

SUPERIOR COURT OF THE STATE OF CALIFORNIA
IN AND FOR THE COUNTY OF LOS ANGELES

WADE ROBSON, an individual,) CASE NO.: BC508502
)
) Plaintiff,)
)
) vs.)
)
) MJJ PRODUCTIONS, INC., a California,)
) corporation; MJJ VENTURES, INC., a)
) California corporation; and DOES 4-50,)
) inclusive,)
)
) Defendants.)
)

VIDEOTAPED DEPOSITION OF
GARY HEARNE
FRIDAY, SEPTEMBER 2, 2016
10:07 A.M.

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Plaintiff,)	
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MJJ PRODUCTIONS, INC., a California,)	
corporation; MJJ VENTURES, INC., a)	
California corporation; and DOES 4-50,)	
inclusive,)	
)	
Defendants.)	

The videotaped deposition of GARY HEARNE taken on behalf of the Plaintiffs, before Louann Thibert, CSR No. 8152 for the State of California, commencing at 10:07 a.m., on Friday, September 2, 2016 at Regus Business Center, Howard Hughes Center, 6080 Center Drive, 6th Floor, Los Angeles, California.

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LETTER	DESCRIPTION	PAGE
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1 FRIDAY, SEPTEMBER 2, 2016; 10:07 A.M.

2 LOS ANGELES, CALIFORNIA

3 -o0o-

4

5 THE VIDEOGRAPHER: Good morning. This is the
6 videotaped deposition of Gary Hearne taken at 6080 Center
7 Drive, Sixth Floor, in Los Angeles, California on Friday
8 September 2nd, 2016, in the matter of Wade Robson versus
9 MJJ Productions, Inc., Case Number BC508502. This case
10 is being heard in the Superior Court of the State of
11 California, in and for the county of Los Angeles.

12 My name is Raul Reyes with Dean Jones Attorney
13 Video Services of Los Angeles and Santa Ana, California.
14 This deposition is now commencing at 10:07 a.m.

10:07:32 15 Would all present please identify themselves
16 beginning with the witness.

17 THE WITNESS: Gary Hearne.

18 MR. STEINSAPIR: Jonathan Steinsapir of
19 Kinsella, Weitzman, Iser, Kump & Aldisert for the witness
10:07:43 20 and for the Defendants.

21 MS. MACISAAC: Suann MacIsaac for the
22 Defendant.

23 MR. SLATER: Matthew Slater of Gradstein &
24 Marzano for James Safechuck.

10:07:53 25 MR. CUNNY: Alex Cunny for Wade Robson.

10:07:55 1 MR. FINALDI: Vince Finaldi for Plaintiff Wade
2 Robson.

3 THE VIDEOGRAPHER: Would the court reporter
4 please now administer the oath.

10:08:13 5
6 GARY HEARNE,
7 CALLED AS A WITNESS BY AND ON BEHALF OF THE PLAINTIFFS,
8 AFTER BEING DULY SWORN, WAS EXAMINED AND TESTIFIED AS
9 FOLLOWS:

10:08:13 10
11 EXAMINATION

12
13 BY MR. FINALDI:

14 Q Good morning. Could you please state and --
10:08:14 15 spell and state your full name for the record.

16 A My full name is Gary David Hearne. That's
17 G-A-R-Y, D-A-V-I-D, H-E-A-R-N-E.

18 Q Have you ever had your deposition taken before?

19 A Yes.

10:08:36 20 Q How many times?

21 A I don't remember, but maybe five or six times.

22 Q All right. I wasn't at those depositions and I
23 don't know if you were informed of all the ground rules,
24 so I'm going to run through them really briefly to make
10:08:53 25 sure we're both on the same page. Okay.

10:08:55 1 To your right is a court reporter. She's
2 taking down, stenographically, everything being said here
3 today.

4 A Uh-huh.

10:09:01 5 Q So for that reason, it's important we get
6 audible responses. In ordinary conversation, we may
7 speak with nods of the head and answers like uh-huh and
8 huh-uh, but answers such as that would not translate well
9 into a written record. So if I try and remind you of
10:09:16 10 that from time to time, I'm not trying to be rude.

11 A Sure.

12 Q I'm just trying to make sure we get a clear
13 written record. We may also in ordinary conversation
14 speak at the same time. That would be perfectly
10:09:26 15 acceptable. If we do that today, it will make it very
16 difficult for the court reporter. So a good rule of
17 thumb is, if you let me finish my question, give it about
18 a second pause. It will give your attorney a chance to
19 object before if he would like, before you answer and
10:09:36 20 also give you a chance to think about the question before
21 you do provide an answer.

22 A Sure.

23 Q If you do provide an answer, I will assume that
24 you understood the question.

10:09:43 25 A Uh-huh.

10:09:43 1 Q So for that reason, if any of my questions are
2 vague or ambiguous or they don't make much sense, they're
3 confusing, let me know and I'll go ahead and rephrase the
4 question so we can get a response to the question that
10:09:55 5 I'm trying to ask. Sometimes I may ask bad questions and
6 I won't be offended. Okay?

7 A Okay.

8 Q There's refreshments here. There's a restroom
9 here. You can take a break at any time you would like.
10:10:05 10 The only thing I ask is if a question is pending, answer
11 the question, please, and then we can go ahead and take a
12 break. So if you need to take a break for any reason,
13 you are uncomfortable, any reason at all, let me know and
14 we can do that. Okay?

10:10:16 15 A Okay.

16 Q Is there any reason you believe you would not
17 be able to give your best and most truthful and accurate
18 testimony here today?

19 A No.

10:10:24 20 Q Okay. Have you ever been diagnosed with any
21 kind of memory problems?

22 A No.

23 Q Okay. Last admonition. Some of the things we
24 may be talking about might have happened two, four, five,
10:10:34 25 who knows, ten years ago.

10:10:37 1 A Uh-huh.

2 Q And the way ordinary human memory works, you
3 may not remember exact dates and times and that's
4 perfectly normal. In those instances, I am not entitled
10:10:45 5 to and I don't want any wild guesses that are not based
6 upon your only personal experience, your own personal
7 recollection.

8 A Uh-huh.

9 Q That being said, I am entitled to your best
10:10:55 10 estimate that is based upon your own personal experience.

11 A Uh-huh.

12 Q So to illustrate kind of the difference between
13 the two, because I could confuse them. If I was to ask
14 you the length of the table in front of you, because
10:11:03 15 you've personally experienced it, you can give me an
16 estimate of, whatever, 10 feet, 12 feet long.

17 A Uh-huh.

18 Q If I was to ask you the length of the table in
19 my office, because you've never been there, never
10:11:14 20 personally experienced it, that would be a pure guess
21 that's not based upon your own personal experience.

22 Do you understand the difference between a
23 guess and an estimate?

24 A Uh-huh.

10:11:22 25 Q Yes?

10:11:23 1 A Yes.

2 Q Okay. We'll go ahead and get started.

3 Can I get your date of birth, please.

4 A January 31st, 1949.

10:11:31 5 Q All right. And what's your address?

6 A 11523 Bradson Place, B-R-A-D-S-O-N, Place,

7 Number 3, Culver City, California 90230-5926.

8 Q How long have you lived there?

9 A I would guess about 20 years.

10:11:57 10 Q And prior to that address, did you live in

11 Marina Del Rey?

12 A No.

13 Q Where did you live?

14 A Culver City. Just a different location.

10:12:09 15 Q Okay. Have you ever lived in Marina Del Rey or

16 the --

17 A No.

18 Q Okay. Do you have any intention of moving

19 anytime in the next, say, two to three years?

10:12:22 20 A No.

21 Q Are you married?

22 A No.

23 Q Have you ever been married?

24 A No.

10:12:38 25 Q Do you live alone?

10:12:39 1 A Yes.

2 Q Alrighty. And it's my understanding you were
3 born in Texas; is that correct?

4 A Correct.

10:12:52 5 Q What year did you move to California?

6 A 19 -- 1991.

7 Q And what brought you out to California?

8 A A job offer.

9 Q Okay. Where were you living prior to that?

10:13:10 10 A East Texas.

11 Q Which city?

12 A Close to Henderson, Texas.

13 Q All right. Was that in your grandmother's
14 family home that you were living in?

10:13:22 15 A Yes.

16 Q Okay. So that was the first time, in 1991,
17 that you ever lived in California?

18 A No. When I was quite young, I lived in -- my
19 family lived in Mountain View, California.

10:13:43 20 Q Did they move there from Texas?

21 A I think it was actually from Virginia Beach.

22 Q What brought them to Mountain View?

23 A My father was in the service. We moved quite a
24 bit.

10:14:00 25 Q What branch?

10:14:01 1 A Navy.
2 Q Officer or enlisted?
3 A Officer.
4 Q All right. Have you ever been in the military?
10:14:09 5 A No, I haven't.
6 Q Do you have any siblings?
7 A Yes.
8 Q How many?
9 A Two.
10:14:17 10 Q What are their names?
11 A My sister's name is Smokey and my brother's
12 name is Mark.
13 Q Is Smokey a nickname?
14 A It started out that way, but she changed it.
10:14:33 15 Q S-M-O-K-E-Y?
16 A Correct.
17 Q What was her original name, her birth name?
18 A Gay, G-A-Y.
19 Q And what's her current last name?
10:14:43 20 A Duverne, D-U-V-E-R-N-E.
21 Q Does she still live in France?
22 A No.
23 Q At one point she did?
24 A Off and on, yes.
10:14:53 25 Q Where does she live now?

10:14:54 1 A Dallas. Actually, Trophy Club, Texas, which is
2 close to Dallas.

3 Q Okay. And your other sibling?

4 A He lives in Dallas.

10:15:08 5 Q Who is that?

6 A My brother Mark.

7 Q Mark.

8 A Uh-huh.

9 Q What's his last name?

10:15:11 10 A Hearne.

11 Q I would like to go briefly through your
12 educational history.

13 A Uh-huh.

14 Q You have a high school diploma, correct?

10:15:25 15 A Correct.

16 Q What year did you get that?

17 A 1967.

18 Q From where?

19 A From Meridian High School in Meridian,
10:15:36 20 Mississippi.

21 Q After that did you continue your education?

22 A Yes.

23 Q Where did you go next?

24 A Stephen F. Aust- -- oh, excuse me -- Meridian
10:15:46 25 Junior College for two years. They're in the same town.

10:15:50 1 Then, Stephen F. Austin State University in Nacogdoches,
2 Texas, where I received my undergraduate degree as well
3 as two graduate degrees.

4 Q Okay. Starting with the junior college, did
10:16:05 5 you receive any degree from there?

6 A Associate of arts.

7 Q What year?

8 A 1969.

9 Q Okay. And you continued your education. Did
10:16:16 10 you receive a bachelor's degree?

11 A Yes.

12 Q Of arts or science?

13 A Arts.

14 Q In art?

10:16:22 15 A Yes.

16 Q What year?

17 A 1971.

18 Q Alrighty. And you got a master's degree as
19 well, right?

10:16:30 20 A Correct.

21 Q What year did you get that?

22 A Let's see. It would have probably been about
23 1974. And then I received a Master of Fine Arts Degree
24 in 1976.

10:16:58 25 Q You have two masters?

10:16:59 1 A Yes.

2 Q Okay. So the Masters in Fine Arts was '76?

3 A Uh-huh.

4 Q And what was the master's in 1974?

10:17:09 5 A It was in art.

6 Q Okay. Any particular medium that you --

7 A My degree was in drawing, painting and

8 sculpture.

9 Q Okay. Have we covered your formal education?

10:17:27 10 A Yes.

11 Q Okay. And those were all at the Fairbanks

12 University there in Nacogdoches, right?

13 A No. Stephen F. Austin.

14 Q Stephen Austin?

10:17:37 15 A Yeah. Stephen F. Austin State University in

16 Nacogdoches, Texas.

17 Q Okay.

18 A That's N-A-C-O-G-D-O-C-H-E-S.

19 Q While you were in college in the '70s, what did

10:17:52 20 you do to support yourself?

21 A The undergraduate, my parents paid for that.

22 And in graduate school, I received a teaching

23 assistantship as well as -- which covered part of my

24 expenses. And I was also an instructor and still am for

10:18:23 25 the transcendental meditation program and I taught

10:18:28 1 courses on the weekend and supported myself that way as
2 well.

3 Q Tell me about how you came into that
4 transcendental meditation practice or what was your first
10:18:43 5 experience with that?

6 A It was -- actually, I learned right in the
7 latter part of my undergraduate education. The
8 organization that teaches transcendental meditation was
9 giving a series of courses there and I happened to see a
10:19:02 10 poster about it and it caught my interest.

11 And I attended and eventually took one of the
12 courses to learn to meditate shortly before I graduated
13 from undergraduate school. I was very pleased with the
14 benefits that I received and continue to receive from it.
10:19:21 15 And that prompted me to go to a teacher training course
16 which was in 1973.

17 Q And which -- what's the name of the
18 organization that provided training?

19 A It was -- well, it's a large organization and
10:19:42 20 there are various branches that -- different outreach
21 programs.

22 Q What's the overarching organization?

23 A You know, at that time, I think it was called
24 the World Plan Executive Counsel. Although, my
10:19:56 25 organization that I was teaching in was the -- at that

10:20:00 1 time, the Students International Meditation Society.

2 Q And is there a particular yogi or someone that
3 was --

4 A Yes.

10:20:09 5 Q -- the head of it or something?

6 A Yes. It was found -- the transcendental
7 meditation or TM, as it's called, movement was founded by
8 Maharishi Mahesh Yogi. It represented what's called the
9 Vedic tradition from India, who, at that time, was
10 holding courses to training teachers in transcendental
11 meditation.

12 Q Okay. And so after your graduation --
13 actually, did you receive some kind of degree or
14 certificate in '73 when you finished that teacher
15 training?

10:20:50 16 A Actually, not a paper degree, but I was
17 definitely -- there's a definite certification process
18 that one goes through. And I worked under the auspices
19 of the organization and so had there been any question
10:21:10 20 about my certification, a person could have checked with
21 the organization.

22 Q And so you worked for the organization after
23 that for a while?

24 A I taught courses in transcendental meditation
10:21:22 25 while I was in school -- in graduate school and then

10:21:29 1 actually did work for the organization for a period of
2 time after I received my -- my graduate degrees.

3 Q Where did you work for the organization? Did
4 you go to a --

10:21:46 5 A Well, first, in the northeast Texas area
6 teaching transcendental meditation. Then I worked
7 actually with an affiliate organization, a university in
8 Iowa called Maharishi International University, it was
9 called at that time, which offered degreed programs in
10:22:17 10 all of the standard curricula and I was a member of the
11 art faculty there for about four years.

12 After which I worked in various locations
13 teaching transcendental meditation doing various
14 administrative duties for the organization in various
10:22:40 15 parts of the world; El Salvador, Sri Lanka, the
16 Philippines, India. Various parts of the United States;
17 Fairfield, Iowa; Baltimore, and so forth.

18 Q What period of time was this that you were
19 traveling to these places between '73 and when? El
10:23:06 20 Salvador, Sri Lanka?

21 A Let's see. It would have been -- I finished my
22 degrees in '73. No. Excuse me. At '73 was when I went
23 to the teacher training course. And I finished my MFA in
24 '76. And it was a period of about 1977 through 19-- --
10:23:45 25 1988 or so. 10 or 11 years.

10:23:50 1 Q Okay.

2 A Uh-huh.

3 Q And I would assume -- I've never gone through
4 the training or done it myself -- but I would assume that
10:23:55 5 one of the things you learn -- what are some of the --
6 obviously, there's some benefits to that type of
7 meditation, correct?

8 A Yes.

9 Q And it can help with a number of different
10:24:06 10 types of ailments that people suffer from, correct?

11 A According to a lot of research that's been done
12 on parameters of the physiology, it seems to have a very
13 beneficial effect for situations like hypertension,
14 various anxiety-related maladies --

10:24:27 15 Q Have you --

16 A -- and so forth.

17 Q Have you learned that sometimes people use it
18 if they're trying to get over certain things like
19 alcoholism or something like that?

10:24:35 20 A Yes. Yes. It's had some application in that
21 way, too.

22 Q How about people who are trying to heal from
23 other types of mental wounds, such as, you know, battered
24 spouse syndrome or, you know, someone who came back from
10:24:52 25 war or something like that?

10:24:53 1 A Uh-huh.

2 Q Were you taught those types of things as well?

3 A Well, it -- just currently, there are a number
4 of programs that are in -- sponsored by the government
10:25:05 5 for treatment of PTSD, particularly, for veterans that
6 are coming back from war situations and it seems to have
7 a very beneficial effect.

8 Q How about at the time, though -- at the time
9 you're receiving your training and you're teaching, this
10:25:19 10 is back in the '70s through the early -- through the late
11 '80s, were you teaching or were you taught that one of
12 the ways that you can use this type of meditation is to
13 help from -- you know, help things like that?

14 A Yeah. Yes. Of course back then, terms like
10:25:39 15 PTSD were not going around.

16 Q Correct. Not as much.

17 A But, yes, basically what the technique does is
18 provide a very deep state of rest for the body, different
19 from deep sleep, as well as an alert state of mind as
10:25:55 20 measured by coherence in brain waves and so forth.

21 Q How about abuse? Did that ever come up, child
22 abuse, physical or sexual, ever come up as, you know,
23 meditation can be used as one of the ways to help, you
24 know, from that?

10:26:11 25 A I don't recall it ever being mentioned in that

10:26:13 1 context, but the idea was -- what happens is that stress
2 is released from the nervous system. We think of stress
3 oftentimes as a mental phenomenon, but it has a
4 physiological correlate in the nervous system. And
10:26:28 5 through this type of rest, sometimes referred to as a
6 fourth state of consciousness, through transcendental
7 meditation, basically, what happens is stress is
8 dissolved from the nervous system while the mind
9 awareness is -- experiences really an expanded state.

10:26:48 10 And so it's such a basic effect that it has in
11 a beneficial way on one's personality that really any
12 kind of situation in life that might cause stress is
13 going to be -- the situation's not going to be changed,
14 but the physiological effect of that situation is going
10:27:04 15 to be mitigated by this twice daily experience of
16 transcendental meditation. So -- so one could
17 extrapolate from that that it could have a beneficial
18 effect in those kinds of situations that you mentioned.

19 Q Did any of the people you have ever taught --
10:27:23 20 did the issue of sexual abuse ever come up during any of
21 those trainings in any of the places -- El Salvador, Sri
22 Lanka, Philippines, India, the U.S., Baltimore -- did
23 that issue ever come up, I'm a survivor and this is
24 helping me?

10:27:37 25 A Yeah, yeah. You know, I doubt it. Of course,

10:27:44 1 you know, teaching many, many people over those years, I
2 heard some of the life situations from them. I think I
3 would have remembered it if something like that came up.

4 Q When is the first time you ever heard about
10:28:01 5 child sexual abuse?

6 MR. STEINSAPIR: Objection; vague. Go ahead.

7 THE WITNESS: Yeah. Well, I mean, you know,
8 it's hard to -- who knows? I mean, I -- how many of us
9 can remember the first time we heard the word "sexual
10:28:17 10 abuse"? I don't know.

11 BY MR. FINALDI:

12 Q What's your first memories of ever hearing or
13 learning of the issue?

14 MR. STEINSAPIR: That assumes facts.

10:28:27 15 THE WITNESS: Yeah. I -- like I say, I have no
16 memory. It's just one of those things that I think
17 everyone has heard about.

18 MR. FINALDI: Okay.

19 THE WITNESS: I don't know how many people
10:28:38 20 would remember the first time they actually heard the
21 phrase.

22 BY MR. FINALDI:

23 Q Do you think it's something you had heard about
24 before you went to work for the Jackson organization?

10:28:47 25 MR. STEINSAPIR: Objection; assumes facts. It

10:28:48 1 is also vague. What's the Jackson organization?

2 THE WITNESS: Yeah. Yeah.

3 MR. FINALDI: You can answer.

4 THE WITNESS: I'll defer to his objection, if
10:28:55 5 it's okay.

6 MR. STEINSAPIR: You can answer if you feel
7 that you understand what he's saying -- what he's saying
8 is correct.

9 MR. FINALDI: Just so you know, the objections
10:29:00 10 are just legal objections --

11 THE WITNESS: Sure.

12 MR. FINALDI: -- for the record to --

13 THE WITNESS: Yeah. Uh-huh.

14 MR. FINALDI: Hang on. Let me finish.

10:29:05 15 THE WITNESS: Okay.

16 MR. FINALDI: -- to be ruled upon, perhaps, by
17 a judge at a later point in time --

18 THE WITNESS: Yes.

19 MR. FINALDI: -- unless you're instructed not
10:29:14 20 to answer.

21 THE WITNESS: Okay.

22 BY MR. FINALDI:

23 Q So how old were you when you began working for
24 the Jackson organization?

10:29:18 25 MR. STEINSAPIR: Same objections.

10:29:20 1 THE WITNESS: I was -- would have been 42.

2 BY MR. FINALDI:

3 Q All right. And as a 42-year-old man, do you
4 think you had already known about the concept of child
10:29:35 5 sexual abuse?

6 A Yes.

7 Q That some kids had been abused?

8 A Sure.

9 Q Have you ever had any formal training in the
10:29:44 10 area of childhood sexual abuse?

11 A No, no.

12 Q To this day?

13 A To this day, yes.

14 Q Never? Okay.

10:29:49 15 A Never. No. And maybe just for the sake of
16 clarity, I'll add that -- that in case, you know, one
17 might think in relation to my position as a teacher of
18 transcendental meditation that I learn all about these
19 different kinds of situations that affect people's lives.

10:30:14 20 No. Because the -- as a teacher of TM, we are simply
21 trained to teach that technique which is actually very
22 simple to learn.

23 Q And people use it for whatever ails them?

24 A Well, they simply do it. And it's not
10:30:27 25 something that is specifically applied to any one

10:30:30 1 situation or another.

2 Q Okay.

3 A Much like when you water the roots of a plant,
4 you just attend to the root of it.

10:30:37 5 Q Okay.

6 A And then everything else will flourish in some
7 way and you don't worry about this flower or that leaf or
8 whatever.

9 Q So is it -- is it a true statement that in your
10 entire life up 'til now, you've never had any type of
11 formal training or education, whether it be through a
12 seminar or just a class --

13 A Uh-huh.

14 Q -- or a weekend course --

10:30:58 15 A Uh-huh.

16 Q -- or just sit down on childhood sexual abuse;
17 is that true?

18 A No. That's true. I have not had such
19 training.

10:31:05 20 Q Alrighty. Now, when I say the Jackson
21 organization, what -- you know who Michael Jackson, the
22 now-deceased entertainer is, correct?

23 A Yes.

24 Q Okay. And you worked for him at one point in
10:31:19 25 time; is that true?

10:31:20 1 A Yes.

2 Q You worked for one of his companies, right?

3 A Worked for him under the auspices of one of his

4 companies, yes.

10:31:26 5 Q And what was the name of that company?

6 A MJJ Productions.

7 Q MJJ Productions, Inc., correct?

8 A I think it may have had "Inc." on it, yeah.

9 Q Okay.

10:31:38 10 A I --

11 Q And just --

12 MR. STEINSAPIR: Were you going to say --

13 THE WITNESS: No. Just, you know, I understand

14 the situation where I'm not supposed to suppose, so I

10:31:48 15 just don't -- we always referred to it as MJJ

16 Productions.

17 MR. FINALDI: Okay. Yeah. That's fine.

18 THE WITNESS: Yeah.

19 BY MR. FINALDI:

10:31:55 20 Q And if I cut you off on accident, please let me

21 know.

22 A Okay.

23 Q Sometimes I'm --

24 A Likewise.

10:32:01 25 Q Okay. So -- but you did receive -- so you

10:32:04 1 worked for pay for the company, MJJ Productions?
2 A Correct.
3 Q And when you received your pay, how did you
4 receive your pay?
10:32:12 5 A A weekly check.
6 Q Okay. It was a hard check?
7 A Yes.
8 Q And you understood that the check came from MJJ
9 Productions?
10:32:19 10 A Yes.
11 Q Would you have that mailed to you or would you
12 pick it up or would it be delivered to you?
13 A It was -- I picked it up.
14 Q Where would you pick it up?
10:32:29 15 A At the MJJ offices.
16 Q And was that on Wilshire?
17 A Yes, it was.
18 Q Do you remember the address?
19 A 10960 Wilshire Boulevard.
10:32:41 20 Q Kind of by UCLA?
21 A Yes.
22 Q And which floor? Do you remember?
23 A I believe it was the 22nd floor.
24 Q Alrighty. Do you remember when you were first
10:32:56 25 hired, what your first day of work was?

10:33:00 1 A Actually, I think I do. I think it was
2 October -- the actual official first day of work was -- I
3 think it was October 10th, 1991.

4 Q Okay. Have we covered your entire educational
10:33:17 5 history?

6 A Yes.

7 Q Okay. I'd like to go through your employment
8 history.

9 A Okay.

10:33:23 10 Q So in high school, for example, did you have a
11 job?

12 A In high school, I earned money as a musician.

13 Q What instrument do you play?

14 A Mostly guitar.

10:33:38 15 Q All right. Any type of music in particular?

16 A Rock 'n Roll.

17 Q Alrighty. How about during college? You
18 talked a little bit about your teacher --

19 A Uh-huh.

10:33:50 20 Q -- work?

21 A Yes.

22 Q Both as a student teacher in the college,
23 right?

24 A Uh-huh.

10:33:55 25 Q Fine arts programs?

10:33:56 1 A Yes. Teaching assistant.
2 Q Okay. And also the transcendental meditation?
3 A Uh-huh.
4 Q Did you have any other kind of jobs in college?
10:34:04 5 A I did a little bit of playing in bands. Made a
6 little bit of money that way, not very much.
7 Q Rock 'n Roll bands?
8 A Yes.
9 Q Alrighty. So any other jobs during that point
10:34:14 10 in time?
11 A No.
12 Q Okay. Then you became the transcendental
13 meditation teacher traveling through the world, correct?
14 A Yes.
10:34:23 15 Q Alrighty.
16 A At some -- over a period of time.
17 Q Okay. That took you all the way up to 1988.
18 So between '88 and '91, what did you do for a living?
19 A Well, actually, now that you mention it,
10:34:38 20 through 1989, I was also employed by an organization
21 which was connected with the transcendental mediation
22 program. Although a few minutes ago, I didn't make that
23 connection.
24 It was called the -- from 1989 through 1991, I
10:35:06 25 was -- I worked for the -- what was called the Maharishi

10:35:10 1 Ayurveda Health Center, which was in Lancaster,
2 Massachusetts.

3 Q And what did you do there?

4 A I was the chef. I started out actually
10:35:37 5 assisting the chef there and then he left and I became
6 the chef.

7 Q How long were you the chef?

8 A For about -- over a year. And then after that
9 I transitioned to working in what was called guest
10:35:56 10 services.

11 Q How long did you work under -- as an understudy
12 for the chef?

13 A It would have been, roughly, I would say, maybe
14 eight or nine months.

10:36:14 15 Q And no formal training ever as a chef?

16 A No.

17 Q Was that as a vegetarian and other food or was
18 it a special type of diet?

19 A It was vegetarian.

10:36:27 20 Q Okay. It was vegetarian?

21 A Uh-huh.

22 Q Were you a vegetarian at the time?

23 A Yes.

24 Q And -- okay. What's the reason why you moved
10:36:38 25 to guest services from being a chef?

10:36:40 1 A Well, basically, I was ready for a change. And
2 while I was a chef, I organized the kitchen in such a way
3 that the menu for each day and the whole menu for, like,
4 a two-week period was set. And I made sure that all of
10:37:04 5 the people who worked in the kitchen knew how to do --
6 make all the dishes correctly to everybody's satisfaction
7 and then I felt like my job was done and I was invited to
8 come work in guest services.

9 Q **And what did you do in guest services?**

10:37:25 10 A Basically, I was something of a liaison between
11 the guests who came there and the administration of the
12 health center.

13 Q **Liaison in what respect?**

14 A Well, if they had any problem with their room
10:37:44 15 or something like that, I would make sure that it all got
16 worked out.

17 Q **How long did you have that job?**

18 A Probably around a year, maybe a little less.

19 Q **Alrighty. And did you transition directly from**
10:38:01 20 **that position to working for Michael Jackson's company?**

21 A No, no. I left the health center. They asked
22 me to stay, but I had an opportunity to do what I had
23 been wanting to do for a long time which is painting.
24 And I was -- basically, over time I was kind of
10:38:23 25 transitioning myself out of there and I told everybody

10:38:27 1 I'll be leaving in time. So that's what I did.

2 Q Do you still stay in contact with that place?

3 A No. No, I don't.

4 Q Did you stay in contact at all after you left?

10:38:40 5 A Oh, yeah. Yeah.

6 Q And so you went back to Texas to try and pursue
7 being a painter for a living?

8 A Correct.

9 Q Okay. How long did that last?

10:38:52 10 A Not very long.

11 Q For what reason?

12 A Well, while I had been saving money, I was not
13 comfortable with not having an income, but I -- I moved
14 to what used to be my grandmother's house. And it was a
10:39:12 15 wonderful situation, but I -- after a short while, I
16 received the job offer to come to California to work for
17 Michael Jackson.

18 Q Okay.

19 A And I think it was what prompted me to follow
10:39:28 20 through and check that out was the idea of, well, I'll
21 save some more money and maybe do this two or three years
22 and then go back to painting.

23 Q Okay. And how long did you work for that
24 company, MJJ Productions?

10:39:48 25 A 15 years.

10:39:51 1 Q So you worked there -- do you remember when
2 your last day of work was?

3 A It was in August of 2006 was when I was finally
4 terminated from that company.

10:40:06 5 Q So you didn't leave voluntarily?

6 A No. And I will say that was not my last day of
7 work because my last day of actual work was a good bit
8 before that. I sort of expected that -- that my job
9 would run out because there -- the duties that I
10:40:29 10 originally had had been taken over by others and then --
11 I'm sort of jumping ahead of the story. If you want to
12 go through --

13 Q Go ahead.

14 A -- through the whole history of it. But I --
10:40:44 15 the latter part of my employment with MJJ Productions was
16 to oversee a couple of warehouses full of Mr. Jackson's
17 belongings and I was in the process of cataloging those
18 and so forth.

19 And then they all got moved, all of that got
10:41:06 20 moved out to another location and I was no longer working
21 directly with Mr. Jackson. So I was more or less
22 instructed to just wait, which I did. But there was --
23 there was nothing left to do.

24 Q Okay. I'm going to mark as Exhibit A for the
10:41:28 25 record the Amended Notice of Deposition of Mr. Hearne.

10:41:30 1 I've shown it to counsel. I've got a check here.
2 A Uh-huh.
3 Q It's in the amount of \$36.60. In California,
4 you're entitled to a witness fee and also mileage.
10:41:40 5 That's calculated on where your residence is. So that's
6 for you.
7 A Thank you.
8 Q Did you read any documents or materials in
9 preparation for your deposition here today?
10:41:51 10 A No.
11 Q Didn't read a single thing?
12 MR. STEINSAPIR: Asked and answered.
13 THE WITNESS: Yeah. That's correct. No, I
14 didn't.
10:42:00 15 BY MR. FINALDI:
16 Q Okay. Have you ever --
17 A Aside from the subpoena that, you know --
18 Q Okay.
19 A -- I got from you.
10:42:04 20 Q Have you ever read any of your former
21 depositions?
22 A Never thoroughly.
23 Q Well, how about in a cursory manner?
24 A Just -- yeah, a few -- way back in the past.
10:42:16 25 Q Okay. When is the last time you read through

10:42:18 1 those?
2 A I don't remember.
3 Q What's your best estimate?
4 A 15 years --
10:42:35 5 Q Alrighty.
6 A -- maybe 12.
7 Q Do you still have copies of those?
8 A I'm not certain.
9 Q At one point in time you did, correct?
10:42:44 10 A Yes.
11 Q You don't remember getting rid of them?
12 A No.
13 Q Without you revealing what was discussed, who
14 did you speak with in preparation for your deposition
10:42:56 15 here today?
16 MR. STEINSAPIR: Assumes facts. Go ahead.
17 THE WITNESS: The -- Misters -- Jonathan here
18 and --
19 MS. MACISAAC: Suann.
10:43:05 20 THE WITNESS: Suann.
21 BY MR. FINALDI:
22 Q Okay. You were served with a deposition
23 subpoena in this case, correct?
24 A Yes.
10:43:14 25 Q You were served at your home over the weekend?

10:43:16 1 A Yes.

2 Q Okay. And after you were served, did you
3 contact someone about it?

4 A Well, I did mention it to someone that I speak
10:43:31 5 with regularly.

6 Q Who did you mention it to?

7 A A lady named Evvy Tavasci.

8 Q And do you know who she works for?

9 A My understanding is that she works for the
10:43:50 10 Michael Jackson Estate.

11 Q You said you speak with her regularly?

12 A Yes.

13 Q Do you meet with her for lunch or anything like
14 that or just talk over the phone?

10:44:09 15 A Mostly just talk over the phone.

16 Q Is it because you're friends?

17 A Yes.

18 Q Okay. Do you know her phone number?

19 A Yes.

10:44:19 20 Q What is it?

21 MR. STEINSAPIR: You can contact her through
22 me.

23 MR. FINALDI: I'd like a phone number.

24 MR. STEINSAPIR: I'll instruct the witness not
10:44:25 25 to answer to protect her privacy. So you can contact her

10:44:29 1 through me.

2 MR. FINALDI: Are you authorized to accept a
3 subpoena on her behalf?

4 MR. STEINSAPIR: I absolutely am.

10:44:35 5 MR. FINALDI: Okay. We'll do that.

6 BY MR. FINALDI:

7 Q What did you tell Evvy over the phone?

8 A I just mentioned that I had gotten a subpoena
9 relating to Wade Robson.

10:44:48 10 Q Do you know who Wade Robson is?

11 A Yes.

12 Q You knew when you read the subpoena?

13 A Yes.

14 Q And what's your understanding of who he is?

10:44:56 15 A Well, he is a -- well, he was a friend of Mr.
16 Jackson's and I knew that he was a dancer and he lives --
17 he lived with his mother in this country. I think -- I
18 think she was from Australia or maybe they both were.
19 Although, I remember she had an accent, I don't recall
10:45:26 20 that with Wade. And I was with them on various
21 occasions.

22 Q Did you like Wade?

23 A Yeah.

24 Q What did you like about him?

10:45:44 25 MR. FINALDI: Why are you laughing?

10:45:45 1 MR. STEINSAPIR: Because it's a funny question.

2 MR. FINALDI: All right. Well, if you can
3 please not laugh during the deposition.

4 MR. STEINSAPIR: Counsel, just ask your
10:45:51 5 questions, please.

6 MR. FINALDI: It's disrespectful.

7 MR. STEINSAPIR: I know you're going to teach
8 me the hard way. So, go ahead.

9 MR. FINALDI: It's disrespectful.

10:45:56 10 MR. STEINSAPIR: Coming from you that's --

11 MR. FINALDI: Now you're both laughing. And I
12 don't see anything funny about this so --

13 MR. STEINSAPIR: Okay.

14 BY MR. FINALDI:

10:46:02 15 Q What -- what did you like about --

16 MR. STEINSAPIR: The question is vague.

17 MR. FINALDI: Well, let me finish the question,
18 please.

19 BY MR. FINALDI:

10:46:08 20 Q What did you like about Wade Robson?

21 MR. STEINSAPIR: The question is vague.

22 MR. FINALDI: Go ahead and answer.

23 THE WITNESS: Well, he seemed like a good kid.
24 I admired him for his talent. And I don't remember too

10:46:26 25 much else about him that would give me any further

10:46:34 1 grounds for a more elaborate description.

2 BY MR. FINALDI:

3 Q You drove him in your -- in Mr. Jackson's
4 limousine or other vehicles on several occasions?

10:46:44 5 A Other -- yes. Various vehicles.

6 Q Okay. And was he polite and respectful during
7 those trips?

8 A Yes. Uh-huh.

9 Q Okay. Were there other individuals that you
10:46:55 10 drove for Mr. Jackson throughout the years that may have
11 not been polite and respectful?

12 A Yeah. Sure.

13 Q He wasn't one of them?

14 A Wasn't one --

10:47:08 15 Q Wade wasn't one of them, correct?

16 A "Them" being the ones who were not polite?

17 Q Disrespectful.

18 A No, no. Wade was not.

19 Q Okay. And his mother same answer?

10:47:18 20 A Yeah. She was -- she was polite.

21 Q Okay. Now, before you got served with the
22 subpoena, did you know that Wade had filed a lawsuit?

23 A No. It seems like I had heard something that
24 this was a long time ago before that, something about
10:47:42 25 that but never heard any more about it.

10:47:45 1 Q Do you know where you heard that from?

2 A It may have been from Evvy Tavasci.

3 Q What did she say?

4 A I can't remember other than the fact that
10:47:52 5 Wade -- it looked like he was mounting a case.

6 Q Do you know what for?

7 A For child abuse, child -- yeah.

8 Q Child abuse. Physical abuse, sexual abuse,
9 emotional abuse?

10:48:11 10 A That -- that's -- I don't remember more
11 specifics than that about the time that I heard about it.

12 Q Gotcha.

13 A Uh-huh.

14 Q Do you have any opinion about that, about his
10:48:20 15 claim?

16 A Well -- yeah. Yeah, I do. I -- as I did when
17 the two other cases arose in the past. And do you want
18 to hear my opinion?

19 Q Yeah. Sure.

10:48:45 20 A Okay. Well, in the -- hearing news of, you
21 know, a case against Michael Jackson for child sexual
22 abuse has always ran counter to my impression of
23 Mr. Jackson from being with him for such long periods of
24 time, both on a daily basis and a weekly and monthly
10:49:15 25 basis and, you know, being very close, working very

10:49:22 1 closely with him. It seemed in contradistinction to the
2 impression I had of Mr. Jackson.

3 Q You weren't a child at the time you worked with
4 him, correct?

10:49:33 5 A No.

6 Q Did you ever spend time in his bedroom?

7 A Yes.

8 Q Behind closed doors?

9 A Yeah.

10:49:39 10 Q Behind closed doors? How often?

11 A Well, you mean, literally, was the door closed
12 or not?

13 Q Yes.

14 A I didn't ever pay attention to the door, but I
10:49:50 15 assume at times the doors may have been closed.

16 Q How often would you spend time with Mr. Jackson
17 in his bedroom?

18 A Well, it would depend on what the situation
19 was. A regular example of that would be when we -- when
10:50:09 20 I would drive Mr. Jackson to his ranch, his Neverland
21 Valley Ranch and he would usually have some bags and some
22 things that he had bought while shopping and I was
23 usually the one who would carry those things into his
24 room from the car.

10:50:30 25 Q Okay. And so --

10:50:32 1 MR. STEINSAPIR: Were you done? Were you done?

2 THE WITNESS: And then quite a bit of
3 Mr. Jackson's time was also -- particularly, after about
4 1993 or '94, a lot of his time, when he was in the Los
10:50:49 5 Angeles area, was spent in hotels and I was very
6 frequently in his hotel suite.

7 BY MR. FINALDI:

8 Q Okay. When you would carry his bags, et
9 cetera, into Neverland, his bedroom there --

10:51:02 10 A Uh-huh.

11 Q Yes? -- were there alarms in the hall leading
12 to his bedroom?

13 A I don't recall any.

14 Q Were there locks on his door?

10:51:12 15 A Yes. Uh-huh.

16 Q All right. Several people have mentioned
17 through the years and I think he actually admitted
18 himself that there were audible alarms that would go off
19 if someone was in the hallway leading to his bedroom.

10:51:31 20 A Uh-huh.

21 Q Does that ring a bell?

22 A There could have been. I don't remember it
23 specifically.

24 Q Okay. Did you ever see any children's clothes
10:51:43 25 in his bedroom?

10:51:45 1 A Well, he -- I don't remember seeing any, no.

2 Q How about children's toys?

3 MR. STEINSAPIR: Vague as to time.

4 THE WITNESS: There were toys, yes.

10:52:02 5 BY MR. FINALDI:

6 Q How about photos of children?

7 A I remember seeing in the ranch photos of
8 children, yes.

9 Q Children who were not in his family, correct?

10:52:17 10 A Some were in his family. Some were friends of
11 his that I had met myself. He had -- he had a huge
12 piano, a Berndorf, that the whole top of it was covered
13 with photographs, you know, in frames, portrait style of
14 children, of grown-ups, of people that were in his life.

10:52:50 15 Q Alrighty. Getting back to Evvy.

16 So you told Evvy that you got served with a
17 subpoena, correct, and what did she say?

18 A She suggested that I inform Karen Langford who
19 works for Michael's estate.

10:53:13 20 Q And did you do that?

21 A No.

22 Q Why not?

23 A I had in mind to do it and I was just busy the
24 following Monday. I received the subpoena on Sunday.

10:53:25 25 Q Okay.

10:53:25 1 A And I intended to do it but, in the meantime, I
2 was contacted by Mr. Steinsapir here and so I didn't
3 follow through with connecting with Karen.

4 Q Is he your attorney here today?

10:53:41 5 A Yes.

6 Q Are you paying him?

7 MR. STEINSAPIR: I'm going to instruct you not
8 to answer that question. Terms of retention are
9 confidential under California law.

10:53:49 10 MR. FINALDI: Well, the fact of whether he's
11 paid you or not or is going to is not confidential.

12 MR. STEINSAPIR: I've made my instruction.
13 BY MR. FINALDI:

14 Q Have you paid him anything?

10:53:57 15 MR. STEINSAPIR: I just instructed him not to
16 answer the question. Move on.

17 BY MR. FINALDI:

18 Q Have -- has there been an agreement where you
19 don't have to pay him?

10:54:07 20 MR. STEINSAPIR: I'm going to instruct the
21 witness not to answer that question.

22 BY MR. FINALDI:

23 Q You don't currently work for any Michael
24 Jackson companies --

10:54:16 25 A No.

10:54:16 1 Q -- or organizations, correct?

2 A No. Correct.

3 Q When you left the organization, when you were
4 terminated, were you given any kind of a severance or
10:54:24 5 separation?

6 A No.

7 Q So you never signed any kind of severance
8 agreement?

9 A No.

10:54:44 10 Q And did you meet with Mr. Steinsapir?

11 MR. STEINSAPIR: Yes or no.

12 THE WITNESS: Yes.

13 BY MR. FINALDI:

14 Q When is the first time you met with him?

10:54:58 15 A Would have been -- let's see. It was recently.

16 MR. STEINSAPIR: It was Monday.

17 THE WITNESS: Monday. Monday. Yeah.

18 BY MR. FINALDI:

19 Q And that was the first time you ever met him?

10:55:11 20 A Correct.

21 Q And that's the only time you ever met him in
22 person prior to today?

23 A Yes.

24 Q And that meeting was at his office in Santa
10:55:22 25 Monica?

10:55:23 1 A Yes.

2 Q And was anyone there besides him and --

3 A Suann.

4 Q Just the three of you?

10:55:34 5 A Yes. Yes, that's correct.

6 Q Alrighty. So getting back to those

7 depositions, you said you gave deposition testimony five

8 times. In which cases were those; do you know?

9 A The first case was the -- what's referred to as

10:55:57 10 the Chandler case.

11 Q Did you testify truthfully --

12 A Yes.

13 Q -- in that case?

14 A Yes.

10:56:04 15 Q Okay. Second time?

16 A Second time, I -- you know, I don't remember

17 the sequence, but I -- at one point I testified in the --

18 a case involving a Maureen Dougherty.

19 Q Okay. And what was your understanding that

10:56:37 20 case was about?

21 A She was attempting to sue MJJ Productions

22 because she had some -- she felt that she was not treated

23 well in her work situation.

24 Q Okay. Next one?

10:57:00 25 A It would have been a case involving an Ali

10:57:03 1 Soltani.

2 Q Against Mr. Jackson?

3 A Yes.

4 Q And what was that case involving?

10:57:13 5 A He was a merchant in Beverly Hills and
6 Mr. Jackson was a frequent customer. And he had given
7 Mr. Jackson -- excuse me -- given him use of a very
8 expensive watch for Mr. Jackson to try out to see if he
9 wanted to purchase it. And Mr. Jackson had the watch for
10:57:44 10 what he felt -- what Mr. Soltani felt was an undue amount
11 of time and Mr. Jackson was tardy in returning the watch.
12 And so he decided -- Mr. Soltani decided to take legal
13 action.

14 Q Do you know how long he had the watch?

10:58:04 15 A I don't remember.

16 Q What's your best estimate?

17 A It was several months.

18 Q Okay. Next case?

19 A Let's see -- you know, I may have misestimated
10:58:27 20 the number of depositions I've done. I might have mixed
21 in with that a couple of visits -- a couple of
22 testimonial periods before a grand jury, which was also
23 the Chandler case. And I can't think of other
24 depositions.

10:58:51 25 Q Okay. There were a couple different

10:58:53 1 depositions in Chandler?

2 A It seems like maybe one of them was actually
3 officially one deposition, but it may have taken place
4 over more than one day.

10:59:02 5 Q Okay. Have you ever been convicted of a
6 felony?

7 A No.

8 Q Ever been charged with a felony?

9 A No.

10:59:08 10 Q Ever been charged or convicted of any kind of
11 crime involving moral turpitude, ethical types of issues,
12 dishonesty, anything like that?

13 A Convicted of a crime?

14 Q Charged --

10:59:21 15 A Charged.

16 Q -- or convicted. Any crime, whatsoever, even
17 if it's not a felony involving deceit, dishonesty,
18 anything like that?

19 A No.

10:59:30 20 Q Those are standard questions I ask everyone --

21 A Yeah.

22 Q -- so please don't be offended.

23 A Oh, no.

24 Q Other than Mr. Steinsapir and his partner, did
10:59:44 25 you speak with anyone else in preparation for your

10:59:47 1 deposition?

2 A No.

3 Q Okay.

4 A Other than a man in Huntington Beach that I
10:59:53 5 ordinarily do work for through the day.

6 Q Who's that?

7 A Dr. David Baum. I needed to inform him simply
8 because I ordinarily would be down in Huntington Beach
9 today.

11:00:11 10 Q What kind of doctor is he?

11 A He's an M.D., internal medicine.

12 Q All right. After you left the Michael Jackson
13 company --

14 A Uh-huh.

11:00:24 15 Q -- MJJ Productions, did you continue working
16 somewhere?

17 A Uh-huh.

18 Q Yes?

19 A Yes.

11:00:29 20 Q Okay.

21 A Sorry.

22 Q What was your next job?

23 A I became an adjunct faculty member for the Los
24 Angeles Community College District.

11:00:41 25 Q Teaching what?

11:00:42 1 A Art and art history.

2 Q At what campus?

3 A West Los Angeles campus.

4 Q Okay.

11:00:54 5 A And then following that I taught some courses
6 at -- they were college courses that were outreaches to
7 high schools, so I actually taught on some high school
8 campuses as well.

9 Q All right. And how long did you do that?

11:01:17 10 A Well, it was off and on for a period of I'd say
11 three to four years.

12 Q 2008 to 2012?

13 A Yes.

14 Q Okay.

11:01:35 15 A And again, it was an adjunct position so it
16 was -- there were some semesters where I did not teach.

17 Q Did you do anything else to support yourself
18 during that time period?

19 A No, I don't -- it seems like there was
11:01:49 20 something else I did. I can't think of what it is right
21 now.

22 Q Did you stop teaching?

23 A Like I say, there were times when I did not
24 teach because as an adjunct faculty member, sometimes
11:02:01 25 there were not -- they didn't have a need for another

11:02:06 1 teacher to teach a course.

2 Q I understand that. But you said that you
3 taught until 2012. So you stopped --

4 A Actually --

11:02:14 5 Q Do you still teach?

6 A No -- well, I started teaching in 2006. And
7 then it was for about the next three to four years that I
8 continued as an adjunct. So that would put it to about
9 2010, 2009. What I -- the other thing that I did was I

11:02:37 10 taught transcendental meditation from time to time.

11 Q Where did you teach that?

12 A That was out of the Beverly Hills
13 Transcendental Meditation Center.

14 Q Alrighty. So since 2010 -- 2010 to present,
11:02:50 15 what have you done to support yourself?

16 A In 2010, I received a job offer from the
17 Michael Jackson Estate.

18 Q What was the job offer?

19 A It was to help with the -- a project of -- of
11:03:14 20 inventorying and appraising of the items left behind in
21 Mr. Jackson's estate. And my job involved the physical
22 logistics of the whole thing, primarily.

23 Q And this is different from the warehouse job
24 that you had before you left?

11:03:38 25 A Yes. It's a different job, but very similar in

11:03:41 1 a lot of ways.

2 Q Same location or different location?

3 A Different location.

4 Q All right. What types of things were you

11:03:54 5 inventorying?

6 A All types of things that fit within the range
7 of the types of things Mr. Jackson had acquired in his
8 lifetime which is --

9 Q Art?

11:04:04 10 A Art. Lots of art.

11 Q Toys?

12 A Toys.

13 Q Electronics?

14 A Electronics, correct.

11:04:10 15 Q Photographs of kids?

16 A Many, many pictures, including pictures of
17 children that -- yeah.

18 Q Books?

19 A Lots of books.

11:04:22 20 Q Clothing?

21 A Clothing, yes.

22 Q Beds?

23 A There were beds.

24 Q And you created inventories for --

11:04:34 25 A Furniture.

11:04:34 1 Q -- all this stuff, right?
2 A Lots of furniture.
3 Q You created inventory lists of all this?
4 A Yes.
11:04:45 5 Q What did you do with those inventory lists of
6 all this?
7 A I -- as an employee of the estate, I left them
8 with the estate.
9 Q How long did that job last? 2010 until when?
11:05:02 10 A It actually took a bit over two years.
11 Q To around 2013?
12 A 2012, 2013, in there. And --
13 Q Who offered you the job?
14 A Well, I was contacted by Evvy Tavasci about it.
11:05:26 15 And then I indicated my interest and communicated with
16 the estate and I don't remember who it was. Well, I, you
17 know, made a resume and wrote a letter, a formal letter
18 stating what I would like to be paid and so forth; the
19 usual things when negotiating a job.
11:05:57 20 Q Okay.
21 A And who specifically that I was writing to, I
22 don't remember now.
23 Q Gotcha. And that job ended in 2012, 2013?
24 A Yeah. Probably, I think, 2012. And then there
11:06:17 25 were some periods of time where I would go back and do

11:06:20 1 some further work.

2 Q When is the last time you did that, went back
3 and did further work for the estate?

4 A I don't remember. It's been well over a year.

11:06:30 5 Q Okay. About 12 months ago or more?

6 A Could be more.

7 Q What's the longest? Is it 12 to 15 months ago?

8 A I would say within the last 18 months.

9 Q Okay. So is that -- do you still have that job
11:06:46 10 title?

11 A Well, the job is no longer --

12 Q Were you terminated from the job or did it just
13 have a set end date?

14 A Well, the job was finally finished.

11:06:57 15 Q Okay. Did anyone else assist you in that job?

16 A Yes.

17 Q Who else?

18 A I don't remember all the names, but, at one
19 time, we had a crew of about 15 people. That later
11:07:11 20 became a crew of approximately 5 people.

21 Q Were you the head of that crew?

22 A Yes.

23 Q And who was under you -- directly under you?

24 A Members of the crew?

11:07:19 25 Q Yeah.

11:07:20 1 A I can't remember everybody's name.

2 Q Well, who was the person directly under you,
3 the next person in charge. Surely you remember that
4 person's name.

11:07:30 5 A Well, Jesus Salas; J-E-S-U-S, S-A-L-A-S.

6 Q Okay. Who else?

7 A Alfredo Ruiz.

8 Q Anyone else?

9 A Let's see. I'm trying to remember their full
11:07:56 10 names because we generally called each other by first
11 names, you know. Uh-huh. Juan Gonzalez and a gentleman
12 named Alfredo. I can't remember precisely his last name.

13 Q Did you ever -- were you ever in contact with
14 John Branca?

11:08:35 15 A During the time of my working --

16 Q Yeah. Inventorying?

17 A No.

18 Q No direct contact with him?

19 A No.

11:08:42 20 Q How about Howard Weitzman?

21 A No.

22 Q But surely you've met them before?

23 A Yes.

24 Q Throughout your time --

11:08:49 25 A Uh-huh.

11:08:50 1 Q -- working initially --

2 A Yes.

3 Q -- for the company?

4 A Yes.

11:08:58 5 Q And who do you keep in contact from the
6 company -- that company being MJJ Productions -- aside
7 from Evvy Tavasci?

8 A No one. Although, my understanding is that as
9 far as -- well, here I am speculating, but I haven't
11:09:19 10 referred -- haven't heard it referred to as MJJ

11 Productions, but it's rather the Michael Jackson Estate.

12 Q Okay. But my question was, at one point in
13 time you worked for MJJ Productions?

14 A Correct.

11:09:34 15 Q A number of years, correct?

16 A Yes.

17 Q And you worked with numerous different
18 employees of that company, correct?

19 A Yes.

11:09:39 20 Q Do you stay in contact with any of them?

21 A Mostly Evvy. I speak with Miko Brando
22 occasionally.

23 Q Anyone else?

24 A No.

11:09:53 25 Q Any reason why not?

11:09:57 1 A I primarily have just lost touch with them.
2 Those two were probably the two that I worked most
3 closely with aside from Mr. Jackson himself.

4 Q How about Norma Staikos, you worked with her at
11:10:14 5 one point in time, correct?

6 A Correct.

7 Q Did you get along with her?

8 A Yeah -- yes.

9 Q When's the last time you saw her?

11:10:24 10 A I don't remember. It was a long time ago.

11 Q Was it while she was still working for the
12 company?

13 A Last time, to my knowledge, she was not.

14 Q Where did you see her?

11:10:40 15 A She was getting off of an airplane with a party
16 that included Mr. Jackson and I was there to pick
17 Mr. Jackson up.

18 Q Do you know what year this was?

19 A It would have been -- I can only say it would
11:11:00 20 have been after 1993 or 1994. Not too long after that, I
21 would say.

22 Q How long --

23 A Again, I'm speculating here a bit. I don't
24 remember exactly.

11:11:12 25 Q How long after she had left the company?

11:11:14 1 A Oh. My best guess is nine months to a year,
2 perhaps.

3 Q And do you know why she was with him?

4 A No.

11:11:31 5 Q What's your understanding of where she moved to
6 after she left the company?

7 A My understanding -- and this is hearsay -- that
8 she moved to Greece.

9 Q Her husband was Greek, correct?

11:11:49 10 A Correct.

11 Q You met him before, right?

12 A Yes.

13 Q What was his name?

14 A Give me a few minutes and I'll probably
11:12:06 15 remember it. It's -- I can't recall his name.

16 Q If it pops in your mind, just let me know.

17 A Okay.

18 Q And do you know where they were getting off a
19 plane from?

11:12:23 20 A No. I don't remember.

21 Q Where did you pick him up? Was it Santa
22 Monica?

23 A You mean this particular instance?

24 Q Yes. You said she was with a party who had
11:12:34 25 gotten off a plane with Mr. Jackson --

11:12:36 1 A Yes.

2 Q -- and you were there to pick them up?

3 A Yes. It may have been Santa Monica Airport.

4 Q And where did you take them to?

11:12:45 5 A I don't remember.

6 Q How many people were in the party?

7 A I don't remember.

8 Q Was her husband with her?

9 A I don't remember. But I'm -- I think if he had

11:12:55 10 been there, I would have probably remembered it.

11 Q Do you know anyone else who was with them?

12 A Don't remember.

13 Q Do you know where you took them to?

14 MR. STEINSAPIR: Asked and answered.

11:13:07 15 THE WITNESS: Yeah. I don't remember.

16 BY MR. FINALDI:

17 Q Do you know where they flew in from?

18 A No.

19 MR. STEINSAPIR: That's asked and answered.

11:13:13 20 THE WITNESS: No. If I knew, I don't remember

21 now.

22 BY MR. FINALDI:

23 Q And that was the last time you saw Norma?

24 A Yes.

11:13:19 25 MR. STEINSAPIR: Asked and answered.

11:13:21 1 BY MR. FINALDI:

2 Q Did you speak with her?

3 A I think I probably -- I recall probably saying
4 hello, something like that.

11:13:31 5 Q Okay. And she said hello back?

6 A Uh-huh.

7 Q Yes?

8 A Yes.

9 Q As of the time she left the company, you were
11:13:37 10 on good terms with her, correct?

11 A Yes.

12 Q Okay. Were you surprised to see her?

13 A Yes. I think I recall.

14 Q For what reason?

11:13:53 15 A Just because I hadn't seen her and I heard she
16 was in Greece. I was -- it was unexpected to see her
17 there. It was not a shock or anything like that.

18 Q Okay. So from 2012, 2013 to the present, what
19 have you done for employment?

11:14:25 20 A Again, teaching transcendental meditation. And
21 then it was in 2012, I believe, I was offered another
22 position very similar to what I did for the Michael
23 Jackson Estate, was offered a position by the Elizabeth
24 Taylor Trust.

11:14:51 25 Q Do you know who was in charge of that?

11:14:54 1 A The -- yes. The person in charge of that was a
2 fellow named Tim. I'll think of his name in a minute.
3 His last name. Tim Mendelson.

4 Q Do you know how -- did you contact him or did
11:15:16 5 he contact you?

6 A He contacted me, yes.

7 Q And did you -- did you ask him why, why are you
8 contacting me?

9 A No. No.

11:15:27 10 Q Did you know him already?

11 A I had met him years before.

12 Q Had you met Elizabeth Taylor as well?

13 A Yes.

14 Q Okay. And did he say how he got your contact
11:15:42 15 information?

16 A Actually, I knew he was going to -- I was -- I
17 was told that he would contact me because he was given my
18 name by Evvy Tavasci.

19 Q And you took that job, right?

11:15:52 20 A Yes.

21 Q Do you know where Evvy lives?

22 A Yes.

23 Q Where?

24 MR. STEINSAPIR: You can say the state.

11:16:08 25 THE WITNESS: Oh, well, yeah. It's here in the

11:16:09 1 state.

2 BY MR. FINALDI:

3 Q Yeah. Where?

4 A I would prefer not to give her address.

11:16:12 5 MR. STEINSAPIR: You can contact her through
6 me.

7 BY MR. FINALDI:

8 Q Well, generally, where does she live?

9 MR. STEINSAPIR: Counsel --

11:16:15 10 MR. FINALDI: I'm not limited to that. All
11 right. If you want to instruct him not to answer, go
12 ahead.

13 MR. STEINSAPIR: I will instruct him not to
14 answer.

11:16:22 15 THE WITNESS: Okay.

16 BY MR. FINALDI:

17 Q She lives in Los Angeles County?

18 A Yes.

19 Q And do you meet up with her for coffee or

11:16:27 20 dinner or lunch from time to time?

21 MR. STEINSAPIR: Asked and answered.

22 THE WITNESS: Very rarely.

23 BY MR. FINALDI:

24 Q But you do?

11:16:33 25 A Yes.

11:16:33 1 Q When's the last time you saw her in person?
2 MR. STEINSAPIR: Asked and answered. Answer
3 again.
4 MR. FINALDI: I didn't ask her this -- ask him
11:16:39 5 this.
6 THE WITNESS: I -- yeah, I don't remember.
7 BY MR. FINALDI:
8 Q Within the last year you've seen her in person
9 A Oh, sure.
11:16:47 10 Q -- is that correct?
11 All right. And how long did that job last?
12 2012 to when?
13 A It lasted right about eight months.
14 Q And where was the warehouse of her belongings?
11:17:08 15 Was that in the L.A. area as well?
16 A Yes.
17 Q So 2012, 2013 time period, correct?
18 A Uh-huh.
19 Q Yes?
11:17:23 20 A Yes.
21 Q All right. Any other employment since then?
22 A Yes. I have been employed by Dr. David Baum,
23 whom I mentioned earlier and also have taught
24 transcendental meditation.
11:17:40 25 Q Is he an orthopedist?

11:17:43 1 A Internal medicine.

2 Q How did you come about working for him?

3 A Actually, I should mention -- I neglected to
4 mention earlier I did work for him for a brief period
11:17:56 5 back in the period -- during the times that I was a
6 faculty member for West Los Angeles College, but it was
7 one of the times when I was not teaching. I met him
8 because I used to go with his sister. So I met him
9 through his sister.

11:18:17 10 Q Used to date his sister?

11 A Yes.

12 Q Okay. What decade was that?

13 A In the '90s.

14 Q And what did you do for him?

11:18:32 15 A Actually, a couple of things. I started last
16 year archiving and cataloging a collection of vintage
17 Rock 'n Roll posters and memorabilia that he had had for
18 years. And in the meantime, some of his administrative
19 staff were let go from employment and he needed some help
11:19:14 20 with his -- some of his administrative work, paperwork,
21 that kind of thing and so I stepped in to help him with
22 that as well.

23 Q Does he have Michael Jackson memorabilia?

24 A I don't recall running across any.

11:19:33 25 Q Now, when you first began working for MJJ

11:19:38 1 Productions -- before you were hired, were you a fan of
2 his music?

3 A No.

4 Q Did you dislike him or his music?

11:19:50 5 A No, no. I -- I -- that was a period of time
6 during my -- let me put it this way. I hadn't been
7 listening to much popular music for about 10 years, so I
8 was -- I had heard of Michael Jackson. I didn't even
9 know that he was the same Michael Jackson that was the
11:20:16 10 little boy in the Jackson 5, but I had an admiration for
11 his talent from that time.

12 Q From when he was young?

13 A Yes.

14 Q Okay.

11:20:37 15 MR. STEINSAPIR: Counsel, we've been going
16 about an hour and a half.

17 MR. FINALDI: Sure. We can take a break.
18 That's fine.

19 MR. STEINSAPIR: Take a break.

11:20:43 20 MR. FINALDI: Five, ten minutes.

21 MR. STEINSAPIR: That's fine.

22 THE VIDEOGRAPHER: Video deposition going off
23 record at 11:20 a.m.

24 (Off the record.)

11:29:23 25 THE VIDEOGRAPHER: Videotaped deposition is now

11:33:48 1 returning to the record at 11:33 a.m. This begins tape
2 number 2.

3 BY MR. FINALDI:

4 Q You understand you're still under oath,
11:33:55 5 correct?

6 A Yes.

7 Q And you pledge to continue telling the truth,
8 right?

9 A I do.

11:33:59 10 Q And during the break you had a chance to speak
11 with your attorneys, correct?

12 A That's correct.

13 Q Okay. Getting back to MJJ Productions, is that
14 the only Michael Jackson company that you believe you
11:34:11 15 worked for during the time that you were working for him?
16 So prior to the estate work.

17 A Yes.

18 Q Okay. Have you ever heard of a company called
19 MJJ Ventures, Inc.?

11:34:25 20 A Yes.

21 Q Have you ever worked for that company?

22 A Not that I remember. I mean, the names, at the
23 time, struck me as rather fluid. You know, I didn't -- I
24 don't recall ever having a clear understanding of what
11:34:36 25 the distinction was.

11:34:39 1 Q Being fluid as in people kind of used them
2 interchangeably?

3 A Well, fluid in my mind, I suppose, is what I
4 mean. I am sure there were probably some very clear
11:34:51 5 distinctions.

6 Q Yeah. But did people use both terms when
7 talking to you?

8 A I don't remember.

9 Q In what circumstances would MJJ Ventures come
11:35:00 10 up?

11 A That I don't recall.

12 Q You just remember hearing --

13 A I do recall hearing it, but more often MJJ
14 Productions. And those of us who worked together thought
11:35:14 15 of ourselves as working for MJJ Productions.

16 Q Okay. And did you ever work for Michael
17 Jackson personally?

18 A Yes.

19 Q As opposed to MJJ Productions?

11:35:28 20 A Oh, you mean hired under some separate
21 auspices?

22 Q Yeah.

23 A No.

24 Q Just separate side work for him personally?

11:35:34 25 A No.

11:35:36 1 Q And you found out about the job from your
2 friend Bill Blatt, correct?

3 A Yes.

4 Q And you worked with him?

11:35:44 5 A He was the chef at the Maharishi Ayurveda
6 Health Center.

7 Q He's the chef that taught you?

8 A Yes.

9 Q And then he left to go work for Michael
11:35:52 10 Jackson?

11 A Yes.

12 Q Do you know how he found out about the job?

13 A He became employed. He was the chef at
14 Michael's ranch.

11:36:00 15 Q Yes. Do you know how he found out about his job
16 when he came to the ranch?

17 A I think the connection -- in fact, he told me
18 the connection was through Deepak Chopra.

19 Q Who knew Mr. Jackson, correct?

11:36:13 20 A Yes.

21 Q And had you ever met Mr. Chopra?

22 A Yes.

23 Q Was he involved with your -- in the center that
24 you worked at?

11:36:21 25 A Yes, he was.

11:36:22 1 Q When did you first meet him?

2 A At that center.

3 Q Was he a teacher or something?

4 A Well, he is a -- or was -- is a physician
11:36:36 5 connected with the Boston Medical community at the time
6 and he became interested in the transcendental meditation
7 and a related branch of Vedic knowledge called ayurved or
8 ayurveda, which has to do with an approach to physical
9 health, physical and mental well-being.

11:37:11 10 Q Okay. So that's where you became acquainted
11 with him?

12 A Yes.

13 Q Okay. And so it's my understanding Bill Blatt
14 called you on the phone. You were in France visiting
11:37:20 15 your sister. And he said I've got a job opening if you'd
16 like it? Something to that --

17 A Uh-huh. Yes.

18 Q Okay. I've heard about a job opening.
19 What did he say the job was?

11:37:29 20 A To be the driver for Mr. Jackson.

21 Q Did you have a driver's license at the time?

22 A Yes.

23 Q And had you had any special training in being a
24 professional driver?

11:37:44 25 A No. No training. But I had a few times as

11:37:51 1 working in the guest services of the Maharishi Ayurveda
2 Health Center, we had, I guess, what you could call a
3 limousine that occasionally I would drive guests between
4 the health center and the airport and Boston.

11:38:08 5 Q Was it a limousine?

6 A It was an old Cadillac limousine, very modest
7 dimensions.

8 Q And did you have a -- they didn't provide you
9 any formal training for that?

11:38:19 10 A No.

11 Q You didn't have a taxi cab license or a limo
12 driver license?

13 A No.

14 Q Or anything like that?

11:38:24 15 A No. Because I was not officially a driver. I
16 was just the guy who happened to drive that car.

17 Q Okay. And what was your driving record like
18 when you began with MJJ Productions?

19 A Very good.

11:38:37 20 Q Very good. Have you ever had any tickets or
21 accidents?

22 A I've had tickets.

23 Q I'm talking about at the time you were hired by
24 MJJ Productions, had you had any tickets or accidents?

11:38:48 25 A I don't remember.

11:38:51 1 Q What's your best recollection as to how many
2 tickets you had had as of that point in time?

3 A Before I was hired?

4 Q Yeah.

11:38:58 5 A My best recollection -- I'm trying to remember
6 if I even had any. I would say one or two, if any.

7 Q Speeding tickets or something?

8 A Something like that.

9 Q All right. How about accidents, collisions?

11:39:14 10 A No.

11 Q Never been in a collision?

12 A Oh, I was actually, yeah. Yeah, I was -- in
13 1973, I believe or '74 -- yeah. '74. I was stopped at
14 an intersection and a jackknifed -- a big rig jackknifed
11:39:39 15 and ran into my car.

16 Q Any other collisions?

17 A No.

18 Q Okay. At the time that you were at that center
19 in Massachusetts where you were working, were there any
11:39:58 20 children who were brought there for teachings or anything
21 like that or --

22 A It was -- there were some brought there, yes.

23 Q Some kids?

24 A Uh-huh.

11:40:08 25 Q Yes? And you --

11:40:09 1 A Yes.

2 Q -- taught kids as well?

3 A Pardon me?

4 Q And you taught kids there as well sometimes?

11:40:18 5 A I never taught any children there.

6 Q How often would kids be brought there?

7 A Seldom.

8 Q All right. Were there always kids there or was

9 it --

11:40:30 10 A No.

11 Q Okay. There were time periods where there were

12 no kids there?

13 A Correct.

14 Q All right. And did you have any training --

11:40:38 15 for that job there, did you ever have any training on

16 dealing with kids or anything like that?

17 A No.

18 Q Alrighty. So my understanding, you came out to

19 California and you interviewed with someone for the job,

11:40:59 20 right?

21 A That's right.

22 Q Who did you interview with?

23 A I interviewed with Mr. Jackson and with Norma

24 Staikos.

11:41:05 25 Q Norma first, correct?

11:41:06 1 A I met Norma just a few minutes before I met
2 Michael.

3 Q And what kind of things did she ask you at the
4 interview?

11:41:15 5 A I don't recall. I did speak with her by
6 telephone before I came to Los Angeles.

7 Q Okay.

8 A I don't remember specifically what she asked
9 me.

11:41:28 10 Q Did she ask about your driving record?

11 A I don't remember too many questions about that.

12 Q Did you have to provide them a copy of your
13 driving record?

14 A I don't recall having done that.

11:41:39 15 Q Okay. What kind of stuff do you remember her
16 asking you or telling you about, if anything?

17 A She told me that Mr. Jackson had decided to
18 have a personal driver. He had been having -- using a
19 driving service. It was not working out so well. I
11:42:07 20 remember her saying that some of the drivers from the
21 service would be a little too interested in whatever
22 Michael was doing. They would sort of hover over him,
23 you know. He was out and about shopping or whatever and
24 --

11:42:27 25 Q Okay. And when you spoke with Mr. Jackson,

11:42:32 1 it's my understanding you met him at a studio in Culver
2 City?

3 A Correct.

4 Q And exchanged pleasantries, right?

11:42:40 5 A Yeah. We spoke a little bit.

6 Q Did he tell you a little bit about himself?

7 A No, not really.

8 Q Did he tell you what he expected of you in the
9 job duties?

11:42:54 10 A No.

11 Q Did he speak about any of the job duties at
12 all?

13 A I don't recall him speaking of any of the
14 duties.

11:43:02 15 Q Do you remember asking him about any of your
16 job duties?

17 A No. I think the purpose of me meeting Mr.
18 Jackson at that time was so that he could just get a feel
19 for who I was. I think they pretty much assumed I knew
11:43:14 20 how to drive.

21 Q Okay.

22 A And --

23 Q Did you have a driving test?

24 A No.

11:43:19 25 Q Okay.

11:43:21 1 A You mean for the job, specifically?
2 Q Yeah.
3 A No.
4 Q Did either Michael Jackson or Norma say let's
11:43:27 5 go for a driving test?
6 A Oh, no. No.
7 Q I'm going to test you and see --
8 A No, no.
9 Q No?
11:43:31 10 A No.
11 Q Okay. Who offered you the job?
12 A Well, it was -- it was Norma.
13 Q Okay. After you met Michael?
14 A Yes.
11:43:41 15 Q And what did she say in relation to offering
16 you the job?
17 A Well, I met them on one day. And then she said
18 let's meet tomorrow morning. So I went back to the hotel
19 I was staying in and I didn't have any indication one way
11:44:00 20 or the other if they wanted me for the job. So I met
21 with Norma the next day. And she was telling me more
22 about the job, but I still didn't know if they really
23 wanted me or not. So finally, I stopped. I said, Well,
24 now, do you want me for the job? And she said, Oh, yeah,
11:44:21 25 we do. And so --

11:44:23 1 Q Okay.

2 A So that was sort of how the offer came about.

3 Q And you accepted it right there?

4 A Yeah. Yes. I think I did.

11:44:31 5 Q Okay. What was your job description when you
6 accepted the job?

7 A It was to be the driver for Mr. Jackson.

8 Q And was there set hours that you were to work?

9 A No.

11:44:51 10 Q So no set hours as far as the times that you
11 would work or the time periods during which you would
12 work, correct?

13 A Correct.

14 Q And you were told that before you began?

11:45:01 15 A Yes.

16 Q And you accepted that, right?

17 A Yes.

18 Q Alrighty. And did they send you to any kind of
19 a driver's course or training for limo drivers or taxi
11:45:12 20 drivers?

21 A No.

22 Q Have you ever had in your entire life any type
23 of training for taxi driver, limo driver, anything --

24 A No.

11:45:20 25 Q -- of that nature?

11:45:22 1 Okay. Never had any license other than your
2 regular --

3 A That's correct.

4 Q -- C driver's license?

11:45:28 5 A Uh-huh.

6 Q Okay. And I would assume your driver's license
7 has never been suspended or revoked?

8 A No.

9 Q Okay. Had you -- so the limo that you drove at
11:45:38 10 the place in Massachusetts, you said it was a Cadillac
11 limo, correct?

12 A Yes.

13 Q Was it a stretch limousine or was it just a
14 four-door Cadillac?

11:45:47 15 A Stretched about that much. Yeah. It was
16 virtually a regular sized --

17 Q So it was like a regular --

18 A In fact, there were two cars. One was just a
19 Cadillac, a regular Cadillac. And the other -- the older
11:45:58 20 one was -- it had a little more foot room in back, but it
21 was not -- not -- if you saw it going down the street,
22 you wouldn't think, oh, wow, there's a stretch limo. Not
23 that you would say that here in California.

24 Q A four-door car with a little larger backseat?

11:46:16 25 A That's correct.

11:46:16 1 Q Maybe a foot larger?

2 A Yeah.

3 Q When is the first time you ever drove a real
4 stretch limousine?

11:46:20 5 A I don't remember the first time. Because most
6 of the time, Mr. Jackson did not use a stretch limousine.

7 Q But did he have a white limousine, correct?

8 A He did.

9 Q And you did --

11:46:31 10 A Stretch limousine.

11 Q -- drive that for him?

12 A Yes.

13 Q All right. And was the first time you ever
14 drove a stretch limousine when you drove it for Michael
11:46:40 15 Jackson?

16 A No. No. It was sometime -- I don't remember
17 clearly, but it was before I started driving -- actually
18 driving Mr. Jackson after I accepted the job, I had some
19 things I had to do back in Texas. So it was another
11:47:01 20 month or so before I actually moved to California. And
21 the idea was that I would spend about two weeks under the
22 tutelage of Miko Brando to sort of learn the city and to
23 get a sense of some of the places where Michael would go
24 regularly.

11:47:19 25 Q Okay.

11:47:20 1 A As well as he showed me, you know, the cars.
2 And I did have -- as I recall, I had some time to
3 practice with the stretch limo.

4 Q With Miko?

11:47:32 5 A With Miko.

6 Q But this is after you were working for the
7 company?

8 A This is after I was officially hired, yes.

9 Q Okay. And it's your understanding you never
11:47:49 10 registered in Los Angeles or Santa Barbara County or
11 anywhere in the state as a taxi or a limo or chauffeur --
12 right -- driver?

13 A Correct. I just got a California license
14 because I was not driving people for hire. It was a
11:48:03 15 privately -- you know, privately owned cars so that was
16 not required.

17 Q Okay. Who owned the cars?

18 A MJJ Productions, I would assume and --

19 MR. STEINSAPIR: Don't assume.

11:48:16 20 THE WITNESS: Yeah. Correct. I shouldn't.

21 BY MR. FINALDI:

22 Q Well, you had to have the car registration and
23 insurance for the car at all times, correct?

24 A Yeah. Yeah.

11:48:26 25 Q And you had to produce that?

11:48:27 1 A Yeah. And now that does jog my memory. Some
2 of the cars were listed in Mr. Jackson's name.

3 Q And some of them were in MJJ Productions' name?

4 A I think so, yes.

11:48:39 5 Q Okay. Do you remember which ones were in MJJ
6 Productions' name?

7 A No.

8 Q Do you remember which ones were in Michael
9 Jackson's name?

11:48:49 10 A The car that -- yes, I do remember some of
11 them. The car that he used most often which was a --
12 sort of a forerunner of today's SUV was in his name.

13 Q And what was that?

14 A It was a General Motors, I think -- I forget
11:49:13 15 the model name. We called it the Jimmy.

16 Q And it was white?

17 A White. Yep.

18 Q Had two doors?

19 A A GMC. GMC.

11:49:26 20 Q GMC?

21 A Yeah. Uh-huh.

22 Q Was it like a Blazer?

23 A A Blazer. I believe that's it was. Yes.

24 Q And was it two-door or four-door?

11:49:36 25 A Two-door.

11:49:37 1 Q Was it manual transmission or automatic?
2 A Automatic.
3 Q Bench seat upfront or bucket seats?
4 A Bucket seats in front. I don't remember if
11:49:49 5 the -- I think the back had bench seats, too. I mean --
6 excuse me -- bucket seats.
7 Q You drove that car from time to time, correct?
8 A Yes.
9 Q You would drive Mr. Jackson around in it,
11:50:02 10 correct?
11 A Uh-huh.
12 Q Yes?
13 A Yes.
14 Q And when you drove him, he was usually in the
11:50:08 15 back?
16 A Yes.
17 Q And it had a mobile telephone upfront, correct?
18 A Yes.
19 Q Okay. Do you know which other vehicles were
11:50:15 20 registered in Michael Jackson's name besides that Jeep or
21 the Jimmy?
22 A There was a car that we seldom used that was in
23 his name. It was a black Mercedes.
24 Q What model?
11:50:42 25 A It was an SEL or an SEC.

11:50:46 1 Q The SEL is the four-door. Was that what it
2 was? SEC is two-door.

3 A It probably was.

4 Q Yeah.

11:50:52 5 A I think it was --

6 Q It was a four-door car?

7 A Four-door, yeah.

8 Q Was it burgundy or black?

9 A There was a burgundy one as well. We used the
11:51:03 10 burgundy one more often. I don't recall if it was in his
11 name or MJJ Productions.

12 Q Okay. And any other vehicles? There was a
13 Rolls Royce as well, correct?

14 A Yes. There was a -- there was a -- well, there
11:51:25 15 were -- I remember three Rolls Royces which were -- none
16 of which he used for -- until one of them was finally put
17 in condition where it could be driven. There were --
18 there were two other small -- this was a large,
19 classical-style, a Phantom V Rolls Royce.

11:51:59 20 Q Okay.

21 A And then there were two smaller Rolls Royces
22 that he didn't use. One of them was not drivable.

23 Q Okay.

24 A Yeah.

11:52:09 25 Q Alrighty. And these are the vehicles that you

11:52:11 1 would use as a driver for Mr. Jackson, correct?

2 A Yes. Now, over time different vehicles came
3 into use. He's acquired additional vehicles.

4 Q Okay. When you were -- did you ever run into
11:52:25 5 Bikram Chouldhury?

6 A I don't remember.

7 Q Yoga guy?

8 A I remember hearing a name that sounds like it
9 was that.

11:52:35 10 Q Okay.

11 A But --

12 Q Getting back to -- so when you were -- when you
13 were being interviewed for the driving job --

14 A Oh, excuse me.

11:52:44 15 Q Sure.

16 A Just to be precise.

17 Q Yes.

18 A Bikram Chouldhury -- oh, I think where I heard
19 that name, he teaches --

11:52:49 20 Q Like, Bikram Yoga?

21 A Yeah. Yeah. That's probably where I heard it.
22 Yeah.

23 Q Okay.

24 A I don't think I've ever --

11:52:53 25 Q But never came into personal contact with him?

11:52:57 1 A No. And I don't think I ever heard of it from
2 Michael.

3 Q Okay. When you were being interviewed for the
4 job, were you talked to about the importance of being
11:53:06 5 discrete?

6 A Yes.

7 Q And what were you told about, you know, the
8 issue of discretion?

9 A Just that Mr. Jackson wanted to have privacy
11:53:27 10 because so often he didn't. That, you know, for him, any
11 kind of privacy or confidentiality was a rare commodity.
12 Just things that most of us take for granted. Plus,
13 there was so many people who were trying to get access to
14 him in one way or another. I think we can all understand
11:53:54 15 what celebrities deal with, particularly, well-known
16 celebrities.

17 Q Were you told that it's important not to talk
18 about the things that you see or that you hear when
19 you're driving him --

11:54:05 20 A Yes.

21 Q -- with outside sources?

22 A Uh-huh. Sure.

23 Q And you agreed with that, correct?

24 A Yes.

11:54:15 25 Q And were you told that you were not to talk

11:54:19 1 with Mr. Jackson much or other people in his car about
2 the things that you saw or heard them talking about?

3 A Would you say that question again?

4 Q Sure. As a professional driver for him, were
11:54:35 5 you told that it's important that you maintain certain
6 boundaries between yourself and Mr. Jackson and the
7 people you're driving and that you don't get yourself
8 involved in their conversations or talk with them much?

9 A I don't specifically remember being told that,
11:54:49 10 but it was -- I remember understanding that that was the
11 case just based on the type of business relationship I
12 had with Mr. Jackson. I think it was more my own
13 intuitive understanding given the situation that I --
14 it's not that I didn't interact with him at all and
11:55:19 15 sometimes we talked quite a bit, but I would always let
16 it come from his side.

17 Q So some of the places you would drive him to
18 and pick him up from, did you ever drive him to a movie
19 studio or pick him up from one?

11:55:32 20 A Yes.

21 Q How about a sound studio?

22 A Yes.

23 Q How about dance --

24 A That's what I understand a movie studio to be.
11:55:38 25 Sound stage, sound studio.

11:55:42 1 Q Like dance rehearsal studios --
2 A Yes. Uh-huh.
3 Q -- you would take him?
4 Places he would go to write songs?
11:55:49 5 A Well, he didn't -- to my knowledge didn't have
6 a specific place where we would write songs. Now I would
7 take him to recording studios where they would work on
8 songs.
9 Q Did you ever take him to different buildings in
11:56:02 10 Century City where he would have business meetings?
11 A Yes.
12 Q And pick him up from those places as well?
13 A Uh-huh.
14 Q Yes?
11:56:10 15 A Yes. Yes.
16 Q Did you ever take him to dinners or lunches or
17 pick him up from them?
18 A Very seldom.
19 Q He didn't eat out that much?
11:56:20 20 A No, he didn't.
21 Q Kind of difficult for him to do, correct?
22 A Uh-huh. Yes.
23 Q Okay. And how about when he was doing
24 non-business type things? He wanted to go to Disneyland
11:56:31 25 or something, have some fun, did you ever take him there?

11:56:34 1 A Yes.

2 Q Picked him up from something like that?

3 A Yes. Or I would go and stay with him.

4 Q Okay. How about he wanted to go see a friend,

11:56:43 5 like, wanted to go see Elizabeth Taylor, did you ever

6 take him?

7 A Uh-huh.

8 Q Yes?

9 A Yes.

11:56:51 10 Q And pick him up from Elizabeth's house or you

11 wait for him?

12 A Usually stay there.

13 Q Okay. And take him to go see other friends he

14 may have?

11:56:58 15 A Yes.

16 Q Take him to go maybe shopping or something?

17 A Yes.

18 Q Okay. And those were all a part of your job

19 duty?

11:57:04 20 A Yes.

21 Q Okay. How about if he was at a place or

22 something, did he ever send you on errands, like, I need

23 some Cool Ranch Doritos? Could you --

24 A Sure.

11:57:17 25 Q Okay. And that was part of your job --

11:57:19 1 A Yes.

2 Q -- to go get the Doritos and bring them back?

3 A Yes.

4 Q Okay. Or, like, I need a Diet Coke or

11:57:24 5 something. Can you get me Diet Coke?

6 A Sure.

7 Q Yes?

8 A Yeah.

9 Q Okay.

11:57:27 10 A More often it was Minute Made Orange Soda.

11 Q Gotcha. Did you sign a confidentiality

12 agreement when you began?

13 A Yes.

14 Q Was that right when you started working there?

11:57:50 15 A Yes.

16 Q And what was your general understanding of what

17 that confidentiality agreement was -- you're not a

18 lawyer, correct?

19 A Correct.

11:57:56 20 Q Never had any formal training as a lawyer,

21 correct?

22 A Correct.

23 Q So I just want to know what your lay

24 understanding of what that confidentiality agreement

11:58:03 25 meant.

11:58:03 1 A Well, it meant that I would not discuss or in
2 any way communicate any information or knowledge that I
3 gained pertaining to Mr. Jackson or his business or his
4 personal life with anyone else unless it was clear that
11:58:40 5 it was through set business channels --

6 Q All right.

7 A -- that he approved of.

8 Q Alrighy. Is it your understanding that that
9 does not apply today or are you withholding
11:58:57 10 information based upon --

11 A It's not my understanding that that does not
12 apply today.

13 MR. STEINSAPIR: Wait. There was a double
14 negative there.

11:59:03 15 THE WITNESS: I know it. But you asked me --
16 BY MR. FINALDI:

17 Q Let me ask it -- probably a bad question. Let
18 me ask it this way: Are you withholding any information
19 today based upon that confidentiality agreement or any
11:59:14 20 other type of a confidentiality agreement?

21 A Let's see. There was a time when you
22 instructed me not to answer something and I don't
23 remember what it was.

24 Q That's different. Conversations with your
11:59:28 25 lawyer, I'm not entitled to.

11:59:30 1 A Right, right.

2 Q I don't want to know what you talked with him
3 about.

4 A That's the only thing.

11:59:33 5 Q Okay. So there's not other things about
6 Mr. Jackson or your time there or your job duties that
7 you are withholding on the basis of any type of a
8 confidentiality agreement with him, correct?

9 A That's correct. And I -- in fact, I might ask
11:59:48 10 my attorney is, am I bound by that?

11 MR. STEINSAPIR: You're not bound by that in
12 this situation.

13 THE WITNESS: Okay.

14 BY MR. FINALDI:

11:59:57 15 Q Okay. So when you were first brought on to the
16 job, were you told -- did he have Neverland Ranch yet?

17 A Yes.

18 Q And did you go there before you were hired?

19 A No.

12:00:11 20 Q Did you know about Neverland Ranch before?

21 A Yes.

22 Q How did you know about it?

23 A I don't recall when I first heard about it, but
24 I think it was common knowledge. And by then I knew
12:00:23 25 of -- about Michael Jackson and I think Neverland Valley

12:00:29 1 was so associated with Michael Jackson and his public
2 image that I was aware of it.

3 Q You saw it on T.V. or something or in the
4 media?

12:00:38 5 A Perhaps.

6 Q And what did you understand Neverland Ranch
7 was?

8 A That it was his -- I -- before I met him, I
9 sort of thought it was his home that he -- that was his
12:00:49 10 address where he lived most of the time which was not
11 entirely correct.

12 Q What did you later understand that to be after
13 you began working for MJJ Productions?

14 A Well, that he had another residence in the Los
12:01:06 15 Angeles area.

16 Q So, I mean, was it just another -- was
17 Neverland just another house he owned or --

18 A No, no. Because his work was in Los Angeles
19 and the Neverland Valley is almost three-hour drive away.
12:01:24 20 It wouldn't have made sense for him to commute. So --
21 and most of his time he was working. So he spent more
22 time at his residence in the Los Angeles area. So that
23 Neverland Valley Ranch was a getaway for him when he had
24 a few days here and there to -- where he wasn't put upon
12:01:51 25 by work duties or, you know, his career.

12:01:54 1 Q Okay.

2 A He'd go visit.

3 Q All right. So the residence that he lived in
4 in L.A., what was the address of that?

12:02:03 5 A I don't remember. It was on a street called
6 Galaxy Way.

7 Q Was it a condo?

8 A A condo or a townhouse.

9 Q Okay. How many stories?

12:02:25 10 A Three, if you count the landing for the garage
11 which was basically a utility room. Otherwise, two.

12 Q And the whole complex was three or two stories,
13 correct?

14 A Yes.

12:02:42 15 Q Was it -- was it called the Century Hill
16 Estates?

17 A I don't recall clearly. No.

18 Q Do you remember the unit number?

19 A No.

12:02:48 20 Q Was it at 2247?

21 A It might have been.

22 Q Okay. And what did he refer --

23 A I mean, that's total speculation. I don't
24 remember.

12:02:59 25 Q What did he refer to that place as?

12:03:01 1 A It was referred to as the Hideout.
2 Q Who called it that?
3 A Everybody who knew of it.
4 Q Did he ever call it that?
12:03:07 5 A Yes.
6 Q Did you ever ask him why he calls it the
7 Hideout?
8 A I don't recall asking him that.
9 Q Did you ever ask anyone that?
12:03:19 10 A I don't recall asking it, but the -- I remember
11 having the understanding, to whatever degree I thought
12 about it, that it was called that because at the time
13 nobody knew he lived there. And it was, as with much of
14 his life, the location was kept -- the existence of the
12:03:43 15 place was kept confidential. Otherwise, you know, he
16 would have had reporters waiting at the gates and so
17 forth. Paparazzi. All of that, all of the time.
18 Q Were there gates to get on the property?
19 A Yes.
12:03:55 20 Q And after you go through the gates onto the
21 property, was there a garage that you could park in?
22 A Yes. There was an underground parking system.
23 Q And was it an underground parking system into
24 multiple units?
12:04:08 25 A Yes.

12:04:08 1 Q So you would go into the garage and was there a
2 special doorway that led to his unit or did it lead to
3 multiple units?

4 A The way it worked is for all -- I would assume
12:04:21 5 all of the residents, they would go into the parking
6 structure. And as you drove along the parking structure,
7 there would be a place where cars could park but on one
8 side would be garage doors. And these were the garages
9 for the different living units. And one would use a
12:04:39 10 remote, a clicker to open that garage door. You drive
11 your car in and then there is a stair landing that goes
12 upstairs to the living area.

13 Q Direct access to the unit --

14 A Yes.

12:04:50 15 Q -- from that garage?

16 A Uh-huh.

17 Q Okay.

18 A Yes.

19 Q Alrighty. And did you ever drive the limo --
12:04:58 20 limousine down into there or would it not really fit?

21 A It would not fit into the garage but there were
22 times when I had driven it down there.

23 Q Okay. Usually, were you driving the Blazer or
24 another car?

12:05:10 25 A Usually, the Blazer.

12:05:15 1 Q Okay. Did he have other residences?

2 A He -- there was a residence that I understood
3 he owned on Hayvenhurst Avenue in Encino which was not
4 his residence. He did not live there.

12:05:43 5 Q Gotcha. His family lived there, right?

6 A Yes.

7 Q Did you ever go there?

8 A Yes.

9 Q For what purpose?

12:05:48 10 A To take Mr. Jackson. Occasionally, to deliver
11 one thing or another.

12 Q Okay. And to pick him up and take him back
13 sometimes?

14 A Yeah. Oftentimes I would stay there while he
15 was there.

16 Q Okay. Did he go there often?

17 A No.

18 Q He didn't like going there?

19 A He didn't seem to be too fond of it.

12:06:10 20 Q Okay. How about any other homes?

21 A None that I know of. And I would say had there
22 been others, I would have known of it.

23 Q Any other condos that he may have owned or
24 spent time at in the Century City area in any high rises?

12:06:44 25 A No.

12:06:44 1 Q Alrighty. How about any other offices,
2 business offices, things like that?

3 A Well, there was the offices of MJJ Productions,
4 which --

12:06:57 5 Q The ones earlier?

6 A Yes. I gave you the address for that.

7 Q Did he have an office there, like, a personal
8 office there?

9 A No. No, he didn't.

12:07:14 10 Q Did he spend much time there?

11 A To my knowledge he never went there.

12 Q All right. Any other offices that he had?

13 A I don't remember any -- any other offices.

14 There were places he went on business, but I was just
12:07:47 15 trying to go through my mind to recall if there was
16 anything that had been designated as his office space
17 other than Neverland Valley.

18 Q Okay. You were driving for him when he got
19 married to -- when he got married, right?

12:07:59 20 A Correct.

21 Q And he married Lisa Marie Presley, correct?

22 A Yes.

23 Q Did you ever drive her?

24 A Yes.

12:08:07 25 Q And where did they live together?

12:08:12 1 A They lived in a gated community in, I believe,
2 it's called Hidden Hills out in the direction of
3 Calabasas.

4 Q Alrighty. Did you go to their wedding?

12:08:31 5 A No.

6 Q Did you know they were getting married before
7 they did?

8 A Yes.

9 Q How did you find out?

12:08:37 10 A I don't remember.

11 Q What were you told?

12 A I don't remember. And I don't remember -- I
13 knew that they were friends. The reason I think I must
14 have known ahead of time was because when the news came
15 that they actually got married, I had no surprise about
16 it.

17 Q Were they dating before that?

18 A Yes.

19 Q They were dating?

12:09:04 20 A Yes.

21 Q How long had they dated?

22 A Oh, it could have been a period over a year. I
23 don't remember.

24 Q That's your best estimate?

12:09:12 25 A Yes.

12:09:14 1 Q And how did you know --
2 A I -- just to be clear, they were long-time
3 acquaintances.
4 Q And how did you know they were dating, though?
12:09:23 5 A Because I would take them out.
6 Q Take them out where?
7 A To dinner.
8 Q I thought he didn't go to dinner much?
9 A He didn't much.
12:09:30 10 Q Okay. So where would you take them to dinner
11 to?
12 A There was an Italian restaurant in Brentwood
13 and a Chinese restaurant. I don't remember all the
14 places. A place near the Beverly Center. Various
12:09:48 15 places.
16 Q Okay. How many times did you take them to
17 restaurants together?
18 A Best estimate --
19 Q Your mike fell off.
12:10:03 20 A Oh -- 12 to 15 times.
21 Q Alrighty. And take them anywhere else other
22 than to restaurants?
23 A Yes.
24 Q Where else?
12:10:23 25 A I don't remember all the places. I remember

12:10:27 1 that she was in the car quite often; that they were often
2 together. I do recall taking them both to the
3 Scientology building in Hollywood, one of their
4 buildings.

12:10:47 5 Q On a date?

6 A I don't know if you would call it a date.

7 Q And this is all before they got married, right?

8 A You know, some of this may have been after they
9 got married.

12:11:00 10 Q Okay. Well, before they got married, did you
11 ever see them romantic with one another?

12 A Yes.

13 Q In which way?

14 A Sitting in the back seat of the car we were in.

12:11:12 15 Q Doing what?

16 A Kissing.

17 Q How many times?

18 A Once or twice.

19 Q And was that the first time you had ever seen
12:11:28 20 him kissing a girl? And was that the last --

21 A First time that I recall other than, perhaps,
22 on the cheek or --

23 Q Yeah. Other than like kissing your mom on the
24 cheek or something?

12:11:44 25 A Right. Right.

12:11:44 1 Q Is that the last one you ever recall seeing him
2 kiss?

3 A Yes.

4 Q When he was living with her and married, you
12:12:01 5 were still his driver, correct?

6 A Yes.

7 Q So would you take him to that home every night
8 to sleep?

9 A For a period of time, yes.

12:12:09 10 Q For how long did that last?

11 A Well, it was for a period of some months that I
12 did it on a daily basis. The reason being that he was
13 working on a record album and working in a recording
14 studio and he would usually finish sometime in the wee
12:12:36 15 hours of the morning and I would drive him to the house
16 there and then pick him up late, late -- late morning the
17 next day.

18 Q Okay. So that was what? A month?

19 A No. Months.

12:12:52 20 Q Every single night?

21 A Virtually. Not -- it's -- it would vary, but
22 on a regular basis.

23 Q And on the nights that he wouldn't sleep there,
24 where would he sleep?

12:13:11 25 A I don't have specific recollection as to place.

12:13:16 1 But when he moved out of the Hideout when he was working
2 intensely and not at Hidden Hills, he would be in a
3 hotel.

4 Q Why did he move out of the Hideout?

12:13:34 5 A Because the location became known to the
6 general public and the paparazzi.

7 Q Is this after the Chandler case?

8 A Yes. Yeah. Correct.

9 Q And you had seen Jordie Chandler at that home,
10 correct?

11 A Yes.

12 Q Did you see any other kids at that Hideout?

13 A Yes.

14 Q Which other kids?

12:13:50 15 A His nephews, the three sons of his brother
16 Tito.

17 Q Which sons? Taj and --

18 A Taj, Taryll and TJ. I don't know what the TJ
19 stands for.

12:14:05 20 Q Okay. Who else?

21 A A Brett Barnes and his family and --

22 Q Wade Robson?

23 A I don't recall if I saw Wade there or not.

24 Q May have, may not have. You don't remember as
12:14:27 25 you sit here today?

12:14:28 1 A Yeah.

2 Q How about Jimmy Safechuck?

3 A I don't recall spec- -- I don't recall if I saw
4 him there or not.

12:14:36 5 Q Did you ever take Michael Jackson to Jimmy
6 Safechuck's parents' home?

7 A Yes, I think I recall one time taking him
8 there.

9 Q And you spent the night?

12:14:48 10 A Simi Valley. Spent the night? No, I don't
11 remember that.

12 Q All right. Which kids' homes did you remember
13 taking him to spend the night?

14 A Let's see. Taj, Taryll and TJ, also known as
12:15:08 15 3T, he went there quite a bit.

16 Q That was in Woodland Hills?

17 A Yes. And the home of June and Jordie Chandler
18 and his little sister.

19 Q Okay. The Schwartz home, that one?

12:15:28 20 A I didn't think of it as the Schwartz home. I
21 remember she was married to someone and his name may have
22 been Schwartz.

23 Q Okay.

24 A I don't remember.

12:15:42 25 Q Which other homes?

12:15:47 1 A I don't recall any others. That's not to say
2 that it didn't happen --

3 Q Yeah.

4 A -- but I just don't recall.

12:15:57 5 Q How about Emmanuel Lewis's home?

6 A I do recall being at Emmanuel Lewis's home with
7 Mr. Jackson.

8 Q Do you know if he ever stayed the night there?

9 A I don't remember if he ever did.

12:16:10 10 Q All right. So when you first started working
11 there, when is the first time you ever went to Neverland
12 Ranch?

13 A It was sometime in November of 1991.

14 Q And were you taking Mr. Jackson there or --

12:16:31 15 A Yes.

16 Q Anyone else?

17 A No.

18 Q Was there a protocol as far as when you arrived
19 at the place, flash the lights twice if you've got him,
12:16:45 20 or flash it once if you don't or honk the horn or as far
21 as entering the gates, stop at the gates, don't stop at
22 the gates, call first?

23 A There's a -- there was a security gate right by
24 the road. And it had the usual little box where you
12:17:01 25 press a button. And there was a security house -- little

12:17:13 1 house on the other side of the gate. And I would let the
2 drivers know that I was there with Mr. Jackson.

3 Q Let the drivers know?

4 A Excuse me. The security guard.

12:17:22 5 Q Okay.

6 A I was the driver.

7 Q So you press a button. Would there be a
8 speaker there?

9 A Yeah.

12:17:26 10 Q Would you press the button or would
11 Mr. Jackson?

12 A I would.

13 Q And you would tell them, we're here?

14 A Yes.

12:17:33 15 Q And what would they say? They'd let you in?

16 A They would open the gate.

17 Q And then you would drive up to the gate?

18 A Drive through the gate.

19 Q And you would drive to the guard tower, right?

12:17:43 20 A Drive past it.

21 Q You wouldn't stop or say hi or check in or say,
22 here's the people I've got with me or anything like that?

23 A No -- well, if it was Mr. Jackson in the car or
24 Mr. Jackson and his friends, we would just go straight
12:17:56 25 through.

12:17:56 1 Q Okay.

2 A If it were guests or others and he was not in
3 the car, then they -- we would stop.

4 Q Okay. So there were times you drove people
12:18:15 5 other than Michael Jackson --

6 A Yes.

7 Q -- to the ranch?

8 A Uh-huh. Yes.

9 Q Kids?

12:18:23 10 A Probably. Yes.

11 Q And adults?

12 A Oh, yeah. Yeah. Kids and adults. I'm trying
13 to remember some specific occasions.

14 Q Ever bring kids without adults?

12:18:39 15 A I don't specifically remember doing that but I
16 can't say that I didn't.

17 Q May have, may not have?

18 A May have, yeah.

19 Q There were times when you drove kids alone for
12:18:50 20 Michael Jackson, correct? Take this kid here, drop these
21 kids off here?

22 A Yes. Uh-huh.

23 Q That wouldn't be out of the ordinary, right?

24 A No.

12:18:58 25 Q And it's no secret that he had kids with him

12:19:01 1

all the time?

2

A No, not all the time.

3

Q Well --

4

MR. STEINSAPIR: Objection; vague.

12:19:04 5

BY MR. FINALDI:

6

Q Did he have kids around him quite a bit of the
time?

7

8

MR. STEINSAPIR: Objection; vague.

9

THE WITNESS: Would you define "quite a bit"?

12:19:13 10

BY MR. FINALDI:

11

Q Sure. Well, at Neverland Ranch weren't there
kids there a lot of the time that you were there?

12

13

A A lot of the time, including many times when
Mr. Jackson was not there.

14

12:19:25 15

Q Okay. There were kids there even when he
wasn't there?

16

17

A Yes. He would regularly have bus loads of
children who were connected with organizations that
helped underprivileged children from children's

18

19

hospitals.

12:19:41 20

21

Q Okay.

22

A They would come up there and have a day at
Neverland. It was kind of a structured event.

23

24

Q Gotcha.

12:19:49 25

A And that was a regular --

12:19:51 1 Q There were amusement park rides there, correct?
2 A Yes.
3 Q There was an arcade?
4 A Yes.
12:19:57 5 Q Popcorn and candy?
6 A Yes.
7 Q Animals?
8 A Animals, yes.
9 Q Train?
12:20:01 10 A Train, yes.
11 Q ATVs, right?
12 A Yes.
13 Q Pretty fun place for kids to go, did it seem?
14 A I would think so. Sure.
12:20:11 15 Q And at times you saw numerous kids there,
16 right?
17 A Yes.
18 Q What's the most kids you ever saw there at one
19 point in time?
12:20:18 20 A Probably hundreds.
21 Q Hundreds?
22 A Uh-huh. Yes.
23 Q And were there ever any times that you were at
24 Neverland where there wasn't at least one or a couple
12:20:31 25 kids there?

12:20:32 1 A Yes.

2 Q Was that most often the case or was that the
3 rare occasion?

4 A I would say probably more often the case than
12:20:42 5 with kids.

6 Q So most oftentimes you were there, there were
7 no kids?

8 A Yes.

9 Q And so those times that you were there most
12:20:56 10 often with no kids there and Michael Jackson was there,
11 right?

12 A There were -- oftentimes he was there, but
13 there were times I would have reason to go there by
14 myself.

12:21:07 15 Q All right. So I want to talk about the times
16 that Michael Jackson --

17 A Yes.

18 Q -- was there at the ranch and you were there?

19 A Uh-huh. Uh-huh. Yes.

12:21:14 20 Q So as far as those times --

21 A Uh-huh.

22 Q -- were there kids usually there as well or
23 kids usually not there as well?

24 A Now is this assuming -- this is before he had
12:21:25 25 his own children?

12:21:27 1 Q Yes.

2 A Okay. Again, I would say half the time or
3 less.

4 Q Okay.

12:21:35 5 A That kids --

6 Q And the other half of the time there would be
7 kids there?

8 A Yes, or half -- or less than half of the time.
9 I may have misspoken. It was half the time or more that
12:21:51 10 he was there that I would say there were no kids.

11 Q Okay. And so for those times that he was there
12 and there were no kids at Neverland, would he go on the
13 rides?

14 A Sometimes.

12:22:06 15 Q Just alone?

16 A Well, he would sometimes have members of the
17 staff. Sometimes I was with him.

18 Q So he would take --

19 A Not very often. He didn't --

12:22:16 20 Q Sometimes he would say let's go ride the
21 carousel or let's go ride the Ferris Wheel?

22 A Not in those words. But there were times I
23 would be with him on the ranch and kind of in the role of
24 a companion. And there were golf carts where you sort of
12:22:32 25 got around because it was a big place and we would be on

12:22:34 1 the golf cart. And oftentimes, it would be to go and see
2 the animals --

3 Q Okay.

4 A -- and interact with them.

12:22:40 5 Q Okay. I'm talking about the rides.

6 A The rides?

7 Q You guys would go on all the rides?

8 A No, not usually. No.

9 Q Was that usually when the kids were around?

12:22:52 10 A More often when the large groups were there in
11 particular. At times when Michael was not there.

12 Q How about the big tree with the steps up it
13 with the platform, did you ever see him going up there?

14 A Now, there was a big tree that had a kind of a
12:23:11 15 rope ladder with boards that you walked on that went --
16 it was close to the movie theater and it went up to where
17 the train stop was.

18 Q Yeah.

19 A It was kind of close to the ranch.

12:23:26 20 Q You're talking about the tree that had the kind
21 of boards that you can walk up and it had a platform
22 where you can kind of sit?

23 MR. STEINSAPIR: Have you ever been to
24 Neverland?

12:23:35 25 THE WITNESS: I don't recall such a place.

12:23:36 1 BY MR. FINALDI:

2 Q Okay. Never recall him sitting up there and
3 hanging out and spending time?

4 MR. STEINSAPIR: Asked and answered. He said
12:23:41 5 he doesn't recall.

6 THE WITNESS: I do recall a tree that had some
7 boards that would give a tree climber access to the
8 branches where they could climb around, but I don't
9 recall a platform being there.

12:23:51 10 BY MR. FINALDI:

11 Q Okay. And so when you would be at Neverland,
12 how many employees would be there, generally?

13 A Well, you know, I never tried to count them.
14 It was quite a few. I did hear at one time that there
12:24:07 15 were over 100 employees.

16 Q And were they employees of MJJ Productions?

17 A Employees of Neverland Valley Ranch.

18 Q Okay. But who do you think -- do you know who
19 actually employed them and paid them?

12:24:24 20 A My understanding was that the two were separate
21 entities. If you're speaking of MJJ Productions was a
22 separate entity from Neverland Ranch Valley Ranch.

23 Q So you think there was a separate entity that
24 employed those people?

12:24:39 25 A Yes.

12:24:43 1 Q Okay. And what was the name of that entity
2 again?

3 A Neverland Valley Ranch was my --

4 Q Who told you that?

12:24:49 5 A I don't recall who would have told me, but
6 it -- I recall seeing the letterhead on various
7 documents.

8 Q Okay. And who was in charge there?

9 A At the time that I started working, there were
12:25:04 10 two people who were, I guess, co- -- what would you call
11 it? Leaders of the -- a lady named Nikki Wimsatt.

12 Q How do you spell that last name?

13 A W-I-M-S-A-T-T. And a gentleman named -- his
14 first name was Lance. I can't think of his last name.

12:25:31 15 Q Okay. And did you ever work for this Neverland
16 Valley Ranch?

17 A No.

18 Q So at the times that you were there on the
19 property doing things with him and for him, you were
12:25:47 20 still working for MJJ Productions, correct?

21 A That's right.

22 Q Okay. And the times you would bring him and
23 kids there and take him off, you were still working for
24 him?

12:25:59 25 A Yes.

12:26:01 1 Q And did you ever receive any kind of training
2 at all from this Neverland Valley Ranch for the things
3 you were doing there?

4 A No.

12:26:18 5 Q Okay. Did you receive any kind of training
6 from MJJ Productions ever?

7 A No.

8 Q Did you have car seats, like, kids' car seats
9 for the Bronco or the limo?

12:26:40 10 A I remember car seats when Michael had his own
11 children.

12 Q But prior to that, no?

13 A I don't specifically remember any.

14 Q Okay. Do you remember someone named Gayle
15 Goforth?

16 A Yes.

17 Q And what was her job?

18 A She was in housekeeping at Neverland Valley
19 Ranch.

12:27:13 20 Q Okay. Did you get along with her?

21 A Yes.

22 Q Did you like her?

23 A Yes.

24 Q She testified she was an employee of MJJ
12:27:21 25 Productions and that they all were paid with MJJ

12:27:24 1 Productions checks.

2 A Oh, really?

3 Q Yeah.

4 MR. STEINSAPIR: Is that a question?

12:27:28 5 MR. FINALDI: Well, if you let me finish, it
6 would be.

7 BY MR. FINALDI:

8 Q Do you have any understanding as to whether the
9 housekeepers were actually employees of MJJ Productions?

12:27:37 10 MR. STEINSAPIR: Asked and answered.

11 THE WITNESS: Yeah. No, I didn't.

12 BY MR. FINALDI:

13 Q Were there ever any staff meetings, where all
14 the MJJ staff members would have to go, like, yearly
15 meetings, in-service training?

16 A No. No. That's --

17 Q Okay. Was there a maid at the Hideout?

18 A Yes.

19 Q What was the maid's name?

12:28:06 20 MR. STEINSAPIR: Vague as to time.

21 THE WITNESS: Yeah. I -- I can't remember what
22 her name was.

23 BY MR. FINALDI:

24 Q Was there a Rosa Maria at one point in time?

12:28:14 25 A Yes, I think that was her name. Rosa Maria.

12:28:18 1 Q And do you remember her last name?

2 A No, I don't.

3 Q Was there another maid at another point in
4 time?

12:28:28 5 A She had a sister or a cousin that as I recall
6 occasionally did the duties there as a maid.

7 Q Okay. And now, was she an employee of, like,
8 the Hideout Ranch or the Hideout; do you know?

9 A That I don't know.

12:28:48 10 Q Or was she an employee of MJJ Productions?

11 A I don't know.

12 Q Or was she just paid under the table; do you
13 know?

14 A I don't know.

12:28:56 15 Q Okay.

16 MR. STEINSAPIR: She could have been employed
17 by about 15 other entities.

18 MR. FINALDI: Okay. Well, if you find out,
19 just let me know.

12:29:03 20 MR. STEINSAPIR: Yeah. I won't.

21 MR. FINALDI: You won't?

22 MR. STEINSAPIR: You can serve discovery or you
23 can have your partner write a letter to the press.

24 BY MR. FINALDI:

12:29:14 25 Q Okay. You spent the night at the ranch,

12:29:16 1 correct?
2 A Yes.
3 Q And it was like an apartment above the garage,
4 right?
12:29:21 5 A Correct.
6 Q And this is a garage that's attached to the
7 main house?
8 A Yes.
9 Q In that apartment, were you the only person
12:29:27 10 that would sleep there?
11 A Yes.
12 Q So there's only one bed?
13 A Yes.
14 Q Okay. And it wasn't like you shared with
12:29:33 15 another driver or another --
16 A No.
17 Q -- housekeeper or anything, correct?
18 A No.
19 Q And how often would you spend the night there?
12:29:41 20 A Hundreds of times --
21 Q Okay.
22 A -- if not a thousand.
23 Q When you would take Michael there to the ranch,
24 did he ever go there just -- just to get away and just
12:30:04 25 for personal -- purely personal, just to have fun and

12:30:07 1 relax and get away from it all?

2 A Yes.

3 Q And swim in the pool and go on the rides?

4 A I never saw him swim in the pool. And when he
12:30:14 5 was there by himself he would -- it was more -- I think
6 it was more to rest. He -- you know, he had a movie
7 theater.

8 Q Yeah.

9 A He would, I know, a few times watch movies, but
12:30:29 10 I never tried to keep up with what he did --

11 Q Yeah.

12 A -- at the ranch. I considered it part of my
13 job not to --

14 Q You never --

12:30:39 15 MR. STEINSAPIR: Hold on. You've got to let
16 him answer it. You keep talking over him.

17 BY MR. FINALDI:

18 Q Were you finished?

19 A Just that I wanted to give him his privacy.
12:30:48 20 That was one of the reasons he was there.

21 Q Uh-huh.

22 A Plus, I was not interested, really. I have my
23 own life. Might have a book to read or something.

24 Q Gotcha.

12:30:58 25 A Yeah.

12:30:59 1 Q You never saw him swimming there?
2 A I don't recall ever seeing --
3 Q Do you know if he knew how to swim?
4 A Huh?
12:31:07 5 Q Do you know if he knew how to swim?
6 A I don't recall knowing one way or the other.
7 Q Okay. Did kids ever spend the night at the
8 ranch?
9 A Yes.
12:31:24 10 Q And where would they spend the night? Ever
11 with you up in the apartment?
12 A No.
13 Q Did kids ever go up into that apartment?
14 A I don't know. I was just -- not while I was
12:31:37 15 there.
16 Q Okay. Never saw kids come in when you were
17 there or evidence of kids?
18 A Let's see -- actually, yes. Yes. I went there
19 one time -- evidence. What I saw was evidence that
12:31:53 20 someone had stayed there previously. I don't know who it
21 was.
22 Q But you thought it might have been a kid?
23 A As I recall, it was in a bit of disarray and
24 some candy around and whatnot. So -- and the
12:32:11 25 housekeeping just hadn't come to make up the room before

12:32:16 1 I got there.

2 Q Gotcha. Do you remember a kid named Jason
3 Francia spending time at the ranch?

4 A Say the name again.

12:32:24 5 Q Jason Francia. Blanca Francia's child.

6 A No, I don't recall.

7 Q Do you remember Blanca Francia?

8 A No. No. I remember a lady, I think her name
9 was Blanca, but she's the maid that I referred to
10 previously who worked at the Hideout, unless that's who
11 Blanca Francia was.

12 Q Okay. So you remember a Blanca that worked at
13 the Hideout?

14 A No, she was --

12:32:54 15 Q Because earlier we talked about --

16 A Just very occasionally it seems like she might
17 have taken over the duties from Rosa Maria because the
18 two were related. She was either the sister or the
19 cousin --

12:33:05 20 Q Okay.

21 A -- of Rosa Maria.

22 Q And did you get along with Blanca?

23 A Oh, yes. Uh-huh.

24 Q Did you ever see her child at the Hideout?

12:33:13 25 MR. STEINSAPIR: Assumes facts.

12:33:16 1 THE WITNESS: I -- I don't recall ever seeing a
2 child with her.

3 BY MR. FINALDI:

4 Q Never? Okay.

12:33:20 5 Do you remember any kind of an apartment or
6 condo that Michael Jackson had that really didn't have
7 much furniture in it; that had a bedroom but didn't have
8 a bed in it?

9 A No.

12:33:31 10 Q You never went to that place, huh?

11 MR. STEINSAPIR: Assumes facts. He just said
12 he didn't remember it.

13 BY MR. FINALDI:

14 Q You never went to a place like that, right?

12:33:38 15 MR. STEINSAPIR: He says he didn't remember it.

16 THE WITNESS: Correct. What I said, no.

17 MR. STEINSAPIR: Asked and answered. Let's
18 move on.

19 BY MR. FINALDI:

12:33:44 20 Q All right. Do you remember any other kind of,
21 like, condo or high-rise apartment places in the Century
22 City --

23 A Okay.

24 Q -- area you might take him to?

12:33:56 25 A Well, if I might be so bold as to speculate,

12:34:00 1 you may be referring to a residence that he had before I
2 started working for him.

3 Q Okay.

4 A Because I had heard of a place in a high-rise
12:34:09 5 but I never was there.

6 Q Gotcha. Who had you heard about that from?

7 A I don't recall. But it would have most likely
8 been from one of the people that worked closely with
9 Michael that knew he was there, knew he had such a place.

12:34:27 10 Q And where had you heard it was located,
11 generally speaking?

12 A You know, somehow I want to say Century City,
13 but it could have been somewhere else.

14 Q Gotcha.

12:34:47 15 A Do you mind if I take about a five-minute
16 break?

17 MR. FINALDI: I think we're about ready for
18 lunch.

19 THE WITNESS: Sounds good.

12:34:52 20 MR. STEINSAPIR: I don't want you -- let's go
21 off the record and we'll talk about the schedule.

22 THE VIDEOGRAPHER: Videotape deposition is now
23 going off the record. This concludes tape number 2.

24 (Off the record.)

01:24:34 25 THE VIDEOGRAPHER: Videotaped deposition is now

01:39:31 1 returning to the record at 1:39 p.m. This begins tape
2 number 3.

3 BY MR. FINALDI:

4 Q You understand you're still under oath,
01:39:37 5 correct?

6 A Yes.

7 Q All right. And you went to lunch with your
8 attorneys over the break?

9 A Yes. Uh-huh.

01:39:44 10 Q You had a chance to talk to them?

11 A We talked, yes.

12 Q Okay. Getting back into where we left off.
13 Did you go to Mr. Jackson's funeral?

14 A Yes.

01:39:55 15 Q And did you go to that event that was at
16 Staples Center as well?

17 A No. I was out of town at the time.

18 Q Okay. I assume you were upset when he passed
19 away?

01:40:06 20 A Yeah.

21 Q Did you consider --

22 A Saddened.

23 Q What's that?

24 A Saddened. Saddened very much.

01:40:17 25 Q Do you consider him a personal friend?

01:40:18 1 A Yes.

2 Q When did you begin to consider him a personal
3 friend?

4 A It's -- it's hard to pinpoint a time. It's
01:40:27 5 just I was with him many hours a day, mostly seven days a
6 week.

7 Q Yeah.

8 A So it's just something that kind of grew that
9 way.

01:40:36 10 Q After the first couple of years maybe?

11 A Even before that.

12 Q Before that?

13 A Yeah. Personal friend alongside parallel with
14 a business relationship.

01:40:46 15 Q Yeah.

16 A I always understood that.

17 Q Okay.

18 A And that's that.

19 Q Okay. Your direct supervisor while you were
01:40:58 20 his driver was -- who was your direct supervisor?

21 A For the overwhelming majority of the time, it
22 was Evvy Tavasci. I would not call her a supervisor as
23 much as an organizer of the -- part of her job was to
24 organize the daily schedule for Mr. Jackson as far as his
01:41:25 25 business went. And she would keep me informed of what --

01:41:29 1 what the appointments were that Mr. Jackson had to go to.

2 Q Before that, who was it?

3 A Norma Staikos.

4 Q Was Norma your direct supervisor until she left
01:41:44 5 in '93?

6 A Yes. In the same respect as Evvy Tavasci was.

7 Q And then Evvy took over after Norma left?

8 A That's correct.

9 Q Okay. So did you ever get in any kind of
01:42:01 10 trouble or reprimanded during your entire time working
11 for MJJ Productions?

12 A Oh, yeah.

13 Q In what way?

14 A Well, one time -- Michael didn't like to be
01:42:12 15 inconvenienced with stops for gasoline and that kind of
16 thing. And one time, somehow -- I went to pick him up,
17 this was when he was in Hidden Hills and he had an
18 appointment. We got in the limo and we were driving
19 along and I realized I had forgotten to put gas in the
01:42:29 20 car and it was almost on empty. And I realized that I'm
21 going to have to stop for gas. And he was not happy
22 about that. There were other times he --

23 Q Before you get there --

24 A Yeah.

01:42:44 25 Q -- what was the reprimand?

01:42:45 1 A Oh, just that he -- you know, I can't remember
2 specifically. But just that he was put out with me.

3 Q Did you --

4 A There was no punishment.

01:42:55 5 Q No write up?

6 A Oh, no.

7 Q Dock your pay?

8 A No, nothing like that.

9 Q Did he just tell you he was upset or something?

01:43:03 10 A Yeah. I could sense he was. And -- and then
11 there were a few times he acquired -- in the latter years
12 that I worked for him -- I would say the latter half of
13 the time that I was working closely with him, he acquired
14 some additional cars that he liked to ride in and they
01:43:23 15 were stretched by a local company that apparently didn't
16 do a real good job on the mechanics of these cars and
17 they were constantly problematic and sometimes dying or,
18 you know, they would cease to run while we were out and
19 about.

01:43:48 20 Either I was driving him or -- on a few
21 occasions or driving some of his friends or whatever.
22 And he always held me responsible for that, even though
23 I'm not a mechanic and there was -- you know, I did
24 everything I could to keep those cars running and avoid
01:44:05 25 those kinds of problems, but they would come up.

01:44:07 1 Q When he was involved in the 2005 trial --
2 A Yeah.
3 Q -- do you remember that?
4 A Yes, I do.
01:44:12 5 Q Were you driving him to and from the
6 courthouse?
7 A No. No, I wasn't.
8 Q Who was driving him to and from the courthouse?
9 A Some members of his recently acquired cadre of
01:44:22 10 security.
11 Q The Islamic --
12 A Correct. Yeah. The --
13 Q Brotherhood or whatever they are?
14 A Farrakhan's people. Yeah.
01:44:35 15 Q Do you know why it was that you were taken off
16 and one of their drivers was put on?
17 MR. STEINSAPIR: Assumes facts.
18 THE WITNESS: Yeah. No, I can't say I know
19 why. No.
01:44:46 20 BY MR. FINALDI:
21 Q Did you hear why?
22 A No.
23 Q Was it because of anything you did?
24 A No.
01:44:50 25 Q Did you want to be pulled off?

01:44:51 1 A Not particularly. Although, from a partic- --
2 just from a strictly personal position, it was kind of a
3 relief because I sort of had a regular schedule again,
4 had a little bit of a life of my own.

01:45:14 5 Q All right. All right. Which vehicle was it --
6 so let's say from the time you started all the way
7 through '97, which vehicle did you drive him in the most?

8 A I would say in the most, a Ford F150 van.

9 Q How many passenger van was it?

01:45:39 10 A Six including the driver with the two front
11 seats.

12 Q It was like a van conversion with like --

13 A Yes.

14 Q -- the pilot seats in the back?

01:45:49 15 A Uh-huh. Uh-huh.

16 Q Was there a privacy glass or screen between you
17 and the passengers in the back?

18 A No.

19 Q How about in the limousine, was there one that
01:46:00 20 could be raised or lowered?

21 A There was. Yes.

22 Q And did you have a rule regarding when it
23 should be raised or lowered?

24 A No. It was strictly up to the passengers in
01:46:07 25 the back. It was seldom up.

01:46:08 1 Q He mostly had it down?

2 A Yes.

3 Q Okay. Other than Norma and Evvy, did you
4 answer to anyone else while you were working for MJJ
01:46:27 5 Productions?

6 A Well, actually -- again, this is later. This
7 is probably after the year 2000, he brought some people
8 on to -- they had some kind of higher-level position in
9 his business and I didn't make it my business to try to
01:46:45 10 find out what that was. A couple of men from Germany who
11 assumed a fairly authoritarian posture within the
12 organization and --

13 Q What do you mean by that?

14 A They -- they tended to call the shots. That is
01:47:06 15 they gave instructions to people and it was clear that
16 they were trying to instill themselves by way of actually
17 pushing some of the people out. I'm talking specifically
18 about Evvy Tavasci who, in my opinion, was doing a
19 stellar job facing all of the responsibility she had, but
01:47:32 20 it -- my very clear impression was they felt she was an
21 obstacle to their further accruing power, as it were,
22 within the organization.

23 Q Who were they? What were their names?

24 A The names, Dieter Wiesner and Ronald Konnitzer.

01:47:51 25 Q How do you spell Wiesner?

01:47:54 1 A Wiesner.
2 Q Yeah.
3 A W- -- W-I-E-S-N-E-R.
4 Q And Konnitzer?
01:47:59 5 A K-O-N-N-I-T-Z-E-R.
6 Q All right. Do you know which company insured
7 the vehicles that you drove or companies?
8 A No, I'm not sure which company did. I might
9 have known at one time.
01:48:25 10 Q Was there an insurance agent you dealt with?
11 A Not that I personally dealt with, no.
12 Q Did you ever get in any accidents in any of the
13 vehicles you drove?
14 A No.
01:48:33 15 Q How about tickets?
16 A I did get a ticket once.
17 Q For what?
18 A For making a left turn on a country road that
19 the policeman felt was too much -- too -- too close to an
01:48:51 20 oncoming car.
21 Q Was this in Santa Barbara?
22 A No. It was actually in Los Olivos, not far
23 from the ranch.
24 Q And what year was this?
01:49:01 25 A I don't remember.

01:49:04 1 Q How many times did you drive Wade in one of
2 your vehicles?

3 A I can only recall two times for certain that I
4 drove him and that's not to say that I didn't at other
01:49:22 5 times.

6 Q So the first time, can you describe it?

7 A Yes. It was to take him and his mother and a
8 friend or some friends -- I don't recall -- to take them
9 to Neverland Valley Ranch.

01:49:33 10 Q Where did you pick them up?

11 A I picked them up at Wade's and his mother's
12 residence in Hollywood -- oh, wait. I'm sorry. I
13 think -- I think I might have picked them up -- I think
14 he got a new residence and it was in the valley
01:49:55 15 somewhere. So I would say maybe Encino or one of the
16 places north of that.

17 Q Do you remember the name of the street?

18 A No.

19 Q Do you remember if it was a house or an
01:50:05 20 apartment or a condo, a townhouse?

21 A Well, I remember that -- now, if we're talking
22 about the trip that I made that I drove Wade, I believe
23 it was a house. And again, I'm a little uncertain, but I
24 think I picked him up there. If there was another
01:50:28 25 location, the one in Hollywood, it might be that I picked

01:50:33 1 him up in Hollywood in which case it was a condo or a
2 townhouse or a big apartment.

3 Q Okay. So the first time you remember, you took
4 him, his friends and his mother, right?

01:50:43 5 A Yes.

6 Q To Neverland Valley Ranch?

7 A Uh-huh.

8 Q Did you guys stop anywhere on the way?

9 A Not that I recall.

01:50:50 10 Q Where was Michael Jackson at the time?

11 A I don't remember. He was not there.

12 Q Was he at the ranch?

13 A No.

14 Q Did he arrive at the ranch later?

01:50:57 15 A No. I was not with them the whole time. I
16 dropped them off. In fact, they asked me if I wanted to
17 stay, but I was looking forward to some time off. So
18 I -- the understanding was I was going to come and pick
19 them up in two or three days.

01:51:12 20 And I -- I can say with a fair degree of
21 certainty that Michael would not have been there while I
22 was gone simply because a lot of my life revolved around
23 whether or not Michael was in the area, in Southern
24 California. And I just remember that I had some time off
01:51:39 25 before I went to pick them back up and drive them back

01:51:40 1 home.

2 Q How old was Wade at the time; do you know? Do
3 you have an estimate?

4 A Estimate, maybe -- anywhere from 16 to 20.

01:51:54 5 Estimate.

6 Q 16 to 20 years old?

7 A Yeah.

8 Q Okay. And after you dropped them off, did you
9 see them again on that trip?

01:52:06 10 A No.

11 Q You didn't pick them up?

12 A I did. I saw them when I came back to pick
13 them up.

14 Q How much later?

01:52:14 15 A I'd say two or three -- probably three days.

16 Q Are you sure it wasn't longer?

17 A It could have been. Yeah. I don't remember.
18 That's just my estimate.

19 Q Alrighty. And do you remember anything about
01:52:32 20 that trip, in particular, as far as what they did or said
21 or how they acted or --

22 A Well, they seemed happy enough to be going to
23 Neverland Valley. And I recall when I came to pick them
24 up, I had gotten a late start that day on the drive and I
01:52:49 25 -- nothing was said, but I sensed that Wade's mother was

01:52:55 1 a little unhappy that I got there that late to pick them
2 up.

3 Q How late were you?

4 A It was late afternoon.

01:53:02 5 Q But how many hours or minutes late from when
6 you were supposed to pick them up?

7 A I don't recall a specific time being said. It
8 was totally -- this was not an event that was scheduled
9 by Evvy or anyone in the office. This was just -- I
01:53:25 10 mean, I may have been -- I take it back. It could have
11 been. But there was -- it was a situation where there
12 was -- it was pretty much up to the party as to decide
13 when they wanted to come back.

14 Q Who told you to go pick them up?

01:53:39 15 A I don't remember.

16 Q Who could it have been?

17 A I would say it was either Evvy or it was
18 Michael.

19 Q Okay. It wouldn't have been the Robsons?

01:53:51 20 A It could have been. It's conceivable. There
21 was times when Michael was away that he would put me at
22 the disposal of guests or friends. And then we -- we --
23 you know, any kind of scheduling or driving would be
24 purely what we would arrive at. We, being myself and the
01:54:12 25 parties that I was -- I was ferreting around.

01:54:16 1 Q Okay. Were you ever put at the disposal of
2 Wade?

3 A I may have been.

4 Q Okay. And how about Jimmy Safechuck?

01:54:26 5 A It's possible. I don't have too many memories
6 of Jimmy.

7 Q You drove him in your vehicle?

8 A My vehicle or Michael's?

9 Q One of Michael's vehicles?

01:54:41 10 A I'm sure if I drove him at all, it would have
11 been in one of Michael's cars.

12 Q Okay. So that first trip with Wade, which car
13 did you pick him up in?

14 A The one that I described. It was a -- I'm
01:54:53 15 fairly certain a large, very red SUV, a Chevy.

16 Q Whose was that?

17 A That was Mr. Jackson's.

18 Q What year was that, the SUV?

19 A Oh, it was -- I don't remember. Yeah.

01:55:11 20 Q Was it like a Suburban?

21 A Yeah.

22 Q All right. And you said there was a second
23 occasion that you remember picking up Wade, right?

24 A Well, that was to bring him back from the
01:55:27 25 ranch.

01:55:28 1 Q Okay. A couple days later?

2 A And I do recall and I don't recall if I
3 actually picked him up or not, but I remember going
4 and -- I was by myself and I was supposed to meet with
01:55:43 5 Wade either to deliver something to him or maybe I picked
6 him up. By that time, he was teaching dancing lessons
7 and it was at some dancing studio in the Valley. And I
8 remember going there and I remember seeing him teaching
9 dancing and that's pretty much all I remember about that.

01:56:03 10 Q Okay. Did you ever see Wade dancing at
11 Neverland or with Michael anywhere?

12 A I don't recall. I recall seeing him, you know,
13 teaching his group to dance.

14 Q Did you know that Wade was in some of his
01:56:20 15 commercials?

16 A Yes.

17 Q How did you know that?

18 A I don't remember.

19 Q Was it your custom to help individuals upload
01:56:35 20 their packages when you dropped them off?

21 A Yes.

22 Q And when you dropped off Wade and his mother,
23 did you help them with their baggage?

24 A Probably, yeah.

01:56:44 25 Q And where did you take that to?

01:56:46 1 A Well, if it was to take them home, I imagine I
2 would have taken it to their apartment. Now, when I
3 dropped them off at the ranch, there's a good time I
4 didn't help them because usually there was ranch
01:57:00 5 personnel there whenever Mr. Jackson would arrive or
6 guests would arrive and they would do all of the carrying
7 of guests' bags. When I would bring Michael, it was
8 usually he asked me to take his bags.

9 Q So other than -- let me see. So we've already
01:57:22 10 talked about Wade.

11 A Uh-huh.

12 Q We've talked about Jimmy.

13 Do you remember the names of all the kids who
14 you drove in vehicles with Michael?

01:57:34 15 A No.

16 Q Other than Wade and Jimmy, do you remember
17 Jordan?

18 A Yes. Uh-huh. Oh, yeah, Jordie. Jordan.
19 Yeah.

01:57:41 20 Q Okay. And you remember Taj, right?

21 A Uh-huh.

22 Q And the other two?

23 A TJ and Taryll.

24 Q All right. And did you also drive Elijah?

01:57:57 25 A Yes.

01:57:57 1 Q Okay.

2 A Elijah -- what's his last name?

3 MR. STEINSAPIR: I don't know.

4 BY MR. FINALDI:

01:58:05 5 Q Well, in your last deposition you said it was
6 Jackson?

7 A Elijah. Oh, yeah. Yeah. Sure. Elijah and --

8 Q And Levon?

9 A Levon. Yeah. Those were -- I drove them some
01:58:22 10 fair amount.

11 Q And they lived in San Luis Obispo?

12 A I think they did live in that area somewhere.

13 Q How did you know that? Did you drive them
14 there?

01:58:34 15 A I remember picking them up there. And I think
16 it was in that area, probably San Luis Obispo.

17 Q Now, when you picked them up, did you pick up
18 anyone else or just the two of them?

19 A I don't remember anyone else. I drove them
01:58:50 20 many times.

21 Q And was Michael with you?

22 A Sometimes.

23 Q Do you know if they were family members of his
24 or not?

01:58:56 25 A Yes, they were.

01:58:57 1 Q They were actually family members?
2 A Yeah. Let me put it this way. Michael spoke
3 of them as cousins and later I understood they were his
4 nephews.

01:59:06 5 Q Okay. So do you know how they were related?
6 A I think they're the sons of one of his
7 brothers.

8 Q Which brother?
9 A I don't -- I don't recall. I'm not sure.

01:59:27 10 Q Okay. Did you ever drive Emmanuel Lewis in
11 your car?
12 A Yes.

13 Q With Michael?
14 A Yes.

01:59:37 15 Q How many times?
16 A I don't remember. Not -- not many times.

17 Q How about Macauley Culkin or his brother?
18 A Yes -- well, I -- I remember them being at the
19 ranch with the rest of their family. And I remember
02:00:03 20 driving Macauley. This is after he got married. But I
21 do recall being with him a few times. I don't
22 specifically recall if that was driving or in some other
23 context. Could have been.

24 Q Okay. Is it after Michael got married or after
02:00:24 25 Macauley was married?

02:00:26 1 A Oh. After Macauley was married.
2 Q And how about Brett Barnes?
3 A Yes.
4 Q How many times?
02:00:33 5 A Oh, it's -- I don't know. It's -- when his
6 family was in town, I would drive them quite a bit.
7 Q Alrighty. With Michael?
8 A Sometimes with Michael. Oftentimes not.
9 Q How about Jonathan Spence?
02:00:54 10 A I don't remember driving a Jonathan Spence. I
11 remember hearing the name.
12 Q What about Gavin Arvizo?
13 A Yes.
14 Q Do you remember driving him with Michael?
02:01:05 15 A Not a specific time do I remember. There's --
16 Q But you know you did?
17 A Probably. I can't say I know I did because I
18 can't recall a specific time. I know I -- I remember
19 driving him and his family to the ranch.
02:01:22 20 Q And were you ever taught any policies or rules
21 or procedures regarding transporting kids?
22 A No.
23 Q Never given any kind of training on, well,
24 these are our rules when you've got kids in your car?
02:01:38 25 A Well, make sure they wear their seat belts.

02:01:41 1 Q You always made sure the kids wore their seat
2 belts?

3 A As I recall.

4 Q In the limo even?

02:01:47 5 A Well, if I was just driving the kids. If
6 Mr. Jackson was with them or some other adult, I would
7 leave it up to the adults.

8 Q Okay. And was Mr. Jackson ever in the back of
9 the limo with the kids with the privacy glass up?

02:02:01 10 A Not that I recall.

11 Q Never?

12 A Like I say, I don't remember. He seldom had
13 that screen up.

14 Q All right. Did you ever spend the night at the
02:02:25 15 Hideout?

16 A Yes.

17 Q How many times?

18 A I remember only one time.

19 Q And what was that occasion?

02:02:38 20 A Mr. Jackson had -- he had some kind of -- I'm
21 trying to remember. It was some kind of medical
22 procedure that involved him getting some drops in his
23 eyes or something like that. And I think he -- he had
24 had some kind of anesthetic and there was concern about
02:03:07 25 him being there by himself. And he also -- they wanted

02:03:11 1 someone to make sure that he took his medication. So I
2 was drafted for that job.

3 Q Do you know what years this was?

4 A It was early on in my career working for him,
02:03:22 5 but I don't remember the year.

6 Q All right. And you said you had been in his
7 bedroom in the ranch, right?

8 A Yes.

9 Q And you had seen kids in his bedroom at the
02:03:36 10 ranch before, correct?

11 A I remember seeing kids -- well, see, his
12 bedroom consisted -- there was what sometimes was
13 referred to as the bedroom. There was a bedroom which I
14 was in very seldom, but then there was another room
02:03:57 15 before that. Kind of a -- had chairs and a T.V. and some
16 video games and so forth. So -- and all of that was
17 behind the door that was kind of to his quarters. So
18 actually, to be precise, more often I was in that -- when
19 I was back there, it was in the -- in that first room.

02:04:17 20 Q Okay.

21 A As well as his closet, his walk-in closet.

22 Q Okay.

23 A Because sometimes I would put bags there.

24 Q So how many kids -- which kids did you first
02:04:26 25 see in that first room?

02:04:28 1 A Well, it could have been any or all of the ones
2 that I had mentioned, plus others.

3 Q Okay. How about in the bedroom itself where
4 the bed was?

02:04:42 5 A I don't recall in the few times that I might
6 have been back there being back there with any kids.

7 Q Never?

8 A Like I say, I don't remember any times and I
9 was not back there that much.

02:04:55 10 Q You testified about seeing Brett Barnes in his
11 bed?

12 A Could be. Yeah. Like I say, that's -- the
13 last time I testified was quite a long time ago. So --

14 Q But now you don't remember anything about that?

02:05:07 15 A No, I don't.

16 Q Okay. You talk about his walk-in closet.

17 MR. STEINSAPIR: You want to put something in
18 front of him. This was 23 years ago.

19 MR. FINALDI: If you've got questions, you can
02:05:16 20 ask him questions.

21 MR. STEINSAPIR: If you want to ask him about
22 his prior testimony --

23 MR. FINALDI: No, no, no.

24 MR. STEINSAPIR: -- I think it's manifestly
02:05:22 25 unfair not to show it to him.

02:05:24 1 MR. FINALDI: Okay.

2 MR. STEINSAPIR: If you wanted to get to the
3 truth, you would show it to him.

4 MR. FINALDI: Do you have an objection?

02:05:29 5 MR. STEINSAPIR: I think I just made it.

6 MR. FINALDI: That's not an objection. All
7 right. That's not a valid legal objection.

8 MR. STEINSAPIR: Thanks for the lesson.

9 BY MR. FINALDI:

02:05:36 10 Q So his walk-in --

11 MR. FINALDI: I don't why you guys keep
12 laughing the whole day.

13 MS. MACISAAC: Very rude.

14 MR. FINALDI: I'm rude?

02:05:44 15 MS. MACISAAC: Very. You know that you are.

16 MR. FINALDI: I'm rude. Yeah. Sure.

17 MR. STEINSAPIR: We've talked to some people.

18 MR. FINALDI: Yeah. I bet you have talked to
19 some people.

02:05:51 20 MR. STEINSAPIR: Hollywood reporters.

21 MR. FINALDI: Keep talking to them. Keep
22 talking to them. Look at my record. It stands for
23 itself. All right.

24 MS. MACISAAC: Okay.

02:05:56 25 THE WITNESS: All right. Yeah. I mean, I

02:05:58 1 sometimes smile. It's just kind of a -- just a reflex.

2 MR. FINALDI: No. I wasn't talking to you
3 about smiling.

4 THE WITNESS: I know.

02:06:05 5 MR. FINALDI: It was your -- both of your
6 attorneys here were laughing and I think it's rude.

7 THE WITNESS: Yeah.

8 MR. FINALDI: But there's nothing. I'm not
9 casting any aspersions on you.

02:06:13 10 THE WITNESS: Yeah. Yeah.

11 BY MR. FINALDI:

12 Q So getting back to his bedroom and the closet,
13 you would have to go in there from time to time to drop
14 off his --

02:06:21 15 A Sure.

16 Q -- luggage or something, correct?

17 A Uh-huh. Correct.

18 Q Do you remember there being kind of a secret
19 door that led to another room from his closet?

02:06:28 20 A From his -- no. No, I don't.

21 Q You never saw that room?

22 A I guess not. I don't recall a room.

23 Q You didn't know there was a secret room in his
24 closet?

02:06:39 25 A No.

02:06:39 1

Q Huh?

2

MR. STEINSAPIR: We don't believe everything we
read on Radar Online.

4

02:06:46 5

MR. FINALDI: If you want to go under oath, I
would be more than happy to ask you questions. All
right. But if not, then just -- you should just keep it
to the objections.

7

8

MR. STEINSAPIR: I know it's not going well,
but continue.

9

02:06:57 10

MR. FINALDI: Standard -- standard proper --
proper legal objections.

11

12

MR. STEINSAPIR: Please proceed.

13

BY MR. FINALDI:

14

Q Okay. So you don't remember any kind of false

02:07:04 15

doors or false walls --

16

A No.

17

Q -- in his closet?

18

A No.

19

Q Okay. And the bed that you remember seeing

02:07:11 20

inside of his room when you were there, do you remember

21

any particular pillows, any kind of writing on the

22

pillows or pictures or anything like that?

23

A Nothing specific. I mean, there was some that

24

had, you know, a lot of Disney -- I don't even know if it

02:07:26 25

was pillows, though. But, you know, he would have all

02:07:29 1 kinds of --

2 Q Like Peter Pan stuff, did you see that bed?

3 A I remember images of Peter Pan as well as many
4 other Disney posters, not just in the bedroom but all
02:07:41 5 over the room.

6 Q I'm talking about on the bed itself.

7 A Oh, no. I don't specifically remember that.
8 You know, and now as we talk about it, it seems like at
9 least, at one time, there may have been a bed in that
02:07:52 10 front room -- yeah -- where I would go.

11 Q How about a bed in, like, an upstairs area from
12 his room?

13 A I don't recall. I remember being in a room
14 upstairs once or twice. And I don't remember much about
02:08:17 15 the furnishings except that there was -- in that room or
16 an adjoining room was a big train set.

17 Q Okay. Did you ever see any kids' clothes in
18 his room?

19 A Not that I remember.

02:08:28 20 Q How about at the Hideout?

21 A No, I don't remember seeing any. Other than
22 the first time -- in fact, for most of the time that he
23 had the Hideout, he had in his living room some
24 mannequins that were clothed in some clothing that he had
02:08:53 25 endorsed. I forget the name of the brand.

02:09:01 1 Q Like mannequins of adults or kids? They were
2 kids' clothes, right?

3 A I think they were mostly kids, yeah, because
4 they were kids' clothes.

02:09:18 5 Q And this is in the Hideout?

6 A This was in the Hideout. Yeah, he had all
7 kinds of things in the Hideout.

8 Q How many different kids' mannequins did he have
9 at the Hideout?

02:09:23 10 A I would say maybe four or five.

11 Q Boys or girls?

12 A Both.

13 Q Did he ever have -- did he have girls over at
14 the ranch much, little girls?

02:09:33 15 A You mean little by what age? I mean, yeah
16 there were girls.

17 Q Five to ten?

18 A Sure.

19 Q Or was it mostly boys?

02:09:43 20 A It would be hard to say because sometimes there
21 are a great number of kids there and I didn't try to take
22 an inventory, no.

23 Q I'm not talking about the times where there was
24 hundreds, you know, when bus loads came.

02:09:57 25 When he had, you know, five or ten or a dozen

02:10:00 1 kids there when he was there, was it usually boys or
2 girls?

3 A Yeah, I would say more boys than girls.

4 Q Did you ever -- so have we talked about all the
02:10:28 5 times that you remember driving Wade in your car? Your
6 car being Mr. Jackson's car.

7 A Yeah. I think we have. There are a few other
8 occasions I recall, specifically, that Wade was there and
9 that's not to say that there wouldn't have been other
02:10:51 10 times as well as other times I might have driven him, but
11 there's nothing that stands out in my memory as to when
12 or where, you know.

13 Q Okay. Did Wade or his mother ever lie to you
14 or say anything to you to make you have an opinion of
02:11:14 15 them as being, you know, untruthful people?

16 A No.

17 Q And the last time you saw them was when Wade
18 was still young teaching dance?

19 A Well, he didn't strike me as young in the sense
02:11:32 20 that what age he was the first time I was aware of him.

21 Q What do you mean by that?

22 A My first impression -- my first clear memory of
23 him and his mother, he was probably -- I would estimate
24 10 or 12 years old.

02:11:45 25 Q Okay. Still a child, though?

02:11:48 1 A Uh-huh.

2 Q Yes?

3 A But I wouldn't have characterized him as a
4 child the last time I saw him.

02:11:56 5 Q The last time you saw him --

6 A And also that includes the time that I drove
7 them to the ranch. It was probably around that time.

8 Q Okay. Did you ever see him at the ranch? I
9 know you remember dropping --

02:12:13 10 A Uh-huh.

11 Q -- him off that one time.

12 A Uh-huh.

13 Q Do you remember spending time at the ranch when
14 Wade was there on other occasions?

02:12:22 15 A No, not specifically.

16 Q Never saw him dancing there or anything?

17 A I could have, but I don't recall any
18 specific --

19 Q No recollection of ever seeing Wade dance in
20 person?

02:12:27

21 MR. STEINSAPIR: Asked and answered.

22 THE WITNESS: Aside from the time I saw him
23 teaching dancing.

24 BY MR. FINALDI:

02:12:33 25 Q Okay.

02:12:33 1 A Yeah.

2 Q Did you ever see Mr. Jackson practicing dancing
3 with any kids?

4 A No. I don't remember that if that -- I mean, I
02:12:42 5 don't remember such a thing if it happened.

6 Q Okay. Now, when you did see Wade and you had
7 driven him a couple times as of that time, did you
8 already know that he had been in some of Mr. Jackson's
9 videos?

02:13:02 10 A I think I did, yes.

11 Q Did you consider him to be one of -- like, a
12 business associate or an employee or just a friend or
13 what did you consider him to be? Were you told?

14 A No. No. And I did not make it my business to
02:13:16 15 try to find out such information about any of Michael's
16 guests. I would certainly find some out just by, you
17 know, somehow it was sort of like common knowledge or
18 sometimes I would be in discussions with them.

19 Q And you were never taught or trained anything
02:13:35 20 by MJJ Productions or any of the staff regarding child
21 abuse or child sexual abuse, right?

22 A No.

23 Q And this is even after the Chandler
24 allegations, correct?

02:13:45 25 A Correct.

02:13:47 1 Q There were no, like, policies or procedures
2 initiated or anything like that regarding child sexual
3 abuse, right?

4 A There was no, like, a course or seminar, per
02:13:57 5 se, about child sexual abuse. I -- I'm just -- right now
6 I'm trying to remember or think if there was anything --
7 ever anything mentioned to me about some special
8 precautions to take regarding children -- or not
9 precautions, but just principles as would relate to me as
02:14:27 10 their driver and I don't remember any. I think --

11 Q Okay.

12 A I think just things like -- I mean, I just sort
13 of assumed it would be the right thing to do. Like see
14 that they have their seat belts on.

02:14:40 15 Q Okay.

16 A Sometimes I would have to tell them to behave
17 or to sit down.

18 Q Did you ever have to tell Wade that?

19 A I don't recall ever.

02:14:47 20 Q Do you know which kids you had to tell that?

21 A Levon and Elijah.

22 Q Okay. How about Macaulay?

23 A No, I don't think so.

24 Q All right. Did -- it's my understanding from
02:15:01 25 time to time you were sent out to buy gifts?

02:15:04 1 A Yes.

2 Q And you had a credit card -- an MJJ Productions
3 credit card, correct?

4 A For a time, yes.

02:15:10 5 Q Okay. And that's what you would use sometimes
6 to buy gifts at places that they didn't have an
7 established account for Mr. Jackson, right?

8 A It would have been. You know, I can remember
9 there were places we had accounts and I would buy things
02:15:29 10 there and I don't -- many of the purchases that I made I
11 think -- I don't recall if they were for guests or
12 friends of Michael's or for him. Sometimes it -- it
13 would be -- excuse me -- specifically for -- for one of
14 his quests.

02:15:50 15 Q Okay.

16 A You know -- yeah, so I did use a credit card in
17 those cases.

18 Q So you had an MJJ Productions credit card.
19 Did you have an MJJ Productions gas car?

02:16:08 20 A Yes. For a time.

21 Q Which you used for gas for the vehicles?

22 A Yeah.

23 Q And when did you first get that?

24 A When I first started working, pretty much, or
02:16:11 25 soon thereafter.

02:16:11 1 Q Okay. Did you have any other -- did you have
2 any MJJ Productions checks to use to pay for things?

3 A No.

4 Q Okay. Were you ever given cash to use --

02:16:20 5 A Uh-huh.

6 Q -- for Mr. Jackson?

7 A Uh-huh.

8 Q Yes?

9 A Yes.

02:16:24 10 Q And who would give you the cash?

11 A As well as I remember, sometimes it might be
12 there at the office and I would pick it up. It would be
13 in an envelope.

14 Q From either Norma or Evvy?

02:16:40 15 A Yes.

16 Q Okay.

17 A Or I can remember at times going to a bank --

18 one bank or another and withdrawing -- not withdrawing

19 from the account, but I met with the bank officer who

02:16:50 20 knew who I was and would give me some cash.

21 Q And when you would get the envelopes, how much
22 cash are we talking about at a time?

23 A It would vary.

24 Q What's the range?

02:17:01 25 A I can remember there was a series after --

02:17:03 1 after we stopped using the credit card, I would simply be
2 issued petty cash and it was usually in the amounts of
3 \$2,000, typically.

4 Q Okay. And when you would go to the bank and an
02:17:18 5 officer would meet you and give you the money, how much
6 would he give you?

7 A 2,000.

8 Q Okay.

9 A Now, sometimes that varied.

02:17:24 10 Q Okay. And what bank was that with?

11 A I don't remember the name of it. This
12 particular bank was in Beverly Hills, though.

13 Q And was that an MJJ Productions bank account?

14 A I don't -- I don't recall. I don't know if I
02:17:37 15 ever knew because, you know, it was not by check.

16 Q Did Mr. Jackson carry cash or did he generally
17 not carry cash?

18 A Generally not.

19 Q Okay.

02:17:49 20 A At least not any significant amount as far as I
21 knew.

22 Q So when you would go through, like, a toll
23 booth or had to pay for parking --

24 A Yeah.

02:17:58 25 Q -- you would have money to pay for it?

02:18:01 1 A Uh-huh.

2 Q And it's my understanding you would sometimes
3 be sent to Toys R Us to buy some toys for kids, correct?

4 A Correct.

02:18:13 5 Q And you would use the MJJ Productions credit
6 card to do that?

7 A While I had that card, yes.

8 Q Okay. I want to go through some of the --
9 could you name some of the kids you remember buying toys
10 for in that manner?

02:18:23 11 A Well, let's see. I'd say most of the ones that
12 I've mentioned.

13 Q So James Safechuck?

14 A Actually, not so much -- I'm not sure I did for
02:18:37 15 him.

16 Q Okay.

17 A Simply because I was with him so little.

18 Q Wade?

19 A Probably.

02:18:42 20 Q Okay.

21 A Again, that's -- I don't remember a specific
22 time.

23 Q Macauley?

24 A Could have been. And he's another that I was
02:18:52 25 not with very much, so maybe not.

02:18:55 1

Q Okay. Jonathan Spence?

2

A Again, another that I -- I wasn't with. I

3

don't specifically recall ever being with him, but I

4

can't say that I wasn't.

02:19:04 5

Q Brett Barnes?

6

A Yeah.

7

Q Okay. The Cascios?

8

A Oh, yes, Cascios. Uh-huh.

9

Q The Arvizo kids? Arvizo?

02:19:14 10

A Arvizo, yeah.

11

Q Okay. And the Chandler kids as well?

12

A Yes. And again, now the ones you've just

13

mentioned, I don't have too much in the way of specific

14

recollections, but, in general, I can remember that there

02:19:31 15

were times that I would either -- I think it was more

16

often that I would allow them to shop for themselves and

17

then I would pick up the tab.

18

Q What would you do with the receipts?

19

A I would keep them and, eventually, turned them

02:19:49 20

in and get reimbursed. This was after we stopped using

21

the credit card.

22

Q Okay. When did you stop using the credit card?

23

A I don't remember. It was after --

24

Q After Chandler?

02:20:06 25

A Probably, yeah.

02:20:06 1 Q And do you know why it was that you stopped
2 using the credit card and started using cash?

3 A Well, apparently -- no, I don't know about the
4 credit card, but -- yeah.

02:20:17 5 Q Okay. So you would turn in the receipts to
6 whom?

7 A I believe it would have probably been Norma and
8 then Evvy.

9 Q All right. And did you --

02:20:33 10 A It certainly must have been, yeah.

11 Q Did he ever tell you why he was buying these
12 toys for these kids?

13 A No. He never sat down and explained it to me.
14 It seemed pretty obvious he was doing it because they
02:20:48 15 loved to shop for toys. And he was -- not just kids, but
16 adults. So many of the people that were friends of his
17 and business associates that he liked, he would have me
18 buy presents for them or he would have presents
19 delivered.

02:21:05 20 Q Okay. So I'd like to just keep it to the kids
21 and the kids and the --

22 A Okay.

23 Q -- toys right now.

24 A Okay.

02:21:10 25 Q Never gave you a reason why you were doing

02:21:13 1 that?

2 MR. STEINSAPIR: Asked and answered.

3 THE WITNESS: That's what I just said. I guess
4 for the same reason anybody gives a gift to anyone.

02:21:24 5 BY MR. FINALDI:

6 Q Okay. And do you know how much money you spent
7 on gifts on Mr. Jackson's behalf for Wade?

8 A No.

9 Q Do you think it's in the hundreds?

02:21:38 10 A Could have been.

11 Q Thousands?

12 A Could have been. I doubt it.

13 Q And is the answer the same for James?

14 A James?

02:21:52 15 Q Safechuck.

16 A Like I say, I have little or no recollection of
17 him.

18 Q Okay.

19 A I mean, I can remember hearing the name. So I
02:21:59 20 may have never bought anything for him. I don't know.

21 Q Now --

22 A It's possible.

23 Q Now, Joy -- you met Wade's mother?

24 A Uh-huh.

02:22:07 25 Q Were you ever sent to get gifts for her?

02:22:11 1 A Could have been. I don't remember.
2 Q Okay. You don't remember in particular?
3 A No.
4 Q For example, June Chandler, you recalled buying
02:22:19 5 a necklace for her, rather expensive necklace, correct?
6 A Yeah.
7 Q \$18,000 or --
8 A Something like that.
9 Q Yeah. And I would assume that was probably the
02:22:29 10 first time you ever spent that much on a piece of
11 jewelry?
12 A Yeah. Yeah.
13 Q Okay. Had you ever been sent out to do
14 something like that after that? Buy a very expensive
02:22:40 15 piece of jewelry for someone?
16 A No. No, I hadn't.
17 MR. STEINSAPIR: Before that or after that?
18 THE WITNESS: Oh, you mean --
19 BY MR. FINALDI:
02:22:46 20 Q After that?
21 A Oh, I don't recall -- oh, you mean a piece of
22 jewelry?
23 Q Yeah.
24 A No, I don't remember.
02:22:52 25 Q You had been sent out to buy a watch for Mr.

02:22:55 1 Chandler, correct?

2 A I don't remember that.

3 Q Okay. Did anyone tell you why you were buying
4 this expensive jewelry for Miss Chandler?

02:23:08 5 A Well, that -- I remember that specifically just
6 because of the circumstances. I knew that Michael wanted
7 to give presents, as he often did, so that didn't
8 surprise me. And he had actually -- I remember that day
9 that he was looking at a -- he had some magazine that had
02:23:33 10 a Tiffany's ad in it and it had a piece of jewelry, some
11 kind of bobble that was quite expensive. And his
12 original instruction was that I would go out and get one
13 of those. And for some reason I was not able to do that.
14 They might not have had it in stock or something.

02:23:53 15 Q Okay.

16 A But he was I think -- as I recall, it seemed
17 like they were about to take a trip or June was or
18 something. I don't know. But it was kind of like a
19 special occasion. So he wanted to buy something really
02:24:09 20 nice for her, apparently.

21 And we went to the Century City Mall and the
22 idea was that we would go in and he wanted to visit a
23 jewelry store there. I don't think he even had a
24 particular store in mind, but he wanted to do that. And
02:24:30 25 he got on a business call and he -- he asked me to go in

02:24:37 1 and just buy a piece of jewelry for her. And I knew what
2 kind of price range he had in mind, so I found a jewelry
3 store and took some time and found -- there was a
4 necklace and kind of a set of ruby items because I think
02:24:59 5 it was more than the necklace. And to me, it was quite
6 beautiful and I thought, well, that would make a nice
7 present. So I chose it. And I had -- I must have had
8 the credit card at that time to be able to pay for it
9 right then and there.

02:25:14 10 Q Yeah.

11 A Because it -- you know, that kind -- kind of
12 created a stir in the store that someone would just walk
13 in and buy something like that that fast.

14 Q Yeah.

02:25:24 15 A So I bought it and took it back to the car and
16 showed it to Mr. Jackson and he seemed to approve of it.

17 Q Okay. In a prior deposition, you said that you
18 saw Brett Barnes in Michael Jackson's bedroom at
19 Neverland and Michael was taking care of him. He was
02:25:51 20 maybe sick with a fever. He was under the covers.

21 Does that refresh your recollection?

22 A Yes, it does.

23 Q Okay. And do you remember anything else about
24 that?

02:26:03 25 A Just, you know, now that you mention it, I do

02:26:05 1 recall that he was sick one time there at the ranch, but
2 I don't remember much more about it.

3 Q Do you know why Michael was taking care of him
4 if he had, you know, 100 employees at the ranch?

02:26:17 5 A Well, he was there. They were friends. I
6 don't recall if he had another doctor there or, you know,
7 because there was a clinic for a doctor in that area that
8 occasionally was consulted if somebody, you know, got an
9 injury or something.

02:26:35 10 Q And there were other beds at Neverland as well,
11 correct?

12 A Oh, yeah.

13 Q And in fact, do you remember the beds that
14 were -- that were right there at the theater behind the
02:26:46 15 glass?

16 A Uh-huh.

17 Q Yes?

18 A Yes. Yes, I do.

19 Q And those were actually hospital beds for sick
02:26:53 20 kids, correct?

21 A Yes. Correct.

22 Q Do you recall ever seeing any sick kids in
23 those beds?

24 A I don't recall having seen any there.

02:26:59 25 Q Okay.

02:27:01 1 A I was very seldom there when they would have --
2 other than to -- let me put it this way, the times when
3 he had sick children there, like, from hospitals and so
4 forth, if I happened to be there, you know, I had other
02:27:17 5 business that would have kept me out of the theater.

6 Q Okay.

7 A I didn't go inside the actual theater very
8 often.

9 Q Did you ever see Mr. Jackson in the shower?

02:27:28 10 A No.

11 Q Never saw him naked?

12 A No.

13 Q Okay. And there was a period of time where you
14 brought Michael Jackson to the Chandler home to sleep at
02:28:01 15 night, correct?

16 A Correct. I assumed. Yeah, he spent the night.

17 Q That was around mid February of '93?

18 A It could have been. I don't recall the -- even
19 the time of year.

02:28:14 20 Q Okay. And it's my understanding it was at
21 least a month's worth of nights in a row that you took
22 him there, correct? 30 days?

23 A I remember that was the -- one of the headlines
24 in the paper about that testimony. That's why I remember
02:28:30 25 the number. I think the question I was asked was my best

02:28:33 1 estimate of the number of times. And I said it could
2 have been 20, 40. I don't -- I didn't know.

3 Q Okay.

4 A I was working seven days a week and the days
02:28:41 5 just kind of ran together.

6 Q Yeah. Did you ask -- ever ask why he was
7 sleeping there?

8 A No. No.

9 Q He had other places to sleep, though, right?

02:28:49 10 A Uh-huh.

11 Q Yes?

12 A Yes. Yes. Uh-huh.

13 Q And he wasn't physically sick at the time that
14 you knew of, correct?

02:28:56 15 A Correct.

16 Q "He," being Mr. Jackson?

17 A As far as I remember, he was not.

18 Q Okay. So you never found out why he was going
19 there to sleep?

02:29:08 20 A I never inquired or tried to find out why.

21 Q Did you know where he was sleeping --

22 A No.

23 Q -- in the house?

24 A No.

02:29:14 25 Q You never knew he was sleeping in Jordan's

02:29:17 1 room?

2 MR. STEINSAPIR: That assumes facts.

3 THE WITNESS: Like I say, I didn't know where
4 he was sleeping in the house.

02:29:25 5 BY MR. FINALDI:

6 Q Did you ever drive him and Jordan around
7 together?

8 A Yeah. Yes.

9 Q Did you ever see him with his arm around
02:29:31 10 Jordan?

11 A I don't remember ever seeing him that way.

12 Q You never saw him touch Jordan at all?

13 A No, I can't say that. As with any of his
14 friends, you know, Michael and people, I don't know -- I
02:29:50 15 never saw him specifically trying to touch him in some
16 certain way, but it's certainly conceivable that they
17 touched, just like he did with many of his friends. I
18 mean, sometimes he and I touched. We would be talking
19 about something and be kind of close to each other
02:30:07 20 standing there and --

21 Q In which way would you touch?

22 A Oh, just -- I mean, in an unconscious sort of
23 way.

24 Q Okay. Where would you be touching one another
02:30:17 25 unconsciously?

02:30:19 1 A Arm to arm or something like that.

2 Q Okay.

3 A Not like we were walking along with our arms
4 around each other but --

02:30:27 5 Q Okay.

6 A -- just like when you're talking to someone and
7 maybe there are other people there and you stand. And I
8 think a few times I was kind of -- you know, we would go
9 to a meeting or something and I'd open the door for

02:30:40 10 Mr. Jackson and I'd sometimes put my hand, you know,
11 behind his back as to kind of -- I guess, a gesture of --
12 of, you know, here.

13 Q Okay.

14 A Yeah.

02:30:51 15 Q But the question was him touching kids.

16 A Kids, right.

17 Q Are you saying this is the way you saw him
18 touching kids?

19 A Something like that, yeah, I would say. You
02:31:02 20 know, like I say, I don't specifically remember any
21 particular posture or position of body. But let me put
22 it this way, if it was something that was inappropriate
23 or in a sexual way, as I assume you might be curious
24 about, I would have remembered that and I have no such
02:31:23 25 memory.

02:31:24 1 Q Okay. Why would you have remembered that?

2 A Because it would -- I think for the same reason
3 I would have remembered it if I saw any adult touching a
4 child inappropriately. That's -- you know, it's just
02:31:41 5 something that's -- you know, it's a wrong thing to do.
6 It's --

7 Q Do you remember ever bringing any kids on the
8 property at Neverland and having them hide in the back
9 when you went through the security booth?

02:31:53 10 A No. No, I don't remember anything like that.
11 I can't say it didn't happen.

12 Q Okay. It may have happened. If it did, you
13 don't remember it?

14 A Correct.

02:32:05 15 Q Okay. Why would a kid need to hide in the back
16 of your limo?

17 A I -- well, you're -- I don't know. Like I say,
18 I don't know if that ever happened. When I say something
19 could have happened, it's -- I mean, there's no way I
02:32:34 20 could know, but I -- I suppose it would suffice to say
21 that I just don't ever remember seeing such a thing.

22 Q Okay. So as far as you remember, there were no
23 certain protocols for going into the gate at Neverland
24 Ranch that changed in any way? Like, any protection from
02:32:54 25 kidnapping or any kind of, you know, standard protocol

02:32:59 1 for you going into the gates that changed? Do you
2 remember any of that?

3 A No. No. Other than very late in my career
4 working for Michael, after there was a period of time
02:33:19 5 when the Nation of Islam was kind of allowed to come in
6 and takeover. Then things changed --

7 Q Yeah.

8 A -- for all of us.

9 Q I'm talking about '93 to '97.

02:33:30 10 A Oh, no. No, I don't remember any such thing.

11 Q Was there a rule that every time you went
12 through that front gate, you had to roll down the window
13 and let them see Mr. Jackson or not let them see
14 Mr. Jackson?

02:33:41 15 A No. In fact, I'm certain there was not a rule.

16 Q So there were times under the rules or as you
17 understood them at the time, it would be possible for you
18 to bring Mr. Jackson and a child onto the Neverland Ranch
19 property without the security guards seeing it?

02:33:57 20 MR. STEINSAPIR: Objection --

21 THE WITNESS: Well --

22 MR. STEINSAPIR: Hold on. That assumes facts.
23 He never testified about any rules, but you can go ahead
24 and answer.

02:34:08 25 THE WITNESS: As I recall, the way the protocol

02:34:14 1 was that when I, you know, pushed the little button to
2 say that I was here with Mr. Jackson, I would also say
3 the other guests.

4 BY MR. FINALDI:

02:34:26 5 Q Yeah.

6 A Yeah.

7 Q But there was no rule, like, you had to roll
8 down the window or not roll down the window so they can
9 actually verify it, right?

02:34:32 10 A It could have been -- I don't specifically
11 recall, but it may have been at times when Mr. Jackson
12 was not in the car that that was a procedure we would do.

13 Q Okay.

14 A But not with him because, you know, he's -- he
02:34:46 15 was the owner of the place. And I think -- anyway, I
16 would get into all kind of speculations as to why, but
17 that's --

18 Q Okay. So how many years did you work for
19 Mr. Jackson before he passed away?

02:34:59 20 A I worked a total of 15 years.

21 Q Okay. And while he was alive, how many years
22 was that?

23 A 15 years.

24 Q Did you ever tell him no?

02:35:16 25 A You mean --

02:35:17 1 MR. STEINSAPIR: Objection; vague.

2 THE WITNESS: I may have -- yeah, I may have
3 spoken the word "no" to him. It depended --

4 BY MR. FINALDI:

02:35:23 5 Q I'm asking did you ever tell him no? Him ask
6 you to do something or tell you to do something and you
7 said no?

8 A No. None.

9 Q Never?

02:35:30 10 A No such time that I can remember and I think if
11 there had been such time, I'd remember it.

12 Q Why do you think that?

13 A Well, because it would have been highly
14 unusual. I can't imagine of a circumstance where I would
02:35:44 15 have.

16 Q Do you remember ever hearing anyone tell
17 Michael Jackson no?

18 A That word specifically?

19 Q Yeah. Him telling them to do something and
02:35:56 20 them saying no?

21 A No, I don't remember --

22 Q Okay.

23 A -- any such time.

24 Q Alrighty.

02:36:10 25 MR. STEINSAPIR: Can we take a break?

02:36:15 1 MR. FINALDI: Sure.

2 THE VIDEOGRAPHER: Videotaped deposition is now
3 going off the record at 2:36 p.m.

4 (Off the record.)

02:44:12 5 THE VIDEOGRAPHER: Videotaped deposition is now
6 returning to the record at 2:44 p.m.

7 BY MR. FINALDI:

8 Q You understand you're still under oath,
9 correct?

02:44:28 10 A Correct.

11 Q And you had a chance to speak to your attorney
12 on the record -- I mean, while on the break, right?

13 A Pardon me?

14 Q You had a chance to speak with your attorney
02:44:36 15 while on the break?

16 A Yes. Uh-huh.

17 Q Okay. You had a pager when you were working
18 for MJJ Productions?

19 A Yes.

02:44:41 20 Q Did you ever have a cellphone?

21 A Yes.

22 Q Later on?

23 A Actually, it was fairly early in my working
24 there, I got, you know, one of those chunky ones.

02:44:49 25 Q Big ones?

02:44:51 1 A Yeah.

2 Q What year was that?

3 A Could have been -- could have been '94.

4 Q Okay.

02:45:00 5 A Maybe late '93.

6 Q And is that how either Norma --

7 A I'm sorry. Could have been '92 or even late

8 '91.

9 Q Okay. And is that how Norma or Evvy would

02:45:14 10 communicate with you?

11 A Yes.

12 Q Either on a phone or through a pager?

13 A Uh-huh.

14 Q Yes?

02:45:21 15 A Yes.

16 Q And did Mr. Jackson have a cellphone or did he

17 use the one you had?

18 A I don't recall him having a -- carrying a

19 cellphone.

02:45:35 20 Q Getting back to that confidentiality agreement

21 that you signed when you were hired. Did you sign other

22 ones during your career or is it just that initial one?

23 A It seems like I did, yes. Yes.

24 Q And was it your understanding you had to sign

02:45:49 25 that in order to keep being employed?

02:45:51 1 A Yes.

2 Q Okay. That was one of the terms you had to
3 agree to, right?

4 A Uh-huh.

02:45:54 5 Q Yes?

6 A Yes. Uh-huh.

7 Q Okay. And did you sign it in front of Norma?
8 Is that the person who had you sign it?

9 A I don't, specifically, recall.

02:46:06 10 Q Okay.

11 A No.

12 Q Do you know if it was Evvy?

13 A I remember signing one. I can't recall it.
14 Probably it was given to me either by -- probably Norma
02:46:15 15 or Evvy or it could have been the receptionist who worked
16 there. It was just everybody signed one.

17 Q It was at the --

18 A At the office.

19 Q At the offices on Wilshire?

02:46:26 20 A Uh-huh.

21 Q Okay. And did the office at Wilshire, did that
22 take up the whole floor or just part of the floor?

23 A No. Part of the floor.

24 Q Do you know how many offices?

02:46:37 25 A Let's see. I think there were four office

02:46:43 1 spaces there, plus a central kind of reception area and a
2 waiting room.

3 Q And initially who do you remember working
4 there? Do you remember Norma?

02:46:51 5 A Norma, Evvy Tavasci, Rosemary Chavira,
6 receptionist.

7 Q C-H-A-V-I-R-A?

8 A That's correct.

9 Miko Brando worked, I would say, more out of
02:47:09 10 the office. I'm not sure what all he did, but he would
11 be there not on a regular basis. I think that's
12 everybody at that time when I started.

13 Q Okay. Did you get along with Miko?

14 A Yes.

02:47:25 15 Q Do you still stay in touch with him?

16 A Occasionally.

17 Q How do you stay in touch with him?

18 A Usually -- the most recent time was quite some
19 time ago. Maybe a year. He and Evvy and I, along with
02:47:46 20 some others, had lunch together.

21 Q Where was that at?

22 A It was an Indian restaurant on Pico Boulevard.

23 Q And was there a particular occasion?

24 A No. Just to get together.

02:48:03 25 Q And which other employees besides you and --

02:48:07 1 A Grace. Grace. Grace Rwaramba was there. Oh,
2 yeah, and she also -- not too long after I started to
3 work, she was also working in the MJJ offices.

4 Q How do you spell her last name?

02:48:20 5 A R-W-A-R-A-M-B-A.

6 Q All right. Who else was at that lunch?

7 A Let's see. There was Evvy, Miko, Miko's wife,
8 Grace and me.

9 Q Do you know if Miko's wife ever worked for MJJ
02:48:37 10 Productions?

11 A To my knowledge, she did not.

12 Q Okay. And what's her name?

13 A Karen.

14 Q Last name?

02:48:46 15 A Brando.

16 Q Okay. Did Michael Jackson ever talk to you
17 about the need for secrecy or confidentiality or did he
18 ever talk about that from time to time?

19 A He might have. I don't recall a specific time.

02:49:10 20 That -- occasion.

21 Q Okay. Now, on a day-to-day basis, who would
22 you report to? Was it Norma or Evvy or was it Michael as
23 well?

24 A It was Mr. Jackson.

02:49:27 25 Q So you had a direct line of communication to

02:49:30 1

Mr. Jackson?

2

A Yes.

3

Q Okay. It wasn't, like, always filtered through

4

someone --

02:49:36 5

A No.

6

Q -- like Norma?

7

A No.

8

Q Okay. And wherever he said for you to drive

9

him, you drove him, right?

02:49:44 10

A That's right.

11

Q And is it true that you never really had a

12

set-in-stone schedule?

13

A Yes.

14

Q Like you might know that he's going to be on

02:49:59 15

tour for these amount of weeks and I'll be off maybe, but

16

--

17

A Oh, yeah. Yeah. That was always.

18

Q But when he was in town, it was -- it could be

19

a 24/7 job?

02:50:08 20

A Yeah. I mean, there was never -- we never went

21

for 24 hours straight, but it -- I was with him -- well,

22

as I often have put it on the occasions I've discussed

23

it, an eight-hour day was a holiday.

24

Q Yeah. Now, there was certain doctors that --

02:50:27 25

or medical providers that Mr. Jackson would see in the

02:50:32 1 L.A. area?
2 A Yes.
3 Q Mr. Klein -- Arnold Klein?
4 A Yes.
02:50:35 5 Q And you took him to and from appointments with
6 him?
7 A Yes.
8 Q Who else?
9 A At various times it -- there were different
02:50:48 10 doctors. There was one he would sometimes visit.
11 Doctor -- he's in Santa Monica. I can't think of his
12 name at the moment. Cosmetic surgeon. A Steve -- Steve
13 Hoefflin.
14 Q How do you spell that last name?
02:51:05 15 A H-O-E-F-F-L-I-N.
16 Q All right.
17 A And then a Dr. Metzger.
18 Q Dr. Allan Metzger?
19 A Dr. Allan Metzger in Beverly Hills.
02:51:22 20 Q Beverly Hills, right?
21 A Yeah.
22 Q Yeah. Were they friends?
23 A Yes.
24 Q Did you ever drive Dr. Allan Metzger in any of
02:51:34 25 the vehicles?

02:51:35 1 A I might have. I don't specifically remember.

2 Q Anyone else?

3 A By way of doctors?

4 Q Yeah.

02:51:47 5 A Yes. Yes. And I don't remember the doctor's
6 name. He had an office, I think, about a block over from
7 Dr. Klein's office in Beverly Hills.

8 Q Do you remember what kind of doctor he was?

9 A I believe he was in the field of cosmetic
02:52:10 10 surgery.

11 Q All right.

12 A There was a -- also, in that same area of
13 Beverly Hills, there was a -- I guess what you might
14 describe as a holistic doctor, who had an office that
02:52:37 15 Mr. Jackson visited a few times. Not very often.

16 Q Anyone else? Any other doctors you remember?

17 A You mean that lived in the area that I would
18 take him to?

19 Q Yeah.

02:52:54 20 A No, I don't recall. There could have been, but
21 I don't remember.

22 Q Now, who set your pay?

23 A I would pick -- the paychecks were issued on a
24 weekly basis and I would pick up my paycheck or
02:53:08 25 paychecks --

02:53:10 1

Q Yeah.

2

A -- in the office. Sometimes there would be quite a few of them because I hadn't been able to stop by to pick them up.

02:53:17 5

Q Yeah. But who set your pay rate?

6

A Who set -- oh.

7

Q You were hired at a certain rate, correct?

8

A Correct.

9

Q And I assume it -- did it increase throughout

02:53:27 10

your entire time of work?

11

A It did a bit.

12

Q Okay. And who was in charge of those

13

increases; do you know?

14

A No. No, I don't.

02:53:36 15

Q Did you ask for pay raises or were you they

16

just --

17

A No, I never asked.

18

Q -- given to you?

19

Why not?

02:53:42 20

A Well, there were times when I thought I

21

probably could ask for a hefty raise, but my situation

22

was such that generally when Mr. Jackson was in town, I

23

worked seven days a week, long hours each day. The

24

upside of that was that when he would go out of town,

02:54:07 25

like, on tour, which might be a couple of months, then,

02:54:10 1 it was my own time and I still got a paycheck.

2 Q Okay.

3 A And I liked that situation. And I thought,
4 well, if I ask for a big raise maybe, you know, I'm going

02:54:24 5 to be expected to check in on those times that

6 Mr. Jackson was -- was not around. So I was happy with
7 it.

8 Q Did you ever ask for a raise?

9 A No, I didn't.

02:54:36 10 Q Okay. Did you receive any raises after '93?

11 A I think so. I'm not certain but I think
12 probably so.

13 Q Did you receive medical benefits as well?

14 A Yes.

02:54:53 15 Q And did you get -- besides your normal pay, did
16 you get bonuses or gifts or anything like that?

17 A It was customary for employees of MJJ
18 Productions to receive presents on their birthday,
19 sometimes during the holidays.

02:55:11 20 Q What kind of gifts did you get?

21 A Well, let's see. The first gift that I recall
22 was a video camera. Typically, such gifts were in the
23 form of electronics.

24 Q Okay. Computer?

02:55:29 25 A I did at one time receive --

02:55:31 1 Q What kind of computer?
2 A It was the first Sony laptop. A little thing
3 that came out.
4 Q All right. But never anything like \$20,000
02:55:45 5 computer?
6 A No, no.
7 Q Never any \$18,000 jewelry?
8 A No, no.
9 Q Did you ever take video of Mr. Jackson or did
02:55:57 10 he say, hey, shoot some video of us here at the ranch or
11 anything like that?
12 A The only time I can recall doing that was when
13 Mr. Jackson was in a hotel and it was his son's first
14 birthday -- first or second. And I remember Grace was
02:56:15 15 there. And we were having a little party for his son,
16 Prince. There was a cake there and I videotaped the --
17 you know, the presentation of the cake and Prince. I
18 think we allowed him to tear into the cake. And, you
19 know, he got it all over himself and so forth, et cetera.
02:56:38 20 Q Okay. That's the only time you remember doing
21 video?
22 A Uh-huh.
23 Q Yes?
24 A Yes.
02:56:48 25 Q And that includes still video?

02:56:50 1 A I don't ever remember taking a still photo of
2 Mr. Jackson.

3 Q Okay.

4 A I wouldn't -- I wouldn't have. Unless he asked
02:56:58 5 me to do it, I, of course, would not.

6 Q Did he ever have alcohol in his cars?

7 A He -- I can remember on rare occasions
8 purchasing white wine for Mr. Jackson. And he had --
9 this is when he would have a cold or a cough or something
02:57:21 10 and he had some kind of concoction that was for medicinal
11 purposes and that was one of the ingredients.

12 Q Would he mix the orange soda with it?

13 A Oh, I don't know. The times I remember that --
14 I don't ever remember him drinking alcohol in the car,
02:57:46 15 but it would be something I would bring to his hotel room
16 or you know -- I guess, mostly the hotel because if he
17 was in town and he was working, that's where he'd be
18 staying after 1993 or early '94.

19 Q And what would be in the concoction?

02:58:07 20 A I don't know.

21 Q How do you know it was a concoction he was
22 making?

23 A Because he -- I remember him talking about it.
24 And he very well may have told me what the ingredients
02:58:19 25 were but --

02:58:19 1 Q You would see him making it?
2 A No. Like I said, he told me about it.
3 Q Okay. What would he call it?
4 A I don't recall what he -- he did have a
02:58:30 5 colloquialism for --
6 Q Jesus Juice?
7 A Yes, yes.
8 Q You heard him saying that?
9 A Yes.
02:58:38 10 Q All right. When you said he would stay in
11 hotels after '93 in the L.A. area, which hotels would he
12 stay in?
13 A The Beverly Hills Hotel, the --
14 Q Where at the Beverly Hills Hotel; do you know?
02:58:56 15 A It would sometimes be in a suite in the hotel.
16 A few times it was in one of the bungalows.
17 Q Okay. And did you have a special entrance that
18 you would use or did you just come in the main entrance?
19 A For the hotels?
02:59:13 20 Q Yeah.
21 A Oh, that he would come through?
22 Q At the hotel, yeah.
23 A Oh, usually, if possible, we would arrange an
24 entrance through the back. Some of the other hotels
02:59:18 25 included the Universal Hilton and the Sheraton next to

02:59:24 1 it, the Bel Air Hotel.

2 Q So you remember taking him to the Universal
3 Hilton there in Universal City?

4 A Yes.

02:59:35 5 Q By Universal Studios?

6 A Uh-huh.

7 Q Yes?

8 A Yes.

9 Q All right. And how often would he stay there?

02:59:46 10 A It's hard to say. It's hard to remember. I
11 mean, I can remember it was several times.

12 Q Wade said he remembered going to that
13 Universal.

14 Do you remember taking Wade there or picking
03:00:00 15 him up there or seeing him there?

16 A No.

17 Q Okay. Do you remember Michael Jackson driving?

18 A Yes, I do. On --

19 Q From time to time?

03:00:12 20 A -- rare occasions.

21 Early on when I first started working for him,
22 he drove himself more often. He -- you know, he --
23 oftentimes, I would be instructed to pick him up. But he
24 was really his own boss, you know. And he didn't have to
03:00:31 25 tell anybody. So how often he drove himself, I'm not

03:00:34 1 certain. But I know that I always welcomed those times
2 so I'd have a little time off myself.

3 Q What do you mean by he was his own boss?

4 A Exactly that. There was --

03:00:48 5 Q He didn't have a supervisor?

6 A No. He was -- he was it.

7 Q Okay. And I would assume after the Jordan
8 Chandler incident with the broken down car, he didn't
9 drive much; is that true? Or did he continue to drive
10 after that?

03:01:03 11 A I don't recall him driving very much around
12 that time frame and thereafter.

13 Q Okay.

14 A Now -- yeah. I don't know. He -- as far as
03:01:19 15 times that he would be at the ranch that I wasn't there,
16 I don't know.

17 Q Okay. And do you remember ever receiving any
18 kind of formal policy or procedure or training manuals
19 while you were at MJJ Productions?

03:01:40 20 A No.

21 Q You don't?

22 A No, I don't. I remember there was a directive
23 at least once that came out about certain -- I guess,
24 you'd call them stalkers after Mr. Jackson that, you
03:01:52 25 know, would be posted. I remember seeing them at the

03:01:55 1 ranch as well with the photo of the person on it, people
2 that had in some way seemed to possibly pose a threat to
3 Mr. Jackson.

4 Q So MJJ did have at least a means for
03:02:10 5 distributing warnings to the employees for Mr. Jackson's
6 benefit, correct?

7 A Yes.

8 Q Okay. I'm going to show you a document here.
9 I have a copy here for counsel, I think. It's actually a
03:02:26 10 set of documents we'll mark as Exhibit B for the record.
11 It's two-sided. Please take note when you make copies.
12 It's about 20 or so pages, maybe more. At the front it
13 says, "Memorandum." Oh, give you a copy to look at.

14 A Thanks.

03:02:52 15 MR. FINALDI: Did you need a copy?

16 MS. MACISAAC: Sure. Thank you.

17 BY MR. FINALDI:

18 Q And it says, "Memorandum, April 15th, 1991.
19 All employees. From Norma Staikos. Re: Employee
03:03:02 20 Handbook."

21 MR. STEINSAPIR: Are we going to mark this?

22 MR. FINALDI: Yeah. Exhibit B. I've marked
23 it.

24 MR. STEINSAPIR: Oh, you have?

03:03:07 25 MR. FINALDI: I'm reading from the exhibit.

03:03:09 1 MR. STEINSAPIR: You should let the witness
2 look at the marked copy.

3 MR. FINALDI: That's fine. You want to look at
4 this one. I can take this one back from you. Alrighty.

03:03:17 5 BY MR. FINALDI:

6 Q Have you ever seen letters distributed from MJJ
7 Productions on this type of letterhead?

8 A Oh, with the dancing feet, yes.

9 Q Okay. And it says, "Attached please find your
03:03:33 10 copy of MJJ Productions Employee Handbook. Each employee
11 is asked to read his or her copy in its entirety and sign
12 the acknowledgment receipt at the end of the manual. All
13 signed statements should then be returned to my attention
14 as soon as possible. This manual will supercede any
03:03:47 15 previous handbooks, policies, et cetera."

16 A Uh-huh.

17 Q "Your earliest attention to this matter will be
18 greatly appreciated. Thank you for your cooperation in
19 this regard."

03:03:58 20 Do you remember ever receiving this?

21 A No, not specifically. I see it's dated at a
22 time fairly well before I started working for
23 Mr. Jackson. And so now -- you know, it's quite possible
24 that I saw this at some point.

03:04:10 25 Q Okay. The next two pages -- the next page

03:04:13 1 says, "MJJ Productions Employee Handbook." And the next
2 page after that has a table of contents, "Introduction to
3 Handbook. Equal Employment Opportunity."

4 Does this refresh your recollection as to
03:04:27 5 whether you received this handbook ever?

6 A No. No, it doesn't. I was kind of -- in a
7 way, my employment was kind of unique and irregular as
8 opposed to say the other employees in the office or for
9 that matter the people who worked for Neverland Valley
03:04:46 10 Ranch, in that most of them, they had set hours and kind
11 of like a regular job. Where, you know, this sort of
12 thing would be given to everybody. And I'm sure -- like
13 I say, I don't recall seeing this.

14 Q So do you know that --

03:05:10 15 A Yeah.

16 Q I'm sorry.

17 A You know, holidays and all that, that would not
18 apply -- wouldn't apply to me and --

19 Q Okay.

03:05:17 20 A -- so --

21 Q Do you know, generally speaking, these rules
22 and policies applied to you or not?

23 A I would have to read them over, but I would
24 assume that they do. And insofar as the particular
03:05:34 25 requirements of my own job differed from that of the

03:05:38 1 other employees.

2 Q Did you have a uniform?

3 A I wore a suit. But, you know, it was of my own
4 choosing as to what it -- what it -- what suit it was

03:05:51 5 or --

6 Q You weren't given a suit to wear?

7 A No, no, no.

8 Q You would go buy one?

9 A Pardon me?

03:05:56 10 Q You would go buy them yourself?

11 A Oh, yeah.

12 Q Were you reimbursed for these?

13 A No.

14 Q You weren't given a clothing allowance?

03:06:03 15 A I never asked for reimbursement.

16 Q Okay.

17 A I remember later on in my career as a driver
18 for Mr. Jackson he indicated his preference that I wore
19 white gloves when I drove.

03:06:15 20 Q Oh.

21 A And I think he had seen that in Singapore and
22 he liked it. So --

23 Q So when did he start making you wear white
24 gloves?

03:06:24 25 A I don't remember. It was -- it was, like I

03:06:25 1 said, later in the period of time that I drove for him.

2 Q Best estimate?

3 A Oh, probably around 1999 or 2000. Somewhere in
4 there.

03:06:41 5 Q Okay. Did you ever get involved in any
6 accidents while you were driving for Mr. Jackson? I
7 think I might have asked you that.

8 A Yeah, you did. And no, I can't remember any.

9 Q Okay. We talked about the ticket?

03:06:54 10 A Yes.

11 Q Okay. And while you were his driver, you were
12 his only driver, correct? Aside from when the Nation of
13 Islam took over or whatever.

14 A For the most part. The exception to that was
03:07:09 15 in 2001, I took an extended leave of absence. It was
16 kindly granted to me by Mr. Jackson to help my mother get
17 re-situated after my father passed away and I was gone
18 for some months. And in that time, Mr. Jackson hired an
19 additional driver.

03:07:37 20 Q Do you know who that was?

21 A His name was -- let's see. He went by a
22 nickname we all called him. Kato. I'm trying to
23 remember what his real name was. I certainly knew it,
24 but I can't seem to summon it up right now.

03:07:58 25 Q Okay. If that comes to you, let me know.

03:08:00 1 A I will. I will.

2 Q Getting back to Jordan Chandler a little bit.

3 A Sure.

4 Q You testified about an occasion where

03:08:13 5 Miss Staikos called you and asked you to go to the

6 Hideout, correct?

7 A I'm sorry. Would you repeat that.

8 Q Miss Staikos called you and told you to go to
9 the Hideout to collect some items, correct?

03:08:26 10 A This was after the Chandler allegations came
11 out?

12 Q Yes.

13 A No. No. I was called -- I did that, but the
14 instruction was from Anthony Pellicano.

03:08:41 15 MR. STEINSAPIR: Gary, why don't you put that
16 to the side so you don't fiddle with it.

17 THE WITNESS: Okay.

18 BY MR. FINALDI:

19 Q So it's my understanding that Norma called you
03:08:48 20 and told you go to the Hideout. And you got there and
21 the door was locked and the key wasn't there. So you had
22 to call a locksmith, right?

23 A Oh, yes, I do. I guess I'm thinking of a
24 separate -- I mean, there were many times Norma

03:09:04 25 instructed me to go to the Hideout for one thing or

03:09:07 1 another. Often to deliver documents or whatever.
2 Q There was another time that Anthony Pellicano
3 told you to go there?
4 A Yes, there was.
03:09:16 5 Q And how did he tell you?
6 A Phone call.
7 Q He called you on -- on that --
8 A My cellphone.
9 Q And what was the cellphone number at the time?
03:09:24 10 A Oh, gosh, I don't remember.
11 Q And what did he say?
12 A It could have been the car phone. He asked me
13 to pick -- he -- he instructed me to go to the Hideout
14 and go in and then he would call me once I got inside.
03:09:46 15 Q Okay.
16 A And --
17 Q So you drove there?
18 A I drove there and --
19 Q And you got inside?
03:09:51 20 A Uh-huh.
21 Q Was this the same -- that's a yes?
22 A Oh. Yes, yes.
23 Q Was this the same time you had to get a
24 locksmith?
03:10:00 25 A No, no.

03:10:00 1 Q That's a different time?
2 A I jumped ahead there.
3 Q Okay.
4 A I thought you were referring to that time.
03:10:05 5 Q So what year was this when Mr. Pellicano told
6 you to do this?
7 A It would have been 1993.
8 Q And this is during the Chandler litigation?
9 A Yes.
03:10:18 10 Q Okay.
11 A Actually before -- it was shortly after the
12 allegations came out.
13 Q And where was Mr. Pellicano at the time; do you
14 know?
03:10:32 15 A I don't know.
16 Q Was he in town?
17 A I don't know.
18 Q And so when you got into the apartment, did you
19 call him?
03:10:34 20 A I called him or he called me.
21 Q This is the apartment off of Galaxy?
22 A Yes.
23 Q Okay. And either way you spoke to him,
24 correct?
03:10:43 25 A Uh-huh. Yes.

03:10:44 1 Q And what did he tell you?
2 A He asked me to look for a document that was
3 lying wherever it might be. Somewhere he didn't know.
4 Q And what was the document?
03:10:55 5 A It was the document of the execution of a
6 search warrant of the apartment.
7 Q Did you find it?
8 A Yes, I did.
9 Q Where was it?
03:11:02 10 A I think it was on a table.
11 Q And did you read it?
12 A Yes, I did. I read it to him.
13 Q And what did it say?
14 A I don't remember the specifics except that it
03:11:13 15 was the -- it mentioned the -- that the purpose of the
16 search had to do with potential charges or an
17 investigation into child molestation.
18 Q And what went through your mind when you saw
19 "child molestation"?
03:11:34 20 A Oh, it was very, very surprising.
21 Q Is that the first time --
22 A Insofar as my -- my knowledge and familiarity
23 with Mr. Jackson. It was not so surprising based on my
24 observation of Jordan Chandler's father prior to that
03:11:58 25 time.

03:11:58 1 Q Okay. We'll get to that. Did you know that he
2 had already been accused of child abuse?

3 A No.

4 Q So this is how you found out?

03:12:08 5 A Yes.

6 Q When you read that search warrant?

7 A Right.

8 Q Okay. And you didn't believe it?

9 A No, I didn't.

03:12:19 10 Q How did you know that Evan made the allegation?

11 A I didn't know but I had a feeling that he was
12 probably behind it.

13 Q Why did you have a feeling he was behind it?

14 A Because he struck me -- I hadn't known him very
03:12:38 15 long, but based on my impression of him, he seemed to --
16 well, I suppose it's kind of a long, involved story to
17 explain why I felt that way.

18 Q Go ahead.

19 A But I'll -- he -- Michael Jackson had, of
03:13:00 20 course, established a relationship with June Chandler and
21 her children. You know, and they -- I drove them around
22 a lot probably some months before I met their father.
23 And I had learned that they were estranged from Jordan's
24 father.

03:13:24 25 And at some point, I met his father. I had

03:13:32 1 never driven Michael to the father's house. But from my
2 perspective as an observer -- not an intentional
3 observer, but I -- I surmised that, you know, Jordan's
4 father was kind of part of that relationship, again,
03:13:54 5 because I saw Jordan with his father and I never had
6 before.

7 Q He was part of what relationship?

8 A Of the general relationship between Michael and
9 the Chandler family. In other words, you know, here was
03:14:08 10 a kind of relationship of Mr. Jackson, June Chandler and
11 her children and the father never saw him. He was not
12 part of that.

13 Q Okay.

14 A And then eventually here it came that Michael
03:14:21 15 was also associating with his father. So --

16 Q And I don't understand how that would lead you
17 to believe that he would make up or was behind a child
18 molestation allegation? Could you connect me there?

19 A Yeah. Sure. That's what I'm in the process --
03:14:37 20 MR. STEINSAPIR: He wasn't done.

21 THE WITNESS: Yeah. Yeah.

22 MR. FINALDI: I thought you were finished,
23 like, I'm not getting it.

24 THE WITNESS: Okay. So what I had heard from
03:14:48 25 Jordan, actually, was that there was some sense of

03:14:54 1 estrangement from the father and also, I think, from June
2 as well. And again, I don't remember specific
3 conversations.

4 And I remember the occasion that Mr. Jackson
03:15:11 5 was over at Jordan's father's house and Jordan was there.
6 And the purpose of that was that Jordan had a school
7 report to do that involved -- it was a report about
8 primates. Michael was going to help him with that
9 because Michael had a certain experience. You know, he
03:15:41 10 owned -- he had a bunch of apes.

11 BY MR. FINALDI:

12 Q **Yeah, Bubbles? Yeah?**

13 A No. This was -- Bubbles was long gone before
14 I -- when a chimp gets a certain age, you can't --
03:15:48 15 they're not a good pet any more, so you have to find a
16 new home for them.

17 Q **So you never met Bubbles?**

18 A Never met Bubbles, but I met several of the
19 others.

03:16:01 20 Q **Okay.**

21 A Anyway. So -- so Michael was going to help
22 Jordan with this report and I had come over there either
23 to deliver something or they had asked me to come over.
24 The upshot of it was that I was sent out to buy some
03:16:27 25 books at book stores about primates, so they could have

03:16:32 1 some references for their report.

2 Q Okay.

3 A And I remember on my way out I was -- and the
4 father Evan Chandler, I think was his name.

03:16:43 5 Q Yep.

6 A He was there. And he -- I remember he -- he
7 told me don't bother with the books. He wanted a certain
8 kind of basketball from Big 5 Sporting Goods down in
9 Santa Monica. He said go get this basketball for me. He
03:17:04 10 seemed to be totally uninterested in his son's welfare in
11 that way; that he would put his desire for a basketball
12 ahead of his son's report.

13 And part of the reason that I did not feel so
14 surprised about the abuse allegations because of my
03:17:27 15 impression of the father has to do with just the feeling
16 that I got from the father. He seemed like a child in a
17 man's body.

18 Q The dad did?

19 A Yes, he did. The -- very definitely in my
03:17:47 20 opinion, a narcissist. And I can't remember all of the
21 specific observations that gave me this impression, but I
22 do recall on another occasion -- and I remember hearing
23 that Jordan had come up with an idea for a movie and the
24 father was, apparently, an aspiring screenwriter and the
03:18:21 25 father Evan had written or co-written a screenplay based

03:18:26 1 on an idea that Jordan had. And I remember the story
2 was, according to Jordan, that his father had promised
3 him a computer in payment for the idea for the screenplay
4 which he never received. Then --

03:18:45 5 Q And you learned all these before you read that
6 search warrant?

7 A Oh, yes. All of this was before any of those
8 allegations came up.

9 Q And where did you learn all of this from? From
03:18:54 10 Michael?

11 A From observation and from Jordan and from
12 Michael, from the whole group. Quite honestly, they all
13 seemed to be down on the father --

14 Q Okay.

03:19:05 15 A -- you know. And I, of course, had not met him
16 up until a certain point. And then my impressions of
17 him, after I had met him, was that their attitude towards
18 their father was probably justified. Of course, I had no
19 way of knowing for sure. I didn't really know the guy.

03:19:24 20 Q So did you warn your boss? Say, "Watch out for
21 this guy? I've got a feeling"?

22 A No. No, I didn't.

23 Q Why not?

24 A Well, let me finish my story.

03:19:34 25 Q Okay.

03:19:34 1 A And then I'll come back to that.

2 Q Sure.

3 A So -- let's see. Where was I? Okay. The
4 computer. Then I think one of my -- this could have been
03:19:48 5 my last impression of the father, the last time that I
6 saw him. There was a meeting held in a hotel in Westwood
7 where Michael often had business meetings. You know,
8 rooms were scheduled and so forth. And I took him there
9 one time. And I was given to understand that -- that
03:20:14 10 Jordan and his father would come to this business meeting
11 and I -- at the time Mr. Jackson got there and there was
12 some other people there. I don't remember who they were.

13 I was waiting sitting on a chair not far from
14 where the elevators came up. And I remember sitting
03:20:45 15 there and the elevator opened and here came Evan Chandler
16 with Jordan. And it seemed like they had some gifts for
17 Michael or something wrapped up and they were really
18 upbeat and he said, Oh, hi, Gary. How are you doing, and
19 so forth.

03:21:02 20 And they went into the meeting and they were in
21 there for some time. And eventually, they emerged from
22 the meeting and Evan -- it was a whole different feeling
23 from Evan. He was totally stone-faced and didn't say hi.
24 He was very unfriendly coming out of there and that may
03:21:27 25 have been the last time I saw him.

03:21:30 1 Somehow I had heard -- and I don't know if it
2 was before or after -- that he was trying to get Michael
3 to help him to promote this idea for a movie and was --
4 and, apparently, Mr. Jackson had decided not to do it.

03:21:49 5 And what -- my take away from that observation was that
6 whatever friendship or friendliness that was displayed by
7 Mr. Chandler was based on some other agenda which had not
8 been fulfilled, apparently, from that meeting.

9 **Q Was this meeting at the Westwood Marquis Hotel?**

03:22:11 10 A That was the name of it.

11 **Q Now it's the W?**

12 A I'm almost certain that's the name of it.

13 **Q Now it's the W?**

14 A The W, yeah. Yeah. I don't recall calling it
03:22:19 15 that, but it may have been.

16 **Q And Jordie and Michael was there and June and
17 Evan?**

18 A I don't remember if June was there or not.

19 **Q Do you remember Anthony Pellicano being there?**

03:22:31 20 A I don't recall him being in there. Like I say,
21 I remember the people I mentioned.

22 **Q You didn't go up in the room, though, right?**

23 A I may have been in there just briefly, you
24 know, when I brought Michael there. But, no, I was not
03:22:45 25 there during the meeting.

03:22:46 1 MR. FINALDI: All right. We've got to change
2 tapes, so let's take a quick break.

3 THE VIDEOGRAPHER: Videotaped deposition is now
4 going off the record at 3:22 p.m. This now concludes
03:23:01 5 tape number 3.

6 (Off the record.)

7 THE VIDEOGRAPHER: Videotaped deposition is now
8 returning to record at 3:28 p.m. This begins tape number
9 4.

03:28:19 10 BY MR. FINALDI:

11 Q You understand you're still under oath, right?

12 A Yes.

13 Q Okay. And when we left, you had talked about a
14 meeting at the Marquis?

03:28:27 15 A Correct.

16 Q The Wilshire Marquis?

17 A Uh-huh.

18 Q Or Westwood Marquis Hotel.

19 And were you finished with your story?

03:28:35 20 A Let's see, I left off with my takeaway from
21 that --

22 Q Yeah.

23 A -- regarding Evan Chandler.

24 Q So your takeaway was that he would make up an
03:28:47 25 allegation of sexual abuse?

03:28:48 1 A Yes. Yes, to use as a way of getting what he
2 wanted.

3 Q And had you ever had that impression of anyone
4 you had met prior in your entire life?

03:28:58 5 A No.

6 Q Okay. You said he seemed like he was a child
7 in a man's body?

8 A That's my --

9 Q Have you ever met anybody else in your life
03:29:15 10 that you felt was kind of similar to that, kind of like a
11 child in a man's body?

12 A I'm trying to compare him to other people I've
13 known. His -- no, I can't -- well, what I mean by that
14 phrase, a child in a man's body is that, this was a grown
03:29:41 15 man, obviously, but I would say emotionally, not fully
16 developed.

17 Q Gotcha.

18 A Yeah.

19 Q And you can't think of anyone just offhand --

03:29:52 20 A Oh, yeah. Sure. Lots of people I can think of
21 that I have had that impression --

22 Q Can you think of one right now?

23 A Yeah. Before.

24 Q Yeah?

03:30:00 25 A Yeah.

03:30:00 1 Q For MJJ Productions?

2 A No.

3 Q Never, huh?

4 A No.

03:30:02 5 Is it okay with this candy in my mouth?

6 MR. STEINSAPIR: You might want to swallow it.

7 MR. FINALDI: I can hear you.

8 THE WITNESS: Huh? Let me know if it's
9 problem.

03:30:16 10 BY MR. FINALDI:

11 Q And what's your definition of a narcissist?

12 A A narcissist is someone who sees the world in
13 terms of -- as revolving around their own personal needs
14 and wishes.

03:30:31 15 Q Have you ever had a chance to work for anyone
16 like that?

17 A In my opinion, yes.

18 Q Who?

19 A A man who -- this was before I ever worked for
03:30:49 20 Mr. Jackson. He was -- at the time I worked for him, he
21 was trying to create a career as a sculptor and he was
22 quite wealthy and had a big bronze casting project going
23 and I helped him with that. And he was of that sort.

24 Q Anyone else since then?

03:31:22 25 A Yeah. I mean, I'm trying to remember. I can't

03:31:25 1 think of anyone offhand.

2 Q Have you -- do you have anything negative at
3 all to say about Mr. Jackson?

4 A Well, he was really bad in keeping
03:31:38 5 appointments. You know, he -- he was -- like I said, he
6 was his own boss and you could have -- there might be
7 umpteen dozen things that he -- by way of business
8 meetings that he has -- would have to do, but if he felt
9 like going shopping, he would do that. He --

03:31:58 10 Q Anything else?

11 A I would say that he sometimes would trust
12 people that he shouldn't have trusted.

13 Q Anything else?

14 A A few occasions I can remember he mistrusted
03:32:32 15 people that he probably should have trusted.

16 Q Okay. Anything else?

17 A Well, he -- he was not a very good housekeeper.

18 Q What do you mean by that?

19 A He -- I think he was accustomed to having other
03:32:59 20 people do that for him. But if it was ever a situation
21 where he had quarters that he lived in that were not his
22 own and the house -- he was not fond of having
23 housekeepers, like, in hotels and so forth that he didn't
24 know that didn't work for him to come into his room when
03:33:19 25 he wasn't there. So sometimes things would tend to pile

03:33:22 1 up.

2 Q Do you know if he wet the bed?

3 A I -- no, I don't know. Well, I assume not
4 because part of my duties, I would be that housekeeper

03:33:36 5 after he was finished in a hotel room.

6 Q Yeah.

7 A And I don't ever recall finding any sheets that
8 someone had wet the bed on.

9 Q Okay. Are those all the negative things you
03:33:54 10 have to say about him?

11 A Well --

12 Q Any others?

13 A I mean, no. I'm trying to think because when
14 you just --

03:34:10 15 Q Just general ones that come to mind.

16 A Just general. I can't think of anything major
17 like that that would be of interest. If you know
18 somebody well, you can probably -- where you know so many
19 details in their life, you know, on what scale do you
03:34:27 20 want to go in terms of positivity and negativity.

21 Q Was he one of your favorite employers ever?

22 A Yes.

23 Q Was he your favorite employer ever?

24 A I'm trying to think if there's any I preferred.

03:34:42 25 Yeah, I think he was.

03:34:43 1 Q Do you have fond memories of working for and
2 with him?
3 A Very many.
4 Q Did he ever give you any jewelry?
03:34:52 5 A He gave me a watch one time.
6 Q When was this?
7 A Fairly early in my career working for him.
8 Q What kind of watch?
9 A It was called a Sector, I think.
03:35:14 10 Q Okay. So you read the search warrant. We're
11 back in the Hideout.
12 A Okay.
13 Q Did it say that anything was seized by the
14 police?
03:35:25 15 A I don't recall that.
16 Q Okay. It said there's an allegation of child
17 molestation and you automatically think of Evan, right?
18 A Yeah.
19 Q Because it didn't say -- usually, it doesn't
03:35:38 20 say the victim's name. It will say John Doe, right?
21 A I don't know. I haven't read that many or
22 that's probably the only such document that I've read.
23 Q Did it say Jordan's name on it?
24 A I don't remember.
03:35:55 25 Q Well, what made you think about the Chandlers

03:35:56 1 and not one of the other kids, you know, numerous other
2 kids you had seen, hundreds of other kids throughout your
3 time working there?

4 A I think it was because prior to that time --
03:36:04 5 because of what I just described. The meeting in the
6 hotel and the few other times that I was there with --
7 when about the time that Evan Chandler came on the scene,
8 so to speak, that I was aware of. I think it was
9 primarily on the level of feeling. It seemed like there
03:36:26 10 was some kind of tension there going on.

11 Q And did you ever ask or hear what the tension
12 was?

13 A No, I never -- I made it a point not to inquire
14 into such things.

03:36:39 15 Q Did you hear that Evan was questioning Michael
16 about are you sleeping with my boy? Are you having sex
17 with my boy?

18 A No.

19 MR. STEINSAPIR: Assumes facts.

03:36:49 20 BY MR. FINALDI:

21 Q Did you know that he confronted him?

22 MR. STEINSAPIR: Assumes facts.

23 THE WITNESS: No. No, I don't.

24 BY MR. FINALDI:

03:36:51 25 Q You didn't know that?

03:36:51 1 A That's the first that I've heard of any of
2 that.

3 Q Okay. Michael, at the very least, had the
4 opportunity to engage in those types of activities with
03:37:01 5 Jordan because he slept at his house numerous times,
6 right?

7 MR. STEINSAPIR: In what kind of activities?

8 MR. FINALDI: Sexual activities.

9 BY MR. FINALDI:

03:37:12 10 Q Right?

11 A Well, I mean, I guess he had the opportunity to
12 do anything with anybody in that house as far as I could
13 say, because I would drop him off and pick him up in the
14 morning.

03:37:31 15 Q Did you ever ask why, why are you sleeping
16 here?

17 A No, no.

18 MR. STEINSAPIR: That's asked and answered.

19 BY MR. FINALDI:

03:37:36 20 Q Did that seem weird to you?

21 MR. STEINSAPIR: Asked and answered.

22 BY MR. FINALDI:

23 Q Did it seem weird to you?

24 A Actually, no, it doesn't based on my
03:37:45 25 knowledge --

03:37:47 1 MR. STEINSAPIR: Let's keep the faces and the
2 --

3 MR. FINALDI: If you don't like my face, then,
4 you know, unfortunately, you're going to have to look
03:37:54 5 away. Okay. This is the face I was born with. So --

6 THE WITNESS: No. No disrespecting. I
7 entirely respect whatever's going on here but --
8 BY MR. FINALDI:

9 Q So he could have done that with anyone in the
03:38:14 10 house? Are you saying --

11 MR. STEINSAPIR: Objection. Come on ---

12 MR. FINALDI: Hold on a --

13 (Simultaneous speaking.)

14 THE WITNESS: If he wanted -- if you're asking
03:38:19 15 my opinion.

16 MR. FINALDI: Yeah.

17 THE WITNESS: No, I don't think he did it with
18 anybody.

19 MR. FINALDI: Okay.

03:38:23 20 THE WITNESS: So any way, I was going to answer
21 your question.

22 BY MR. FINALDI:

23 Q Yeah. Just for clarity the question was, did
24 you ever ask or wonder why -- why is this man with all
03:38:35 25 this money and so many resources going and sleeping at

03:38:38 1 **this little boy's house every night?**

2 MR. STEINSAPIR: Objection; that's just a
3 ridiculous question, but you can go ahead and answer it.

4 THE WITNESS: Yeah. No. Because it was
03:38:50 5 clear -- it was like they were a family. And I remember
6 Michael at one point -- and this could have been before
7 or after that or maybe several occasions, he -- he told
8 me that when he was growing up, he didn't have the kind
9 of childhood most kids had. It was work. And he always
03:39:18 10 seemed to gravitate in his friends toward families.

11 There were various families that he would visit.

12 And my impression when I'm -- I'm mentioning
13 this because you've asked me why it didn't seem weird.
14 They all seemed to enjoy each other's company so much
03:39:46 15 when I was with them. Not just Michael and Jordan, but
16 with June and -- I can't remember the daughter's name
17 right offhand.

18 BY MR. FINALDI:

19 Q Lily?

03:39:57 20 A Lily. Yeah. Lily. Yeah. It was like they
21 were a family. And --

22 Q So he was like a father figure for them?

23 A Gosh. I'm not going to try to -- I mean, I
24 didn't really try to analyze it. But they were -- they
03:40:12 25 all seemed happy together.

03:40:14 1 Q Did it seem -- did they give you that
2 impression because you talked about how he was getting
3 them school books and trying to help him with his --

4 A No. In fact, this was before that occasion.
03:40:25 5 Again, that was when the father came on the scene.

6 Q Yeah. Yeah.

7 But did you -- it seems to me you were saying
8 that Jordan's relationship with his father was not the
9 best; is that right?

03:40:35 10 A That's right.

11 Q So was Mr. Jackson, in your impression, trying
12 to assist with that by providing support for Jordan?

13 A Well, I probably -- that could well be. He
14 did, in fact, buy a computer for him at one time.

03:40:49 15 Q Did you assist with that?

16 A I believe I did, yeah.

17 Q And it was \$20,000, right?

18 A No.

19 Q Well, that's what you said in your deposition.

03:40:56 20 A No. That's a different computer.

21 Q He bought him two computers?

22 A Yeah. The computer that he bought for Jordan
23 was a Toshiba laptop and I think it was 6- or -- well,
24 no, I don't remember how much it was. They were pretty
03:41:16 25 expensive back in those days.

03:41:19 1

Q Yeah.

2

A The other computer, a Macintosh, was one when he still had the Hideout that he wanted himself. And I remembered he wanted it to be something -- at the time,

03:41:33 5

it was a state-of-the-art Macintosh. And it probably -- it may well have cost that much. It had all the accessories.

7

8

Q Okay. And --

9

MR. STEINSAPIR: He's not done answering.

03:41:46 10

THE WITNESS: So at the time he -- I remember having the impression that he wanted it there for any of his guests and friends who came.

12

13

BY MR. FINALDI:

14

Q Okay. So do you remember you were deposed on November 30th, 1993?

03:42:03 15

16

A I don't remember the dates.

17

Q Okay. Does it sound familiar?

18

A As far as the dates, it could have been any day. You know, I really -- I think because the seasons don't change much in California, I have a hard time keeping up with --

03:42:16 20

21

22

Q Okay. I'm going to read you some testimony from page --

23

24

MR. STEINSAPIR: I'm just going to object to you reading testimony.

03:42:25 25

03:42:26 1 MR. FINALDI: Okay.

2 MR. STEINSAPIR: I think that for completeness,
3 you should put the entire deposition in front of him and
4 let him read it.

03:42:32 5 BY MR. FINALDI:

6 Q Okay. So I'm going to read from page 140.

7 "Question: And did you have an account" --

8 MR. STEINSAPIR: Lacks foundation because you
9 haven't shown us the document.

03:42:38 10 MR. FINALDI: You're cutting me off. You're
11 cutting me off, so let me finish. You can make whatever
12 objections you deem necessary.

13 BY MR. FINALDI:

14 Q It says:

03:42:45 15 "And did you have an account there
16 or did you use your credit card?

17 "Answer: I used the credit card.

18 "Question: Did you ever buy, on
19 behalf of Mr. Jackson, Jordie a

03:42:54 20 computer?

21 "Answer: Yes.

22 "Question: Where did you get that?

23 "Answer: That came from a store.

24 I believe it's called The Computer

03:42:59 25 Center.

03:43:03 1 "Question: Where is it located?
2 "Answer: It's on Santa Monica."
3 Did you ever go to a place called The Computer
4 Center?
03:43:10 5 A I went to a place and got the computer. I
6 don't remember the name of it, but I assume I was -- I
7 remembered it back then.
8 MR. STEINSAPIR: Okay. I'm going to interpose
9 an objection and move to strike. And I want to just,
03:43:21 10 again, reiterate for someone who says he's tried a lot of
11 cases and teach us all how to try cases that when you
12 went to refresh --
13 MR. FINALDI: Who said that?
14 MR. STEINSAPIR: -- the witness's recollection,
03:43:30 15 we put it in front of the witness.
16 MR. FINALDI: Hang on. Who said that? That I
17 tried a lot of cases and I'll teach you -- did I say
18 that?
19 MR. STEINSAPIR: I believe you did.
03:43:38 20 MR. FINALDI: Yeah. Okay. Show me the e-mail.
21 MR. STEINSAPIR: Just go on, please.
22 MR. FINALDI: All right. Yeah.
23 MR. STEINSAPIR: Please proceed.
24 MR. FINALDI: If you're going to quote me then
03:43:42 25 do it accurately. Please. All right.

03:43:45 1 MR. STEINSAPIR: Sure, Buddy.

2 MR. FINALDI: And second of all, no need to
3 call me "Buddy." All right. I've got a name. And third
4 of all, please stop laughing again. I think it's the
03:43:53 5 third time I've asked.

6 MS. MACISAAC: Don't bother.

7 BY MR. FINALDI:

8 Q All right. So was that store located in Santa
9 Monica?

03:44:02 10 MR. STEINSAPIR: Same objections.

11 THE WITNESS: No, no --

12 BY MR. FINALDI:

13 Q Or Westwood?

14 A -- no, no. The store where I bought the
03:44:09 15 Macintosh?

16 Q No, no, no. It says -- let me finish reading
17 this.

18 MR. STEINSAPIR: This is the problem with
19 reading depositions like this.

03:44:15 20 BY MR. FINALDI:

21 Q So it says:

22 "That came from a store. I
23 believe it's called the Computer
24 Center.

03:44:19 25 "Question: Where is it located?

03:44:21 1 "Answer: It's in Santa Monica" --
2 "It's on Santa Monica?
3 "Question: In what city?
4 "Answer: In -- I think it would be
03:44:27 5 Westwood. It's right down from Overland."
6 THE WITNESS: Oh, okay.
7 MR. FINALDI: "Or excuse me. Yeah.
8 Overland.
9 "Question: Did you use a credit card?
03:44:33 10 "Answer: Yes.
11 "Question: How much was that computer,
12 if you remember?
13 "Answer: With the accessories, it was
14 -- it came close to \$20,000.
03:44:41 15 "Question: And did you buy Jordie
16 watches?
17 "Answer: Yes."
18 So did you buy Jordan a \$20,000 computer using
19 the credit card from MJJ Productions? Yes or no?
03:44:54 20 MR. STEINSAPIR: Asked and answered and same
21 objections as before.
22 THE WITNESS: I will say no to that, if you --
23 if you require a yes or no answer.
24 BY MR. FINALDI:
03:45:06 25 Q Okay.

03:45:10 1 MR. STEINSAPIR: I thought this was Wade
2 Robson's case, not Jordie Chandler's, you know. Kind of
3 interesting, you know.

4 BY MR. FINALDI:

03:45:16 5 Q So did you ever buy Jordie Chandler any
6 computer?

7 A Yes. The Toshiba that I mentioned.

8 Q Okay. What is this computer that you were
9 talking about purchasing for \$20,000?

03:45:30 10 MR. STEINSAPIR: Lacks foundation.

11 MS. MACISAAC: Asked and answered.

12 MR. STEINSAPIR: You haven't established a
13 foundation that he was talking about anything because you
14 refuse to put the document in front of him. It's also
03:45:36 15 asked and answered, third time. I'll let him answer it
16 one more time and then I'm going to instruct him not to
17 answer as harassment.

18 THE WITNESS: The computer -- I will say quite
19 honestly that I misspoke in that deposition. And I'll
03:45:56 20 give you a little background on that. Mr. Jackson wanted
21 a -- at that time, he wanted to acquire this
22 state-of-the-art Macintosh computer for himself and for
23 guests to use. It had games on it and so forth.

24 And although it may well have been purchased at
03:46:28 25 the time that Mr. Jackson was spending time with the

03:46:30 1 Chandler family, I do recall -- and I, for whatever
2 reason with the way, you know, the line of questioning
3 was going in that deposition back then, I was imprecise
4 in my answer.

03:46:48 5 MR. FINALDI: Okay.

6 THE WITNESS: Because undoubtedly, if
7 Mr. Jackson was seeing the Chandlers at that time, I
8 would assume that they would have been included as
9 potential users of the computer.

03:46:59 10 BY MR. FINALDI:

11 Q Do you remember that you had a chance to review
12 your deposition?

13 MR. STEINSAPIR: That assumes facts. Not true.

14 THE WITNESS: I don't recall, but I understand
03:47:09 15 that's the normal procedure, yes.

16 BY MR. FINALDI:

17 Q Okay. Do you know if you made any changes to
18 it?

19 MR. STEINSAPIR: Objection; that assumes that
03:47:14 20 the time to make changes had come. For the record, it
21 never did. There was a stipulation in that case that
22 changes would be made 30 days before trial.

23 MR. FINALDI: If you want to testify, put on a
24 microphone.

03:47:23 25 MR. STEINSAPIR: No. You are misleading the

03:47:25 1 witness. I'm going to make my record. In that
2 proceeding -- and again, we're hearing nothing about Wade
3 Robson today.

4 MR. FINALDI: If you want to prepare your
03:47:32 5 client --

6 MR. STEINSAPIR: In the Chandler proceedings --

7 MR. FINALDI: -- then prepare him off the
8 record.

9 MR. STEINSAPIR: Excuse me. It's my chance to
03:47:37 10 make a statement. In the Chandler proceedings, there was
11 a stipulation between Mr. Feldman and Mr. Fields, later,
12 Mr. Cochran, that all changes to depositions would be
13 made 30 days before trial. 30 days before trial never
14 came. So the -- the premise of the question is false.

03:47:54 15 MR. FINALDI: Okay.

16 MR. STEINSAPIR: No one had a chance to make
17 corrections to depositions.

18 MR. FINALDI: And he didn't make any changes,
19 huh? So at page 147, where it's changed to say no to I
03:48:04 20 don't recall, "GH," in handwriting? That's not a change,
21 huh? He never made a change?

22 MS. MACISAAC: You know what, why don't you
23 mark --

24 MR. STEINSAPIR: Why don't you mark an exhibit?
03:48:11 25 Why don't you learn how to take a deposition, Buddy?

03:48:15 1 MS. MACISAAC: No one in the room has any idea
2 whether you are accurately readying it because you didn't
3 bring copies for anyone.

4 MR. FINALDI: Okay. So I've got a document
03:48:21 5 here we're going to mark as an exhibit.

6 MR. STEINSAPIR: You're going to mark the
7 entire deposition or you're not going to mark anything.

8 MR. FINALDI: Listen. You're going to stop
9 cutting me off.

03:48:29 10 MS. MACISAAC: We're going to a problem at
11 Blanca --

12 MR. FINALDI: Excuse me?

13 MS. MACISAAC: If you do this, we're going to
14 have a lot of problems on Tuesday.

03:48:34 15 MR. FINALDI: Excuse me?

16 MS. MACISAAC: A lot of problems.

17 MR. FINALDI: Is that a threat?

18 MS. MACISAAC: It's not a threat. I'm just
19 telling you --

03:48:40 20 MR. FINALDI: First of all, one person should
21 be defending the deposition.

22 MS. MACISAAC: One person is.

23 MR. FINALDI: No. It's because you're both
24 talking. You're both yelling. You're both making

03:48:48 25 objections for no reason at all. Okay.

03:48:50 1 Now, I'm going to mark as Exhibit C for the
2 record a page from the deposition of Mr. Hearne. And the
3 deposition is dated --

4 MR. STEINSAPIR: You say it is.

03:49:00 5 MR. FINALDI: -- November 30th, 1994. And the
6 page number is 147. And I'll let you take a look at it.

7 BY MR. FINALDI:

8 Q Do you remember making changes to your
9 deposition in your own handwriting?

03:49:13 10 A I don't specifically remember it.

11 Q Is that your handwriting?

12 A Yes, yes. It looks like it.

13 Q Is it your initials?

14 A Looks like it. Yeah. Definitely.

03:49:20 15 Q Okay. So did you ever make a change to the
16 testimony that talked about buying the \$20,000 computer
17 for Jordie Chandler?

18 A If it's not already here, probably not.

19 MS. MACISAAC: Do you want to see it?

03:49:29 20 MR. FINALDI: Okay.

21 MS. MACISAAC: Would you like to see it?

22 MR. STEINSAPIR: Would you like to show him the
23 entire deposition.

24 MR. FINALDI: I can show it to him.

03:49:33 25 MS. MACISAAC: Why don't you show him all the

03:49:34 1 pages you're reading so he can read them over. Sorry --

2 MR. STEINSAPIR: This is kind of bush league.

3 Let's just move on.

4 MR. FINALDI: Bush league? Bush league?

03:49:47 5 That's just rude. It's condescending.

6 MR. STEINSAPIR: This coming from the guy who
7 the first time I ever talked to him used the f-word with
8 me. You know, that's good.

9 MR. FINALDI: And the word was friggin'.

03:49:57 10 MR. STEINSAPIR: No, it wasn't. You can tell
11 yourself that.

12 MR. FINALDI: Okay.

13 MR. STEINSAPIR: I'll put my credibility on the
14 line against yours any day --

03:50:07 15 MR. FINALDI: Okay. All right. So we'll see
16 at the resolution of this case.

17 BY MR. FINALDI:

18 Q So page --

19 MR. FINALDI: Keep laughing.

03:50:13 20 MR. STEINSAPIR: Keep laughing. Michael
21 Jackson's being tried seven years after he's dead on a
22 case that was tried 25 years ago.

23 BY MR. FINALDI:

24 Q Okay. All right. Page number 141 here.

03:50:22 25 MR. STEINSAPIR: Public reaction.

03:50:24 1 MR. FINALDI: Public -- what are you talking
2 about?

3 MR. STEINSAPIR: It's a public reaction.

4 MS. MACISAAC: Can we move on?

03:50:30 5 MR. FINALDI: Public reaction. What are you
6 talking about?

7 MR. STEINSAPIR: Let's just move on.

8 MR. FINALDI: I'm talking about kids who were
9 raped and sexually abused by your client. Okay.

03:50:36 10 MR. STEINSAPIR: My client?

11 MR. FINALDI: Yes.

12 MR. STEINSAPIR: Who's my client?

13 MR. FINALDI: Who owned MJJ Productions. Okay.
14 So I don't think there's anything funny about this.

03:50:42 15 MR. STEINSAPIR: Yeah. I don't think it's very
16 funny. It's false.

17 MR. FINALDI: Yeah. Were you in the room with
18 them?

19 MS. MACISAAC: Did you bring copies for us?

03:50:49 20 MR. FINALDI: I've got one copy of the
21 deposition. Would you like me to stop and make copies?
22 Because we can take a pause and I can make copies of the
23 entire deposition.

24 MR. STEINSAPIR: Let's move on. I mean, if you
03:50:58 25 ask me about your own client, you would be asking about

03:50:59 1 that.

2 MR. FINALDI: If you want me to, I can pause.

3 We can take a break. I can make a copy --

4 MR. STEINSAPIR: Let's just move on. Let's get
03:51:05 5 this done. It's Friday afternoon. Let's move.

6 MR. FINALDI: All right.

7 THE WITNESS: So any way, should I read this or

8 --

9 MS. MACISAAC: Yes.

03:51:12 10 MR. FINALDI: If you would like to.

11 MR. STEINSAPIR: If he wants to ask you a
12 question about it, if you can.

13 MR. FINALDI: And the page number is page 141.

14 THE WITNESS: Okay.

03:51:22 15 BY MR. FINALDI:

16 Q Where you said you bought him a \$20,000
17 computer --

18 A Uh-huh.

19 Q -- using Mr. Jackson's MJJ Productions credit
03:51:35 20 card. Are you saying that's not true now?

21 MR. STEINSAPIR: It's asked and answered.

22 THE WITNESS: Yes. The specificity of the
23 reason for buying the computer is -- is too narrow.

24 BY MR. FINALDI:

03:51:48 25 Q Where did you take that computer to after you

03:51:51 1

bought it?

2

A To Mr. Jackson's townhouse in Century City.

3

Q How did you know what to buy?

4

MR. STEINSAPIR: Asked and answered. He

03:52:00 5

already said it.

6

THE WITNESS: As far as that computer, I vaguely recall that Mr. Jackson knew of that particular computer model and asked me to get one.

9

BY MR. FINALDI:

03:52:11 10

Q Okay. Well, it says that there were various accessories and things of that nature. Did you get a written list of the things to buy?

11

12

13

A I don't recall. I may have just -- I

14

understood that -- well, see, at that time, money was not such a object of, you know, got to save money here. So a lot of the purchasing of the accessories may have been at my own discretion.

03:52:27 15

16

17

18

Q Were you very computer tech savvy at the time?

19

A Not at all, no -- well, I take that back. I

03:52:45 20

had worked on -- done a little bit of work in the past on some of the really old computers.

21

22

Q Did you have a computer in 1993?

23

A No, no.

24

Q So how would you know what to buy?

03:52:55 25

A Well, I consulted with the people at the store.

03:52:59 1 I certainly would not have purchased anything that I
2 didn't know what it was for or, you know, what its
3 purpose was within the context of the whole system.

4 Q And your testimony under oath is that you did
03:53:12 5 not give that computer to Jordie Chandler?

6 MR. STEINSAPIR: Asked and answered. He's
7 already answered this about --

8 MR. FINALDI: He hasn't answered.

9 MR. STEINSAPIR: Yes, he absolutely has. Go
03:53:20 10 ahead and answer it again.

11 THE WITNESS: Okay. I will testify here and
12 now that it was not -- I did not purchase that computer
13 for -- specifically, for Jordan Chandler.

14 BY MR. FINALDI:

03:53:31 15 Q Okay. Are there anything -- is there anything
16 else that you've said in this deposition under oath that
17 was not correct?

18 A Not that I know of.

19 Q Okay. That's the only one you can think of?

03:53:41 20 A Yes.

21 MR. FINALDI: Okay. All right. Let's take a
22 quick break. If I can see that --

23 THE VIDEOGRAPHER: Videotaped deposition is now
24 going off the record at 3:53 p.m.

03:53:54 25 (Off the record.)

04:04:47 1 THE VIDEOGRAPHER: Videotaped deposition is now
2 returning to the record at 4:04 p.m.

3 BY MR. FINALDI:

4 Q All right. You understand you're still under
04:04:55 5 oath, right?

6 A Yes, I do.

7 MR. FINALDI: Today is the 2nd. Whoops.
8 Alrighty. I am going to go ahead and serve you with a
9 subpoena for the trial in this case. The trial will be
04:05:23 10 the 13th. Your attorney will talk to you about it. But
11 if you want, you can sign an on-call agreement and you
12 don't have to show up the first day. So it's a subpoena
13 for the trial.

14 MR. STEINSAPIR: Just give it to me.

04:05:32 15 MR. FINALDI: Here is also a check for you for
16 the witness fees for the trial.

17 MR. STEINSAPIR: Can he cash it now?

18 MR. FINALDI: Yeah. No problem.

19 BY MR. FINALDI:

04:05:45 20 Q The Chandlers -- so the mother and Jordie, they
21 lived off of San Lorenzo in Santa Monica; is that right?

22 A I don't remember the street.

23 Q Okay. But somewhere by the golf course there?

24 A I don't recall a golf course.

04:06:00 25 Q Okay. Did you ever deliver a VCR to Jordie?

04:06:08 1 A I don't remember if I did or not.

2 Q Okay. You don't remember buying a VCR for
3 someone using the credit card?

4 A I bought many VCRs for lots of people.

04:06:17 5 Q For kids?

6 A Possibly children and adults.

7 Q How many kids do you think you ended up buying
8 VCRs for?

9 A Oh, I -- I really don't know. I -- oftentimes,
04:06:31 10 I would buy and not knowing who it's for.

11 Q Yeah. But for the ones that you knew, either
12 because you delivered them to him or because he said buy
13 for this child, what's your best estimate as to how many
14 kids you bought VCRs for over the years?

04:06:57 15 A It could be -- I mean, it could be somewhere
16 between -- again, estimate, three. It could have been
17 20.

18 Q Did you ever buy cameras or video recorders for
19 kids?

04:07:12 20 A I just -- I recall buying various electronics
21 including VCRs and cameras to give as gifts. And I just
22 don't remember which ones might have gone to children or
23 which ones would have gone to adults.

24 Q How about video games?

04:07:31 25 A Same thing. I don't even specifically remember

04:07:36 1 buying video games, but it's entirely conceivable that I
2 did.

3 Q Okay. Do you remember ever taking kids to the
4 airport to go fly with Michael somewhere?

04:07:55 5 A Yes.

6 Q Which kids?

7 A Remember taking Brett Barnes and members of his
8 family and the Chandlers, which included children, of
9 course. And then I might have taken others. I just
04:08:29 10 don't remember specifically.

11 Q Did you ever wonder why he was spending so much
12 time with young boys?

13 MR. STEINSAPIR: Objection; asked and answered.

14 THE WITNESS: I -- well, he -- like, he --
04:08:42 15 maybe I -- I thought I said it previously, but maybe I
16 didn't. He -- he seemed more at ease with young people,
17 with children because I think my impression was that
18 many of the adults that he dealt with had some agenda to
19 be in some way or other close to him because he's such a
04:09:27 20 celebrity.

21 The impression that I gained was that he
22 gravitated toward children's and young people's company
23 because they were able to appreciate him more for who he
24 was than his celebrity.

25

04:09:44 1 BY MR. FINALDI:
2 Q Okay. Getting back to the Hideout. So you saw
3 the search warrant, you read it?
4 A Uh-huh.
04:09:52 5 Q Right?
6 Did you keep it or did you take it with you?
7 A I don't recall -- oh, no, I did take it.
8 Q Okay.
9 A I did take it.
04:09:57 10 Q And then he told you to grab some other items
11 and take them, correct?
12 A Yes. Yeah.
13 Q What other items?
14 A The only thing I remember at this point is a
04:10:06 15 briefcase.
16 Q All right. Brown leather briefcase, right?
17 A Yes, that's right.
18 Q And it was in one of the closets?
19 A Yes.
04:10:14 20 Q How heavy was it?
21 A I don't remember. Just not particularly -- not
22 light, not particularly heavy.
23 Q But it seemed like there were things in it?
24 A I would say so, yes.
04:10:28 25 Q And did you ever see Mr. Jackson use that

04:10:31 1 **briefcase before?**

2 A I don't remember if I did or not.

3 Q **All right. And you testified about a gray**
4 **suitcase -- gray hard suitcase. Do you remember taking**
04:10:43 5 **that out?**

6 A I don't really remember that at this point.
7 Not to say that I didn't.

8 Q Okay.

9 A I think I took the document as well.

04:11:03 10 Q **You took the document with you, right?**

11 A Yeah. I think so, yeah.

12 Q **In your deposition, page 73, I'll just read**
13 **some.**

14 It says, "And the second object
04:11:21 15 **was a suitcase, right?**

16 "Answer: Yes.

17 "Question: Can you describe the
18 **suitcase for me?**

19 "Answer: It was a gray hard shell.

04:11:27 20 "Question: Hard shell meaning what?

21 What does that mean?

22 "Answer: As opposed to soft, you
23 **know, leather-type kind of a bag**
24 **thing. Medium sized. And it had**
04:11:37 25 **one of the -- it had the wheels**

04:11:41 1 attached to it and a handle that
2 would come out
3 "Question: So you could wheel it?
4 "Answer: Yes.
04:11:45 5 "Question: Okay. And did you
6 attempt to open it?
7 "Answer: No.
8 "Question: Was it heavy?
9 "Answer: A little bit."
04:11:53 10 Does that refresh your recollection?
11 A Yes. I do vaguely remember a suitcase.
12 Q Okay. And my understanding is that you took
13 those somewhere, correct?
14 A Yes.
04:12:03 15 Q Where did you take them to?
16 A I took them to a residence in Agoura -- I
17 believe it was Agoura Hills, somewhere out that way,
18 which appeared to be the residence of Anthony Pellicano.
19 Q And it's my understanding that when you spoke
04:12:24 20 with Mr. Pellicano and Michael on the phone --
21 A Uh-huh.
22 Q -- they were on tour, correct?
23 A Yeah. Yeah. That's my impression.
24 Q Okay. Did they say what was in the briefcase
04:12:37 25 or the suitcase?

04:12:38 1 A No.

2 Q Did they say why they wanted them?

3 A No.

4 Q Okay. Did you take them to the home in Agoura
04:12:44 5 Hills?

6 A Yes.

7 Q Mr. Pellicano's home?

8 A He received them. I gave them to him.

9 Q Okay. He was there?

04:12:52 10 A He was, yes -- no, no. Wait. I think his --
11 whom I -- the person I took to be his wife was there, I
12 think.

13 Q Kat?

14 A Who?

04:13:04 15 Q Kat?

16 A Yeah. I wouldn't remember her name. I just --
17 I think that's the only time I ever saw her.

18 Q You show up at the house and what do you tell
19 her? Was she expecting you?

04:13:16 20 A I think so. Yeah.

21 Q Okay. And did she know who you was -- who you
22 were?

23 A Yeah. I -- I mean, she -- I don't know if she
24 knew -- she seemed to know -- she seemed to be expecting
04:13:34 25 that somebody would be bringing something there and

04:13:38 1 leaving it off with her. And I don't know if she knew
2 who I was or what my -- you know, that I worked for Mr.
3 Jackson. I don't recall.

4 Q Okay. You don't know if you had met her
04:13:48 5 before?

6 A I don't recall having the sense that, oh, this
7 is somebody I met before.

8 Q Do you know what Mr. Pellicano's job was?

9 A No. No, I didn't. I later learned that he was
04:14:04 10 a private investigator.

11 Q You're saying you had never met him before you
12 had spoken to him on the phone?

13 A No. I had met him or I had been with him. He
14 was -- I saw him with Michael a number of times and I
04:14:24 15 didn't ask who he was or what he did. And I didn't even
16 know his name.

17 Q What was your general understanding of what he
18 did at the time, if any?

19 A You know, I didn't really even bother to
04:14:39 20 surmise. There's so much -- there was so many people
21 that Michael dealt with and in his life, it was neither
22 my responsibility nor interest to try to find out about
23 all of them.

24 Q Okay. So -- well, how did you know to follow
04:15:00 25 his instruction?

04:15:04 1 A Because by that time, I had been -- well, I'll
2 tell you. I understood that he -- he worked for Michael
3 and Michael was there wherever he was because I think I
4 may have spoken very briefly to Michael.

04:15:20 5 Q Okay.

6 A And so that was the reason.

7 Q Okay. So you arrive at the Hideout. You get
8 the call, you speak with Michael and Anthony?

9 A Uh-huh.

04:15:36 10 Q They tell you the items they wanted you to
11 retrieve and take them to Agoura Hills to Mr. Pellicano's
12 home. Do I have that right?

13 A Yes. And I think it was Agoura Hills.

14 Q And this is -- you read the search warrant that
04:15:52 15 says "child molestation" and you think about the
16 Chandlers and you've got these two bags and you don't
17 know what's in them?

18 A Uh-huh.

19 Q And you're taking them to a place you've never
04:16:03 20 been before?

21 A Uh-huh.

22 Q Did you think that was weird?

23 MR. STEINSAPIR: Objection; vague.

24 THE WITNESS: No. Frequently, Michael -- you
04:16:10 25 know, when he traveled, he had all kinds of suitcases and

04:16:14 1 bags and so forth. Some were just general, you know,
2 clothing bags. He had, you know, bags with papers in
3 them. Bags with demo tapes of his recordings. And it
4 was not uncommon for him to run off and leave something
04:16:28 5 he meant to bring, you know, with him. And --

6 BY MR. FINALDI:

7 Q Was it common for him to have a search warrant
8 issued --

9 A No.

04:16:34 10 Q -- and served when he was gone?

11 A No, no.

12 Q No?

13 A No.

14 Q Okay. So in the context of a search warrant
04:16:38 15 regarding child sexual abuse --

16 A Uh-huh.

17 Q -- did you think in your head, uh-oh, I might
18 be doing something bad here. I don't know what's in
19 these bags, but it looks like I might be helping him hide
04:16:52 20 something? Did that go through your head?

21 A Not really because the place had just been
22 searched by the police.

23 Q Yeah.

24 A And the bag -- both bags were in plain sight.
04:17:00 25 And I assumed that whatever was in them, they knew what

04:17:04 1 was in those suitcases.

2 Q Well, you said they were in the closets?

3 A Correct.

4 Q That's not in plain sight?

04:17:12 5 MR. STEINSAPIR: Hold on. Hold on. Don't
6 argue with him. He's testifying.

7 THE WITNESS: Just to clarify. If you walked
8 into the closet, you would see it up there on the shelf
9 in plain sight. Later in a grand jury testimony, I was
04:17:25 10 shown the photograph that the police had taken and you
11 could see the briefcase right there.

12 BY MR. FINALDI:

13 Q But you have no understanding that the police
14 looked in them, right?

04:17:34 15 A No. No, I was not there when they searched.

16 Q There was no evidence that they had been
17 opened, right?

18 A They were closed. Whether they had been opened
19 or not I don't know.

04:17:46 20 Q Yeah. Were they locked?

21 A I don't know.

22 Q Okay. Because you never tried to open them?

23 A No, I didn't.

24 Q You weren't curious about what was in them?

04:17:57 25 A Not particularly, no. I -- you know, I just

04:18:00 1 didn't go through his things unless he asked me to
2 retrieve something.

3 Q Do you know what became of those?

4 A No. They were delivered. I assume they
04:18:12 5 were -- eventually found their way into Mr. Jackson's
6 hands and he was off on a tour at that time and had gone
7 for a couple of months. And so, you know, in that kind
8 of situation, things could get lost, shifted around so --

9 Q Did you hear the Pellicanos denied under oath
04:18:30 10 that any bags were dropped off at the home?

11 MR. STEINSAPIR: Objection; lacks foundation.

12 THE WITNESS: No, I haven't heard that.

13 BY MR. FINALDI:

14 Q You didn't know that they denied they said --

04:18:39 15 MR. STEINSAPIR: Asked and answered. You've
16 already answered. Next question.

17 BY MR. FINALDI:

18 Q You never heard that they were saying --

19 MR. STEINSAPIR: Instruct you not to answer.
04:18:43 20 You asked the same question.

21 MR. FINALDI: I haven't even finished the
22 question.

23 MR. STEINSAPIR: You're asking the same
24 question. You've been doing this the entire deposition.

04:18:49 25 MR. FINALDI: Okay.

04:18:49 1 MR. STEINSAPIR: Okay.
2 MR. FINALDI: Then make your objection.
3 MR. STEINSAPIR: You don't get to ask the same
4 question three, four times.
04:18:53 5 MR. FINALDI: Then make your objections.
6 MR. STEINSAPIR: When we see the transcript,
7 you asked questions this morning that you asked this
8 afternoon. You keep asking him the same questions. You
9 asked him did you know that Anthony Pellicano testified
04:19:02 10 as such? He said no. Now you're asking the same
11 question again.
12 BY MR. FINALDI:
13 Q Okay. You never learned anything along the
14 lines that the Pellicanos have denied, they said you
04:19:12 15 never brought suitcases to my house? Is this the first
16 time you've ever heard something like that?
17 MR. STEINSAPIR: I am going to instruct you not
18 to answer. The question lacks foundation.
19 THE WITNESS: The answer is no.
04:19:25 20 BY MR. FINALDI:
21 Q Okay. And you definitely deny that? You would
22 contest that if they said it, correct?
23 A Well, I don't know that it was his house that I
24 had dropped them off at. I was told to give them -- I
04:19:36 25 don't remember what he said, except I had an address and

04:19:41 1 I was told that there would be someone there to receive.

2 Q Okay. But you know for certain that you took
3 it to the address that he told you to take it to,
4 correct?

04:19:51 5 A I'm -- I'm certain I would have. I mean, I
6 wouldn't have -- if it was a different address, I
7 wouldn't have dropped them off.

8 Q And the woman who came out to accept the bags,
9 she introduced herself to you, I assume?

04:20:05 10 A I don't remember.

11 Q Did you knock on the door?

12 A Either that or rang the bell.

13 Q Okay. And did you introduce yourself?

14 A I'm sure I must have.

04:20:15 15 Q And she must have known who you were, right?
16 You wouldn't give the bags to a stranger?

17 A Well, by know who I am, you mean know my name
18 and what I do?

19 Q What I'm getting at is you didn't just ring the
04:20:29 20 door, a person opened and you gave the bags and ran away
21 without knowing that that's who you're supposed to give
22 them to, right?

23 A No.

24 Q The person seemed to know, all right, thanks
04:20:41 25 for the bags?

04:20:42 1

A Yeah.

2

Q Okay.

3

A Okay.

4

Q And you never heard of what became of the bags

04:20:44 5

after that, right?

6

MR. STEINSAPIR: Asked and answered now about
four times.

8

THE WITNESS: Yeah. Yeah. No.

9

MR. STEINSAPIR: Want to ask again?

04:20:53 10

BY MR. FINALDI:

11

Q And since that time, have you ever wondered

12

about what was in the bags?

13

A No.

14

Q Never thought about it?

04:21:01 15

MR. STEINSAPIR: You already asked that.

16

Already asked that. Asked and answered. Keep answering
it.

18

THE WITNESS: No. No. I mean, not any more

19

than I would any other bag.

04:21:17 20

MR. STEINSAPIR: You answered the question.

21

You are done answering.

22

THE WITNESS: No.

23

BY MR. FINALDI:

24

Q Now, in your deposition you said there were

04:21:21 25

some other things that you took there as well. You took

04:21:24 1 the briefcase, the gray suitcase, a piece of paper and
2 some other items that you can't remember what they are.

3 Do you recall what those other items were?

4 A No. I still don't remember. I don't even
04:21:40 5 remember now that I had taken any additional items.

6 Q And what did you do with that search warrant
7 paper? Did you give that paper to the woman as well?

8 A I -- I think I did.

9 Q Okay. On page 81 of your deposition you said
04:22:37 10 question on line 6 is:

11 "What did you do at the
12 condominium after this phone
13 call with Mr. Jackson and Mr.
14 Pellicano?

04:22:46 15 "Answer: I removed some objects.

16 "Question: What do you remove, sir?

17 "Answer: I don't remember all of
18 them.

19 "Question: Well, those that you
04:22:53 20 remember, what did you remove?"

21 A Uh-huh.

22 Q And then you answer:

23 "I recall removing a briefcase.

24 "Question: Okay.

04:23:01 25 "Answer: And a suitcase.

04:23:03 1 "Question: Anything else?

2 "Answer: And the search warrant."

3 So as you sit here today, you don't remember
4 what those other items would have been. Do you even
04:23:12 5 remember the types of items, whether they were bags or
6 suitcases or household items, clothing?

7 A No --

8 MR. STEINSAPIR: Hold on. That was several
9 different questions in one. I object as compound and
04:23:25 10 asked and answered. Go ahead and answer again.

11 THE WITNESS: Yeah. Like I said, I -- I -- if
12 that's what I said then, right now I don't even remember
13 any of those extra items. I didn't really remember the
14 suitcase until you refreshed my memory.

04:23:38 15 BY MR. FINALDI:

16 Q So it could have been clothing?

17 A Could have been.

18 Q It could have been photos?

19 A Could have been.

04:23:43 20 Q Okay. Could have been videos?

21 A Could have been.

22 MR. STEINSAPIR: Could have been pictures of
23 you.

24 MR. FINALDI: Could have been what?

04:23:57 25 MR. STEINSAPIR: Pictures of you. Pictures of

04:23:58 1 anything.

2 MR. FINALDI: I just don't find it -- I don't
3 find it funny, you know. And I don't understand why you
4 have to say those kinds of things. It's just
04:24:09 5 unprofessional.

6 BY MR. FINALDI:

7 Q Did Mr. Jackson call Jordan his cousin in front
8 of you?

9 A I don't ever remember him calling him that.

04:24:21 10 Q Do you remember him calling some of the kids
11 that he was with, other than his real cousins --

12 A Uh-huh.

13 Q -- his cousins or his nephews, like, Jimmy
14 Safechuck or --

04:24:34 15 A No.

16 Q -- Macauley Culkin? No?

17 A No.

18 Q Okay. After this suitcase incident, did you
19 ever see Mr. Pellicano after that?

04:24:45 20 A I -- yes. Yes, I did.

21 Q On which occasions would you see him
22 afterwards?

23 A I saw him -- I only remember one time seeing
24 him after that. And that was at an office and I think it
04:25:03 25 was in Century City.

04:25:05 1 Q And what was the occasion?
2 A He wanted to ask me some questions.
3 Q About what?
4 A The whole Chandler incident and the things that
04:25:17 5 transpired leading up to the search of the apartment,
6 that kind of thing.
7 Q Leading up -- to the search and the suitcase?
8 A Uh-huh. Yes.
9 Q Okay. Who was with him --
04:25:31 10 A I don't recall --
11 Q -- if anyone?
12 A -- anyone else being with him at that time.
13 Q Do you know whose office this was?
14 A I don't remember. It might have been his
04:25:41 15 office, if he had an office.
16 Q Was there anyone else in there with him?
17 A No.
18 Q All right. Was it recorded?
19 A Yes, it was.
04:25:50 20 Q Video or tape?
21 A I think it was taped. Just audio.
22 Q Okay. And how long was this interview?
23 A I don't remember. I don't remember it as being
24 really long.
04:26:12 25 Q Were you nervous?

04:26:14 1 A I don't remember being nervous.

2 Q Did you ask for an attorney?

3 A Excuse me?

4 Q Did you ask for an attorney?

04:26:19 5 A No.

6 Q Did you think about getting one?

7 A I don't remember thinking about that.

8 Q And what did he ask you?

9 MR. STEINSAPIR: I'm going to object and
04:26:35 10 instruct the witness not to answer. Mr. Pellicano was
11 working for Greenberg Glusker and as an investigator. We've
12 asserted the privilege and have served a privilege log on
13 this exact interview. No challenge was ever made to that
14 so consider the issue closed.

04:26:59 15 MR. FINALDI: Attorney-client work product?

16 MR. STEINSAPIR: Work product.

17 BY MR. FINALDI:

18 Q You did speak with him, though, correct?

19 A Correct.

04:27:04 20 Q And how long was that meeting?

21 MR. STEINSAPIR: Asked and answered.

22 THE WITNESS: I don't remember.

23 BY MR. FINALDI:

24 Q More than an hour?

04:27:10 25 A I would say not.

04:27:14 1 Q About an hour?
2 A Maybe -- maybe significantly less.
3 Q Half an hour?
4 A Could have been.
04:27:19 5 Q Okay. Is that your best estimate?
6 A Yeah.
7 Q Okay. And after that, did you ever see Mr.
8 Pellicano again?
9 A I don't recall ever seeing him again.
04:27:28 10 Q Do you know where he is now?
11 A No.
12 Q Do you know what became of him?
13 A He was in the news. I think he spent some time
14 in jail or was convicted or like that.
04:27:41 15 Q Perhaps, still there?
16 A I have no idea.
17 Q Do you know what he went to jail for?
18 A No. No, I don't.
19 Q No?
04:27:52 20 A I think I remember reading -- let me put it
21 this way, I don't remember. I think I read about it, but
22 I don't remember what he went to jail for.
23 Q Okay. And no one -- did anyone from MJJ
24 Productions ever discuss with you Mr. Pellicano's legal
04:28:14 25 troubles?

04:28:15 1 A Not that I remember.

2 Q Were you ever interviewed by the police with
3 respect to any criminal investigation involving Mr.
4 Pellicano?

04:28:23 5 A No.

6 Q You took Jordie to the Hideout on several
7 occasions, correct?

8 A That's correct. Yeah.

9 Q Did you ever take Wade there?

04:28:37 10 MR. STEINSAPIR: Asked and answered.

11 THE WITNESS: I don't recall.

12 BY MR. FINALDI:

13 Q When you took Jordie there, was it just Jordie
14 that you took alone?

04:28:51 15 A I don't remember.

16 Q Which other kids do you remember taking there?

17 MR. STEINSAPIR: That's asked and answered.

18 MR. FINALDI: I asked him who he saw there and
19 I asked him who he took there.

04:29:07 20 THE WITNESS: The ones that I mentioned most
21 of -- most of the ones I mentioned -- I have very little
22 recollection of specific times, but quite possibly --
23 probably Brett Barnes, Jordan Chandler, Taj -- the three
24 young men I referred to as 3T.

04:29:45 25 MR. FINALDI: Uh-huh.

04:29:47 1 THE WITNESS: The sons of Tito. Levon and
2 Elijah. And those are only ones I remember,
3 specifically.

4 BY MR. FINALDI:

04:29:55 5 Q Okay. You said there were times that -- at
6 least one time where you took some kids to Disneyland
7 with Michael Jackson?

8 A Uh-huh. Yes.

9 Q Yes?

04:30:12 10 A Yes.

11 Q Which kids?

12 A All of the above. In other words, kids -- now,
13 again, I -- there are few I remember, specifically. But
14 I remember taking the Chandler family with Michael to
04:30:30 15 Disneyland. And I'm trying to come up with a specific
16 memory of some of the others. And I don't -- although,
17 it's entirely conceivable that I did take them with
18 Michael to Disneyland.

19 Q And when you took the Chandlers, did you say
04:30:57 20 that you went onto the park with them?

21 A Yes. Uh-huh.

22 Q Did you go on the rides with them as well?

23 A Yes.

24 Q And was that just a day trip?

04:31:07 25 A Yes.

04:31:08 1 Q Okay. On these other occasions you went to
2 Disneyland with Mr. Jackson, did you go in the park as
3 well?

4 A Yes.

04:31:14 5 Q On the rides?

6 A Yes.

7 Q Okay. Did you ever take the Cascio kids to the
8 Hideout?

9 A Oh, yes, probably. Probably. You know, it's -
04:31:48 10 I -- the Cascios -- the Cascios was another family that
11 Michael was friends with and they had a number of
12 children and we would do things together or Mr. Jackson
13 would and I would drive.

14 Q What about a child named Omar?

04:32:09 15 A Omar. Yes.

16 Q Do you remember him?

17 A Yeah. Yeah.

18 Q What do you remember about him?

19 A He was another friend of Michael's, he and his
04:32:15 20 family. I later learned they were from Norway. And they
21 also, you know, did various things together.

22 Q Okay. Did you ever drive that kid around?

23 A Yes. Yes. With his -- I remember picking them
24 up at the airport. The family.

04:32:38 25 Q Did you ever drive just the child?

04:32:40 1 A I may well have.

2 Q Okay. Were there times when you dropped the
3 parents off for, like, shopping and maybe took the kid to
4 go see Michael?

04:32:48 5 A I don't, specifically, recall having done that.

6 Q When is the last time you saw Omar?

7 A I -- I don't remember. It would have been
8 sometime after 2000.

9 Q And do you know how old he was at the time?

04:33:19 10 A I -- no, I don't -- don't -- I wouldn't have
11 specifically known. I would assume that he was probably
12 a teenager.

13 Q In the Chandler case, did you ask Norma for a
14 lawyer? Did you say it would be good if I had a lawyer?

04:33:55 15 A No.

16 Q Never said that?

17 A No. I never asked for an attorney.

18 Q Okay. Because you wouldn't have any reason to
19 have an attorney, right? You didn't do anything wrong?

04:34:09 20 MR. STEINSAPIR: Objection; that's an improper
21 question.

22 BY MR. FINALDI:

23 Q Correct?

24 MR. STEINSAPIR: Hold on. Lacks foundation,
04:34:15 25 it's misleading.

04:34:18 1 BY MR. FINALDI:

2 Q Do you understand the question?

3 A Would you ask it again?

4 Q Yeah. You didn't do anything wrong that would
04:34:26 5 require you to want a lawyer, right?

6 A That's correct.

7 Q Okay.

8 MR. STEINSAPIR: That's an interesting view of
9 attorney-client relationship.

04:34:39 10 BY MR. FINALDI:

11 Q Now, when you arrived at the Century City
12 apartment, you testified earlier, in earlier deposition,
13 in '93, that the security guard had told you that the
14 police had just been there.

04:34:54 15 Do you remember talking about that?

16 A No, I don't.

17 Q Were you friends with the security guard?

18 A I knew -- knew them. They knew me because I
19 would come and go regularly.

04:35:07 20 Q Did they know who your client was?

21 A I don't know.

22 Q Your employer? Did it seem that they knew?

23 A It wouldn't have surprised me if they knew. I
24 think they probably did, but I -- they would have never
04:35:22 25 said it if they knew.

04:35:25 1 Q When is the last time you communicated with
2 Norma?

3 MR. STEINSAPIR: Asked and answered.

4 THE WITNESS: Yeah. The last, I think I may
04:35:33 5 have mentioned earlier, I saw her at an airport.

6 BY MR. FINALDI:

7 Q Yeah. I know you saw her at the airport. But
8 this question's a little more broad. This is
9 communication. So it would include text message, letter,
04:35:42 10 e-mail, phone call --

11 A No, no.

12 Q -- text message.

13 A Nothing past that.

14 Q And in any of your get-togethers that you had
04:35:54 15 with the other employees, such as the lunch at the Indian
16 restaurant, did you ever talk about Norma and say what
17 she's doing or what's she up to or --

18 A The topic has come up a few times, but a lot of
19 discussion when we get together has nothing to do with
04:36:09 20 work or Michael.

21 Q No. So what have you heard about Norma lately
22 as far as what she's doing or where she's been?

23 MR. STEINSAPIR: Assumes facts.

24 THE WITNESS: The last I heard, the last
04:36:17 25 discussion that I can recall was something to the effect

04:36:22 1 of wonder what Norma's doing and where she is. I think
2 pretty much everyone is out of touch with her.

3 BY MR. FINALDI:

4 Q Did you get any kind of a retirement or pension
04:36:41 5 from MJJ Productions?

6 MR. STEINSAPIR: That's asked and answered.

7 THE WITNESS: No.

8 BY MR. FINALDI:

9 Q No?

04:36:45 10 A No.

11 Q Okay. Now, you said at the hotels sometimes
12 you would be responsible for taking care of the linens in
13 Mr. Jackson's bed, right?

14 A Let me again make clear what I would do. He
04:37:09 15 would stay at a hotel sometimes for an extended time.
16 And then when he was ready to leave, he would leave. And
17 the -- but the room would not be checked out.

18 And what I would do is travel to that hotel
19 after he had left and pack all of his things up and go
04:37:37 20 through everything that was there at the hotel to make
21 sure that there was nothing by way of any kind of
22 confidential things, phone numbers or whatever written on
23 scraps of paper and make sure that none of those were
24 left behind.

04:37:53 25 Q Okay.

04:37:54 1 A So it was -- typically, it would take me a week
2 or more to do that because it was quite a big job. He
3 loved to shop. And --

4 Q And he was a little messy?

04:38:05 5 A Little messy. And over time it would
6 accumulate.

7 Q In the items that you were cleaning up or
8 packing up or picking up for him, did you ever see any
9 kind of pornography?

04:38:16 10 A No.

11 Q Never?

12 A That's correct.

13 Q So no books that had naked pictures or
14 anything --

04:38:24 15 A Well, I do a couple of times recall running
16 across a Playboy magazine.

17 Q Do you know if he had a subscription?

18 A I don't know. I -- I -- like I say, I only saw
19 a couple of those. I would think if he had a
04:38:49 20 subscription, it would have been -- I would have probably
21 seen them around regularly.

22 Q And where did you see those?

23 A It could have been -- well, now that you
24 mention it, it may have been in the hotel or it may have
04:39:05 25 been -- you know, among some of the things that I

04:39:09 1 inventoried in the warehouse which I think I referred to
2 earlier. So I was a little imprecise on my answer to you
3 there.

4 Q If we looked at the invoices, the inventory
04:39:26 5 that you created that would tell us, right?

6 A Well, the inventory was not done to that amount
7 of detail. Like, it could be box of magazines, papers,
8 so forth.

9 Q You wouldn't say what kind of magazines?

04:39:39 10 A No. No. Probably not. Although, it would
11 depend. Like he really liked magazines, these thick
12 periodicals on architecture and nice homes and he -- that
13 was one thing that he did have a subscription to. And as
14 much as possible, when there were a lot of similar items,
04:39:59 15 I would try to put them together. So it's conceivable
16 that, you know, those would be in a box that is marked
17 architecture magazines.

18 Q In the items that you were inventorying from
19 the estate, do you remember any other kind of
04:40:16 20 pornographic materials other than the Playboy?

21 A No. No, I don't.

22 Q No other, like, Hustler magazine --

23 A No.

24 Q -- or any other?

04:40:24 25 Just one Playboy magazine one time you saw?

04:40:28 1 A I said one or two. And by one or two, maybe it
2 was three or four. But not -- not in any kind of a way
3 where it seemed like, you know, he collected these
4 magazines or subscribed to them regularly.

04:40:49 5 Q Okay. And the only person you ever knew him to
6 date romantically was Lisa Marie, correct?

7 A Well, I mean, I -- he -- I know he went out
8 with some -- with at least one other person.

9 Q Who?

04:41:13 10 A Brooke Shields.

11 Q Was that while you were the driver?

12 A Yes.

13 Q All right.

14 A And again, that was a friendship that went back
04:41:25 15 in the past before I started to work for him.

16 Q And did you ever see them doing anything
17 romantic with one another?

18 A No.

19 Q Kissing or making out or --

04:41:36 20 A No, I didn't. And the previous observance of
21 that sort that I witnessed with Mr. Jackson and Lisa
22 Marie Presley was inadvertent. You know, I just happened
23 to be looking up in the rear view mirror and I realized
24 what I was -- you know, they were having a private moment
04:41:57 25 and so I didn't continue to look.

04:42:02 1 Q Oh, you didn't stare?
2 A No, no, no.
3 Q Okay. When Michael was involved with Lisa
4 Marie at that point in time, did she have kids?
04:42:26 5 A She did.
6 Q How many?
7 A Two.
8 Q Boys, girls?
9 A Both. One of each.
04:42:31 10 Q How old were they?
11 A The girl was probably, I would say, five or six
12 years old and the boy was two or three.
13 Q What was the boy's name?
14 A Let's see. I can't remember his name.
04:42:58 15 Q And you saw Michael spending time with the boy,
16 correct?
17 A Pardon me?
18 Q You saw Michael spending time with the boy,
19 correct?
04:43:04 20 A Not per se. They were -- I saw them as a group
21 together, yeah. So he was with the boy as well as with
22 Lisa Marie and her daughter.
23 Q Did you ever drive Norma Staikos anywhere?
24 A I remember one occasion, yes.
04:43:29 25 Q Where?

04:43:29 1 A I drove her to the ranch.
2 Q From?
3 A From Los Angeles. I don't know if I picked her
4 up at the offices or at her residence.
04:43:37 5 Q And why was it that you were driving her?
6 A I don't remember. She had some business.
7 Q Did you talk with her while she --
8 A Yeah.
9 Q It was just her?
04:43:47 10 A Just her, yeah.
11 Q And you got along with her, right?
12 A Yes.
13 Q Okay. And you don't know why you were bringing
14 her up there?
04:43:52 15 A I don't remember. I may well have known. She
16 had some business.
17 Q Any other times you drove her there?
18 A I don't recall any other times.
19 Q How about any other members of the Jackson
04:44:02 20 family? Do you remember driving any others? Janet or La
21 Toya or Tito, Jermaine?
22 A You mean to the ranch?
23 Q Anywhere.
24 A Yes. Yes. I drove -- at various times, I
04:44:20 25 drove his mother; drove La Toya, his sister; and Janet.

04:44:36 1 It seems like I might have driven Jermaine, his brother,
2 at one point or another. I don't have a clear
3 recollection of that. And I don't recall driving other
4 members of the family --

04:44:56 5 Q Okay.

6 A -- of his immediate family.

7 Q Do you have kids?

8 A No.

9 MR. FINALDI: All right. Let's take a quick
04:45:27 10 break.

11 THE VIDEOGRAPHER: Video deposition is now
12 going off the record at 4:45 p.m. This concludes tape
13 number 4.

14 (Off the record.)

04:50:23 15 THE VIDEOGRAPHER: Videotaped deposition is now
16 returning to the record at 4:50 p.m. This begins tape
17 number 5.

18 BY MR. FINALDI:

19 Q You understand you're still under oath, right?

04:50:39 20 A Yes, I do.

21 Q Okay. Did you ever hear Mr. Jackson using
22 nicknames for kids?

23 A He had a generalized nickname that he applied
24 to a whole lot of people.

04:50:57 25 Q Which nickname?

04:50:58 1 A Applehead.
2 Q And do you know what that meant, if anything?
3 A No. No, I don't.
4 Q Had he ever called you Applehead?
04:51:11 5 A I don't recall being called an Applehead.
6 Q Okay. Do you remember him calling kids that?
7 A Yes.
8 Q Do you remember him calling kids rubba?
9 A Oh, yeah. Yeah.
04:51:23 10 Q And do you know what that meant?
11 A It was short for rubber head. It was some kind
12 of private joke between him and Emmanuel Lewis, I think.
13 Q Rubber head?
14 A Yeah.
04:51:40 15 Q Okay. Any other nicknames?
16 A No, I don't remember any others.
17 Q And who told you that that was a rubba head
18 was -- it was a nickname for rubber head?
19 A Because sometimes they would use the two
04:51:55 20 interchangeably.
21 Q Did you hear him say rubba and rubber head?
22 A Rubba, rubber head. In fact, he called his --
23 his rubber head sometimes.
24 Q Did you ever hear him saying anything to the
04:52:10 25 effect that women are bitches, ho's and heifers or

04:52:15 1 something like that?

2 A I think -- no. He wouldn't use that kind of
3 language. At least I didn't hear him.

4 Q Never hear --

04:52:23 5 A Heifer, maybe.

6 Q Okay. In what context would he use the word
7 "heifer" in respect to a woman?

8 A You know, I just -- it seems like I remember
9 hearing him say that. I don't remember who it might have
04:52:45 10 been that he was referring to.

11 Q All right. How about talking about a club
12 having a club with kids or part of his special club or
13 secret club? Did you ever hear him talking about that?

14 A I don't recall hearing that.

04:52:58 15 Q How about talking about Peter Pan? Him being
16 Peter Pan, stuff like that? Did he ever talk about that
17 with you?

18 A No.

19 Q Okay. So you believe Wade Robson is making up
04:53:13 20 the allegations against Michael, correct? You believe
21 they're false?

22 A Well, yes, I do.

23 Q Do you have any idea in your head as to why he
24 would do that?

04:53:24 25 A No, I don't know why he would.

04:53:31 1 Q Okay. Did you ever hear him calling kids dudu
2 head?

3 A Oh, he did use that term, which I believe is --
4 he -- was derived from, I believe, a French term which
04:53:51 5 means friend or some kind of amicable --

6 Q Dudu?

7 A Yeah. D-U-D-U.

8 Q You were never written up as far as discipline?

9 A No.

04:54:21 10 Q Disciplinary punishment?

11 A No, no.

12 Q Okay. On page 13 of this manual here, it talks
13 about a policy against harassment. "MJJ Productions is
14 committed to providing a workplace which is free from
04:54:48 15 discrimination of any sort. In keeping with this
16 commitment, MJJ Productions maintains a strict policy
17 prohibiting unlawful harassment, including sexual
18 harassment."

19 Do you ever remember receiving this policy?

04:55:00 20 MR. STEINSAPIR: Asked and answered.

21 THE WITNESS: Like I said, no -- excuse me.

22 No, I don't remember it. I might have.

23 BY MR. FINALDI:

24 Q So you may have or you may not have?

04:55:13 25 A That's correct.

04:55:14 1 MR. FINALDI: Okay. You guys have any
2 questions?

3 MR. SLATER: I just had a couple quick
4 questions.

04:55:19 5

6 EXAMINATION

7

8 BY MR. SLATER:

9 Q During your time at MJJ Productions did you --
04:55:23 10 were you familiar with the day-to-day operations of the
11 company apart from what you did?

12 A Somewhat. Not in any kind of systematic way.

13 Q Do you -- did you know to what extent Michael
14 Jackson was involved in the daily operations of the
04:55:42 15 company?

16 A Well, you mean in terms, like, just what went
17 on in the office on a --

18 Q Yes.

19 A No. He was not involved with that.

04:55:55 20 Q So do you know were there -- on a daily basis
21 were there many decisions made without his input or his
22 approval?

23 A Well, I -- you know, not being one of the
24 people who was in that position, I can't say. I could
04:56:12 25 surmise -- which I'm not supposed to do -- but that it

04:56:14 1 would depend entirely on the level of the decision being
2 made.

3 Certainly, those who worked in the office had
4 one or another level of authority and, of course, they
04:56:25 5 would make decisions within the realm of that authority.
6 As far as big decisions, nothing was decided without
7 Michael's approval, which sometimes he would -- you know,
8 he would be busy with other things when he should have
9 been reading this document to make this or that decision.
04:56:50 10 He loved to shop and that kind thing.

11 But, yeah, I -- it seems like -- well, it
12 doesn't seem -- that oftentimes it was to the detriment
13 of the business that Michael was more interested in
14 shopping, for instance, or going to Disneyland than going
04:57:15 15 through documents and signing documents that he had to
16 sign before anything could be done.

17 Q So for example, could people be hired or
18 terminated without his approval?

19 A I believe a certain level of in terms of their
04:57:34 20 responsibility, yes, I think that might be the case.
21 Yeah. As far as, you know, sort of every day mundane
22 business decisions, he preferred not to be bothered with
23 that. In fact, he would have had no time for anything
24 else if he had been involved in those kinds of things.

04:57:55 25 Q And who in the company would you say was

04:57:59 1 ultimately -- had ultimate authority over these decisions
2 that he wasn't involved with?

3 MR. STEINSAPIR: Vague as to time.

4 BY MR. SLATER:

04:58:08 5 Q During your time at MJJ Productions?

6 A Yes. Well, when it was day-to-day business in
7 the office, it was first Norma Staikos and then Evvy
8 Tavasci after Norma left. Now, as I alluded to earlier,
9 there was, at times, individuals who were brought in that
04:58:23 10 were not, specifically, employees of MJJ Productions who
11 Michael had given a lot of administrative authority to.
12 So there were certain decisions that these people would
13 make and we -- you know, it was outside the scope of the
14 offices of MJJ Productions, per se.

04:58:50 15 And these were people more on the level of I
16 guess would you call them managers or, you know, people
17 who would negotiate big business deals or whatever. And
18 again, those were -- had to be -- have Michael's, you
19 know, okay. Nobody controlled, in other words.

04:59:13 20 Q Would you say -- so when arrangements were made
21 for children or other guests to visit Michael Jackson --

22 A Uh-huh.

23 Q -- were those made during the ordinary course
24 of business by MJJ Productions employees?

04:59:33 25 MR. STEINSAPIR: Objection; calls for a legal

04:59:33 1 conclusion. It's vague and ambiguous, but go ahead and
2 answer.

3 THE WITNESS: Uh-huh. Well, if it were of a
4 social nature, you know, friends coming, the impression I
04:59:43 5 had was that it was at the behest of Mr. Jackson. Like,
6 you know, he would, for instance, talk to his friends.
7 Now, I'm just kind of creating a scenario here that is --
8 would make a lot of sense.

9 His friends in Australia, the Barneses, you
05:00:04 10 know, he would be in touch with them and they'd decide,
11 oh, you know, come for a visit. And Michael would -- I
12 would assume he would let Norma or Evvy know that, oh, we
13 want the Barneses to come on a certain time and then he
14 would leave it up to them to make all the arrangements,
05:00:22 15 you know, the specific time. That is the way it appeared
16 to go. Although, I was not generally involved in those
17 kinds of activities.

18 MR. SLATER: Okay. Great. No further
19 questions.

05:00:33 20 THE WITNESS: Okay.

21 MR. FINALDI: Anything?

22 MR. STEINSAPIR: I have no questions.

23 MR. FINALDI: No. Alrighty. I'll offer a
24 stipulation. Is 30 days enough time?

05:00:41 25 MR. STEINSAPIR: Yeah. 30 days is fine.

05:00:43 1 MR. FINALDI: Alrighty.

2 MR. STEINSAPIR: From receipt of the final
3 transcript.

4 MR. FINALDI: All right. So I'll offer a
05:00:47 5 stipulation that the court reporter be relieved of her
6 duties under the code. She shall prepare the transcript
7 and have it sent to Mr. Steinsapir's office. He'll see
8 to it that the witness receive the transcript, review it,
9 make any corrections he deems necessary thereto, signs it
05:01:01 10 under penalty of perjury and then send it back to my
11 office.

12 My office will retain custody of the original.
13 We'll lodge it with the court upon reasonable request and
14 upon trial of this matter. And if original is lost,
05:01:15 15 misplaced, stolen or otherwise unavailable, a courtesy
16 copy can be used in lieu thereof, a certified one, for
17 any and all purposes including trial.

18 MR. STEINSAPIR: So stipulated.

19 MR. FINALDI: I was going to tell him about the
05:01:29 20 transcript. So you can make any corrections you deem
21 necessary.

22 THE WITNESS: Okay.

23 MR. FINALDI: If you do change something that's
24 substantive in nature, like you change a yes to a no,
05:01:38 25 people can comment upon it at time of trial.

05:01:41 1 THE WITNESS: Say that again.

2 MR. FINALDI: Attorneys can comment upon that
3 at time of trial and it may be seen as negatively
4 affecting your credibility.

05:01:47 5 THE WITNESS: Uh-huh.

6 MR. FINALDI: Does that make sense?

7 THE WITNESS: Yes.

8 MR. FINALDI: If you need to make a correction,
9 just make it on the transcript itself, just like you did
05:01:52 10 prior. Lineate, interlineate, put your initials.

11 THE WITNESS: Okay.

12 MR. FINALDI: That will be perfectly fine.

13 Okay?

14 THE WITNESS: Okay.

05:01:55 15 MR. STEINSAPIR: One more thing. Under the
16 protective order in this case, all depositions are
17 treated as confidential for 15 days. So I just want that
18 noted. I will make any confidentiality designations
19 within 15 days of my receipt of the transcript. But at
05:02:11 20 least in the interim, it should be treated as
21 confidential. Thank you.

22 THE VIDEOGRAPHER: Videotaped deposition of
23 September 2nd, 2016 is now going off the record at 5:02
24 p.m. This concludes tape 5 of 5 that was used in this
25 deposition. This also concludes this deposition. Thank

1 you.

2 (Deposition concluded at 5:02 p.m.)

3 (Exhibits A through C were marked by the
4 Certified Shorthand Reporter.)

5 (Deposition to be signed under penalty of
6 perjury.)

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* * * *

I do solemnly declare under penalty of perjury under the laws of the State of California that the foregoing is my deposition under oath; are the questions asked of me and my answers thereto; that I have read same and have made the necessary corrections, additions or changes to my answers that I deem necessary.

Executed this _____ day of _____, _____.

CERTIFICATION
OF
CERTIFIED SHORTHAND REPORTER

The undersigned certified shorthand reporter of the state of California does hereby certify:

That the foregoing deposition was taken before me at the time and place therein set forth, at which time the witness was duly sworn by me;

That the testimony of the witness and all objections made at the time of the deposition were recorded stenographically by me and thereafter transcribed, said transcript being a true copy of my shorthand notes thereof.

In witness whereof, I have subscribed my name
this date SEP 15 2016.


Certificate No.: 8152