molestation
12 if it really happens?

13 MR. SNEDDON: Your Honor, I'm going to
14 object as an improper hypothetical; assumes facts
15 not in evidence.

16 THE COURT: Sustained.

17 Q. BY MR. MESEREAU: Now, you indicated that --
18 you used words that you're not a specialist.
19 Remember that?

20 A. Yes.

21 Q. And what did you mean by "specialist"?

22 A. We do have a unit that deals with sexual
23 abuse only.

24 Q. But certainly with 30 years of experience,
25 you've --

26 A. Oh, yeah.

27 Q. -- you've gotten a lot of training --

28 A. A lot of sexual abuse cases. 10732

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1 Q. -- in cases of sexual abuse?

2 A. Yeah. There are indicators in sexual abuse,
3 yes.

4 Q. What indicators are you talking about?

5 A. I usually look at the -- how they disclose
6 the information to me, if they're withdrawn, or they
7 may be reluctant to answer any of my questions. The
8 relationship that they had with their -- the
9 interaction they had with their mother.

10 Gavin appeared to be very open, eager to
11 talk. He didn't seem at any point uncomfortable
12 with -- when I asked a question.

13 Q. And isn't it correct that Gavin showed no
14 indication of having been sexually abused when you
15 interviewed him?

16 A. My observation at the time, when I
17 interviewed them on that particular day, which was
18 February 20th, he showed no indication of any signs
19 of any sexual molestation.

20 Q. And would you say the same about Star, after
21 you interviewed Star?

22 A. Star, also.

23 Q. He also showed no indication of having been
24 sexually abused, right?

25 A. No, he did not.

26 Q. Okay. Now, the prosecutor asked you
27 questions about the Bashir documentary, but you knew

28 that in the Bashir documentary Mr. Jackson expressly 10733

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1 denied any sexual contact with children, right?

2 MR. SNEDDON: Object. Leading.

3 THE COURT: Overruled.

4 Q. BY MR. MESEREAU: Did you know that?

5 A. Can I answer that?

6 Q. Yes.

7 A. Say it again.

8 Q. Were you aware that, in the Bashir

9 documentary, Mr. Jackson denied any sexual contact
10 with children?

11 A. Yes.

12 Q. And the prosecutor asked you questions about

13 Mr. Jackson admitting sleeping with boys, but Mr.

14 Jackson admitted letting children into his bedroom,
15 correct?

16 A. The question that I -- do you want -- posed

17 to the children was, "Have you ever slept in the bed
18 with Michael Jackson?"

19 Q. Right. What did they say?

20 A. That's the question that I asked.

21 Q. What did they say?

22 A. They said, "No." Because that was the

23 allegations that was on the referral, so I went
24 verbatim.

25 Q. But they did admit sleeping in his bedroom,

26 correct?

27 A. They did admit that they have slept in the

28 bed and in the bedroom. 10734

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1 Q. In Mr. Jackson's bed in Mr. Jackson's
2 bedroom, right?

3 A. Yes. And they said if he was there, he
4 would sleep on the floor. They told me about an
5 incident where he slept on the floor and a blanket
6 and something.

7 Q. The prosecutor asked you about Janet Arvizo
8 being a welfare mother. Do you remember that
9 question?

10 A. Yes, I do.

11 Q. Do you know whether or not she was a
12 fraudulent welfare mother?

13 MR. SNEDDON: Your Honor, I'm going to
14 object to that question. It's argumentative and it
15 calls for a legal conclusion.

16 THE COURT: Sustained.

17 Q. BY MR. MESEREAU: When you interviewed Janet
18 Arvizo and the children at Major Jay Jackson's home,
19 did you determine whether or not Major Jackson was
20 supporting Janet Arvizo and her children?

21 MR. SNEDDON: Object. Calls for a
22 conclusion; lack of foundation.

23 THE COURT: Overruled.

24 You may answer.

25 THE WITNESS: I never had any contact with
26 Major Jackson. I think my supervisor did have
27 occasion to speak to him, and from what she told me

28 is that he said he was paying for the tutoring. 10735

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1 Q. BY MR. MESEREAU: But you did believe at the
2 time you interviewed Janet that she and the family
3 were living at least part of the week at Jay
4 Jackson's home, right?

5 A. Yes, that's where I thought they resided.

6 Q. Did you investigate whether or not she was
7 putting any welfare money into his bank accounts?

8 A. You know, we don't deal with welfare.

9 Q. Okay. Did you actually investigate her
10 financial condition at all?

11 A. Based on the information that she gave me,
12 and I did know that she was on welfare, and we do
13 have access to whether or not they are receiving
14 public assistance or not. The actual amount of it
15 is based on the children, how many children you
16 have, and yourself. And that was -- that was -- I
17 think she told me it was \$700, and I think that's
18 pretty accurate for a family of four.

19 Q. But you don't do any investigation into
20 whether that's being lawfully received, right?

21 A. No. It's two different departments. One is
22 the Department of Public Social Services, which
23 deals with welfare, and Aid to Families With
24 Dependent Children it was called, and now it's
25 called Cal-Works. It's two different departments.

26 Q. You didn't investigate her history of any
27 prior litigation, did you?

28 A. No, I did not. 10736

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1 Q. Did you ever hear of a suit against J.C.

2 Penney?

3 MR. SNEDDON: Your Honor, I object. Calls

4 for hearsay.

5 THE COURT: Sustained.

6 Q. BY MR. MESEREAU: Did you ask her whether or

7 not she was raising money from various celebrities

8 at the time for personal use?

9 A. No, I didn't. But when I looked at the

10 prior allegations of 2001, I think it was, she did

11 make mention of knowing certain people and that she

12 was friends of Michael Jackson, her children went

13 out to Neverland. She did say that in the other

14 referral from the other -- I mean, other social

15 worker who interviewed her, which was almost two

16 years prior to this allegation that we're speaking

17 of right now.

18 MR. SNEDDON: Excuse me.

19 I move to strike as nonresponsive to the

20 question.

21 THE COURT: Stricken.

22 MR. SNEDDON: Everything beyond "No."

23 THE COURT: The only -- I'll leave in the

24 part about "No, I didn't." Strike the voluntary

25 statement.

26 Q. BY MR. MESEREAU: But didn't Ms. Arvizo tell

27 you at the time that she had been obtaining money or

28 financial benefits from celebrities? 10737

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1 MR. SNEDDON: Object; asked and answered.

2 THE COURT: Sustained.

3 Q. BY MR. MESEREAU: Did you determine how much

4 Major Jackson was making at the time?

5 MR. SNEDDON: Object as immaterial.

6 THE COURT: Sustained.

7 Q. BY MR. MESEREAU: Would it be correct to say

8 that in terms of your investigation, limiting it to

9 what you do in your job, do you sort of -- let me

10 rephrase that.

11 Did you just take her word for it, "I'm

12 getting welfare," or did you look further?

13 A. I knew she was getting welfare, because it

14 shows up on our system.

15 Q. But you didn't know whether or not she was

16 getting it in a lawful way, correct?

17 A. I don't know.

18 MR. SNEDDON: Object. Asked and answered

19 and --

20 THE COURT: Sustained.

21 MR. SNEDDON: And assumes facts not in

22 evidence and calls for a legal conclusion.

23 THE COURT: I already ruled.

24 MR. SNEDDON: I'm sorry, I didn't hear you.

25 Apologize.

26 THE COURT: Go ahead.

27 Q. BY MR. MESEREAU: You said -- the prosecutor

28 asked you questions about these big guys who were at 10738

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1 Major Jackson's apartment - okay? - and you
2 indicated that Janet told you she was being hassled
3 by the media; is that right?

4 A. Yes.

5 Q. Okay. Did you ever ask her why these
6 security guards were there?

7 A. She said for support.

8 Q. Okay. Did she ever complain about them to
9 you?

10 A. No, she did not.

11 Q. Okay. Did she ever suggest to you in any
12 way they were a threat to her?

13 A. No, she did not.

14 Q. Did any of her children ever suggest to you
15 that these security guards were a threat to them?

16 A. No, she did not.

17 Q. All right. Now, the prosecutor asked you
18 questions about whether or not you've seen security
19 guards before when you've done your interviews,
20 right?

21 A. Right.

22 Q. And you said something about you've seen
23 security people at various locations before when you
24 interviewed; is that correct?

25 A. What I meant by that is that when you're
26 going into a home, there may be several people there
27 that are not identified. Being that I do do --

28 investigate a lot of law enforcement people and 10739

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1 things like that, I've had occasions where there
2 were other police officers there, yeah.

3 Q. Now, your unit deals with high-profile-type
4 investigations, right?

5 A. Yes, they do.

6 Q. And your unit obviously would investigate
7 celebrities if referrals were made --

8 A. Yes, we do.

9 Q. -- correct?

10 And in your experience, have you -- are you
11 aware that celebrities often have security people?

12 A. Yes. I'm aware of it, yes.

13 Q. Okay.

14 A. Yes.

15 Q. And in your experience, would it be unusual
16 for a celebrity the stature of Michael Jackson to
17 need security?

18 A. No.

19 Q. Now, the prosecutor also asked you a
20 question about all these people being there when you
21 did the interview, and I think you said that it's
22 your policy that other people can be present if the
23 person you're interviewing permits it?

24 A. Yes.

25 Q. Are there any restrictions on that at all?

26 A. We try to interview kids separately, but if
27 the parents refuse, we allow it. We try to

28 interview them separately. 10740

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1 Q. And I believe you said that Janet was
2 concerned about your interview with she and the
3 children being kept confidential, right?

4 A. Yes, she was.

5 Q. Did Janet ever tell you that you were being
6 recorded?

7 A. No, she didn't.

8 Q. Did she ever tell you she knew you were
9 being recorded?

10 A. No, she didn't.

11 Q. Now, were the security people -- or, excuse
12 me, let me rephrase that.

13 Were the people that you thought were
14 security people in the room when you did the
15 interview?

16 A. No.

17 Q. Do you know where they were?

18 A. Outside.

19 Q. To get outside, would they have to go down a
20 stairway?

21 A. They would go out -- yeah, they have to go
22 out of the building.

23 Q. And did you ask if they would leave the
24 building while you conducted the interview?

25 A. Yes, we did.

26 Q. Have you ever met Major Jay Jackson at any
27 time?

28 A. No, I didn't. No. 10741

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1 Q. Have you ever spoken to him at any time?

2 A. No, I did not.

3 Q. Okay. Did your investigation involve any
4 check into Major Jay Jackson's background?

5 A. No. They're making an allegation. And when
6 there's an allegation, we go for the perpetrator.

7 And the perpetrator of this particular allegation
8 was the mother, Janet Arvizo.

9 Q. Okay. But in your investigation as to
10 whether or not there is any type of general
11 neglect --

12 A. Uh-huh.

13 Q. -- would you look into who the mother was
14 staying with or living with?

15 A. That's taken into consideration, yes, if
16 it's -- but he was not on the allegation. I was
17 there to check to see whether or not in fact -- the
18 allegations was against the mother. It was not
19 against Major Jackson. It was against the mother,
20 if she was providing adequate care for the children.

21 So, for instance, hypothetically, if you're
22 in a home and there may be someone that is kind of
23 risky, and I know that, yes, I would talk to that
24 person. Yes, I would. Any other person that's
25 living in the home.

26 But I was under the impression that she was
27 just using his home there because she was hiding

28 from the media and her home being the address in 10742

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1 East Los Angeles and that's where I had to do the
2 interview.

3 Q. Did the fact that she told you that she was
4 hiding from the media suggest to you she might need
5 security?

6 A. Yes.

7 Q. Did the fact that she was hiding from the
8 media suggest that maybe she asked Mr. Jackson would
9 he help her with some security?

10 A. Yes.

11 MR. SNEDDON: I'm going to object. Calls
12 for speculation.

13 THE COURT: Sustained.

14 Q. BY MR. MESEREAU: Now, on April 1st, 2003,
15 again, you saw the Arvizo family at the Fatburger,
16 right?

17 A. Yes.

18 Q. And Janet told you that her kids were being
19 tutored, right?

20 A. Yes, she did.

21 Q. And she pointed to you and showed you where
22 the tutoring office was, right?

23 A. Yes, she did.

24 Q. You saw that on the second level, right?

25 A. Yes, I did.

26 Q. And that was JGI Tutoring, was it not?

27 A. I believe so, yeah.

28 Q. And do you know what it costs to have a 10743

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1 child tutored at JGI Tutoring?

2 A. I can speculate. I don't know.

3 Q. It's pretty expensive, isn't it?

4 A. Yes.

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

6 object. She answered the question she'd have to

7 speculate. Move to strike the question, and -- and

8 it's also irrelevant.

9 THE COURT: The objection is sustained. The

10 answer is stricken.

11 Q. BY MR. MESEREAU: Was it your understanding --

12 it's JEI -- I made a mistake -- that JEI Tutoring is

13 a private organization?

14 A. I do believe that is a private organization,

15 yes.

16 Q. And was it your understanding that they

17 provide after-school care?

18 A. At JEI?

19 Q. Yes.

20 A. I'm not aware of that, no.

21 Q. Did Janet tell you who was paying for it?

22 A. Major Jackson, I think. Yeah.

23 Q. Now, I believe you said that Janet told you

24 that she could go into Mr. Jackson's room any time

25 she wanted, right?

26 A. Yes, she did.

27 Q. Was it words to that effect?

28 A. Words to that effect, yeah. She said she 10744

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1 was up all around, all the time, and --

2 Q. And did she tell you whether or not Mr.

3 Jackson had a lock on his door to his bedroom?

4 A. She said no lock.

5 Q. Okay.

6 A. She said it was an open room.

7 Q. Okay. So she said it was open for her to go

8 in and out as she chose?

9 A. That's what she told me, yeah.

10 Q. Okay.

11 A. That's what I visualized as she was

12 speaking.

13 Q. And she told you she would do that any time

14 of night?

15 A. Yes.

16 Q. Now, was that the same conversation where

17 you learned that Gavin had slept on Mr. Jackson's

18 bed?

19 A. Um --

20 Q. Let me rephrase that. I didn't ask a good

21 question.

22 A. Okay.

23 Q. Janet was sitting there when Gavin told you,

24 "I have slept on Mr. Jackson's bed," right?

25 A. Yeah. Janet, the mother, yes. Yes.

26 Q. That was the same -- and Janet heard Gavin

27 say that to you, right?

28 A. Yes, she did. 10745

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1 Q. She never made any objection to that
2 statement?

3 A. No, she did not.

4 Q. Never made any objection to that happening?

5 A. No, she did not.

6 Q. Okay. But what she said to you is, "But I
7 can go in and out and see what's going on," right?

8 A. Yes, she did.

9 Q. All right. Did Star suggest that he had
10 spent evenings in Mr. Jackson's room?

11 A. Yes, he did.

12 Q. And did he also deny that anything improper
13 ever happened?

14 A. He denied anything ever happened.

15 MR. SNEDDON: I'm going to object as asked
16 and answered.

17 THE COURT: Sustained.

18 Q. BY MR. MESEREAU: Now, the prosecutor asked
19 you if Janet had said things were horrible at
20 Neverland when you bumped into her on April 1st,
21 right?

22 A. Right.

23 Q. And you said she never said that, right?

24 A. No, she did not say that.

25 Q. When you bumped into Janet and the kids on
26 April 1st, did they ever tell you anything about
27 child molestation by Michael Jackson?

28 A. No, they didn't. 10746

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1 Q. Now, Davellin told you that she had a
2 girlfriend at Neverland; is that right?

3 A. Yes, she did.

4 Q. Did she ever mention the name Marie Nicole;
5 do you know?

6 A. I can't remember the name.

7 Q. How about Simone? Did she ever mention the
8 name Simone to you?

9 A. Maybe.

10 Q. Does that sound --

11 A. I'm not really sure. That's catchy, so
12 maybe. Simone, yeah.

13 Q. You indicated that the counselor at school
14 informed you that homework was being sent to the
15 Arvizos for the children, right?

16 A. Yes, she did.

17 Q. And what did you take that to mean? Excuse
18 me, let me rephrase.

19 You learned that from a counselor at school,
20 right?

21 A. Yes.

22 Q. The counselor told you that they hadn't been
23 attending school, but homework is being sent to
24 them; is that correct?

25 A. The mother was constantly in contact with
26 them.

27 Q. And that's what the counselor said?

28 A. Yes, she did. Uh-huh. 10747

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1 Q. Did you discuss that fact with Janet Arvizo
2 when you interviewed her?

3 A. Yes, I asked them about the homework, how
4 was school going. And she said that she was giving
5 homework and sending the work in. So I don't know
6 over what period of time we were talking about, if
7 it was one week, two weeks. But at the particular
8 time when I went to the school, it was fresh.

9 So the 14th was the day we actually got the
10 alle -- the referral. I went to the school, what,
11 about three days -- about the 18th of February. So
12 I'm thinking the time span might have been a week or
13 maybe two weeks that they were getting homework sent
14 to them.

15 Q. And did the counselor appear to you to be
16 satisfied that this process of sending homework to
17 the Arvizos was working?

18 A. Yeah, she did.

19 Q. And did the counselor inform you that the
20 homework was being done?

21 A. I don't remember that part of it. What I do
22 remember is that she did confirm that they were
23 getting homework, and that's -- as I said earlier,
24 previously, that that's how I was aware of where she
25 was, because I had no idea of her location. Even
26 though I had gone to the address on St. Andrews, I
27 did not have another address for her.

28 It was really coincidental or by luck that I 10748

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1 found that out, because I was sitting at the school,
2 because I did go to the school, and that was one of
3 our collateral contacts that we do do is go to the
4 schools, and I was -- found out they were not in the
5 school and she called on the phone.

6 MR. SNEDDON: Object as a narrative and
7 nonresponsive beyond the first sentence.

8 THE COURT: Sustained.

9 Q. BY MR. MESEREAU: Let me go through this a
10 little bit.

11 You mentioned the word "collateral contact,"
12 right? Is that correct?

13 A. Right.

14 Q. What is a collateral contact?

15 A. That's when I go and talk to someone else
16 about the situation. And I didn't read the referral
17 to the school or anything. I just asked was she in
18 contact with those kids and did they attend that
19 school, and she told me they did.

20 Q. All right. Now, when you're investigating
21 someone for an allegation of general neglect --

22 A. Right.

23 Q. -- do you often take the time to go to the
24 child's school?

25 A. A lot of times, yes, we do.

26 Q. Why do you do that?

27 A. Depends on what the allegations are. If

28 they're not attending school for any period of time, 10749

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1 for sure we go to the school. That's a given.

2 Q. If you find that a child is not attending
3 school and not getting their homework done somewhere
4 else, might that be an indication of general
5 neglect?

6 A. Not getting their homework done, no. I
7 mean, we have a lot of those cases of children not
8 doing their homework. But if they're not attending
9 school, it becomes a serious problem, they go to the
10 Student Attendance Review Board, and we are notified
11 of that, Department of Children & Family Services.

12 Q. In the case of Janet Arvizo, you've
13 indicated that, based on your investigation, you
14 found that she was raising her kids properly?

15 A. Properly.

16 Q. And your findings are limited to the
17 investigation you did, right?

18 A. Right.

19 Q. And that investigation included going to the
20 school, right?

21 A. I did.

22 Q. Did what you learned from the counselor at
23 the school affect your findings?

24 A. Yes, it did.

25 Q. How so?

26 A. That she was taking care of her kids, making
27 sure they were getting their homework, and that she

28 was not neglecting them in any way in terms of their 10750

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1 education.

2 MR. MESEREAU: Okay. No further questions.

3

4 RE-CROSS-EXAMINATION

5 BY MR. SNEDDON:

6 Q. This will be short, I promise you.

7 A. Sure.

8 Q. I promise everybody, actually.

9 The first question: Mr. Mesereau asked you

10 about your conversation with Davellin and about the

11 girlfriend, okay?

12 A. Okay.

13 Q. It's true, is it not, that in your report,

14 what Davellin says was, "Most of the time I take a

15 girlfriend with me to keep me company. We stay in a

16 room down the hall in the main house," correct? Is

17 that what your report reflects?

18 A. That's what the report says.

19 Q. So she would take somebody with her, not

20 that she would meet somebody there?

21 A. No. She told me she would take someone with

22 her.

23 Q. Okay.

24 A. For company, yes.

25 Q. Okay. Now, Mr. Mesereau asked you some

26 questions about your experience with child abuse

27 cases, child sexual abuse cases.

28 A. Right. 10751

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1 Q. And you indicated a few of the things that
2 you, based on your training, saw as indicators of
3 child abuse, correct?

4 A. A few of the things, yes.

5 Q. A few of them.

6 A. Not all of them.

7 Q. All right. And that's what I want to just
8 ask you, if some of these are the one of the ones
9 you recognize.

10 A. All right.

11 Q. Now, most of the time when you're doing some
12 kind of an interview in this kind of a setting where
13 you go to a home or to a school, the allegations
14 involve somebody who is in a position of trust with
15 the child, correct?

16 A. What did you say?

17 Q. Yes. There are two basic situations in
18 which you can have a sexual assault on a child.
19 They could be picked up off the street by a stranger
20 and taken somewhere and molested. That's one way,
21 correct?

22 A. Right.

23 Q. And another way is where an allegation comes
24 in where it is somebody who is a family friend, or a
25 stepfather, or a brother, or somebody like that.
26 It's somebody who's in a position of trust with that
27 child, correct?

1 Q. Okay.

2 A. Right.

3 Q. And the indicators for the latter situation,
4 that's what I want to talk about, somebody in a
5 position of trust, okay? Do they tell you when --
6 in your training, that one of the indicators that
7 you look for for somebody who would take advantage
8 of a child is that the child is from a broken home?

9 A. That's one of the indicators, yes.

10 Q. And did they also tell you that another
11 indicator was that there's no father figure in the
12 family?

13 A. That can be one of the indicators, yes.

14 Q. And both of those indicators were present in
15 this case, correct?

16 MR. MESEREAU: Objection; misstates the
17 evidence.

18 THE COURT: Overruled.

19 You may answer.

20 THE WITNESS: No father in the home and you
21 said --

22 Q. BY MR. SNEDDON: Broken home?

23 A. Broken home. I mean, we have a lot of those
24 cases. No father in the home, no -- broken home. I
25 mean, that's America.

26 Q. Those are some of the indicators you looked
27 for, correct?

28 A. That's one of the indicators, yes. Yes. 10753

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1 Q. Along with some of the other stuff you
2 mentioned?

3 A. Yes. Yes.

4 MR. SNEDDON: Okay. Thank you. No further
5 questions.

6

7 FURTHER REDIRECT EXAMINATION

8 BY MR. MESEREAU:

9 Q. Very briefly, did you determine whether or
10 not Major Jay Jackson was a father figure in this
11 family?

12 A. They seemed to think highly of him. I think
13 they were involved in the Navy Seals. They did a
14 lot of extracurricular activities. And --

15 Q. With Major Jay Jackson?

16 A. No, the children did. But I think, if I can
17 recall, one of the children was involved in the Navy
18 Seals.

19 Q. And did Ms. Arvizo tell you that Major Jay
20 Jackson was very involved with her children?

21 A. Yes, she did. She spoke very highly of him,
22 yes.

23 Q. Did she tell you they were living a good
24 portion of the week at his home?

25 A. Yeah. They spent a lot of time there, yes.

26 Q. And did she tell you that Major Jackson was
27 spending a lot of time with her children?

28 A. Yes. You know what? When I went -- when I 10754

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1 went there, I'm going to assume that he was not in
2 the United States or somewhere else, like on duty.

3 Q. Did she tell you that she met Major Jay
4 Jackson through a Seals program?

5 A. Yes, she did.

6 Q. Did she tell you her children were involved
7 with Major Jay Jackson in that program?

8 A. Yes, she did.

9 Q. Did you conclude that Major Jackson was a
10 father figure to the Arvizo children?

11 A. Since I didn't meet him, I didn't have a
12 chance to observe, you know, their interactions or
13 really speak to him about their relationship, so I
14 think it would be unfair for me to make that
15 conclusion.

16 Q. But certainly, based on what you heard of
17 Janet Arvizo's relationship with Major Jay Jackson --

18 A. Oh, yeah, she spoke very highly of him,
19 perhaps a father figure.

20 Q. Didn't sound like a broken home?

21 A. Oh, no. Didn't sound like a broken home,
22 no.

23 MR. MESEREAU: Thank you.

24 MR. SNEDDON: Nothing further.

25 THE COURT: All right. Thank you. You may
26 step down.

27 THE WITNESS: Thank you.

28 THE COURT: Call your next witness, please. 10755

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1 MR. SANGER: We'll call Karen Walker.

2 THE COURT: Come forward, please. When you
3 get to the witness stand, remain standing.
4 Face the clerk over here and raise your
5 right hand.

6

7 KAREN WALKER

8 Having been sworn, testified as follows:

9

10 THE WITNESS: I do.

11 THE CLERK: Please be seated. State and
12 spell your name for the record.

13 THE WITNESS: Karen Walker. K-a-r-e-n. Last
14 name, W-a-l-k-e-r.

15 THE CLERK: Thank you.

16 THE WITNESS: You're welcome.

17

18 DIRECT EXAMINATION

19 BY MR. SANGER:

20 Q. Good afternoon.

21 A. Good afternoon.

22 Q. Miss Walker, the first thing I want to ask
23 you to do is try and talk into that microphone
24 that's on your right side. Kind of lean into it.

25 Everybody has the problem of not being able to get
26 close enough to it.

27 A. Okay.

28 Q. So if you could do that. Thank you. 10756

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1 Now, how are you employed?

2 A. I work for Department of Children & Family
3 Services. I supervise children's social workers.

4 Q. What county do you work for?

5 A. Los Angeles County.

6 Q. All right. You just saw Miss Peters leave
7 here; is that correct?

8 A. Yes.

9 Q. Do you know her, by any chance?

10 A. Yes. I'm her supervisor.

11 Q. All right. How long have you worked for the
12 Department of Children & Family Services?

13 A. Almost 13 years.

14 Q. Okay. What's your educational background?

15 A. I have my bachelor's in English and my
16 master's in counseling psychology.

17 Q. All right. Do you have any licenses or
18 certificates?

19 A. Certificates from inservice trainings that
20 I've attended and through the department. But I
21 don't have my LCSW or my MFCC.

22 Q. And those two series of letters that you
23 just rattled off there, those are licenses for
24 people to counsel in private practice; is that
25 right?

26 A. Yes.

27 Q. So if you decided to retire some day and you

28 wanted to open a counseling practice, you would have 10757

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1 to get a license of that sort; is that correct?

2 A. Right. You'd have to do hours and then get
3 your license.

4 Q. All right. For the work that you do, you do
5 not need to have that counseling license; is that
6 correct?

7 A. No.

8 Q. Now, you indicated that you have some
9 inservice certificates. Can you tell us what that
10 is about?

11 A. Parenting certificates. Sexual abuse
12 inservice trainings. The department has several
13 trainings that they give throughout the year, and
14 you can sign up and attend those trainings.

15 Q. All right. Have you been doing that over
16 the years that you've been there?

17 A. Yes.

18 Q. And were you employed in the same capacity
19 in February of 2003?

20 A. Yes.

21 Q. All right. Now, at some point -- oh, let me
22 ask you this. You said that you're, I believe, a
23 special unit supervisor; is that correct?

24 A. I have the Sensitive Cases Unit and Medical
25 Placement Unit.

26 Q. And briefly explain to us what the Sensitive
27 Cases Unit is.

28 A. The Sensitive Cases Unit goes out and 10758

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1 investigates allegations of child abuse, neglect,
2 exploitation of children whose parents work for
3 Department of Children & Family Services, Los
4 Angeles Police Department patrol officers, sheriff's
5 department patrol officers, and high-profile persons
6 and celebrities.

7 Q. All right. You mentioned another unit.

8 A. Medical placement.

9 Q. Medical placement. All right. That has
10 nothing to do with this case; is that correct?

11 A. No.

12 Q. So we'll not ask about that.

13 In your capacity as a supervisor of the
14 special unit, did you have occasion to become
15 involved in an investigation in February of 2003
16 involving the Arvizo family?

17 A. Yes.

18 Q. All right. Can you tell me what your first
19 contact was in that regard?

20 A. Lavern called me on the telephone when the
21 referral came in, and I believe it was Valentine's
22 Day, and she and another social worker were going to
23 the home because they got a referral called in, and
24 they were going to go and investigate. And they
25 weren't able to locate the family.

26 So then the following week, which I believe
27 was February 20th, we had a better idea and a

28 location, because Lavern had spoken to the mother, 10759

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1 and we went to the address and got the correct
2 apartment number.

3 Q. So the first day that any activity occurred
4 in your office that you're aware of was February the
5 14th?

6 A. Right.

7 Q. And then February 20th, you say "we went to
8 a location."

9 A. Yes.

10 Q. That is the first time you actually got
11 physically involved in doing something on the case;
12 is that right?

13 A. Yes.

14 Q. All right. And why was it that you
15 accompanied the other social workers or -- do we say
16 "social workers"?

17 A. Uh-huh.

18 Q. Yes. Okay. Why was it that you accompanied
19 the other social workers to go on this particular
20 visit?

21 A. My assistant regional administrator, Brenda
22 Blackburn, thought that it would be a good idea for
23 me to accompany Lavern and Jackie.

24 Q. Okay. And what are the last names of Lavern
25 and Jackie?

26 A. Lavern's last name is Peters, and
27 Jacqueline's last name is Bowen.

28 Q. All right. So Miss Peters and Miss Bowen. 10760

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1 We're really supposed to use last names in court,

2 so --

3 A. Okay.

4 Q. It's not absolutely insisted upon, I

5 suppose, but we try to do that.

6 All right. So you went out there with Miss

7 Peters and Miss Bowen, correct?

8 A. Yes.

9 Q. And where did you go?

10 A. To the location where the Arvizo family was

11 living.

12 Q. Is that St. Andrews Place?

13 A. Yes.

14 Q. What part of town is that in?

15 A. Mid-Wilshire area.

16 Q. All right. And did you have any other

17 people with you, law enforcement officers or other

18 staff people?

19 A. No.

20 Q. All right. So the three of you traveled out

21 there. Did you meet or did you go in one car?

22 A. We all went in one car.

23 Q. So you arrived there at the same time, I

24 would assume?

25 A. Yes.

26 Q. All right. What did you observe when you

27 went into the residence?

28 A. Do you mean inside, upstairs? 10761

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1 Q. What's the first thing that happened?

2 Somebody answered the door, I suppose. Tell us
3 about that.

4 A. The mother answered the door, and from --
5 Peters, Bowen and myself, we walked in. We
6 introduced ourselves. And she introduced us to the
7 children, and everybody gave us a hug, and then we
8 met the other people that were also there in the
9 apartment.

10 Q. All right. Now, were you the person
11 designated to do the interview?

12 A. No, Lavern was going to do the interview.

13 Q. So that's Miss Peters?

14 A. Yes, I'm sorry, Miss Peters.

15 Q. That's all right. So Miss Peters, it was
16 her case, as it were?

17 A. Uh-huh.

18 Q. You have to -- I'm sorry. We'll get all
19 these rules straight. You have to say "yes" or
20 "no" --

21 A. Oh, yes.

22 Q. -- for the court reporter. It's really hard
23 to get the others down.

24 A. She was the assigned social worker to --

25 Q. So what happens, if you go along as a
26 supervisor, you're not there to usurp the assigned
27 social worker's duties; is that correct?

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1 Q. And you mentioned that you had been asked by
2 Brenda Blackburn to go with Miss Peters on this
3 interview.

4 Is that a usual occurrence, that you go out
5 in the field with various people every day, or is
6 this more unusual?

7 A. I'm usually not in the field. I'm usually
8 in the office. Every now and then I do go out on a
9 referral with a worker if it's getting late or it's
10 before Daylight Savings Time and they have to go to
11 Lancaster or Palmdale. And depending on what kind
12 of referral it is, sometimes I will go out with
13 them.

14 Q. So sometimes you'll just go as backup, as it
15 were?

16 A. Right.

17 Q. Okay. Now, prior to your becoming a
18 supervisor, did you go out in the field and do
19 interviews yourself?

20 A. All the time.

21 Q. How many years did you do interviews on a
22 regular basis?

23 A. Seven.

24 Q. All right. Can you estimate the number of
25 interviews of this sort that you did; in other
26 words, initial interviews to go out and assess the
27 situation?

28 A. At least two or three a week. 10763

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1 Q. Two or three a week for seven years?

2 A. (Nods head up and down.)

3 Q. All right. And I know you were saying

4 "yes," I think, by shaking your head.

5 A. Yes. I'm sorry.

6 Q. That's all right. You'll get the rules all

7 straight just as we finish.

8 A. Okay.

9 Q. Happens to everybody. Don't worry about it.

10 All right. Now, you said you went to the

11 door and you mentioned that the Arvizos gave

12 everybody a hug?

13 A. Uh-huh.

14 Q. In your experience, was that unusual to go

15 investigate a situation on a family and have

16 everybody come up and give you a hug?

17 A. Yes.

18 Q. What was their attitude towards you and your

19 co-workers, Miss Peters and Miss Bowen?

20 A. Very engaging. Very nice. Very warm, very

21 friendly.

22 Q. After the hugs and the greeting was

23 accomplished with the Arvizos, I think you said you

24 noticed there were some other people in the room?

25 A. Yes.

26 Q. Do you recall who they were?

27 A. I believe one of them, they told us, worked

28 for Mr. Jackson. The other one was a young lady, 10764

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1 and I believe her name was Aja, and her son.

2 Q. All right. Do you know if Aja and her son
3 had any relationship to anybody else in particular?

4 A. Aja's son's father is Chris Tucker.

5 Q. Okay. And was Aja -- what was her demeanor
6 during the time she was there?

7 A. She was very nice and very friendly.

8 Q. And she was friendly to you; is that
9 correct?

10 A. Yes.

11 Q. Was she also friendly to the Arvizos?

12 A. Yes, they seemed very close.

13 Q. The Arvizos seemed to be close to her; in
14 other words --

15 A. Yes.

16 Q. -- both ways.

17 A. Yes.

18 Q. All right. Now, you mentioned another
19 person being there. I don't know if you said male.

20 I think you said male; is that correct?

21 A. Male.

22 Q. Can you describe the male who was there?

23 A. Maybe five-nine, five-ten, kind of a medium
24 build, and he was Caucasian.

25 Q. All right. And what was his demeanor?

26 A. Really kind of nondescript. I mean, we
27 really didn't have much interaction with him.

28 Q. Was he unpleasant? 10765

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1 A. No.

2 Q. Okay. So you didn't have enough interaction

3 to really gauge --

4 A. Formulate an opinion, no.

5 Q. Formulate an opinion, there you go.

6 Was there anybody else in the room that you

7 can recall?

8 A. No.

9 Q. All right. After you made these

10 observations, you got the hugs, you made the

11 observations of these people, what happened next, to

12 your recollection?

13 A. We all sat on the couch, and Mrs. Ventura

14 proceeded to put in a videotape.

15 Q. All right. Now, you called her Mrs.

16 Ventura. The name that she was going by at that

17 time was Janet Ventura?

18 A. Yes.

19 Q. Did you understand that she was also Janet

20 Arvizo?

21 A. Well, I knew the children's last name was

22 Arvizo, but on the referral, it said "Janet

23 Ventura."

24 Q. That's fine. So you knew that you were

25 dealing with the Arvizo children?

26 A. And their mother.

27 Q. And their mother?

28 A. Yes. 10766

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1 Q. And Janet Ventura was their mother, right?

2 A. Yes.

3 Q. What did you understand about the location
4 of your meeting? Was it their house, somebody
5 else's house?

6 A. It was someone else's house that they were
7 staying in. Apartment.

8 Q. Do you know whose house it was?

9 A. Yes. His name is Major Jackson.

10 Q. And who told you that Major Jackson lived
11 there?

12 A. Mrs. Ventura.

13 Q. All right. Did she refer to him as Major
14 Jackson?

15 A. Yes.

16 Q. Did you understand what he was a major in?

17 A. The military.

18 Q. Okay.

19 A. But I'm not sure.

20 Q. Not sure which branch?

21 A. Right.

22 Q. But you understood that that was a rank and
23 he was --

24 A. Yes.

25 Q. She was telling you he's a major in the
26 military?

27 A. Yes.

28 Q. Some branch of the military? 10767

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1 A. Yes.

2 Q. All right. What was your understanding
3 about where Mr. Jackson, or Major Jackson, was at
4 the time you were doing the interview?

5 A. Out of town.

6 Q. Was he -- did you have any understanding as
7 to whether or not he was out of town for an extended
8 period of time, or that day, or for an hour?

9 A. I think maybe on the base.

10 Q. Okay. So he was at work?

11 A. Right.

12 Q. Okay. Now, you said the next thing that
13 happened was they put a tape into a machine, or
14 Janet Ventura put a tape into a machine; is that
15 correct?

16 A. Yes.

17 Q. Do you remember if it was a tape or a DVD
18 or --

19 A. No. I think it was a cassette, but I'm not
20 sure.

21 Q. Something that you could put in a television
22 and it will play?

23 A. Yes.

24 Q. All right. And what did she tell you about
25 that, if anything?

26 A. I believe she said that this was a tape that
27 Mr. Jackson had given to her son.

28 Q. And did you feel -- well, let me withdraw 10768

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1 that.

2 Was this an unusual way to start your

3 interview process?

4 A. Yes.

5 Q. All right. And did you object, or did you

6 sit back and watch it?

7 A. No, we sat down and we watched the tape.

8 Q. All right. And do you recall what the tape

9 was about?

10 A. It was of Gavin Arvizo and Mr. Jackson, I

11 believe at his home, outside by a lake, watching

12 swans swimming, climbing a tree.

13 Q. Okay. And was there music to this video?

14 A. I can't remember.

15 Q. All right. Did it appear to be a

16 professional production of some sort?

17 A. Um --

18 Q. In other words, somebody just --

19 A. Somebody taping?

20 Q. Somebody holding a video camera, if you

21 could tell?

22 A. I really couldn't tell.

23 Q. All right. When the tape was over -- was

24 there any talking during the tape? Any discussion

25 in the room while the tape was playing?

26 A. No, I don't believe so.

27 Q. Okay. So the tape was over. And what

28 happened after the tape was over? 10769

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1 A. I told Aja and the other gentleman there
2 that, for confidentiality reasons, they were going
3 to have to leave the apartment, because we needed to
4 discuss some things with Mrs. Ventura.

5 Q. Okay. Did Janet Arvizo object to that?

6 A. She said that Aja was like family, and, you
7 know, she could hear anything. And she said that
8 the other gentleman that was there, you know, was
9 welcome to stay as well.

10 And so I kind of reiterated to her that, for
11 purposes of confidentiality, that they really needed
12 to leave before we discussed anything pertaining to
13 the case.

14 Q. Now, as far as your policy in your office is
15 concerned, was it necessary to make them leave? In
16 other words, if -- if Miss Arvizo said, "I
17 absolutely insist that they stay or I won't talk to
18 you," would you have gone ahead and talked to her in
19 the presence of other people?

20 A. Probably we would have, yes.

21 Q. All right. But your goal is to clear the
22 room, basically, so you can have a one-on-one
23 conversation with the various people you're supposed
24 to talk to; is that correct?

25 A. Exactly.

26 Q. And when we say "one-on-one," ideally you
27 would talk to each family member independently, too;

28 is that correct? 10770

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1 A. Yes.

2 Q. Did you make an effort to do that?

3 A. Yes.

4 Q. And what happened when an effort was made to
5 talk to family members one-on-one?

6 A. Mrs. Arvizo wanted us all in the same room
7 together.

8 Q. And did she insist on that?

9 A. Yes.

10 Q. All right. Now, as far as the other people
11 leaving, did they, in fact, leave?

12 A. Yes.

13 Q. All right. And they left without incident,
14 I take it?

15 A. Yes.

16 Q. All right. Now, during the -- during the
17 time that these people were leaving, that being Miss
18 Pryor and her son and the other gentleman you
19 described, do you recall if Miss Peters did
20 anything?

21 A. While they were leaving?

22 Q. Yeah. Did she take Miss Ventura into
23 another room?

24 A. I believe she took her into the bedroom for
25 a moment.

26 Q. Okay. And while she took her into the
27 bedroom, did you make an effort, or you or the other

28 worker, Miss Bowen, make an effort to talk to any of 10771

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1 the children?

2 A. No.

3 Q. All right. What happened after that? Miss

4 Peters goes into the bedroom with Janet Ventura.

5 You're out there with the children; is that right?

6 A. Uh-huh.

7 Q. Okay.

8 A. The door was open. She came back out, and

9 we all proceeded to sit around the table.

10 Q. All right. Now, what was the attitude of

11 the children during this interview process? Were

12 they cooperative or --

13 A. Very.

14 Q. -- uncooperative?

15 A. Very cooperative.

16 Q. Did they appear to be reluctant to talk?

17 A. No, not at all.

18 Q. Did they appear to be hiding anything?

19 A. No.

20 Q. And what was Janet Ventura's attitude during

21 this process?

22 A. She was very compliant and very cooperative.

23 Q. All right. By the way, the male that you

24 referred to, do you recall any discussion about what

25 that person's role was?

26 A. I believe that she said because of all the

27 media attention and after the airing of the Martin

28 Bashir videotape, that he was there, I guess, for 10772

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1 protection for them from media, and also, I guess,
2 driving them back and forth to Mr. Jackson's
3 residence.

4 Q. All right. And did that individual
5 appear -- I asked you about his attitude or some
6 word to that effect, his demeanor, but did he appear
7 to be a menacing type of person, or how would you
8 describe him?

9 A. No. Not somebody that I would be afraid of,
10 no.

11 Q. Now, when the interview commenced with
12 everybody there, do you recall what Janet Arvizo
13 said about Michael Jackson, if anything?

14 A. That he was like a father to her children,
15 and that he was a wonderful man; that you can't
16 believe -- she couldn't believe that after showing
17 the tape, that people would come to, you know,
18 conclusions and make allegations.

19 Q. Now, she's saying these things in the
20 presence of the other family members, the three
21 children, correct?

22 A. Yes.

23 Q. What did the three children say about
24 Michael Jackson, the best of your recollection?

25 A. That he was like a father to them; they were
26 very close to him; that he could be a
27 disciplinarian, like if they got out of hand; and

28 they felt very close to him. 10773

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1 Q. Did the children just parrot the same words,
2 or did they have -- tell different stories, or can
3 you describe how they interacted?

4 A. I believe that -- well, no, I mean, they all
5 said the same thing in terms of him being like a
6 father to them. But then, you know, Gavin Arvizo
7 said that, you know, he felt that he had gotten
8 better because of him.

9 Star Arvizo said that everybody thinks that
10 Michael Jackson has a quiet voice, but he can get
11 loud at times.

12 And I don't really remember anything else
13 that Davellin Arvizo had to say, other than he was
14 really nice, and she enjoyed spending time at his
15 home.

16 Q. Do you remember if Davellin said anything to
17 you about Mr. Jackson's interaction with Gavin while
18 Gavin was sick?

19 A. I don't remember.

20 Q. Do you remember if any of them talked to you
21 about Mr. Jackson helping Gavin while he was sick?

22 A. Being somebody that they felt had helped
23 Gavin with his illness, because it was Gavin's wish
24 to meet Mr. Jackson.

25 Q. Do you remember which of the three children
26 said that, or did they all say it, or two of the
27 three?

28 A. No, I don't remember. 10774

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1 Q. Okay. Now, one of the advantages of being a
2 supervisor is that you don't usually have to write
3 reports yourself, is that correct, in these
4 situations?

5 A. Right.

6 Q. All right. I said that in a somewhat
7 humorous fashion. But who was designated to write
8 the report in this case?

9 A. Lavern Peters.

10 Q. So Miss Peters is going to write the report.

11 You're there to observe, assist, back up, do
12 whatever is necessary; is that right?

13 A. Right.

14 Q. Do you recall any of the children talking
15 about their biological father?

16 A. No. But I believe Mrs. Ventura said that
17 they were separated, and that she had a restraining
18 order against her husband.

19 Q. Do you recall anything else that she said
20 about her ex-husband?

21 A. No, I don't believe so.

22 Q. Okay. Now, about how long did this
23 interview last?

24 A. Probably a little over an hour.

25 Q. All right. So you're remembering, the best
26 you can, the parts of it you can recall; is that
27 correct?

28 A. Yes. 10775

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1 Q. You're not purporting to be able to tell us
2 everything that was said by everybody there, are
3 you?

4 A. No.

5 Q. All right. Do you remember talking to Janet
6 or Janet talking to you about Gavin's experiences at
7 school since a certain television show was aired?

8 A. He was not going to school. She had gone to
9 school to pick a book up for he and Star.

10 Q. Did she explain -- you're familiar with the
11 Bashir video or television show; is that right?

12 A. Yes.

13 MR. SNEDDON: Vague as to time. Object.

14 THE COURT: Sustained.

15 Q. BY MR. SANGER: All right. Well, as of
16 right now, you know what I'm talking about if I say
17 the Bashir television show about Michael Jackson?

18 A. Yes.

19 Q. All right. When did you first become aware
20 of that show?

21 A. When it was on television.

22 Q. Did you see it when it actually aired on
23 T.V.?

24 A. Part of it.

25 Q. Okay. And then was there a lot of news
26 coverage and -- both in print and on television
27 about that show?

28 A. Yes. 10776

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1 Q. Did you see any of that at the time?

2 A. Not really.

3 Q. You were just aware of it in general? So by

4 the --

5 A. Yes.

6 Q. By the time you had this interview, had you

7 actually seen the entire Bashir television show?

8 A. No.

9 Q. Had you seen the portions of it that

10 pertained to Gavin Arvizo and Mr. Jackson?

11 A. Yes.

12 Q. All right. Now, did Miss Arvizo talk about

13 the affect that this television show had on Gavin's

14 ability to go to school?

15 A. Yes.

16 Q. What did she tell you about that?

17 A. That he was being teased at school and --

18 and that's pretty much it.

19 Q. And did she -- did she tell you that -- did

20 she tell you whether or not she had signed a release

21 for Gavin to appear in the Bashir television show?

22 A. No.

23 Q. Did she talk about that at all?

24 A. I believe she said that she wasn't aware

25 that it was going to be shown on television.

26 Q. And what was your understanding --

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

28 going to object to the question as to what point in 10777

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1 time are we talking about now? Vague as to time.

2 THE COURT: Overruled. Next question.

3 MR. SANGER: Thank you.

4 Q. At that time, when she's -- we're talking

5 about the interview on the 20th.

6 A. Yes.

7 Q. All right. Just so I'm not confused. Okay.

8 And during the interview on the 20th, did

9 she -- was Janet concerned about not receiving

10 compensation from that Bashir program?

11 A. Not that I know of.

12 Q. Did she discuss that directly with you?

13 A. Compensation for the --

14 Q. Yes.

15 A. -- video?

16 Q. Yes.

17 A. No.

18 Q. Did she say at any time -- say anything to

19 you at any time that suggested during that interview

20 on the 20th that Mr. Jackson had done anything wrong

21 with regard to that video?

22 A. No.

23 Q. Was she -- she seemed to be irritated about

24 the video for some reason; is that safe to say?

25 MR. SNEDDON: Calls for a conclusion, Your

26 Honor. Object.

27 THE COURT: Overruled.

28 You may answer. 10778

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1 THE WITNESS: Would you repeat the question?

2 I'm sorry.

3 Q. BY MR. SANGER: Let me ask a different
4 question, even though the Judge said it was okay.

5 Let me clarify it.

6 She had expressed some concern to you about
7 the video and the affect it had on Gavin and the
8 family, right?

9 A. The media attention.

10 Q. All right. There you go. And did she ask
11 you for advice as to what she could do about the
12 media attention?

13 A. I believe she was speaking to Miss Peters
14 about that she didn't sign a release, and, you
15 know -- I don't know if this actually was on the
16 20th or if this was a phone call.

17 Q. All right. So you're saying this, which is
18 intriguing, but can you remember her saying any more
19 on the 20th, before we get to a phone call?

20 A. No.

21 Q. Do you remember whether or not on the 20th
22 you suggested that she see a lawyer about problems
23 she was describing?

24 A. No. I think that probably was in a phone
25 call. And we weren't able to give legal advice.
26 And if she wanted legal advice, then she should
27 probably seek the aid of an attorney.

28 Q. All right. Then let's go to the phone call 10779

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1 here in just a minute.

2 Before we do, do you recall any other
3 discussion that stands out in your mind during the
4 course of this hour-long interview with this family?

5 A. In terms of --

6 Q. Well, first -- I can ask some categories.

7 First of all, did anybody say anything
8 negative about Michael Jackson during that
9 interview?

10 A. No.

11 Q. Did anybody accuse Mr. Jackson of doing
12 anything unlawful, illegal or improper to anybody in
13 the Arvizo family?

14 A. No. And when we went to do the
15 investigation, the referral was in the mother's
16 name, Mrs. Ventura's name, which was for general
17 neglect.

18 And then the allegations against Mr.
19 Jackson, if anybody would have said anything
20 happened or was inappropriate, then immediately our
21 conversation is terminated and we call the police,
22 because it becomes a criminal matter.

23 Q. You would refer it to the police?

24 A. Yes.

25 Q. Now, when you do these investigations,
26 you're not, you know, putting your hands over your
27 ears to not hear evidence of a crime, right?

28 In other words, if you're doing an 10780

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1 investigation and somebody said there was a child
2 molest that occurred and the person who did it was a
3 third party, you want to hear that. I mean, you
4 want to make sure you get that information, correct?

5 A. Absolutely.

6 Q. All right. And then you refer it to the
7 police?

8 A. Yes.

9 Q. All right. And you heard nothing whatsoever
10 that suggested that there was a child molest that
11 had occurred?

12 A. No.

13 Q. And part of the neglect allegations were to
14 the effect that Janet Arvizo was allowing her
15 children to be put in a situation where they were
16 subject to inappropriate contact; is that right?

17 A. Yes. And failure to protect, yes.

18 Q. So while your interview was focusing on
19 Janet Arvizo, you certainly had in mind that if
20 there was anything that came up that showed that Mr.
21 Jackson had done something inappropriate or illegal,
22 you would want to know about that, correct?

23 A. Yes.

24 Q. And by the end of the conversation, neither
25 you nor the other workers under your supervision had
26 received any such information; is that correct?

27 A. Yes.

28 Q. All right. Now, you talked about telephone 10781

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1 calls. Did you talk to Janet Arvizo, Janet Ventura,
2 did you talk to her at any time prior to the meeting
3 on the 20th of February?

4 A. No.

5 Q. So the first time you ever had any contact
6 with her, she hugged you?

7 A. Yes.

8 Q. All right. After that interview was over, I
9 take it you all said goodbye and you left and went
10 back to your office, right?

11 A. Yes.

12 Q. After that was over, did you have any
13 further contact in any fashion with Janet Arvizo?

14 A. Yes, because I -- we have a language form
15 that you have to sign for our department, which
16 means that the investigation took place in English
17 for Mrs. Ventura, and that she understood the
18 referral and everything that was read to her, and
19 everything that was discussed with her was in
20 English. And I took it back to her to have her sign
21 that form.

22 Q. Okay. Now, you felt that she spoke perfect
23 English or totally adequate English; is that
24 correct?

25 A. Yes.

26 Q. You were just being extra careful to make
27 sure you had the file documented with the proper

28 form; is that right? 10782

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1 A. The language form.

2 Q. The language form.

3 A. Yes. They have to sign that.

4 Q. And a person would have to sign it if you

5 had reason to believe that English was not their

6 first language; is that right?

7 A. Yes. We also -- the reverse side of it is

8 Spanish.

9 Q. Did you have any reason to believe that

10 English was not Miss Arvizo's first language?

11 A. No.

12 Q. You thought it might be -- might or might

13 not have been her first language, but you should go

14 make sure the form is signed; is that right?

15 A. Yes.

16 Q. So did you -- did you go back and have her

17 sign it?

18 A. Yes.

19 Q. And when did that occur?

20 A. I'm not sure of the date, if it was the same

21 day that I went to the home or the next day.

22 Q. Okay. Within a day anyway?

23 A. Yes.

24 Q. And did you actually -- did you go to the

25 same location, St. Andrews Place?

26 A. Yes.

27 Q. And did you talk to Miss Arvizo?

28 A. Yes. She came downstairs to sign the 10783

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1 language form.

2 Q. Okay. And did she sign the language form?

3 A. Yes.

4 Q. Did she indicate in any way that she was

5 under duress or there was any problem?

6 A. No.

7 Q. Can you recall the conversation that you had

8 at that time?

9 A. She wanted to know was there anything that

10 we, meaning the department, I guess between

11 Lavern -- I'm sorry, Miss Peters, Miss Bowen and

12 myself, if there was anything we could do in terms

13 of possibly talking to Mr. Jackson's people about

14 getting the boys home-schooled or to have a private

15 tutor or put in a private school.

16 Q. So did she indicate why she couldn't do that

17 herself?

18 A. No.

19 Q. Did she say anything about not having the

20 money to do it or anything of that sort?

21 A. No.

22 Q. All right. And when she was talking to you

23 about this, was it your understanding she was saying

24 she wanted Mr. Jackson to pay for it?

25 A. Yes, because she wanted to know if we could

26 talk to someone related to him --

27 Q. Go ahead, I'm sorry.

28 A. Right. Someone related to him in terms of 10784

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1 possibly getting those things done for the kids
2 because of the media attention. She didn't feel
3 that the boys were going to be able to go back to
4 their middle school.

5 Q. And she felt that Mr. Jackson should be
6 providing the tutoring for her children?

7 A. Yes.

8 Q. All right. And did you tell her, "Sure.

9 I'll be happy to call Mr. Jackson up and ask him"?

10 A. No. I told her that, you know, that was out
11 of my scope of our investigation for the department
12 and I wasn't able to do something like that.

13 Q. Did she appear to be angry with Mr. Jackson?

14 A. No.

15 Q. All right. Did you give her any -- when you
16 said out of your scope, did you give her any
17 recommendations as to who she might go to?

18 A. No.

19 Q. Did you tell her at that time she could go
20 see a lawyer?

21 MR. SNEDDON: Your Honor, I'm going to
22 object as leading.

23 THE COURT: Overruled.

24 You may answer. You may answer.

25 THE WITNESS: Oh.

26 No. I believe that in terms of the lawyer,
27 it was because she said that she didn't sign a

28 waiver for the Martin Bashir television show. 10785

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1 That's where the attorney part of it came in. And

2 that's when, you know --

3 Q. BY MR. SANGER: All right. Did you have

4 that discussion with her in person at the time of

5 the waiver?

6 A. No, at the time of the -- do you mean at the

7 time of the language form?

8 Q. Yeah, I'm sorry. That's what I meant to

9 say.

10 A. No. This was about the kids getting either

11 home schooling, a private tutor, or private school.

12 Q. Now, was there anybody there with her when

13 she was asking you if you could contact somebody on

14 behalf of Mr. Jackson?

15 A. Somebody that worked for Mr. Jackson.

16 Q. Was it the same person you saw the day

17 before or earlier that day, depending on when this

18 was?

19 A. I can't --

20 Q. Was it the same gentleman you described, or

21 somebody else?

22 A. I think it was somebody else.

23 Q. And where was she when she was talking to

24 you? You said she came out of the apartment.

25 A. Standing outside of my car.

26 Q. Did you stay in your car or you got --

27 A. Yes.

28 Q. -- out of your car. 10786

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1 What was her demeanor while she was talking
2 to you?

3 A. She was fine. She just really wanted to
4 know about getting the kids into another school or
5 another situation. Because, you know, she didn't
6 feel they could go back to their school.

7 Q. The situation. Did she also tell you that
8 she wanted to have a different apartment or a
9 different place to live?

10 A. I don't believe she could stay where she was
11 staying before. And I don't know how long she had
12 been staying at Mr. Jackson's residence, but the
13 school had -- where Gavin and Star went to school
14 had Mr. -- Major Jackson's address as the school
15 that -- as the address that the children lived at.

16 MR. SNEDDON: Your Honor, excuse me, I'm
17 going to object as nonresponsive to the question and
18 move to strike.

19 THE COURT: Sustained. I'll strike it.

20 Q. BY MR. SANGER: Did -- Janet Arvizo, when
21 she was there, came up to your car to talk to you,
22 did she tell you anything about having -- or ask you
23 anything about having Mr. Jackson or his
24 representatives take care of moving her to another
25 location? Did she say anything about that?

26 A. Not that I can recall.

27 Q. All right. Now, was the apartment that you

28 saw, Major Jackson's apartment, was that really an 10787

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1 adequate apartment for a man, a woman and three
2 children to live?

3 MR. SNEDDON: Well, I'm going to object to
4 that question, Your Honor. It's her conclusion.
5 It's irrelevant.

6 THE COURT: Overruled.

7 You may answer. Do you want the question
8 read back?

9 THE WITNESS: Yes, please.

10 (Record read.)

11 THE WITNESS: When you say "adequate" --
12 because there are all types of living situations,
13 especially in the nature of our business. So
14 families live in one-room apartments, children sleep
15 in a living room, children sleep in the bedroom, the
16 parents sleep out on the couches. So I don't really
17 feel, to say adequate, I mean --

18 Q. BY MR. SANGER: All right. So "adequate" is
19 not a good word is what you're telling me. That's
20 fine. Let me change the question.

21 Did you have an understanding from Janet
22 Arvizo that she wanted to have a different place to
23 live other than all of them living in Mr. -- Major
24 Jackson's apartment?

25 A. No.

26 Q. She never really discussed that with you?

27 A. No.

28 MR. SNEDDON: Object. The answer was, "No." 10788

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1 The next question would be leading and suggestive.

2 MR. SANGER: Okay. I'll withdraw it, then.

3 THE COURT: The answer to that one was "No,"

4 too.

5 MR. SANGER: I won't withdraw it if the

6 answer is in. I'll submit it, Your Honor.

7 THE COURT: Next question.

8 Q. BY MR. SANGER: All right. At any time did

9 Janet Ventura tell you during this visit at your car

10 that she was being held against her will?

11 A. No.

12 Q. And I take it your prior contact with her on

13 the 20th, the meeting all three of you had, she

14 didn't indicate in any way she was being held

15 against her will; is that right?

16 A. No.

17 Q. I started to ask you about the other person

18 that was there, and you said you thought there was

19 another gentleman who was there. Did he come up to

20 the window of the car with Miss Arvizo?

21 A. He came up afterwards and she introduced us,

22 and I don't remember his name.

23 Q. So while she was talking to you initially,

24 he stayed back and let you talk?

25 A. Yes.

26 Q. All right. And at some point she asked him

27 to come up so she could introduce --

28 A. Yes. 10789

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1 Q. Did she tell you this is somebody associated
2 with Mr. Jackson?

3 A. Yes.

4 Q. And what was his demeanor as he was
5 introduced to you?

6 A. Fine.

7 Q. Okay. Pleasant?

8 A. Pleasant.

9 Q. All right. Did you notice any anxiety or
10 any -- let me strike the word "anxiety."

11 Did you notice any tension between Miss
12 Arvizo and the person who she said worked for Mr.
13 Jackson?

14 A. No.

15 Q. Now, you indicated that you got some
16 telephone calls, or at least a telephone call. Did
17 you receive more than one telephone call from Janet
18 Arvizo?

19 A. Yes. After we had closed the referral,
20 maybe I had a couple of them from her.

21 Q. Okay. Do you recall what she talked about
22 during those telephone calls?

23 A. The same thing, in terms of getting Gavin
24 and Star tutored, home-schooled, or
25 private-schooled.

26 Q. Okay. Do you remember talking to Major Jay
27 Jackson at some point by telephone?

28 A. Yes, he was the last person that I spoke to 10790

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1 pertaining to the case.

2 Q. And what did he call to ask you about?

3 A. About schooling for the kids as well.

4 And I told him that I wasn't able to get

5 involved with that, or suggest that the kids be

6 home-schooled, private-schooled, or tutored.

7 Q. So between Janet Ventura and Major Jay

8 Jackson, did they appear to be trying to get you to

9 use your office to get Mr. Jackson to come up with

10 some money for their benefit?

11 A. Well, I think it was just more in terms of

12 them wanting to have the kids not go back to their

13 same school, and was there something that we could

14 do about -- and talk to somebody to see about them

15 getting into a private school, home-schooled, or

16 tutored.

17 Q. Okay. Now, when you're at the car and the

18 fella came up, he's summoned up by Miss Ventura to

19 meet you, did you talk to him and say, "Well, it's

20 nice to meet you. You work for Mr. Jackson, Michael

21 Jackson. Could you do something to help these

22 people out and get them some tutoring," and that

23 sort of thing? Did you do that at all?

24 A. No. I believe that my conversation with him

25 was very limited in terms of, "Hello. Nice to meet

26 you," and I think that was pretty much it.

27 Q. All right. At the time -- at some point,

28 did you receive a telephone call from the Santa 10791

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1 Barbara Sheriff's Department, or did somebody on
2 your staff receive a call?

3 A. I called the Santa Barbara Sheriff's
4 Department when we got the referral.

5 Q. Okay. I'm actually -- let me clarify the
6 question, because I'm asking about a call that came
7 in after the interview took place.

8 Do you recall a call coming to your
9 department after the interview took place from
10 somebody in the Santa Barbara Sheriff's Department?

11 A. Okay. You're not talking about prior to us
12 going out.

13 Q. No, after you went out.

14 A. After.

15 Q. After.

16 A. After we had gone out, my assistant regional
17 administrator, Brenda Blackburn, received a
18 telephone call from the Santa Barbara Sheriff's
19 Department asking that we --

20 MR. SNEDDON: Excuse me. I'm going to
21 object to anything that is hearsay. Looks like
22 that's where she's going.

23 THE COURT: Sustained.

24 MR. SANGER: So the answer, then, stops
25 right there; is that correct?

26 THE COURT: That's correct.

27 MR. SANGER: Okay. That's fine.

28 Q. Without telling us what you heard from Miss 10792

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1 Blackburn as to what the other person said, if
2 anything, was the request relayed to you? Did Miss
3 Blackburn --

4 A. Yes.

5 Q. Without telling me what it was, did Miss
6 Blackburn tell you what the person said?

7 A. Yes, and it was documented in our notes.

8 Q. All right. And was that something you had
9 ever heard of before?

10 A. No.

11 Q. Okay. Now, if -- have you been contacted by
12 police in an investigation where there's a
13 concurrent investigation?

14 A. Yes.

15 Q. And in the course of your experience, have
16 police agreed or asked to come with you on
17 investigations?

18 A. We share information with them pertaining to
19 our investigation, and they share information with
20 us pertaining to their investigation.

21 Q. And in your experience as a supervisor in
22 that office, have you ever heard of the police or
23 sheriff telling you not to interview a family that
24 was a subject of an investigation?

25 A. No. Because I had called to the sheriff --

26 Q. Before we get --

27 A. I'm sorry.

28 Q. We have to just -- 10793

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1 A. I'm sorry.

2 Q. -- keep it -- that's okay. I think we have
3 to keep it question and answer so we know we're
4 going to follow the ruling here.

5 So you talked to Janet Arvizo, then, in
6 person on the 20th, right?

7 A. Yes.

8 Q. In person again either the 20th or the 21st,
9 correct?

10 A. Yes.

11 Q. And then you talked to her by telephone at
12 least two times thereafter --

13 A. Yes.

14 Q. -- is that correct?

15 And you also talked to Major Jay Jackson
16 sometime thereafter?

17 A. Yes.

18 Q. Do you recall the last -- the date of the
19 last phone call that you received?

20 A. No.

21 Q. Roughly how long was it after February 20th?

22 A. Maybe a month, six weeks.

23 Q. All right. Now, during that entire period
24 of time, did Janet Ventura Arvizo ever tell you that
25 she was being held against her will?

26 A. No.

27 Q. Did she ever tell you that any member of her

28 family had been treated in an inappropriate or 10794

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1 illegal fashion by Mr. Jackson or anybody associated
2 with him?

3 A. No.

4 Q. And when Mr. -- Major Jay Jackson talked to
5 you, did he indicate to you in any way that anything
6 illegal or inappropriate had happened with regard to
7 the Arvizo family?

8 A. No.

9 MR. SANGER: Thank you. No further
10 questions.

11 You know, I do, actually. And I apologize.

12 Let me just do this:

13 Q. Did you -- did you have occasion -- are
14 those the only times that you saw the Arvizos, or
15 was there another occasion?

16 A. There was another occasion.

17 Q. Okay. Was that at Fatburger?

18 A. Yes.

19 Q. And you weren't having a Fatburger when you
20 went there. You were having a turkey burger; is
21 that right? That sounds better.

22 Can you just tell us about the encounter
23 that you had at Fatburger?

24 A. Miss Peters, Miss Bowen and myself went to
25 lunch together. And -- maybe towards the end of
26 March or the beginning of April, and we were going
27 to Fatburgers. And we ran into Miss Arvizo, Gavin

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1 Q. Okay. And, now, was this before the
2 telephone calls stopped, or was it in the middle of
3 that period, or what would you say?

4 A. After the telephone calls.

5 Q. So after the telephone -- this is a chance
6 encounter that occurred after you had already had
7 the telephone calls; is that right?

8 A. Yes.

9 Q. All right. And at that time, what did Janet
10 Arvizo tell you, if anything, about what was
11 happening in her life?

12 A. She said that Mr. Jackson wanted them to go
13 to Brazil; that they weren't going to Brazil; and
14 the kids, Gavin, Star, had not been home-schooled or
15 tutored or in a private school, and actually they
16 were going upstairs to the tutoring service. Gavin
17 and Star were going to the tutoring service upstairs
18 in the kind of, like, strip mall area.

19 Q. There's some private tutor up there?

20 A. Uh-huh. And that --

21 Q. You mentioned Brazil. Did she indicate
22 why -- what the purpose of the trip to Brazil was?

23 A. No.

24 Q. Did she say anything about the media?

25 MR. SNEDDON: Your Honor, I'm going to
26 object as leading and suggestive.

27 THE COURT: Overruled.

28 Q. BY MR. SANGER: Did she say anything about 10796

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1 the media?

2 A. No.

3 Q. All right. Now, was -- how was the
4 demeanor -- what was her demeanor during this
5 conversation?

6 A. She seemed to be fine. Both of the boys
7 seemed to be fine. They said they were going to
8 tutoring because they had missed a lot of school.

9 And I believe she told Miss Peters and I that Major
10 Jackson was paying for the boys to be tutored.

11 Q. All right. And did she indicate in any way
12 that anything illegal or inappropriate had happened
13 with regard to Mr. Michael Jackson or anybody
14 associated with him?

15 A. No.

16 MR. SANGER: All right. Good. Now I have
17 no further questions.

18 THE COURT: All right. We'll take our break
19 now.

20 (Recess taken.)

21 THE COURT: Go ahead.

22 MR. SNEDDON: Thank you, Your Honor.

23

24 CROSS-EXAMINATION

25 BY MR. SNEDDON:

26 Q. Good afternoon, Mrs. Walker.

27 A. Good afternoon.

28 Q. Have you been with the special unit ever 10797

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1 since it's been created, the Sensitive Case Unit?

2 A. No, I haven't. Seven years.

3 Q. Were you in the department when it was
4 created?

5 A. Yes.

6 Q. And it was created shortly after the 1993-94
7 investigation into Mr. Jackson, correct?

8 MR. SANGER: Objection. Beyond the scope of
9 direct and no foundation.

10 THE COURT: Overruled. Next question.

11 Q. BY MR. SNEDDON: And one of the hallmarks or
12 one of the goals of the unit was to intensify the
13 confidentiality of the investigation when it's a
14 high-profile case, correct?

15 A. Yes.

16 Q. And in this particular case, this unit that
17 you supervise was assigned this case because Mr.
18 Jackson was a high-profile celebrity, correct?

19 A. Yes.

20 Q. And were you aware at the time that you
21 commenced looking into the referral that you
22 obtained or received that there had been a previous
23 '93-'94 investigation by your department?

24 MR. SANGER: Objection; beyond the scope of
25 direct.

26 THE COURT: Overruled.

27 You may answer.

28 THE WITNESS: I had heard that there was an 10798

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1 investigation prior, yes.

2 Q. BY MR. SNEDDON: By your department?

3 A. Yes.

4 Q. And in this particular case, the
5 investigation was conducted under your supervision
6 with the two social workers that you mentioned.
7 There was a report prepared by Miss Peters, correct?

8 A. Yes.

9 Q. And it's true, is it not, that in this
10 particular case, that the information contained in
11 that report was leaked eventually to the press,
12 correct?

13 MR. SANGER: Objection, Your Honor. Beyond
14 the scope and relevance.

15 THE COURT: Overruled.

16 You may answer.

17 THE WITNESS: I have my county counsel here,
18 and I don't know of how to -- answering that
19 question.

20 MR. SANGER: And 352.

21 THE COURT: At this point the question is
22 just whether or not the information was leaked.
23 There's no question about anybody, who did it or
24 anything like that, so --

25 THE WITNESS: The information in our report,
26 though, was not --

27 THE COURT: Okay. Just a moment.

28 I think maybe she wants to consult with you, 10799

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1 which I'll allow.

2 MR. HUNTER: May I approach?

3 THE COURT: Yeah.

4 (Whereupon, an off-the-record discussion was
5 held between the witness and Mr. Hunter.)

6 MR. HUNTER: Thank you, Your Honor.

7 THE WITNESS: Can you repeat the question
8 again, please?

9 MR. SNEDDON: Perhaps the court reporter can
10 read it back.

11 THE COURT: Yes.

12 (Record read.)

13 THE WITNESS: Yes.

14 Q. BY MR. SNEDDON: Now, when you went to the
15 apartment on the 20th with the other two social
16 workers, I believe you described a situation as one
17 where Mrs. Arvizo was very friendly, correct?

18 A. Yes.

19 Q. She gave everybody a big hug?

20 A. She gave all of us a hug, and so did the
21 kids.

22 Q. The kids gave you all hugs?

23 A. Yes.

24 Q. And seemed to be trying to put a good face
25 on for the situation they were in, correct?

26 MR. SANGER: Objection. Vague and compound.

27 MR. SNEDDON: I'll rephrase it.

28 Q. Did you believe they were trying to please 10800

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1 you?

2 A. No, I believe that she had already spoken to
3 Miss Peters on the phone and she knew that we were
4 coming out to talk to her. And I got the impression
5 she didn't have anything to hide, so everything --
6 she wasn't worried about the Department of Children
7 Family Services coming out to investigate general
8 neglect or her failing to protect her children.

9 Q. So you did not find the fact that she gave
10 you a hug as an unusual situation?

11 A. No. No one's ever given us a hug before and
12 she was very warm and friendly and engaging, but I
13 didn't feel that she had anything to hide or
14 anything.

15 Q. Did you use the word "disarming" in
16 describing the situation; that she was trying to
17 disarm the situation, so she was disarming in the
18 way she approached it?

19 MR. SANGER: Objection. The question is
20 vague, ambiguous, confusing, compound.

21 THE COURT: It's compound, sustained.

22 Q. BY MR. SNEDDON: Do you recall using the
23 word "disarming" to describe her approach to you
24 when you first got there?

25 A. In terms of my report, or --

26 Q. I'm just asking if you recall saying that.

27 A. I don't recall.

28 Q. You didn't file a report on this visit, did 10801

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1 you?

2 A. I didn't what? I'm sorry.

3 Q. You didn't file a report on this visit?

4 A. File a report --

5 Q. Yeah. We're talking about the 20th.

6 A. Uh-huh.

7 Q. And we're talking about Janet Ventura, the

8 name you knew her by, Arvizo --

9 A. Right.

10 Q. -- at the apartment. And the three social

11 workers, two others and yourself, went to the

12 apartment, correct?

13 A. Because a report had not --

14 Q. I just asked you if you went to the

15 apartment.

16 A. I'm sorry. Yes.

17 Q. And it was a prearranged meeting?

18 A. Yes.

19 Q. And with regard to that meeting, you were

20 not going to file a report, were you? You

21 individually, yourself.

22 A. "File a report" as in write the report?

23 Q. Yes, ma'am.

24 A. No. Miss Peters wrote the report.

25 Q. Yes.

26 A. Yes.

27 Q. Okay. And did you take notes?

28 A. I probably jotted down a couple of things, 10802

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1 yes.

2 Q. Do you know what happened to those notes?

3 MR. SANGER: Objection. Discovery;

4 irrelevant.

5 THE COURT: Overruled.

6 THE WITNESS: They were incorporated in Miss

7 Peters' report.

8 Q. BY MR. SNEDDON: So some of the things

9 written in Miss Peters' report are things that you

10 remembered as opposed --

11 MR. SANGER: Objection; compound.

12 MR. SNEDDON: I'll rephrase it.

13 Q. So you reviewed her report?

14 A. Yes.

15 Q. Okay. And did you see some of the things

16 that you wrote down in her report?

17 A. Yes.

18 Q. And after -- and then you didn't keep the

19 notes?

20 A. No, because it was inputted into the

21 computer.

22 Q. Okay. Now, when you went there, you said

23 you were introduced to some people who were already

24 in the apartment when you arrived, correct?

25 A. Yes.

26 Q. And one of the individuals that you were

27 introduced to was -- I think she was -- he was

28 described by the last witness as being a very -- 10803

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1 sort of a physically-looking person, buffed out or
2 something like that?

3 MR. SANGER: Objection, Your Honor.

4 Q. BY MR. SNEDDON: Does that --

5 MR. SANGER: I'm sorry.

6 Q. BY MR. SNEDDON: -- comport with your
7 recollection?

8 A. Um --

9 MR. SANGER: Objection. Improper question,
10 quoting a prior witness, and misstates her
11 testimony.

12 THE COURT: Sustained.

13 Q. BY MR. SNEDDON: Would you describe him as
14 well-built?

15 A. I think I said medium build.

16 Q. So you wouldn't describe him as well-built?

17 A. Not to my recollection. I mean medium
18 built.

19 Q. Not muscular?

20 MR. SANGER: I'm sorry, I didn't understand.

21 THE COURT: "Muscular."

22 MR. SANGER: Oh, okay.

23 THE COURT: Scratch that.

24 (Laughter.)

25 MR. SANGER: I guess -- I suppose the
26 question is, was that a question at this point?

27 THE COURT: Well, I didn't read you the whole

28 question. I just read you the word that you thought 10804

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1 you couldn't understand.

2 MR. SANGER: You're right. I couldn't.

3 THE COURT: Rephrase your question, please.

4 Q. BY MR. SNEDDON: Have you ever described
5 this individual as being muscular?

6 A. I guess -- I'm thinking medium build. I
7 don't necessarily know if he was like -- well,
8 muscular --

9 Q. All right. We won't quibble over whether he
10 had muscles or not. I'll just move on.

11 A. He had a shirt on, and I don't -- I couldn't
12 see him.

13 Q. It's -- I -- okay.

14 While you were at the apartment at some
15 point in time, you saw another individual associated
16 with Mr. Jackson, correct?

17 A. Yes.

18 Q. You described that person as looking like
19 what? Describe him.

20 A. When -- when we were in the apartment,
21 you're talking about the gentleman that was working
22 for Mr. Jackson, or the other young lady that was
23 there?

24 Q. No. No, no. First of all, when you first
25 arrived there, you met the person that you and I
26 were just talking about with the medium build,
27 correct?

28 A. Yes. Yes. 10805

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1 Q. And he was in the apartment?

2 A. Yes.

3 Q. And he was identified as Michael Jackson's

4 security guard, was he not?

5 A. Yes.

6 Q. All right. Now, after the meeting was

7 completed, did you see another person --

8 A. Yes.

9 Q. -- that was associated with Mr. Jackson?

10 A. Yes.

11 Q. And what did that person look like?

12 A. Medium height; not too tall, maybe

13 five-five; Caucasian.

14 Q. Did you remember anything else unusual about

15 him?

16 A. Well, I thought he had on makeup.

17 Q. Yes. When you were asked about that, you

18 said, "Well, it's Hollywood," right?

19 A. No, I don't remember saying that.

20 Q. You don't remember telling the grand jury

21 that?

22 A. No.

23 Q. All right. In any case, the particular

24 individual that you saw when you left, the one that

25 you described as possibly having makeup on, that's

26 the same individual you met the next day, isn't it?

27 A. Yes, I believe so.

28 Q. Now, you talked to the ladies and gentlemen 10806

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1 of the jury, or in response to counsel's questions,
2 that you had a number of telephone calls with Janet
3 Arvizo?

4 A. A couple.

5 Q. A couple?

6 A. Uh-huh.

7 Q. That's fine. And what I want to ask you is,
8 when you received a telephone call from her, did
9 she -- did you indicate to her that her children
10 needed to be taken out of their apartment?

11 A. Never.

12 Q. Never. Okay. And did you say that they
13 needed to be checked out of their current school?

14 A. Never.

15 Q. And that they needed to be placed at some
16 other place to get education?

17 A. No.

18 Q. Okay. You never had that conversation with
19 Mrs. Arvizo?

20 A. No. She said that she wanted them to go to
21 another school and to be home-schooled or to have a
22 private tutor.

23 Q. Yes, ma'am.

24 A. And that they couldn't go back to their same
25 school because of the teasing and the attention that
26 Gavin was getting.

27 Q. But you never told her that her children

28 needed to be taken out of their apartment? 10807

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1 A. No.

2 Q. And you were never asked that by her?

3 A. No.

4 Q. Okay, fine. Thank you.

5 Now, with regard to the confidentiality

6 issue, obviously it would be improper if somebody

7 tape-recorded a confidential conversation between

8 you and somebody you were investigating, correct?

9 A. Yes.

10 Q. And to your knowledge, at the time that the

11 interview on the 20th was taking place, you did not

12 know that you were being tape-recorded, correct?

13 A. Correct.

14 Q. And at some point thereafter, you learned

15 that you had, in fact, been tape-recorded during a

16 part of your visit to the Arvizos on the 20th?

17 A. Yes.

18 Q. And did you learn about that from the media

19 at first?

20 A. No. My mom called me.

21 Q. Okay. And she heard it on the T.V.,

22 correct?

23 A. Uh-huh.

24 Q. She recognized your voice?

25 A. Yes.

26 Q. And have you had an opportunity to listen to

27 that tape?

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1 Q. Okay. So you just -- now, when you were at
2 the apartment, you were introduced to this person
3 with the medium build that was identified as a
4 security guard for Mr. Jackson?

5 A. Yes.

6 Q. Did you ever see that individual hand Janet
7 Arvizo a tape-recorder?

8 A. No.

9 Q. Did you see a tape-recorder while you were
10 there?

11 A. No.

12 Q. Did you see this individual go into another
13 room with Mrs. Arvizo at any point in time?

14 A. Not that I remember.

15 Q. Okay. So you just don't recall one way or
16 the other?

17 A. I don't recall.

18 Q. Now, with regard to the conversations with
19 the Arvizo children and Mrs. Arvizo, in describing --
20 the first question that was asked is what was their
21 relationship with Mr. Jackson, correct?

22 A. Yes.

23 Q. Okay. Now, the reason that you were there
24 is because you had -- not you personally, but your
25 department had received some referrals from some
26 individuals who were concerned about what they saw
27 on the Bashir video, correct?

28 A. We received a referral based on the Martin 10809

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1 Bashir video, yes.

2 Q. And the portion of the Bashir video that was
3 the subject of the concern was the fact that Gavin
4 Arvizo might be sleeping with Mr. Jackson and
5 sharing a bed with him, correct?

6 A. Yes.

7 MR. SANGER: I'm going to object. That
8 calls for hearsay. It's also ambiguous, vague.

9 THE COURT: Overruled. She answered it.

10 Q. BY MR. SNEDDON: And so while you indicated
11 that the focus was on Mrs. Arvizo in terms of her
12 being a neglectful mother -- that's what you
13 indicated, correct?

14 A. Yes.

15 Q. It, in fact, focused on whether -- part of
16 that would be whether or not, in fact, she had
17 allowed her child to sleep in a bed with a
18 45-year-old man, correct?

19 A. Yes.

20 Q. Now, with regard to the conversations that
21 you had, let's start with Mrs. Arvizo, she was asked
22 what the nature of the relationship was with Mr.
23 Jackson, correct?

24 A. Yes.

25 Q. And she said that Michael was like a father
26 to the children?

27 A. Yes.

28 Q. "To my children" is actually what she said. 10810

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1 A. Yes.

2 Q. And when Gavin was asked that, he said,

3 "Michael has been like a father to me," correct?

4 A. Yes.

5 Q. And then Star said, "Michael is like a

6 father to me," correct?

7 A. Yes.

8 Q. And then Davellin, when she's asked that,

9 her answer is, "Michael is like a father to all of

10 us," correct?

11 A. Yes.

12 Q. Now, did Gavin also tell you during that

13 conversation that Mr. Jackson had visited him in the

14 hospital?

15 A. I don't remember.

16 Q. Do you think it might refresh your

17 recollection if I showed you a copy of Miss Peters'

18 report?

19 A. Sure.

20 MR. SNEDDON: May I, Your Honor?

21 THE COURT: Yes.

22 Q. BY MR. SNEDDON: You can ignore all my

23 doodlings and just read it to yourself, okay? Just

24 right here where the check mark is. And you can

25 read up and down if you want, either way.

26 You sure you don't want to turn the page?

27 Just make sure.

28 Okay. Does that refresh your recollection? 10811

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1 A. Yes.

2 Q. And he did say that Mr. Jackson had actually
3 visited him in the hospital, correct?

4 A. Yes.

5 Q. Now, I'm not going to go through everything,
6 but I just would like to ask you a few questions
7 about the rest of the interview.

8 Based on what you recall of the interview,
9 was it your understanding that the mother was
10 spending most of the time in the house, the main
11 residence?

12 A. Yes.

13 Q. In other words, she was sleeping in the main
14 residence?

15 A. Yes.

16 Q. Okay. And she actually made some statement
17 to you about walking around late at night, correct?

18 A. That she's up all the time at night,
19 something like that, yes.

20 Q. Okay. And you assumed that the statement
21 that she was sleeping in the main house was true,
22 correct?

23 A. Yes.

24 Q. Okay. And you assumed that her statement
25 about being up at night and walking around was true,
26 correct?

27 A. Yes.

28 Q. And one of the things that Davellin said was 10812

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1 that she took a friend with her to the ranch and
2 that she stayed in a room in the house. Do you
3 remember that?

4 A. Yes.

5 Q. And you assumed that was correct or true?

6 A. Yes.

7 Q. And one of the things that all of the
8 children and Janet said to you was, they were
9 emphasizing the fact that there was always somebody
10 in the room with Mr. Jackson when one of the
11 children was with him, correct?

12 A. Yes.

13 Q. And you assumed that was correct, too?

14 A. Yes.

15 Q. And Mrs. Arvizo made the statement that Mr.
16 Jackson's room was like an open room and had no
17 doors. Isn't that what she said?

18 A. Yes.

19 Q. And you assumed that to be correct?

20 A. Yes.

21 Q. Now, if any follow-up work was needed to be
22 done in terms of contacting, let's say, Neverland
23 Ranch, would that have been done by you or Miss
24 Peters?

25 A. Miss Peters.

26 Q. You're her supervisor, correct?

27 A. Yes.

28 Q. Did you ever suggest that she check the 10813

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1 ranch to see what Mr. Jackson's room is like?

2 A. No.

3 Q. Did you ever suggest that she check the
4 ranch to determine what the sleeping arrangements
5 had been?

6 A. No. I think we did contact Santa Barbara
7 Child Protective Services, and they hadn't gone out
8 there.

9 Q. But with regard to the completion of the
10 report that you folks were doing, you didn't do any
11 of that?

12 A. No.

13 MR. SANGER: Objection; argumentative.

14 THE COURT: Overruled. The answer is in.

15 Next question.

16 MR. SNEDDON: Okay.

17 (Off-the-record discussion held at counsel
18 table.)

19 MR. SNEDDON: May I have a moment, Your
20 Honor?

21 (Off-the-record discussion held at counsel
22 table.)

23 Q. Mrs. Walker, I want to go back to something
24 to get some clarification, if I can.

25 A. Sure.

26 Q. You know, I asked you the question about
27 whether Janet Arvizo had spoken to you and said that

28 the children needed to be taken out of their 10814

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1 apartment. Do you remember me asking you that?

2 A. Yes.

3 Q. You said, "No."

4 A. Yes.

5 Q. Do you recall if anybody ever called you up

6 and asked you about that?

7 A. No.

8 Q. Okay. No, it didn't happen? Or no, you

9 don't recall?

10 A. Nobody called to tell me about her moving

11 out of her apartment, no.

12 Q. Or asking you if they should be moved out?

13 A. No.

14 Q. Okay. Now, I just actually have a couple of

15 questions left.

16 I want to talk about the Fatburger meeting.

17 And when you met Mrs. Arvizo at the Fatburger, she

18 described her situation at the ranch as being

19 horrible, did she not?

20 A. I believe they told Lavern and I that they

21 hadn't been back to the ranch.

22 Q. No -- yes, well, but when she was describing

23 the situation that she had been in at the ranch, at

24 one point in time she described it to you, and the

25 word she used was "horrible," did she not?

26 A. Okay. Yes.

27 Q. I mean, you had a conversation with

28 detectives with the Santa Barbara Sheriff's 10815

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1 Department back in December of 2003?

2 A. Okay.

3 Q. Does that sound about right?

4 A. Yes.

5 Q. Okay. And in that conversation, you told
6 them that she described the situation at the ranch
7 when she was there as being horrible?

8 A. Okay.

9 MR. SNEDDON: Nothing further.

10

11 REDIRECT EXAMINATION

12 BY MR. SANGER:

13 Q. All right. Now, your answer to the last
14 question was, "Okay." Does that mean that's your
15 recollection of what happened, or you're just
16 agreeing that that must be what you said because Mr.
17 Sneddon asked you?

18 A. Well, I'm just trying to remember exactly in
19 terms of her saying it was horrible when we were at
20 the Fatburger incident, was there any other
21 follow-up to that, and I can't remember.

22 Q. All right. So do you remember saying -- do
23 you remember her saying to you that her -- that
24 anything to do with the ranch was horrible?

25 A. Well, I know they said that they hadn't been
26 back there. And I think Miss Peters is the one that
27 said, "Have you been back to the ranch?"

28 And they said, "No, we haven't been back 10816

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1 there. It was horrible," if -- if that's the
2 context in which she said it in, and I'm not sure.

3 Q. Do you recall Miss Arvizo telling you that
4 she was trying to get ahold of Michael Jackson and
5 she wasn't able to talk to him directly?

6 A. At the -- you're talking the Fatburger
7 incident?

8 Q. At any time did she tell you that was one of
9 her problems, that she wanted to talk to Michael
10 Jackson directly, and she wasn't able to get ahold
11 of him directly?

12 A. No, I don't remember her saying that to me.

13 Q. I want to try to go back and clarify this,
14 because maybe I misheard, because it seemed to me
15 you were asked about the phone calls from Janet
16 Arvizo Ventura by Mr. Sneddon just a moment ago, and
17 you were asked if you ever told Janet Arvizo that
18 they needed to leave the school and get a different
19 apartment.

20 Do you remember him asking you that
21 question?

22 A. Yes.

23 Q. And I may be wrong, but I thought you said
24 you did not tell her that, but Janet had told you
25 that.

26 A. I never told her that they need to move out
27 of their apartment or leave the school that the boys

28 were attending. 10817

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1 Q. Okay. Did Janet Arvizo tell you that?

2 A. She might have told me that.

3 Q. All right.

4 A. But I never told her that.

5 Q. And it wouldn't be your place in a phone
6 call after your investigation is concluded to give
7 her that kind of advice, would it?

8 A. No.

9 Q. All right. Now, there's been much about
10 what was said in the actual interview. Have you
11 reviewed your notes? You said you had notes and you
12 eventually threw them away because they were
13 incorporated, right?

14 A. (Nods head up and down.)

15 Q. When was the last time you ever saw those
16 notes?

17 A. Two years ago.

18 Q. All right. And do you know if everything in
19 the report is absolutely accurate as to what the
20 Arvizos were saying to the three of you that day?

21 A. Yes.

22 Q. Do you think it's pretty accurate?

23 A. Yes.

24 Q. All right. Now, did -- did Davellin tell
25 you that she spent time with a friend at Neverland?

26 A. As opposed to --

27 Q. As opposed to taking a friend to Neverland.

28 A. I know for sure that she had a friend at 10818

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1 Neverland, because she told us that she did.

2 Q. All right. Did she tell you that she spent
3 time at the theater with her friend?

4 A. Yes.

5 Q. Did she tell you -- did she explain where
6 the theater was?

7 A. She -- she did, but I can't remember --

8 Q. Okay.

9 A. -- where she said it was.

10 Q. Some things were more important to get right
11 in the report -- I shouldn't say "right." I suppose
12 it's important to try to get everything right, but
13 there are some things that are going to be more of a
14 focus in a report like that, in your experience,
15 right?

16 A. Yes.

17 Q. Did you have anybody draw you a diagram of
18 Neverland?

19 A. No.

20 Q. Did Janet Arvizo tell you that she stayed in
21 the guest room?

22 A. I believe so.

23 Q. Did she tell you where the guest room was in
24 the house complex?

25 A. Not that I can remember.

26 Q. All right. Do you recall anybody asking her
27 where the guest room was?

28 A. Not that I can remember. 10819

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1 Q. All right. And then you were asked
2 questions about whether or not somebody said that
3 Michael Jackson visited Gavin at the hospital. Do
4 you recall that?

5 A. Yes.

6 Q. Do you know whether or not you were told
7 that Michael Jackson actually went to the hospital
8 room? Was there any description saying, "Yeah, he
9 arrived and came in the door and sat there at the
10 hospital bed," or was there a statement to the -- a
11 more general statement that he visited with Gavin
12 while he was ill?

13 A. He visited while he was ill.

14 MR. SANGER: Okay. I have no further
15 questions. Thank you.

16

17 RE-CROSS-EXAMINATION

18 BY MR. SNEDDON:

19 Q. All right. First of all, you were asked by
20 Mr. Sanger about your recollection of where Janet
21 Arvizo was sleeping at Neverland Valley Ranch,
22 correct?

23 A. Yes.

24 Q. And, now, the report actually states, does
25 it not, that, "I stay in the visitors' quarters,
26 but" --

27 MR. SANGER: I'm going to object. This is

28 hearsay, reading from the report. 10820

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1 THE COURT: Sustained.

2 Q. BY MR. SNEDDON: Did you not tell me on your
3 cross-examination that your assumption was that Mrs.
4 Arvizo stayed in the main residence, correct?

5 A. Yes.

6 Q. It's still your impression, is it not?

7 A. Yes.

8 Q. And that Mr. Jackson's bedroom is another
9 part of the main residence, correct?

10 A. Yes.

11 Q. Now, with regard to Davellin taking somebody
12 with her to the ranch, do you remember whether she
13 use the word "take" or whether there was somebody
14 already there?

15 A. I don't remember.

16 Q. Is it -- is this a fair statement, that your
17 impression was, based on your recollection of that
18 conversation, that the person that she was with at
19 the ranch was somebody who was a friend of hers and
20 that she took that person to the ranch with her to
21 keep her company?

22 A. Yes.

23 Q. And that, in fact, she said that she took
24 the person to the ranch, and they stayed in a room
25 in the main house, correct?

26 A. Yes.

27 MR. SANGER: Objection. Now it's compound.

28 THE COURT: Overruled. The answer was, 10821

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1 "Yes." Next question.

2 MR. SNEDDON: I have nothing further, Your
3 Honor.

4 MR. SANGER: No further questions.

5 THE COURT: All right. Thank you. You may
6 step down.

7 Call your next witness.

8 MR. MESEREAU: Your Honor, the defense will
9 call Ms. Simone Jackson.

10 And could we approach, Your Honor?

11 THE COURT: Yes.

12 (Discussion held off the record at sidebar.)

13 THE COURT: Hello. You can raise your right
14 hand, please. Face the clerk here.

15

16 SIMONE PECH JACKSON

17 Having been sworn, testified as follows:

18

19 THE WITNESS: Yes.

20 THE CLERK: Please be seated. State and

21 spell your name for the record.

22 THE WITNESS: Simone Pech Jackson.

23 S-i-m-o-n-e; P-e-c-h; Ja-c-k-s-o-n.

24 BAILIFF CORTEZ: If you'd speak loud and use
25 this microphone, okay?

26 THE WITNESS: Okay.

27 MR. MESEREAU: Thank you.

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1 DIRECT EXAMINATION

2 BY MR. MESEREAU:

3 Q. Good afternoon, Miss Jackson. Miss Jackson?

4 A. Yes.

5 Q. This -- hi. Miss Jackson?

6 A. Yes.

7 Q. Okay. My name is Tom Mesereau, and I speak

8 for Michael Jackson, okay?

9 A. Okay.

10 Q. All right. Do you know Michael Jackson?

11 A. Yes, I do.

12 Q. How do you know him?

13 A. He's my cousin.

14 Q. And where is your home?

15 A. In Lompoc.

16 Q. Okay. And how old are you?

17 A. 16.

18 Q. All right. Now, have you ever visited

19 Neverland?

20 A. Yes, I have.

21 Q. How many times do you think you've been to

22 Neverland?

23 A. I don't -- I don't know. A lot.

24 Q. Many times, right?

25 A. Yes.

26 Q. And have you spent the night at Neverland?

27 A. Yes.

28 Q. Okay. 10823

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1 BAILIFF CORTEZ: I'm sorry. Scoot up a
2 little bit more and get a little closer.

3 THE WITNESS: All right.

4 Q. BY MR. MESEREAU: When you go to Neverland,
5 what do you like to do?

6 A. I like to play in the arcade room.

7 Q. Why is that?

8 A. Because there's a lot of games there to
9 play.

10 Q. And have you been playing in the arcade room
11 for a lot of years?

12 A. Yeah.

13 Q. Okay. Do you remember the first time you
14 went to Neverland?

15 A. No, I don't.

16 Q. How old do you think you might have been?

17 A. Probably about eight, nine years old.

18 Q. Okay. And do you have a brother?

19 A. Yes.

20 Q. And what's your brother's name?

21 A. Rio Jackson.

22 Q. And how old is Rio?

23 A. 12.

24 Q. Do you remember being at Neverland and
25 meeting a family named Arvizo?

26 A. Yes, I do.

27 Q. And do you know approximately when that was?

28 A. It was sometime around February of -- 10824

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1 Q. Is that 2003?

2 A. -- 2003.

3 Q. And do you know why you were visiting

4 Neverland in February of 2003?

5 A. It was Prince's birthday.

6 Q. And who is Prince?

7 A. Michael's son.

8 Q. Okay. Do you remember how old Prince was?

9 A. No, I don't.

10 Q. Was there a birthday party?

11 A. Yes.

12 Q. Where was the birthday party?

13 A. At the ranch.

14 Q. Okay. Were the Arvizos at the birthday

15 party; do you know?

16 A. Yes.

17 Q. Okay. Anyone else at the birthday party

18 that you remember?

19 A. I don't remember.

20 Q. Okay. And was Michael Jackson at the

21 birthday party?

22 A. Yes.

23 Q. Where did it take place?

24 A. It took place in the dining room.

25 Q. Okay. And that's in the main house?

26 A. Yeah.

27 Q. And what do you remember about the party?

28 A. There was -- it was a surprise, and there 10825

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1 was a lot of kids there, and that's mostly what I
2 remember.

3 Q. And if you know, how many kids were at the
4 party?

5 A. About ten.

6 Q. Okay. Were they children that you knew?

7 A. No.

8 Q. Okay. And were there a lot of adults there,
9 too?

10 A. A few.

11 Q. Okay. And do you know about what time the
12 party started?

13 A. No, I don't.

14 Q. Okay. Did you ever meet Janet Arvizo?

15 A. Yes, I did.

16 Q. And when do you think you met Janet Arvizo?

17 A. I met her the second -- the time after

18 February. The second time I went there.

19 Q. Okay. And that's in the year 2003?

20 A. Yes.

21 Q. Okay.

22 A. It was sometime in March.

23 Q. Was Janet Arvizo at the -- at Prince's
24 birthday party?

25 A. No.

26 Q. Okay. Was Gavin Arvizo at the birthday
27 party?

28 A. Yes. 10826

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1 Q. Was Star Arvizo at the party?

2 A. Yes.

3 Q. How about Davellin Arvizo?

4 A. Yes.

5 Q. Okay. Now, was this a party that appeared

6 to be organized by Michael Jackson?

7 A. Yes.

8 Q. Okay. And you said it took place in the

9 main dining room, right?

10 A. Uh-huh.

11 Q. And was food served?

12 A. Yes.

13 Q. Did everyone sit at a table?

14 A. Yeah.

15 Q. All right. And were there presents?

16 A. Yes.

17 Q. Okay. Did Prince get some presents?

18 A. Yes, he did.

19 Q. Okay. And what else were the children doing

20 that you remember at the party?

21 A. Playing games.

22 Q. Okay. Were they playing in the main dining

23 room?

24 A. Yes.

25 Q. What kind of games?

26 A. I don't remember.

27 Q. Do you know what time the party began?

28 A. No, I don't. 10827

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1 Q. Okay. Did it end any particular time that
2 you remember?

3 A. Huh-uh.

4 Q. Was it during the day?

5 A. Yes.

6 Q. Okay. Did it go into the night, do you
7 think?

8 A. No.

9 Q. Okay. Now, were you staying at Neverland
10 when you visited to attend Prince's party?

11 A. No, I didn't.

12 Q. Okay. Did you go home at the end of the
13 day?

14 A. Yes.

15 Q. How did you get home? Did somebody drive
16 you?

17 A. Yes.

18 Q. Do you know who that was?

19 A. I don't remember who it was.

20 Q. Okay. How did you get to Neverland for the
21 party, if you remember?

22 A. Somebody came to pick us up.

23 Q. Somebody associated with Michael?

24 A. Yes.

25 Q. Okay. And does Michael from time to time
26 have people pick you up and bring you to Neverland?

27 A. Yes.

28 Q. And sometimes does Michael have somebody 10828

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1 bring you home?

2 A. Yes.

3 Q. Okay. Did you ever see the Arvizo children
4 at Neverland on any other -- on any other date?

5 A. Yes.

6 Q. And approximately when was that, do you
7 think?

8 A. Sometime around March.

9 Q. Okay. Was that March of 2003?

10 A. Yes.

11 Q. Now, at Prince's birthday party in February,
12 was your brother Rio there?

13 A. Yes.

14 Q. And when you next saw the Arvizo children in
15 March of 2003, was Rio there also?

16 A. Yes.

17 Q. All right. And where did you stay -- excuse
18 me. Let me rephrase that.

19 When you saw the Arvizo children at
20 Neverland in March of 2003, did you spend the night?

21 A. Yes.

22 Q. Did you spend more than one night?

23 A. Yes.

24 Q. How many nights do you think you spent?

25 A. Three.

26 Q. Okay. And where did you stay during those
27 three nights?

28 A. In one of the units. 10829

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1 Q. Is that a guest unit?

2 A. Yes.

3 Q. Okay. And is that one of the units that is
4 separate from the main house?

5 A. Yes.

6 Q. And those units are a short walk to the main
7 house, right?

8 A. Yes.

9 Q. Okay. Do you know where your brother Rio
10 stayed?

11 A. He stayed with Gavin and Star.

12 Q. Okay. And where was that?

13 A. In one of the guest units also.

14 Q. Okay. Did you see Rio in the guest unit
15 with Gavin and Star?

16 A. Yes, I did.

17 Q. Did you actually go into the unit that
18 Gavin, Star and Rio were staying in?

19 A. Yes.

20 Q. Okay. And do you know what time of day you
21 went into that guest unit where Gavin, Star and Rio
22 were staying?

23 A. It was at night.

24 Q. Okay. And was it your understanding that
25 Rio spent the night in the guest unit with Gavin and
26 Star?

27 A. Yes.

28 Q. Okay. Do you remember ever seeing Gavin and 10830

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1 Star in the kitchen in the main house?

2 A. Yes.

3 Q. When do you remember seeing that?

4 A. It was one o'clock in the morning.

5 Q. Do you know approximately when that was?

6 Was that in March of 2003?

7 A. It was in March.

8 Q. Was this during the three-day visit that you

9 just described?

10 A. Yes.

11 Q. Okay. And you were in the main house at

12 that time of the morning?

13 A. Yes.

14 Q. Okay. And you were in the kitchen at that

15 time of the morning, right?

16 A. Yes.

17 Q. Okay. What did you see Gavin and Star do in

18 the kitchen at 1:00 in the morning during March of

19 2003?

20 A. I saw them take wine.

21 Q. And when you say you saw them take wine, did

22 you see one of them take it, or both?

23 A. Both of them. They each had a bottle.

24 Q. And were they in the kitchen with the

25 bottles?

26 A. Yes.

27 Q. Did you see them actually take the bottle

28 from some location? 10831

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1 A. No, I didn't.

2 Q. Okay. Did you walk into the kitchen and see
3 them with these two bottles?

4 A. They didn't -- they didn't see me. I was
5 sitting to the side. They didn't see me when they
6 came in.

7 Q. Okay. Now, where were you sitting?

8 A. I was sitting in a corner.

9 Q. Okay. Now, if you can describe it, where is
10 that corner?

11 A. It's on the closer side of the kitchen.

12 There's like a video game there.

13 Q. Okay.

14 A. And they couldn't see me.

15 Q. And what time -- excuse me.

16 You were sitting there in the corner, right?

17 A. Yes.

18 Q. Were you on a chair?

19 A. Yes.

20 Q. And you saw Gavin and Star come into the
21 main house?

22 A. Yes.

23 Q. Did you see them go into the kitchen area?

24 A. Yes.

25 Q. And did you actually watch them grab these
26 two bottles of wine?

27 A. Yes.

28 Q. What did you see them do? How did they grab 10832

www.mjfacts.info

1 the wine?

2 A. They just -- they grabbed it, and they both
3 got a -- well, Star got a wine bottle -- a wine
4 glass, and Gavin just took the bottle.

5 Q. Okay. And what else did you see them do?

6 A. They left.

7 Q. Okay. Did you know which direction they
8 went when they left?

9 A. They went through the back door.

10 Q. Okay. And when was the last time you saw
11 them that evening?

12 A. I didn't see them after that.

13 Q. Okay. Now, why were you sitting in the
14 corner?

15 A. I was playing video games.

16 Q. Okay. Do you know about what time you went
17 into the main house?

18 A. It was around 1:00 in the morning.

19 Q. Okay. And do you know what game you were
20 playing?

21 A. No, I don't.

22 Q. Okay. Did you see Gavin and Star get the
23 wine from the refrigerator?

24 A. No, I didn't.

25 Q. Where did you see them get it?

26 A. I saw them get it from a corner, but I don't

27 remember -- I don't remember where exactly they got

28 it from. 10833

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1 Q. Was that a corner in the kitchen area?

2 A. Yes.

3 Q. Okay. Now, is the kitchen area a big area?

4 A. Yes.

5 Q. Okay. And you've been in that kitchen area

6 many times, right?

7 A. Yes.

8 Q. And how would you describe the kitchen?

9 A. Very big, very brown, lots of silverware.

10 Q. Okay. And you see a lot of refrigerators,

11 right?

12 A. Just one.

13 Q. Okay. On the left side, as you face the

14 kitchen, right?

15 A. Yeah.

16 Q. Okay. Now, if you can describe it, Simone,

17 where is the video game you were playing?

18 A. It was on the counter where the people eat.

19 Q. Okay. And do you sit on a chair at the

20 counter?

21 A. Yes.

22 Q. Okay. And is there one video game on that

23 counter?

24 A. Yes.

25 Q. Okay. So were you sitting there playing the

26 video game?

27 A. Yes.

28 Q. Have you done that before? 10834

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1 A. Yeah.

2 Q. Okay. When you saw Gavin and Star grab the
3 wine, did you say anything to them?

4 A. After they saw me, they had seen me, I told
5 them that he weren't allowed -- they weren't
6 supposed to do that, and they told me to be quiet
7 and not to say anything.

8 Q. Okay. And was that the only discussion you
9 had with them that evening?

10 A. Yes.

11 Q. All right. Did you ever see them with wine
12 any other time?

13 A. No.

14 Q. Is that the only time?

15 A. Yes.

16 Q. Now, do you know Gavin and Star's sister?

17 A. Yes.

18 Q. And her name is Davellin?

19 A. Yes.

20 Q. When did you first meet Davellin?

21 A. At the party.

22 Q. Was that Prince's birthday party?

23 A. Yes.

24 Q. All right. And did you see Davellin sitting
25 at the table at that party?

26 A. Yes.

27 Q. Okay. Was Davellin with her brother and

28 sister at that party? 10835

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1 A. Yes.

2 Q. Okay. Now, when you saw Gavin and Star and
3 Davellin at Prince's birthday party in February of
4 2003, did you know whether or not they were staying
5 at Neverland?

6 A. No, I didn't know.

7 Q. Okay. But you never saw their mother on
8 that visit, right?

9 A. No.

10 Q. When you saw Davellin, Gavin and Star at
11 Neverland in March of 2003, did you see their mom?

12 A. Yes, I did.

13 Q. And was that the first time you recall
14 meeting their mom?

15 A. Yes.

16 Q. Okay. Where did you see Gavin, Star and
17 Davellin's mom in March of 2003?

18 A. She was in one of the guest units.

19 Q. All right. And did you ever go into her
20 unit?

21 A. Yes.

22 Q. Okay. Did you see her in there?

23 A. Yes.

24 Q. Okay. In March of 2003 when you stayed at
25 Neverland, what did you used to do during the day?

26 A. I would go out and see the animals.

27 Q. Okay. Is that at the zoo area?

28 A. Yeah. 10836

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1 Q. All right. And would Rio go with you?

2 A. No, he would stay and do his own thing.

3 Q. Okay. And did Gavellin -- excuse me. Did

4 Davellin ever go with you to the zoo?

5 A. Yes.

6 Q. Did she go with you to the zoo on many

7 occasions?

8 A. No.

9 Q. How many times do you recall going to the

10 zoo with Davellin?

11 A. Probably once or twice.

12 Q. Okay. And what do you recall doing at the

13 zoo when Davellin was with you?

14 A. We'd go see the birds.

15 Q. Okay. And why don't you describe that, if

16 you can.

17 A. We'd usually just go and talk to each other

18 about what -- like what kind of things were going on

19 in our lives.

20 Q. Okay. And did she become a friend of yours?

21 A. Yes.

22 Q. Okay. And did you ever talk to Davellin at

23 any time other than those two visits to Neverland?

24 A. No.

25 Q. Did you and Davellin ever talk on the phone,

26 for example?

27 A. No.

28 Q. Okay. But you thought of her as a friend? 10837

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1 A. Yeah.

2 Q. Okay. And you and she went and looked at
3 the birds, right?

4 A. Yes.

5 Q. And is there an area where you have a lot of
6 birds at the zoo?

7 A. There's just one small area where the birds
8 are.

9 Q. Are those the birds that are outside in the
10 cages?

11 A. Yes.

12 Q. Okay. Did you and Davellin walk all around
13 Neverland?

14 A. Sometimes.

15 Q. Okay. And where would you walk to?

16 A. We'd usually walk to the train station or
17 we'd take a walk to the movie theater.

18 Q. Okay. And what would you and Davellin do at
19 the train station?

20 A. Get candy.

21 Q. Okay. And did you ever ride the trains?

22 A. Yes.

23 Q. Okay. Just you and Davellin?

24 A. Yes.

25 Q. Okay. Do you remember walking around
26 Neverland with Gavin or Star? Did you ever do that?

27 A. Huh-uh.

28 Q. Okay. Now, during your three-day visit in 10838

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1 March of 2003, did you spend a lot of time with
2 Davellin?

3 A. Yes, I did.

4 Q. Were you with Davellin every day?

5 A. No.

6 Q. Okay. How many days do you think you palled
7 around with Davellin?

8 A. Probably two out of three.

9 Q. Okay. And were you and Davellin ever in the
10 main house in that visit?

11 A. Yes.

12 Q. Okay. And what time of day were you and
13 Davellin in the main house on that visit, if you
14 know?

15 A. Usually in the afternoon.

16 Q. Okay. And was it your understanding that
17 your brother Rio was hanging out with Gavin and
18 Star?

19 A. Yes.

20 Q. Okay. Did you see Rio hanging out with
21 Gavin and Star?

22 A. Yes, I did.

23 Q. All right. Do you recall ever discussing
24 with Davellin a possible trip to Brazil?

25 A. Yes.

26 Q. How did that topic come up?

27 A. She just told me one day out of the blue

28 that she had to go to Brazil and I probably wouldn't 10839

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1 see her again.

2 Q. Okay. Did she say anything about whether or
3 not her mom wanted to go to Brazil?

4 A. Yeah. She said her mom wanted to go.

5 MR. ZONEN: I'm going to object as hearsay.

6 THE COURT: Overruled.

7 You may answer.

8 Q. BY MR. MESEREAU: Excuse me, Simone, what
9 did you say?

10 A. Her mom wanted to go.

11 Q. Davellin said her mom wanted to go to
12 Brazil?

13 A. Yes.

14 Q. Did Davellin say whether or not Davellin
15 wanted to go to Brazil?

16 A. She said she didn't want to go.

17 Q. Okay. Did Davellin comment about whether or
18 not Gavin wanted to go?

19 A. She never said anything about Gavin.

20 Q. Okay. How about Star?

21 A. Him either.

22 Q. Okay. But she said her mom wanted to go,
23 but she didn't want to go, right?

24 A. Yes.

25 Q. Okay. When you observed Janet Arvizo in
26 March of 2003, did she ever seem upset to you?

27 A. No.

28 Q. Did Janet Arvizo ever seem mad to you? 10840

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1 A. No.

2 Q. Did she ever look scared to you?

3 A. No.

4 Q. Okay. How many times do you think you were

5 in Janet's room in the guest units in March of 2003?

6 A. Just once.

7 Q. Okay. And do you know about what time of

8 day that was?

9 A. No, I don't.

10 Q. Was it daylight; do you know?

11 A. Yes.

12 Q. Okay. It wasn't the evening?

13 A. No.

14 Q. All right. And how many times do you think

15 you were in the guest unit where your brother Rio

16 was staying with Gavin and Star during your visit in

17 March 2003?

18 A. Once.

19 Q. Okay. Was that during daytime or nighttime,

20 do you think?

21 A. Nighttime.

22 Q. Okay. Was it your understanding that Rio

23 stayed in Gavin and Star's unit for two nights?

24 A. One night.

25 Q. One night, okay.

26 MR. ZONEN: I'm going to object to lack of

27 foundation, no personal knowledge.

1 Q. BY MR. MESEREAU: During your visit to
2 Neverland in March of 2003, did you know where Rio
3 spent his evenings?

4 A. With Gavin and Star. I didn't know where
5 they were going, but he stayed with Gavin and Star.

6 MR. ZONEN: I'll object as nonresponsive
7 beyond "yes" or "no." The question was "did you
8 know"; and lack of foundation.

9 THE COURT: Foundation, sustained.

10 Q. BY MR. MESEREAU: Do you know which guest
11 unit your brother Rio was staying in --

12 A. No.

13 Q. -- during 2003?

14 A. No.

15 Q. March, okay. Now, did you used -- did you
16 used to have meals with Davellin at Neverland during
17 your visit in March of 2003?

18 A. Yes.

19 Q. And where would you and Davellin eat your
20 meals?

21 A. In the kitchen.

22 Q. Okay. Do you remember ever eating meals
23 with Rio, Star or Gavin during your visit in March
24 of 2003?

25 A. No.

26 Q. Okay. Did you eat every meal in March of
27 2003 with Davellin?

1 Q. Okay. How many meals do you remember eating
2 with Davellin in March of 2003, if you know?

3 A. I don't remember.

4 Q. Okay. Now, how did you get to Neverland,
5 you and Rio, when you visited in March of 2003?

6 A. One of Michael's employees would bring us,
7 would come and pick us up.

8 Q. Okay. And did -- when you left, did one of
9 Michael's employees bring you home?

10 A. Yes.

11 Q. Okay. When you came to visit Neverland in
12 March of 2003, was it just you and Rio, or was
13 anyone else with you?

14 A. Just me and Rio.

15 Q. Okay. When you would visit Neverland in
16 2003, if you wanted to enter the main house, how
17 would you do it?

18 A. Through the back door.

19 Q. Okay. And would someone let you in?

20 A. Yes.

21 Q. Did you have to knock on the door to do
22 that?

23 A. Yes.

24 Q. And is that a door near the kitchen area?

25 A. Yes.

26 Q. All right. And do you remember entering
27 through the back door into the main house with

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1 A. Yes.

2 Q. Okay.

3 THE COURT: Do you want to stop at this
4 point?

5 MR. MESEREAU: Yes, Your Honor.

6 THE COURT: All right. We'll reconvene
7 tomorrow at 8:30.

8 (The proceedings adjourned at 2:30 p.m.)

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1 REPORTER'S CERTIFICATE

2

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4 THE PEOPLE OF THE STATE OF)

5 CALIFORNIA,)

6 Plaintiff,)

7 -vs-) No. 1133603

8 MICHAEL JOE JACKSON,)

9 Defendant.)

10

11

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

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

14 That the foregoing pages 10660 through 10844

15 contain a true and correct transcript of the

16 proceedings had in the within and above-entitled

17 matter as by me taken down in shorthand writing at

18 said proceedings on May 17, 2005, and thereafter

19 reduced to typewriting by computer-aided

20 transcription under my direction.

21 DATED: Santa Maria, California,

22 May 17, 2005.

23

24

25

26

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

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