

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

* * *

WADE ROBSON, AN INDIVIDUAL,)	
)	
Plaintiffs,)	
)	
vs.)	CASE NO. BC508502
)	
MJJ PRODUCTIONS, INC., a)	
California corporation; MJJ)	
VENTURES, INC., a California)	
corporation; and DOES 4-50,)	
inclusive,)	
)	
Defendants.)	
)	

CONFIDENTIAL

VIDEOTAPED DEPOSITION OF GAYLE GOFORTH

SANTA MARIA, CALIFORNIA

MONDAY, OCTOBER 24, 2016

10:04 A.M. - 3:54 P.M.

REPORTED BY CAROLYNN E. SPERE, CSR #10091

THE DEPOSITION OF GAYLE GOFORTH

WAS TAKEN AT THE OFFICES OF MCDANIEL SHORTHAND REPORTERS,
301 SOUTH MILLER, SUITE 110, SANTA MARIA, CALIFORNIA,
BEFORE CAROLYNN SPERE, A CERTIFIED REPORTER IN AND FOR THE
STATE OF CALIFORNIA, ON MONDAY, OCTOBER 24, 2016,
COMMENCING AT THE HOUR OF 10:04 A.M.

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I N D E X

WITNESS	EXAMINED BY	PAGE
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1 THE VIDEOGRAPHER: Good morning. This is the
2 video-recorded deposition of Gayle Goforth, taken at
3 301 South Miller Street, Suite 110, Santa Maria,
4 California, on Monday, October 24th, 2016, at 10:05 a.m.
5 in the matter of Robson versus MJJ Productions,
6 Incorporated, being heard in the Superior Court of the
7 State of California, County of Los Angeles, case No.
8 BC508502. This deposition is on behalf of the plaintiff.

9 My name is Deborah Gehrke with Dean Jones Video
10 Services of Santa Ana and Los Angeles, California. The
11 court reporter is Carolynn Spere.

12 Would all parties, please, introduce yourselves,
13 beginning with the witness.

14 THE WITNESS: Gayle Goforth.

15 MR. FINALDI: Vince Finaldi, Manly, Stewart and
16 Finaldi for the plaintiff.

17 MR. LISKIN: Aaron Liskin, Kinsella Weitzman for
18 defendant.

19 THE VIDEOGRAPHER: Will the court reporter,
20 please, administer the oath.

21
22 GAYLE GOFORTH,

23 A WITNESS HEREIN, BEING FIRST DULY SWORN, WAS

24 EXAMINED AND TESTIFIED AS FOLLOWS:
25

EXAMINATION

BY MR. FINALDI:

Q. Good morning. Could you, please, state and spell your full name for the record.

A. First name, Gayle, G-a-y-l-e, last name Goforth, G-o-f-o-r-t-h.

Q. Okay. And what's your address?

A. 280 Lakeview Road, Santa Maria, California 93455.

Q. And do you have any intention of moving any time in the next 12 months?

A. No. I have been there for 31 years.

Q. Okay. I have a check here for your witness fees.

A. Okay.

Q. \$37, based on the statutory amount and the mileage to get here.

A. Okay.

Q. So that's for you.

We're going to go ahead and mark as Exhibit A, your notice of deposition for today. You don't need to read through this. It doesn't request you to bring anything.

(Deposition Exhibit A was marked for identification.)

1 BY MR. FINALDI:

2 Q. How are you?

3 A. I'm okay.

4 Q. Okay. Okay. You seem maybe a little bit
5 nervous.

6 A. I am very nervous, yes.

7 Q. Okay. You have nothing to be nervous about.

8 A. I know that.

9 Q. All right.

10 A. But I just had jury duty and I was --

11 Q. Okay.

12 A. -- very nervous about that even.

13 Q. Okay.

14 A. Just being in a court or anything like that
15 makes me nervous.

16 Q. Just so you know, you are not a party to this
17 case. Your name just came up in some records. That's the
18 reason why we have got you here today.

19 A. Okay.

20 Q. And you haven't done anything wrong. And I just
21 want to let you know that you are not in any kind of
22 trouble. All right?

23 A. That's good.

24 Q. It's my understanding you've had your deposition
25 taken before, correct?

1 A. Yes, I have.

2 Q. Quite some years ago?

3 A. Yes.

4 Q. And you also testified in a trial?

5 A. Yes.

6 Q. Okay. So I am going to go through some of the
7 ground rules for a deposition, just as a refresher for
8 you --

9 A. Okay.

10 Q. -- to make sure we are both on the same page and
11 you're understanding what's happening.

12 A. Right.

13 Q. Seated to your left is the court reporter. She
14 is taking down stenographically everything that is being
15 said here today.

16 A. Right.

17 Q. So for that reason, it's important that we get
18 audible responses. Answers like "uh-huh," or "huh-uh," or
19 nods of the head don't really translate well, so I might
20 remind you of that from time to time. Also, it's
21 important that only one person speak at a time. If we
22 both speak at the same time, it will make it really
23 difficult for the court reporter. And so for that reason,
24 if you just give me a quick pause after I finish my
25 question, we can make sure that I have actually finished

1 it and I am not just pausing in the middle of the
2 question. And it will give other attorneys a chance to
3 object if they would like to. It will also give you a
4 chance to think about the question before you provide a
5 response.

6 A. Okay.

7 Q. If I remind you of those things from time to
8 time, I'm not trying to be rude. I am just trying to get
9 a clear written record. All right?

10 A. Okay.

11 Q. If you provide me an answer to the question, I
12 will assume you understood it.

13 A. Okay.

14 Q. So for that reason, if any of my questions are
15 vague, or ambiguous, or they don't make sense, let me know
16 and I'll rephrase it and I won't be offended. Sometimes
17 my questions come out and maybe I don't even understand
18 them.

19 A. Okay.

20 Q. Is there any reason why you would not be able to
21 give your best, most truthful and accurate testimony here
22 today.

23 A. Well, it's a lot of years ago.

24 Q. Other than that, the passage of time?

25 A. Yeah, just passage of time.

1 Q. Okay. You've never been diagnosed with any kind
2 of memory problems, though, correct?

3 A. Oh, no.

4 Q. Last thing I would like to talk about, I don't
5 want any wild guesses that are not based upon your own
6 personal experience.

7 A. Okay.

8 Q. Okay. Some things we might be talking about may
9 have happened two, four, five, even ten, twenty years ago.
10 In those instances, a lot of times you won't remember
11 exact dates and times, and that's perfectly acceptable.
12 That's how human memory works.

13 A. Right.

14 Q. In those instances, I am entitled to your best
15 estimate. So for example, if I was to ask you a date of
16 something, if you were able to narrow it down by, maybe,
17 five years, or three years, or Christmastime of this year,
18 that's something I am entitled to.

19 Do you understand the difference between a guess
20 and an estimate?

21 A. Right.

22 Q. Okay. Is there any reason why your deposition
23 should not go forward today?

24 A. Not that I can think of.

25 Q. Okay. And you do not have an attorney here

1 today, correct?

2 A. No, I do not.

3 Q. Okay. Did you speak with anyone in preparation
4 for your deposition today?

5 A. I believe I spoke to you?

6 Q. Yes.

7 A. And then I spoke to John from the office of MJJ
8 Productions' lawyers.

9 Q. When you spoke with me, you called me on the
10 phone, correct?

11 A. Yes.

12 Q. And basically asked, "What's this about?" And I
13 told you it's a lawsuit by Wade Robson against Michael
14 Jackson's companies, correct?

15 A. Yes.

16 Q. And that's, basically, all I said, correct?

17 A. Right.

18 Q. And how long was that phone call? About a
19 minute or so?

20 A. Yeah. Possibly five. Five minutes, I would
21 say.

22 Q. All right. Do you recall the last name of the
23 John you spoke to with the defendants?

24 A. No, I do not.

25 Q. How did you get ahold of this John person?

1 A. I believe Aaron left messages on my phone. I
2 was out of town at the time. He left a couple of messages
3 stating that he was representing MJJ Productions in this
4 deposition and asked me to call him. And I was going to
5 call him because I had just returned home Wednesday
6 evening, and I was going to call Monday morning. I mean
7 Thursday morning, I'm sorry. And in the meantime, John
8 contacted me because Aaron was not available, he stated,
9 so.

10 Q. And what was John's last name?

11 A. I do not recall.

12 Q. And what did he say to you on the phone?

13 A. He just asked me if I was being -- doing a
14 deposition and he, basically, stated that they represented
15 MJJ Productions and that I was entitled to counsel by them
16 if I so desired.

17 Q. And what did you say?

18 A. I told him that I didn't think I needed any
19 representation because I didn't have anything to help or
20 hurt anyone on either side.

21 Q. Yeah.

22 A. So --

23 Q. Just so you know, we just want to know what you
24 know. If you don't know something, you don't know. And
25 wherever the chips fall, that's where they lie.

1 A. Okay.

2 Q. Does that make sense?

3 A. Yes.

4 Q. I don't want you to testify for anyone, against
5 anyone, and I am sure Mr. Liskin would probably say the
6 same thing.

7 MR. LISKIN: Agreed.

8 THE WITNESS: Yes.

9 BY MR. FINALDI:

10 Q. What is your date of birth?

11 A. June 3rd, 1955.

12 Q. All right. Are you currently employed?

13 A. No, I'm not.

14 Q. When is the last time you were employed?

15 A. When I left Neverland ranch. I worked on my
16 own.

17 Q. After that?

18 A. Yeah. I was self-employed doing housecleaning
19 for friends and stuff like that. Right now, I babysit my
20 grandkids and I take care of my mother.

21 Q. Okay. My understanding is that you began
22 working at Neverland ranch in 1989?

23 A. Yes. I believe it was August of 1989.

24 Q. How did you find the job?

25 A. My son was friends with a boy that his father

1 was the ranch manager at the time.

2 Q. Gotcha. What's your son's name?

3 A. Gregory Silva. He worked at the ranch at one
4 time too as a security guard.

5 Q. Gregory did?

6 A. Yes.

7 Q. Gotcha. Do you know what years he worked there?

8 A. No, I do not.

9 Q. What's your best estimate? Was it when you were
10 working there?

11 A. Yes. He was still working there when I left.

12 Q. Do you know how many years you worked together
13 with him there?

14 A. I can estimate, two, three, maybe. Maybe
15 longer, maybe less. I'm not sure.

16 Q. It's my understanding you left the ranch in
17 2002?

18 A. Yes.

19 Q. So Gregory would have began around '99, 2000?

20 A. I believe so.

21 Q. Okay. That's your best estimate?

22 A. Uh-huh.

23 Q. Okay. Yes?

24 A. Yes. I'm sorry.

25 Q. It's okay. This is a weird format. It's not

1 natural, so you have nothing to apologize for.

2 And does Greg still live in the area?

3 A. Yes, he does.

4 Q. What does he do now?

5 A. He is a firefighter with CalFire.

6 Q. They have been busy up until now.

7 A. Yes, he has.

8 Q. The rain is good.

9 Do you know how long he stayed at Neverland?

10 A. Maybe a year or so after that. I'm not sure.
11 I'm not positive on anything.

12 Q. Did he ever work for the fire department there
13 at Neverland?

14 A. No, he did not, but he was hired because he had
15 fire -- he had gone through the fire academy at Hancock.

16 Q. Gotcha. So you heard about the job through, you
17 said, your son's friend's father?

18 A. Yes, right.

19 Q. Okay. Was it Gregory's friend or a different
20 son of yours?

21 A. No. It was Gregory's friend.

22 Q. Who was the friend?

23 A. Luis Zimmerman. His father was Jim Zimmerman,
24 who was the ranch manager at that time.

25 Q. Gotcha. And did you talk to Jim Zimmerman about

1 the job?

2 A. No, I did not. My son gave me a phone number to
3 call about -- because I was doing housekeeping jobs on my
4 own at that time.

5 Q. Okay.

6 A. And I called and I spoke to Mark. I cannot
7 remember their last name, but Mark and Faye were in charge
8 of the house at that time.

9 Q. Quindoy?

10 A. Yes, thank you. I knew it started with a Q.
11 That's all I could tell you.

12 Q. When you spoke with Mark, what did you tell him?

13 A. I just told him that my son had given me the
14 phone number to call about a housekeeping position at the
15 ranch.

16 Q. Yeah.

17 A. And he called me in for an interview, and he
18 hired me on the spot.

19 Q. Okay.

20 A. But I told him that I had obligations so I
21 wouldn't be able to start for two weeks.

22 Q. Okay. Did you like Mr. Quindoy when you met
23 with him and interviewed with him?

24 A. Yes, I liked him, but --

25 Q. Was there anything that made you uneasy about

1 him?

2 A. Not at first.

3 Q. But later on?

4 A. Later on working with him, yes.

5 Q. Later on, what kind of things made you
6 uncomfortable?

7 A. Well, he was very -- well, I am opinionated now.
8 This is just my feeling.

9 Q. Sure.

10 A. He was Filipino, and he was very arrogant in
11 that status.

12 Q. What do you mean?

13 A. Well, I don't know. I may be putting words
14 there, but he believed that women's work was different --
15 he didn't really do anything other than just oversee
16 everybody else.

17 Q. Seemed a little chauvinistic, maybe?

18 A. Yes. He asked me to take him to the airport one
19 time, and he was very upset that I was driving. He kept
20 offering to drive my car to take him to the airport, and I
21 just kept telling him, "No. It's okay. I can drive."

22 Q. Gotcha. Did he ever talk to you about what his
23 job was in the Philippines before he came here?

24 A. No.

25 Q. Did you ever hear that he was a lawyer before he

1 came here?

2 A. No, I did not. If I did, I don't recall.

3 Q. Yeah. So he offered you the position, correct?

4 A. Yes.

5 Q. Did you know who owned Neverland ranch at the
6 time that you interviewed?

7 A. Yes, I did.

8 Q. And how did you know that?

9 A. My son had told me.

10 Q. Okay. And it was probably no secret around the
11 area?

12 A. No, but I didn't believe my son either. He kept
13 saying, "Well, I am going out to Michael Jackson's place."
14 When he wasn't there, Jim would let the boys ride the
15 quads and stuff like that, you know.

16 Q. Okay. How old was your son at the time?

17 A. Like 13, 14.

18 Q. Gotcha. And when you spoke with Mr. Quindoy in
19 that interview, did he tell you that it was Mr. Jackson's
20 home that you were going to be working at or did
21 Mr. Jackson come up?

22 A. No. No.

23 I believe so, that he did.

24 Q. And what did he say in that regard?

25 A. Just how it was, you know, very private and not

1 to discuss anything that went on there, and that sort of
2 thing. It was -- yeah.

3 Q. You actually had to sign a confidentiality
4 agreement?

5 A. Yes, I did.

6 Q. Okay.

7 A. Yes, I did. But I believe I did that at a later
8 time.

9 Q. And this is Michael Jackson, the
10 singer/entertainer, correct?

11 A. Yes.

12 Q. Just so we have that.

13 A. Okay.

14 Q. My understanding is later on you had to sign a
15 confidentiality agreement that was given to you by MJJ
16 Productions; is that correct?

17 A. Yes.

18 MR. LISKIN: Objection; lack of foundation.
19 Assumes facts.

20 BY MR. FINALDI:

21 Q. And so when you were there at the ranch, you
22 were actually employed by MJJ Productions, correct?

23 MR. LISKIN: Objection; calls for speculation.
24 Lack of foundation.

25 /

1 BY MR. FINALDI:

2 Q. You can answer.

3 A. I don't know exactly. I know I was employed by
4 Michael Jackson and Neverland Valley Ranch. I know MJJ
5 Productions was associated with it because I spoke with
6 Norma Staikos, who was in charge of MJJ Productions at the
7 time.

8 Q. Do you recall giving your deposition in 1993?

9 A. Yes, I do.

10 Q. Okay. I am going to give you I copy of your
11 deposition.

12 A. Okay.

13 Q. You testified truthfully at that deposition,
14 correct?

15 A. I believe so.

16 Q. And you wouldn't have had any reason to lie or
17 misstate the truth at that deposition, correct?

18 A. No, I would not.

19 Q. So I am going to ask you to look at page -- give
20 me one second here.

21 Page No. 62, please. On the front page you can
22 see it's the "Videotaped Deposition of Gayle Goforth,
23 December 16th, 1993."

24 A. So these are the pages here?

25 Q. Yeah.

1 A. So it was page 60 what?

2 Q. 62. It will be right over here.

3 A. Okay.

4 Q. See that, page 62?

5 A. Yes.

6 Q. And I am going to read that into the record.

7 And the question was, at line 7:

8 "Okay. And all of these housekeepers
9 who work at the ranch are all employees of
10 MJJ Production; is that correct?"

11 And you answered:

12 "I believe so.

13 "Question: And the checks that you
14 get are drawn on accounts of MJJ
15 Productions?

16 "Answer: I believe so.

17 "Question: At least your check is?

18 "Answer: Yeah, I think so.

19 "Question: Okay. At least it clears
20 when you it in the bank?

21 "Answer: Yes, it does."

22 Do you remember giving at that testimony?

23 A. No, I don't.

24 Q. Do you have any reason to believe that what you
25 said here was not true at the time?

1 A. No, I do not.

2 Q. Okay. When you spoke with this John person over
3 the phone the other day, did he speak with you at all
4 about MJJ Productions and whether you worked for MJJ
5 Productions or whether you worked for Michael Jackson?

6 A. Yes, he did.

7 Q. What did you say in that respect?

8 A. I stated to the fact that I had mentioned this
9 in my '93 deposition, and I told him that that was
10 23 years ago and that I couldn't remember what I said at
11 that time.

12 Q. And then what did he say?

13 A. I don't recall.

14 Q. Did he say something to the effect of, "Well,
15 you actually worked for Michael Jackson" or "You worked
16 for Neverland Valley"?

17 A. I don't know if he said that or not.

18 Q. What did he say generally speaking?

19 A. He, basically, just told me that, and I told him
20 I didn't remember if I had said that or not.

21 Q. Okay. But did he say anything to the effect of
22 that, "Well, you are not sure that you really worked for
23 MJJ Productions. You actually worked for Neverland
24 Valley"?

25 A. I'm not sure that that's what was said. Like I

1 said, he asked me about whether I needed counsel and said
2 they would be willing to counsel me if I needed it. And I
3 just stated that I didn't have anything to say for or
4 against.

5 Q. And then he read you the part of your deposition
6 where you said --

7 A. He didn't read it to me. He just stated that I
8 had said that in my deposition in '93.

9 Q. And then what was your response to him?

10 A. I told him I didn't remember. Well, he did ask
11 me who I worked for, and I told him I believed I worked
12 for Michael Jackson, Neverland Valley Ranch.

13 Q. And then what did he say?

14 A. And that was when he told me that that's what I
15 had said in my deposition.

16 Q. About the MJJ Productions?

17 A. Yes.

18 Q. And then what did you say?

19 A. I told him that I didn't know, I didn't recall
20 that that's what I had said.

21 Q. And then what did he say?

22 A. I don't remember.

23 Q. Do you have any of your old pay stubs or account
24 records --

25 A. No.

1 Q. -- or W-2s, or anything from that time period?

2 A. Probably somewhere, but I don't think I have
3 kept things from that far back.

4 Q. Okay. Now, alrighty. Let's go to another page
5 here real quickly. And then go to page 59, please, one
6 more page over.

7 A. Okay.

8 Q. There we go. And at line 7, the question is:

9 "Were you the person that laid off

10 Francine?"

11 And the answer is:

12 "No.

13 "Question: Were you present when she
14 was laid off?

15 "Answer: I believe so.

16 "Question: And who actually laid her
17 off?

18 "Answer: MJJ Productions did, Norma."

19 Do you see that?

20 A. Yes.

21 Q. Do you recall there was a Norma Staikos that
22 worked for MJJ Productions?

23 A. Yes. I stated that previously.

24 Q. And MJJ Productions was the entity that fired
25 Francine, correct?

1 MR. LISKIN: Objection; mischaracterizes
2 testimony. Lacks foundation. Calls for speculation.

3 BY MR. FINALDI:

4 Q. Is that true?

5 A. I guess if I said that, then it did. I don't
6 remember. That was too long ago.

7 Q. Yeah. So when did you first learn that there
8 was a company called MJJ Productions?

9 A. Oh, my gosh. I have no idea. Like I said, I
10 was hired in 1989, and that was a lot of years ago.

11 Q. Yeah. But somehow you learned that there was a
12 company called MJJ Productions, would you agree?

13 A. Yes.

14 Q. And do you remember ever receiving documents
15 from MJJ Productions?

16 A. After I became in charge of the house after the
17 Quindoys left, I would receive information that we were --
18 faxes and that sort of thing coming through the office
19 that we were having guests coming.

20 Q. And where would the faxes come from?

21 A. I believe MJJ Productions.

22 Q. And where was this company based out of? Do you
23 recall where their office was?

24 A. L.A., Los Angeles.

25 Q. And what did the logo for MJJ Productions look

1 like, do you recall?

2 A. It had like Michael's legs, like he was dancing
3 on his toes with his knees bent.

4 Q. And who would send you those faxes? Do you know
5 some of the names?

6 A. At that time, it was Norma Staikos. And then
7 after she left, then Evy.

8 Q. Evy Tavasci?

9 A. Yes.

10 Q. Were there any people before Norma Staikos that
11 you communicated with?

12 A. No. Mr. Bray, Bill Bray came to the ranch a few
13 times, and Bob Jones.

14 Q. And you said you would get faxes that people are
15 coming to visit, correct?

16 A. Right.

17 Q. Which people do you recall being listed on the
18 faxes talking about "this person is going to visit. This
19 person is going to visit"? Do you recall?

20 A. Well, one of the persons like Gregory Peck,
21 Elizabeth Taylor, some people that were just friends of
22 Mr. Jackson's. You know, through the years, there were
23 several people that came. Those two. Marlon Brando.
24 Those people stand out to me.

25 Q. How about kids, ever the names of any kids?

1 A. Normally, they came with their parents --

2 Q. Okay.

3 A. -- and families.

4 Q. But my question is a little different. Did you
5 ever get faxes saying that "This kid is going to come"?

6 A. Just the kid was coming?

7 Q. Or this kid and the parent are going to come?

8 A. Oh, yeah. There was families, always families
9 coming.

10 Q. Which families do you recall being listed on the
11 faxes?

12 A. The Cascios.

13 Q. Cascios?

14 A. Yeah. I believe it was Cascio.

15 Q. Frank was one of the kids?

16 A. Yeah.

17 Q. Who else?

18 A. The Safechucks.

19 Q. The Robsons?

20 A. Yeah. That was later on.

21 Q. All right. Who else?

22 A. There was a family that he befriended in
23 Santa Ynez Valley that would come all the time too, but I
24 don't remember -- I don't remember their last name.

25 Q. Do you recall their ethnicity?

1 A. Oh, they were white.

2 Q. Okay. Anyone else?

3 A. Oh, Macauley Culkin, of course. His whole
4 family would come. He had cousins that would come, Levon
5 and Elijah. I would pick them up in Lompoc and bring them
6 to the ranch, but I normally got a phone call from
7 Mr. Jackson or from Evy to --

8 Q. To tell you to do that?

9 A. Yes.

10 Q. Okay. Anyone else, as far as kids or parents
11 with kids?

12 A. There is probably a bunch more, but I don't
13 remember. Well, the other litigant, so Jordie.

14 Q. Jordan Chandler?

15 A. I don't remember the last name. I remember
16 Jordie. And I remember Gavin, that he came with his
17 family at that time.

18 MR. LISKIN: I just want to interpose a belated
19 objection. I just don't know if you're asking if she
20 received faxes about these kids --

21 MR. FINALDI: Yes.

22 MR. LISKIN: -- versus families that came.

23 So do you understand he is asking the question
24 did you receive faxes about each of these particular
25 children coming?

1 MR. FINALDI: The question was clear.

2 THE WITNESS: Yeah. Normally when these people
3 would come, I would receive a fax that they were coming or
4 a phone call.

5 BY MR. FINALDI:

6 Q. And what would the fax say about them coming?

7 A. It would just have names on the list.

8 Q. But would it say, "These people are coming.
9 Have the house prepared," or something like that or just
10 have the name of the kid?

11 A. It would have the name of the family, the
12 parents and the kids that would be coming.

13 Q. But would it say something else like, "These
14 kids are coming on this date and leaving this date"?

15 A. Yes. It always said -- it always said when they
16 were coming, approximate time and approximate departure
17 time.

18 Q. And did it give you any instructions on what to
19 do as far as set up rooms for them or set up --

20 A. No. That was, basically, up to us, unless there
21 was a specific request for a certain -- like we had the
22 guest units, four guest units. And usually the more
23 important, you know, VIPs went in guest Unit 4 or they
24 would stay in the house until the children arrived. I
25 mean, Mr. Jackson's children, who then lived in the

1 bedrooms upstairs in the main house.

2 Q. How about before Mr. Jackson had children?

3 A. Before that?

4 Q. Yeah.

5 A. I know Elizabeth Taylor stayed in the house.

6 Q. Do you recall June Chandler ever staying in the
7 house?

8 A. I don't know if she did or not.

9 Q. How about Joy Robson, Wade's mother?

10 A. I don't remember if she stayed in the house or
11 in a guest unit.

12 Q. How about any of the kids, do you recall any of
13 the kids ever staying in the house?

14 A. Yes, the kids stayed in the house.

15 Q. Where would they stay in the house?

16 A. Normally they stayed in Mr. Jackson's room.

17 Q. All right. How many kids do you have? You said
18 you had the one kid?

19 A. I have four children.

20 Q. Four kids, okay. What, so we've talked about --
21 let me see.

22 A. Greg.

23 Q. Gregory Silva, correct?

24 A. Yes.

25 Q. Okay.

1 A. He is my oldest son.

2 Q. And he was born in what year?

3 A. 1975.

4 Q. All right. And let's go down the list as far as
5 ages. So that's your oldest. Who is your second oldest?

6 A. Douglas Silva.

7 Q. Okay. And when was he born?

8 A. He was born in '77.

9 Q. Is he still alive?

10 A. Yes.

11 Q. Does he still live in the Santa Ynez area?

12 A. He lives in Santa Maria. They all live in
13 Santa Maria.

14 Q. What does he do for a living?

15 A. He is a math teacher at Santa Maria High School,
16 and he teaches at Hancock College also.

17 Q. Okay. The next kid.

18 A. Patrick Silva. He also was employed at
19 Neverland. He worked in the amusement park.

20 Q. Doing what?

21 A. Operating rides and cleaning and anything that
22 had to do with the park operation.

23 Q. What year was he born?

24 A. In '79.

25 Q. What does he do for a living now?

1 A. He is working for a heating and air conditioning
2 company doing estimations. I don't know what his official
3 title is there.

4 Q. Is he in the area here?

5 A. Uh-huh.

6 Q. Yes?

7 A. Yes. I'm sorry.

8 Q. Do you know the name of the company?

9 A. It's Wighton's, W-i-g-h-t-o-n's.

10 Q. Gotcha. And you have a fourth child, correct?

11 A. Yes, a step-daughter.

12 Q. And what is her name?

13 A. Angela Goforth.

14 Q. And when was she born?

15 A. 1971.

16 Q. Okay. So she is the oldest?

17 A. Yes.

18 Q. Did she ever work at Neverland?

19 A. No.

20 Q. And is she still in the area here?

21 A. Yes, she is.

22 Q. What does she do for a living?

23 A. She is unemployed.

24 Q. Alrighty. So did Doug ever go to Neverland?

25 A. Yes. He helped out on special events.

1 Q. Do you recall any special events that he worked
2 for?

3 A. Not specifically, no.

4 Q. Okay.

5 A. Just when we had large groups.

6 Q. Okay. And did each of your kids -- Gregory,
7 Doug and Patrick -- go to Neverland from time to time to
8 like play on the quads, like you talked about, or see the
9 animals?

10 A. We had family days when they would come. And I
11 remember my youngest son came at one time and Macauley
12 Culkin was there and he wanted kids to play with.

13 Q. How did that come about?

14 A. I believe somebody from the office just stated
15 to the employees, so it was like employees' kids that
16 came.

17 Q. Do you remember who it was from the office?

18 A. Sandy Domz.

19 Q. How do you spell the last name?

20 THE REPORTER: Pardon?

21 THE WITNESS: D-o-m-z, I believe. I could be
22 wrong on that spelling.

23 BY MR. FINALDI:

24 Q. But she called from the Neverland office?

25 A. Yes. She worked in the Neverland ranch on the

1 property.

2 Q. Okay. And what did she tell you?

3 A. She just said that she had gotten a call from
4 Mr. Jackson stating that -- I'm trying to recall. That
5 was a long time ago. My son was only like eight years old
6 and he is thirty-seven now -- just to the fact that the
7 kids were invited to come to play for the day.

8 Q. So was only your youngest invited or all three
9 you had at the time?

10 A. Well, my youngest son was the only one that was
11 available at the time. The others had obligations, so
12 that's why they did not come.

13 Q. Okay. Gotcha. And what did Patrick do when he
14 was at the ranch that day, do you recall?

15 A. He hung out with Mr. Jackson and Macauley and
16 the other kids. And they went on -- I don't know if
17 the -- I don't think the amusement park was there yet, but
18 I know they were in the theater. There was an upstairs
19 room in the theater, and he was upstairs with them.

20 Q. And you were working at the time?

21 A. Yes, I was.

22 Q. And was this while you were a housekeeper or is
23 this after you got promoted?

24 A. This was after I got promoted.

25 Q. You were the head housekeeper. Was that your

1 title?

2 A. Basically. I don't know exactly what my title
3 was. So I know I was in charge of the housekeeping staff.
4 And I was the meeter and greeter, I guess you could say.

5 Q. After you got promoted, I think in your
6 deposition you said "head housekeeper."

7 A. Okay.

8 Q. Whatever the job title was, were you actually
9 cleaning or were you just managing the housekeepers?

10 A. No, I worked too. I cleaned too.

11 Q. And you also managed the housekeepers?

12 A. Yes.

13 Q. Were there other times that you brought your
14 kids to the ranch that were not family days?

15 A. No. That was the only time, I believe.

16 Q. Okay. Do you know if any of your kids ever
17 spent the night at the ranch?

18 A. No.

19 Q. No, you don't know or no, they didn't?

20 A. No, they didn't.

21 Q. And any reason why not?

22 A. They were never invited to stay.

23 Q. Okay. Did you ever stay the night at the ranch?

24 A. I worked late a few times, and I tried to stay
25 the night, and I ended up going home because it was so

1 quiet in the house. And Mr. Jackson was not home at that
2 time but we had different things going on preparing for a
3 busy time and I had to be back early in the morning, and I
4 laid down on the couch in the housekeepers' room, and I
5 couldn't sleep so I ended up going home.

6 Q. You said working for a busy time, what do you
7 mean by that?

8 A. Well, we were having a big group, or Christmas,
9 or something like that. I don't even recall what the
10 instance was but, you know, when we had Christmas, there
11 was a lot of presents to wrap and decorating to do and
12 getting rooms ready and that sort of thing.

13 Q. Could you explain the reason for your departure
14 from the ranch, from that job?

15 A. At the time that I left, I was called in to the
16 library and met with -- I don't remember last names,
17 but --

18 Q. Zia Modabber?

19 A. I guess.

20 Q. An attorney?

21 A. Yes, he was an attorney.

22 Q. Yeah. And?

23 A. And he stated to me that I was being -- I can't
24 remember what the exact wording -- was basically suspended
25 for a trial basis for investigation into the sale of some

1 furniture that belonged to Neverland Valley Ranch.

2 Q. Do you know which furniture they were talking
3 about?

4 A. They were talking about a dining room set that
5 were in the dining room at one time.

6 Q. So a table and chairs.

7 A. Yeah. There was two sets of tables and chairs.
8 And he was given new sets by I don't remember who.

9 Q. Okay.

10 A. And they were put into storage.

11 Q. The old ones were put into storage?

12 A. Uh-huh.

13 Q. Yes?

14 A. Yes.

15 Q. Okay. What is Zia say about this? What was the
16 problem with the dining room sets?

17 MR. LISKIN: Objection; vague and ambiguous.

18 THE WITNESS: I really don't know, other than I
19 knew that the furniture was sold to a bed and breakfast in
20 Santa Ynez, I believe. And this was, basically, done
21 through Nikki Wimsatt. And I believed that Mr. Jackson
22 had given his permission for it to be sold. And how I got
23 involved in it, I was doing what I was told to do. I went
24 with a couple of the guys that worked at the ranch in like
25 a rental -- I don't know. It was like a covered truck,

1 and we drove down to the storage facility in Los Angeles
2 and got the tables and the chairs and brought them back up
3 here, so. And who took them to the bed and breakfast, I
4 don't know.

5 BY MR. FINALDI:

6 Q. Okay. So Nikki -- do you remember what year
7 this was? Was this towards the end?

8 A. No. I do not remember what year.

9 Q. It's my understanding you stopped working there
10 in --

11 A. 2002.

12 Q. Was it around 2002 that you did this?

13 A. It had been a couple years, I think.

14 Q. So '89 or so?

15 A. No, '99.

16 Q. I'm sorry, '99?

17 A. Yeah. I'm not positive on that. They had
18 remodeled this bed and breakfast and they were looking for
19 the furniture and, I don't know, Nikki was friends with a
20 woman that had an antique shop in Santa Ynez. And she is
21 the one that gave her the information that they were
22 looking for it.

23 Q. Was Nikki the one that told you to go with the
24 men?

25 A. Yes.

1 Q. And what was Nikki Wimsatt's position at the
2 time?

3 A. She was the ranch manager at that time.

4 Q. So she was your boss?

5 A. Yes.

6 Q. All right. So they told you go with these
7 gentlemen to pick up this dining room set and bring it
8 back?

9 A. Right.

10 Q. Why you?

11 A. I don't know. I think that they wanted me to
12 look into some other things that were in storage to be
13 brought back.

14 Q. Like what?

15 A. Some furniture.

16 Q. Okay. And did you do that?

17 A. Yes, I did.

18 Q. What else was in that storage unit?

19 A. Oh, my gosh. It was an airplane hanger. It was
20 huge, and it was just full of everything.

21 Q. Where was the airplane hanger?

22 A. At, I believe, around LAX.

23 Q. Were there toys and things in there?

24 A. I don't recall seeing any toys.

25 Q. Any video games or anything like that?

1 A. There might have been. There was -- like I
2 said, there was everything there.

3 Q. Boxes?

4 A. Props from different -- yeah, there was lots of
5 boxes. There were props from videos and everything,
6 his music videos that he had done.

7 Q. So do you know if the furniture was actually
8 sold or not?

9 A. I believe so. It was sold -- the money went
10 back into the ranch.

11 Q. How do you know that the furniture was sold?
12 Did Nikki tell you?

13 A. I believe so.

14 Q. But you weren't involved in that actual
15 transaction?

16 A. No, I was not.

17 Q. You didn't receive any money from that
18 transaction?

19 A. No, I did not.

20 Q. So when Zia told you that you were being
21 suspended, did you say "For what?" Did you say, "What's
22 going on here?"

23 A. I don't know. I had seen -- kind of seen this
24 pattern over the years, you know, different people that
25 when -- it was like I would say their welcome was no

1 longer wanted or something, you know, that this was kind
2 of the process. So I was not surprised when it happened
3 because Mr. Jackson and I had been close for a long time,
4 and he had been real quiet towards me, not normal, so it
5 was kind of like it wasn't unexpected.

6 Q. Gotcha.

7 A. Know what I mean?

8 Q. So in your opinion, was the whole furniture
9 reason like just some --

10 A. An excuse, yes.

11 MR. LISKIN: Objection; calls for speculation.

12 Try and leave a little time in between his
13 question and your answer.

14 THE WITNESS: I'm sorry.

15 MR. LISKIN: That's okay. Common practice in
16 depo.

17 BY MR. FINALDI:

18 Q. Because in your opinion, you actually didn't do
19 anything wrong, correct?

20 A. I didn't believe so. I felt like I was low man
21 on the totem pole, and it went from Evy through Norma to
22 Nikki to me. And I left after that fact. I didn't cry or
23 anything when I left, and I didn't say good-bye to
24 anybody. I just got my things and I left the premises.
25 And I got to Los Olivos, and then I started crying. And I

1 called Evy and I stated that I was quitting because
2 Mr. Jackson believed I was stealing from him and he would
3 never trust me again. Because they said it was a six-week
4 trial, a suspension, and I knew that I would rather quit
5 than be fired because I had been there for 12 1/2 years.

6 Q. Were you offended?

7 A. I was very offended.

8 Q. Because you had never stolen anything from the
9 ranch, correct?

10 A. No.

11 Q. And you never would, correct?

12 A. No, I would not. My kids used to make fun of me
13 because they said, you know, if somebody dropped a penny,
14 I would return it, you know, so.

15 Q. There were probably better things to take than a
16 dining room set.

17 A. Yes, this is true.

18 Q. Now, I saw in your deposition you talked about
19 many mean different people being fired, fired, fired,
20 fired, insubordination, insubordination, things like that.
21 Did that happen often at the ranch, a lot of people just
22 getting fired during the time that you were there?

23 A. Oh, not a lot. I wouldn't say a lot.

24 Q. What was the number one reason why people left
25 the ranch?

1 MR. LISKIN: Objection; vague and ambiguous.

2 BY MR. FINALDI:

3 Q. Do you know? Did more people leave on their own
4 than were fired?

5 A. Yeah, some people left on their own. And other
6 people, they just didn't -- they didn't want to work.
7 They thought they were there for playtime. A lot of it
8 was from my suggestion, some of it, Nikki. I was gone on
9 vacation and Nikki fired one of my housekeepers which --
10 because she didn't feel like she was doing enough work or
11 something. I don't recall what the specific reasoning
12 was.

13 Q. Did -- you saw Norma Staikos fire people from
14 time to time, correct?

15 A. Well, I don't know. A couple. I remember being
16 in meetings with her over disputes between the
17 housekeepers and stuff. This one said that and that one
18 said this, you know.

19 Q. And she would come down to resolve the disputes?

20 A. Basically, yeah. That didn't happen often,
21 though.

22 Q. And you saw her -- did you ever see her
23 reprimand anyone?

24 A. She reprimanded me one time.

25 Q. About what?

1 A. I was at the ranch house with one of the other
2 housekeepers, and we were cleaning the ranch house at that
3 time. And Mr. Jackson was on the property, and he had
4 company and they had been at the theater the night before,
5 I guess. And we got held up in the ranch house, trying to
6 get it done. And then we were going to the theater
7 because the ranch house was further out than the theater.
8 And in the meantime, Norma had gone into the theater or
9 Mr. Jackson -- I don't remember who had gone in the
10 theater, and there was popcorn all over and everything.
11 So we were called in saying, "Why didn't you clean up the
12 theater?" And I told her, I said, "Janelle is not to
13 blame. I am. I was in charge at the time. It was my
14 decision to stay at the ranch house." I mean -- yeah.

15 Q. And did she write you up or anything?

16 A. No. It was just a verbal reprimand.

17 Q. Had you ever been written up?

18 A. Not that I recall, no.

19 Q. Did you ever see your employment file?

20 A. No.

21 Q. Okay.

22 A. I don't believe I had any reason to be written
23 up.

24 Q. Yeah. But you don't -- let me see.

25 So do you remember setting there when Norma

1 **fired anyone?**

2 MR. LISKIN: Objection; lacks foundation.

3 THE WITNESS: I don't know if she actually fired
4 anybody. I remember a couple instances being in the room
5 when she was talking to somebody, but I don't remember.

6 BY MR. FINALDI:

7 Q. About maybe firing but maybe not?

8 A. Just about what had taken place or something.

9 Q. What other instances?

10 A. I don't recall. I just remember that.

11 Q. All right. And how often would she come to the
12 **property?**

13 A. Oh, not very often.

14 Q. Once a month?

15 A. No.

16 Q. Once every six months?

17 A. Yeah, maybe. It depends on what was going on.

18 Q. Did she call the property more often?

19 A. Yes, she called.

20 Q. How often would she call?

21 A. I don't recall.

22 Q. What's your best estimate?

23 A. Pardon?

24 MR. LISKIN: Calls for speculation.

25 /

1 BY MR. FINALDI:

2 Q. What's your best estimate? Everyday? Once a
3 week?

4 A. No. No. A lot of times she would call to speak
5 to Michael or she would call to let me know that his fax
6 machine wasn't working, or something like that. And I
7 would pass that along to whoever was taking care of his
8 room at that time.

9 Q. So she would call at least a few times a month?

10 A. Yes, probably.

11 Q. Okay. And it was your understanding at the time
12 that -- was it your understanding at the time that she was
13 one of the people in charge of you? Like if she told you
14 to do something, you had to do it?

15 A. I believe so, yes.

16 Q. Okay. Do you know what her position was?

17 MR. LISKIN: Objection; lacks foundation.

18 THE WITNESS: Not exactly, no.

19 BY MR. FINALDI:

20 Q. Did you know anything generally of what her job
21 duty was, or what her job title was, or anything like
22 that?

23 A. I know that -- I thought that she dealt directly
24 with Michael over different things. Pardon me. I don't
25 know anything for a fact.

1 Q. Okay. What do you mean you don't know anything
2 for a fact? Did you ever see her talk directly with
3 Michael?

4 A. Did I see her? Hmmm. Maybe I did, I don't
5 know. Mostly over the phone.

6 Q. Uh-huh.

7 A. I guess. I'm not sure.

8 Q. Well, did she ever tell you that, "I work right
9 for Michael," or "Michael told me this, Michael told me
10 that," things like that?

11 A. Michael would usually call her if he was unhappy
12 with something that was happening at the ranch, the way
13 something was taken care of or the way somebody was
14 dressed or, you know, that sort of thing, or dinner wasn't
15 on time. I don't know.

16 Q. Why wouldn't he just call one of the people at
17 the ranch, like the ranch manager something?

18 MR. LISKIN: Objection; calls for speculation.
19 Assumes facts.

20 THE WITNESS: I don't know. Later on when I got
21 to know him better and stuff, a few years after, he would
22 call me directly.

23 BY MR. FINALDI:

24 Q. Gotcha. You said at one point you and Michael
25 became close?

1 A. Yes.

2 Q. Can you describe that, how that came about?

3 A. I don't remember the exact instance of it. It
4 was after Bianca took care of his room when I first
5 started there. And then when she left, Adrian was taking
6 care of his room. And then when she left, then I started
7 taking care of his room. And so then it was after -- at
8 first, it was kind of -- he knew that I was in charge of
9 the house so he would ask me specifically, "You know, we
10 want such and such for dinner," or you know, "Can we have
11 it at this time" or "Can we have dinner here" or "Can we
12 have dinner there," that sort of thing.

13 Q. Do you know the year you became responsible for
14 taking care of his room?

15 A. 19 -- oh, no, I don't remember what year for his
16 room.

17 Q. When did Ms. McManus leave? Do you know the
18 year?

19 A. No, I don't recall.

20 Q. How many years were you responsible for taking
21 care of his room?

22 A. I left in 2002. I believe -- I can't remember
23 when they sued everybody. Was that in 2005? Adrian and
24 Sandy and all of them were -- well, it wasn't against
25 Michael. It was against the security guards at that time.

1 And I testified in that trial also. And she was gone
2 then, but I don't remember the exact year.

3 Q. Okay.

4 A. If it was 2005, 2006.

5 Q. Okay. So about 2005, '06?

6 A. I believe so, yeah. Yeah. So approximately
7 seven years.

8 Q. Well, you left in 2002?

9 A. Yes. No, not -- I'm sorry. Yeah, '90.

10 Q. '95?

11 A. '95, '96, something like that. I'm not sure.

12 Q. Okay. So you cleaned his room for about six
13 years or more?

14 A. Yes.

15 Q. Okay. And when you say "his room," that's the
16 bedroom, his bedroom at Neverland?

17 A. Yes.

18 Q. It was a two-story bedroom?

19 A. Yes.

20 Q. When you began -- actually, was there an alarm
21 in the hallway going up to the bedroom?

22 A. Yes, there was.

23 Q. And when Blanca testified in this deposition,
24 she said that she would open up the door to his room and
25 the alarm would be going off, and she would just go in

1 there and unplug it to shut it off. Is that how the alarm
2 worked when you took care of his room?

3 A. No. There was an alarm installed later on, but
4 when she worked there, there was like a motion detector
5 and it just went "ding-ding, ding-ding," like there was
6 somebody in the hallway before you got to his actual
7 bedroom doors.

8 Q. Okay. And later on, there was an actual alarm
9 installed?

10 A. Yes.

11 Q. And what was that alarm like?

12 A. You had to punch in a code.

13 Q. To get in the door?

14 A. To get into the door.

15 Q. Did you have to have a key as well?

16 A. No. It was just an alarm. I mean, just the key
17 code.

18 Q. And you said there was an alarm too. What would
19 make the alarm go off? Like if you put the wrong code in
20 or something?

21 MR. LISKIN: Objection; assumes facts.

22 THE WITNESS: I don't remember. I just remember
23 there being a code that you had to put in in order for the
24 door to open.

25 /

1 BY MR. FINALDI:

2 Q. Do you remember when that was installed,
3 approximately?

4 A. No, I do not.

5 Q. Approximately.

6 A. Approximately a year before I left or so. I'm
7 not sure.

8 Q. Okay. You said that Michael began distancing
9 himself from you?

10 A. Yes.

11 Q. How early before you were called in to speak
12 with Zia did that start to happen, do you know?

13 A. A couple months.

14 Q. A couple months?

15 A. Uh-huh. And it wasn't anything -- it was just
16 something I felt.

17 Q. Yeah.

18 A. Okay.

19 Q. Intuitive?

20 A. Yes, yes.

21 Q. So it's been several years since you've left
22 Neverland now, right?

23 A. Yes.

24 Q. You have had a chance to reflect on it. After
25 having a chance to reflect on it and think about it, and

1 all these years have passed since then, is there anything
2 that happened that you think may have been related to the
3 reason why Mr. Jackson started to distance himself? Is
4 there anything?

5 A. From me?

6 Q. Yeah.

7 MR. LISKIN: Objection; calls for speculation.

8 BY MR. FINALDI:

9 Q. Anything that you did, anything that you saw,
10 anything that he did, anything whatsoever?

11 A. Not that I recall. Not that I recall, that
12 there was anything specific that happened or anything like
13 that.

14 Q. How about generally?

15 A. I don't understand what you mean by "generally."

16 Q. Yeah. You said you don't remember anything
17 specific that happened, any date or time or some event.
18 But I am saying generally, do you know of anything that
19 may have occurred that may have caused that distancing,
20 you know?

21 A. The only thing I can think of is that Manuel
22 started getting chummy with him. And he was -- before
23 that time, Mr. Jackson had a driver, Gary, and he would
24 drive him in the van. And there were instances where he
25 asked me to take him.

1 Q. Michael did?

2 A. Yes. I drove him down to L.A. a few times. I
3 drove him to Santa Maria a few times, took him and guests
4 and stuff to Toys "R" Us after hours. I would call and
5 arrange for it and that sort of thing. But on one
6 instance, I do remember that Gary, he got upset with Gary
7 because Gary had locked the keys in the van, so then he
8 asked me to drive him.

9 Q. Okay. Do you recall what year that was?

10 A. No, I don't.

11 Q. Okay. So you would drive Michael and other
12 people to like Toys "R" Us?

13 A. Uh-huh.

14 Q. Yes?

15 A. Yes. Sorry.

16 Q. It's okay. It's a weird format.

17 How many times do you think you did that?

18 A. It probably at least five, six.

19 Q. And was this always when it was closed?

20 A. Yes. It was after hours.

21 Q. And you said you would call him to arrange it.
22 Can you explain how you would do that?

23 A. I would call and speak to the manager and just
24 state the fact that Mr. Jackson wanted to come to the
25 store, and they would keep like a skeleton crew and close

1 the store. They would stay after the store was closed.
2 And then we would arrive shortly thereafter, and it was
3 basically free reign. The kids would grab a shopping
4 cart. He would grab a shopping cart. The adults usually
5 stayed with me or whatever, and they would just go and
6 load up their shopping carts.

7 Q. And you would drive the van?

8 A. Yeah. I drove the van once. Other times I
9 drove the ranch van.

10 Q. And was this like a large van we are talking
11 about?

12 A. It was just like a minivan.

13 Q. Okay. And would you park in the front of the
14 Toys "R" Us or in the back?

15 A. I parked on the side, I believe, because they
16 kept the side door open for us.

17 Q. And was this one specific Toys "R" Us or was it
18 different ones?

19 A. It's the Santa Maria one.

20 Q. What street is that on?

21 A. Bradley, I believe.

22 Q. And did you have the phone number for the
23 manager or would you call the store during work hours?

24 A. I would call the store during work hours and ask
25 to speak to the manager.

1 Q. Do you recall who the manager was at the time?

2 A. No, I do not.

3 Q. And you said you would drive Michael and kids?

4 A. Yes.

5 Q. But did you ever drive kids without Michael or
6 was he always with?

7 A. Well, when I picked up his cousins in Lompoc, I
8 picked up the other ones too, Simone and Rio, and took
9 them to the ranch, but --

10 Q. I'm talking about specifically for the
11 Toys "R" Us trips --

12 A. Toys "R" Us?

13 Q. Yeah.

14 A. Not that I recall.

15 Q. He was always with?

16 A. He usually was, yeah.

17 Q. Okay. And which kids do you remember taking to
18 Toys "R" Us? Do you remember?

19 A. The Cascio kids. Who else? I don't remember
20 their last name but Michael and his sister, Pia's,
21 children.

22 Q. Pia Zadora's kids?

23 A. Yes.

24 Q. Okay. Michael and there is a girl?

25 A. Yes, a daughter. I don't remember her name.

1 Q. Okay.

2 A. I remember driving them to Big 5 one time also.

3 Q. Okay. Which other kids? Safechuck ever?

4 A. No. When Jimmy first was coming all the time,
5 his parents would always come also. And his parents
6 always came, even later on after he grew up and stuff,
7 they were guests for a long time, but I never drove them.
8 I wasn't in charge of the house at that time.

9 Q. How about Wade Robson, did you ever drive him?

10 A. I don't recall ever taking Wade to Toys "R" Us.

11 Q. How about Jordie?

12 A. No, I don't believe so. Like I said, I wasn't
13 in that position at that time. It was later on.

14 Q. The Arvizo kids, did you ever drive them to
15 Toys "R" Us?

16 A. Who are they?

17 Q. The ones that were involved in the trial in
18 2005.

19 A. Oh, Gavin and them?

20 Q. Yes.

21 A. No.

22 Q. Which other kids, that you can recall, did you
23 take to Toys "R" Us?

24 A. Well, actually, I didn't take them. I went --
25 he sent me to buy gifts for the family that lived in

1 Santa Ynez. And there was another family. Who were they?
2 I can't remember their last name.

3 Q. Arvizos?

4 A. No, it wasn't Arvizos. There was another family
5 that used to come all the time.

6 Q. All right.

7 A. Agajanian, yeah. Boy, we are really going back.

8 Q. Yeah. So he'd send you so buy gifts for the
9 Agajanians?

10 A. Yeah. When they were coming to stay at the
11 ranch and stuff, he would always.

12 Q. And what kind of gifts would you have to buy
13 them?

14 A. Toys.

15 Q. And how would you purchase them?

16 A. We had an account with them, and I put
17 everything on an account.

18 Q. Okay.

19 A. And then it was turned in to the accountants.

20 Q. You had an account with Toys "R" Us?

21 A. Yes.

22 Q. So you didn't like bring a credit card or
23 something?

24 A. No.

25 Q. Or they didn't give you cash to use?

1 A. No.

2 Q. Who were the accountants?

3 A. I have no idea what their names were, no.

4 Q. And how much money would be spent on these
5 trips? What's the range?

6 A. Sometimes 500, sometimes a thousand. I signed
7 for them. I don't recall exactly.

8 Q. Is that the general range?

9 A. Yes.

10 Q. All right. And you said sometimes there would
11 be more than one kid that you took at a time? What was
12 the range --

13 A. Yeah. There would be a whole group. I don't
14 remember exactly who all went --

15 Q. Okay.

16 A. -- at different times.

17 Q. So you would take anywhere from one kid to how
18 many at once?

19 A. Well, usually it was Michael. There was at
20 least with two or three kids at a time that would go. It
21 was never one child.

22 Q. Usually two or three kids?

23 A. Yes.

24 Q. Okay. Where else do you recall taking kids
25 other than to Big 5, I think you said? Is that what you

1 said, Big 5?

2 A. Yes.

3 Q. And Toys "R" Us?

4 A. I escorted Levon and Elijah to LAX. A limo was
5 sent for me and picked me up at my home, and then we drove
6 from my home to Lompoc, and I picked them up and I made
7 sure that they got on the plane. And they were going to
8 visit Mr. Jackson. I have no idea where.

9 Q. And how old were they at the time?

10 A. Probably ten, nine. Ten, eleven, I'm not sure.

11 Q. And were these his real cousins or nephews?

12 A. Yes, they are cousins.

13 Q. How are they related to Mr. Jackson, do you
14 know?

15 A. Their dad was a cousin of Michael. His father
16 was Joe Jackson's brother.

17 Q. Do you recall his name?

18 A. No, I don't. I remember their father's name was
19 Mark.

20 Q. So Jackson's brother was Mark?

21 A. No. Levon and Elijah's dad's name was Mark, but
22 I do not recall what Joe Jackson's brother's name was. I
23 remember his wife's name was Michelle.

24 Q. Okay.

25 A. Because I dealt with her more. I think I only

1 met him, maybe, once or twice.

2 Q. Okay. Did you ever take Michael and kids
3 anywhere else other than to Big 5 and Toys "R" Us and LAX?

4 A. I drove him and, I believe, two of the Cascio
5 kids to L.A. to view a home. He was looking to purchase
6 another home, I guess.

7 Q. And where was that home?

8 A. It was in L.A., Los Angeles, Santa Monica.

9 Q. Okay. Anywhere else?

10 A. Not that I recall, no.

11 Q. Okay. How about little females, little girls,
12 did you ever drive any little girls anywhere?

13 A. Simone --

14 Q. Simone?

15 A. -- is a cousin also. Simone and Rio are Mark's
16 sister's children, Jackson, and they are from Lompoc also.

17 Q. Any other little girls?

18 A. That I drove?

19 Q. Yeah.

20 A. Not that I recall, no.

21 Q. And the back of the van, was that open to the
22 front of the van where you drove?

23 A. Yes.

24 Q. So you could see in the back?

25 A. Yes.

1 Q. When is the last time you spoke to Mr. Jackson?

2 A. Before I left.

3 Q. He never called you afterwards?

4 A. No, he did not.

5 Q. Never sent you a letter?

6 A. No.

7 Q. Cards? Gifts?

8 A. No.

9 Q. Did you ever send him a letter? Cards? Gifts?

10 A. No. I didn't feel like I could do that such a
11 thing. When I testified at his trial, he waved at me.
12 That was about all.

13 Q. And how did you feel about that?

14 A. I was glad that he had waved at me because I had
15 left with -- but then after I testified and everything, it
16 was like going through the leaving all over again, the
17 defense attorney, basically, tore me apart about being a
18 thief and was questioning my integrity and everything. It
19 was awful, and the media had a field day with it.

20 Q. Mr. Mesereau did?

21 A. No. The defense attorney for -- well, I guess I
22 have got them wrong -- for Gavin's family. He was the one
23 that, you know.

24 Q. Ron Zonen, you mean?

25 A. I don't know what his name was.

1 Q. Was it the prosecutor or the defense attorney?
2 Prosecutors work for -- the DA's office was prosecuting
3 the case.

4 A. Maybe it was a prosecutor, I don't know. I
5 don't know who it was. I know he was on the other side.
6 I know Bob Sanger questioned me from Mr. Jackson's side.

7 Q. Before you testified in that 2005 trial, do you
8 recall if there was a room you were put in to wait in?

9 A. Yes.

10 Q. And where was the room? Was it across the
11 street?

12 A. It was in this building, on the corner. That's
13 where I went to begin with because that's -- I believe
14 it's Bob Sanger's office.

15 Q. It's in this actual building?

16 A. It's in the other wing that's on Cook Street.

17 Q. That's where you waited before you testified?

18 A. Yes.

19 Q. Okay. And did they have any Michael Jackson
20 music playing in there?

21 A. I don't believe so, but there were other
22 witnesses in there also.

23 Q. Who were the other witnesses?

24 A. I remember seeing Joy there.

25 Q. Joy Robson?

1 A. Yes. And Wade and I believe Kiki was there and
2 Francine and I think Chantel was there also.

3 Q. Yeah. Chantel testified that they had Michael
4 Jackson's music playing in the background.

5 A. They might have. I don't know.

6 Q. You don't dispute it. You just don't remember
7 it?

8 A. No, I don't dispute it.

9 Q. Do you recall there being a party at Neverland
10 after the verdict?

11 A. I was not there at that time.

12 Q. You didn't go to that party?

13 A. No. I was not invited to anything.

14 Q. Okay. Going back to -- did you meet with the
15 defense attorneys before you testified in 2005?

16 A. I don't remember if I did or not.

17 Q. Do you recall meeting with anyone? I mean, I
18 would assume you have to; otherwise, how do you know where
19 to go, how to get there?

20 MR. LISKIN: Objection; leading.

21 THE WITNESS: I don't recall. I don't remember
22 anybody other than me being given the subpoena.

23 BY MR. FINALDI:

24 Q. Did you meet with their -- so it's my
25 understanding they had a private investigator who was

1 working and meeting with the witnesses and telling them
2 where to go. Do you recall that, that gentleman?

3 A. I might have met with the investigator.

4 Q. Okay. Do you recall his name?

5 A. No, I don't.

6 Q. You remember Wade Robson, correct?

7 A. Yes, I do.

8 Q. When do you remember first meeting Wade?

9 A. I remember him coming in when he was like eight
10 years old. I'm not sure. He was dressed like Michael,
11 and I was told that he had won a contest in Australia
12 because he sang and danced like Michael. And I met his
13 mother and his sister at that time, also, when he came.

14 Q. Did anyone else come with him besides the sister
15 and the mother?

16 A. I don't know if his dad came at that time or
17 not. I don't know if they were still together then or
18 not. I don't recall.

19 Q. And did you like Wade?

20 A. Yes, I liked Wade very much.

21 Q. Was he a nice kid?

22 A. Yes. He was a very nice kid.

23 Q. And how about Joy?

24 A. I loved Joy and Chantel too.

25 Q. You liked them all?

1 A. Yeah. They were wonderful people.

2 Q. Did Michael have a dance rehearsal studio there
3 somewhere on Neverland?

4 A. Yes. It was in the movie theater.

5 Q. Did you ever see Michael rehearsing there,
6 dancing?

7 A. No, I did not.

8 Q. Never?

9 A. I never saw him rehearsing in there. I knew of
10 him being in there just for the fact that the door was
11 closed.

12 Q. Okay. But you wouldn't actually watch it?

13 A. No.

14 Q. Did you ever know that he was rehearsing in
15 there with kids?

16 A. No. I didn't know who was with him.

17 Q. Okay. Did you ever know that Wade was actually
18 an employee of MJJ Productions?

19 A. Did I know that?

20 MR. LISKIN: Objection; lack of foundation.
21 Assumes facts.

22 MR. FINALDI: Are you disputing he was an
23 employee? We've got an employment agreement, submitted to
24 the government. He was an employee.

25 THE WITNESS: I did not know that. The only

1 person I knew he was involved with was So You Think You
2 Can Dance because I watch that.

3 BY MR. FINALDI:

4 Q. Wade? Oh yeah. You watch that?

5 A. Yes, I did.

6 Q. Did you know that Joy Robson was actually
7 employed by MJJ Productions as well?

8 A. No, I did not.

9 MR. LISKIN: Objection; lacks foundation.

10 BY MR. FINALDI:

11 Q. Okay. You did know that Wade stayed the night
12 at Neverland on multiple occasions, correct?

13 MR. LISKIN: Objection; leading.

14 THE WITNESS: I believe so, yes.

15 BY MR. FINALDI:

16 Q. And when he stayed at Neverland, where would
17 Wade sleep?

18 A. I don't know that for a fact.

19 Q. If we can go back to your deposition, do you
20 recall testifying about Wade?

21 A. Did I testify about Wade?

22 Q. Yeah.

23 A. Okay.

24 Q. Do you recall that?

25 A. No, I don't. What page?

1 Q. Let's just go through -- let me find it. Give
2 me just a minute here.

3 A. Because I didn't remember what year he had come.

4 Q. So you can go to page 24, please. Actually, we
5 will start on 22. Do you see 22?

6 A. Yes.

7 Q. The question was:

8 "What children are you aware of who
9 would spend the night at the ranch, their
10 names?"

11 There were some objections.

12 "During that time, a person that came
13 the most was Jimmy Safechuck."

14 So you remember Jimmy coming?

15 A. What line are we on?

16 Q. Line 9.

17 A. Yes. Okay.

18 Q. So you remember Jimmy Safechuck would spend the
19 night, correct?

20 A. Correct.

21 Q. Okay. And down a little more, on line 16, you
22 said:

23 "Mostly with his family."

24 And then:

25 "Question: But occasionally he would

1 come without his family?"

2 And the answer is "Yes."

3 Do you remember that, Jimmy coming out his
4 family sometimes?

5 A. Yes.

6 Q. Do you remember -- and down a little lower, it
7 says:

8 "And where did Jimmy Safechuck stay?"

9 And answer:

10 "With Mr. Jackson."

11 A. I was assuming that he was staying with
12 Mr. Jackson. I didn't know that for a fact. I was not
13 cleaning his room at that time.

14 Q. Well, let's read a little more. So down in the
15 lower left-hand corner, it says:

16 "And I gather there were other
17 children who would spend the night?

18 "Answer: Yes."

19 Do you recall giving that testimony?

20 A. Like I said, this was in '93. I don't remember.

21 MR. LISKIN: You can say no if you don't
22 remember.

23 THE WITNESS: Okay.

24 BY MR. FINALDI:

25 Q. And it says:

1 "And generally, would those other
2 children spend the night with Mr. Jackson
3 and their families would spend the night
4 in the guest house?

5 "Answer: I don't really recall
6 anyone other than Jimmy at the time."
7 Do you remember giving that testimony?

8 A. No, I don't remember giving that.

9 Q. It says:

10 "Were there any little girls who
11 would spend the night with Mr. Jackson's
12 bedroom?"

13 Do you recall that?

14 A. I remember being asked that question.

15 Q. Do you recall any little girls ever spending the
16 night with him?

17 A. Not usually, no.

18 Q. Do you remember sometimes?

19 A. I know Simone stayed the night in his room, and
20 I believe Amy Agajanian did also.

21 Q. Okay. What is Simone's last name?

22 A. Jackson.

23 Q. All right. Do you know how many times they
24 spent the night in his bedroom?

25 A. No, I don't.

1 Q. Okay. And it says:

2 "Were you aware of any adults who
3 spent the night with Mr. Jackson in his
4 bedroom?"

5 And you answered:

6 "Not that I recall."

7 Do you recall giving that testimony?

8 A. No, I don't recall saying that, but I guess I
9 did.

10 Q. Do you remember -- do you know of any adults
11 that have spent the night with Mr. Jackson in his bedroom?

12 A. Not that I recall.

13 Q. Okay.

14 A. Well, I don't know if you consider them adults
15 or not, but they were older, the three T's, Tito's
16 children -- Taj and Taryll and T.J. They were older when
17 they stayed in his room with him. Frank Cascio and Angel
18 Cascio, they stayed in his room.

19 Q. How old were they -- how old were the three T's
20 when they stayed in his room, approximately?

21 A. They were in their teens to late teens.

22 Q. After 18 or before 18?

23 A. Taj might have been close to 18.

24 Q. And the other two were younger?

25 A. Yes. Taj is the oldest, and then Taryll and

1 T.J.

2 Q. And how about Frank and Angel, how old were they
3 when they stayed in his room?

4 A. Probably about the same, 16 or 17.

5 Q. And the bottom of 23, it says:

6 "And, from time to time, a child
7 would spend the night at the ranch."

8 And you answered "Yes."

9 It goes on:

10 "From time to time, a child would
11 spend the night with Mr. Jackson in his
12 bedroom?

13 "Answer: Yes.

14 "Question: And who are the children
15 who would spend the night with Mr. Jackson
16 in his bedroom?"

17 And you answered:

18 "Macauley Culkin, his brother Quinn --
19 no -- Kieran. Quinn's his sister. Let's see.
20 Brett Barnes, Wade Robson, Levon and Elijah
21 Jackson and Jordie Chandler."

22 Do you remember giving that testimony?

23 A. Okay.

24 Q. Do you remember giving that testimony?

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

1 Q. Do you remember that those kids spent the night
2 with Mr. Jackson in his bedroom?

3 A. I believe so.

4 Q. Okay. And going down, going to page 26, one
5 page over, line 7 on page 26.

6 A. Okay.

7 Q. You were asked:

8 "What's your best estimate of the
9 percentage of times that he would have a
10 child staying with him in his bedroom?"

11 Do you see that?

12 A. Yes.

13 Q. And then down -- it says on line 16:

14 "THE WITNESS: This is really
15 difficult. I am not very good at
16 percentage. Maybe 40 percent."

17 Do you remember giving that testimony?

18 A. No, I don't remember.

19 Q. But your estimate at the time was about
20 40 percent of the time he had a child with him in his
21 bedroom, correct?

22 A. I guess.

23 Q. Okay.

24 A. I don't remember stating that, but.

25 Q. Do you have any reason to dispute that as you

1 sit here today?

2 MR. LISKIN: Any reason to dispute she said it
3 or dispute the number?

4 MR. FINALDI: Both.

5 THE WITNESS: The best I can recall. I don't
6 know exactly, no.

7 MR. LISKIN: Objection; calls for speculation.

8 BY MR. FINALDI:

9 Q. And then so page 27, towards the bottom, it
10 says:

11 "Did someone introduce you to
12 Macauley Culkin?

13 "Answer: I met him when he got out
14 of the car the first time he arrived."

15 A. That's generally how I met all of them.

16 Q. And then the next page over, page 28:

17 "And Wade Robson?"

18 And you said:

19 "Yes."

20 And then he said:

21 "And that's true with Brett Barnes?

22 "Yes.

23 "And Levon and Elijah?

24 "Yes.

25 "And Jordie Chandler?

1 "Yes."

2 That's how you met all those kids?

3 A. Yes. But I met their parents and their family
4 at the same time as them.

5 Q. Okay. Page 29, so remember, this is still in
6 1993.

7 A. '93, I know, that's why.

8 Q. So, it says:

9 "Have you ever been in Mr. Jackson's
10 bedroom?

11 "Yes, I have.

12 "How many occasions?

13 "Too many to count, to number."

14 Do you remember giving that testimony?

15 A. No, I don't. What line are you on?

16 Q. 21 to 25 on page 29.

17 A. Okay.

18 Q. So you had been in Mr. Jackson's bedroom many,
19 many times before this deposition, correct?

20 A. I believe so.

21 Q. Okay. The next page, it says, line 3:

22 "I have gone in and cleaned his room.

23 I have gone in and gotten jackets and
24 sweaters and that sort of thing for guests
25 on Mr. Jackson's request?"

1 Do you remember doing those things?

2 A. Yes.

3 Q. Okay.

4 A. I remember him asking me to get things for him.

5 Q. All right. On line 10, it says:

6 "When children come to the ranch,
7 male and female, they congregate in
8 Mr. Jackson's room and they leave their
9 jackets here and there, as children do.
10 So it's not necessarily for male or female."
11 Do you remember that occurring?

12 A. Yes. Everybody, it was like a big slumber
13 party, a big free-for-all, because he would let all the
14 children do whatever they wanted to.

15 Q. So they would be inside of his bedroom on his
16 bed?

17 MR. LISKIN: Objection --

18 THE WITNESS: They would be all over, watching
19 TV and different places.

20 BY MR. FINALDI:

21 Q. Were they ever on his bed?

22 A. I don't recall seeing anybody on his bed at that
23 time.

24 Q. Is that because you never saw them on the bed or
25 you just don't remember?

1 A. I don't remember. The only child I remember
2 seeing on his bed was Prince, his son. Because later on
3 when -- basically, when I started cleaning his room, he
4 had taken out the bed out of the bottom.

5 Q. You understand that you are under oath here,
6 right?

7 A. Yes. Did I just contradict myself?

8 Q. No, no, no.

9 A. Okay.

10 Q. Let's just read through this.

11 A. Did I state that I did?

12 MR. LISKIN: You didn't do anything wrong.

13 BY MR. FINALDI:

14 Q. It says:

15 "When you would go in there to
16 take meals, Mr. Jackson would be there?

17 "Answer: Most of the time, yes.

18 "And then would be one or more guests
19 with him?

20 "Yes.

21 "And were these guests always children?

22 "Not necessarily.

23 "Can you identify a guest to whom you
24 brought a meal in that was not a child?

25 "Mrs. Barnes.

1 "Mrs. Barnes. Anyone else?

2 "June Chandler."

3 A. Okay. What line are you on?

4 Q. And then I am on line 13 on page 31:

5 "Would there be occasions where
6 you would go into Mr. Jackson's room and
7 the only people who would be there would
8 be Mr. Jackson and a male child?

9 "Answer: Yes."

10 Do you remember that occurring?

11 A. I remember taking meals in to him and Jimmy.

12 Q. "And on how many occasions did that occur?"
13 You said "Several."

14 "And what children were with him on
15 those occasions?"

16 "Jimmy, Brett, Jordie and Wade."

17 Do you remember seeing him alone in his bedroom
18 with those four kids?

19 A. Apparently so, if I said this.

20 MR. LISKIN: Objection; misstates testimony.

21 BY MR. FINALDI:

22 Q. And it says:

23 "On the occasions when you went into
24 Mr. Jackson's room and Jimmy Safechuck was
25 there and Mr. Jackson was there, where were

1 they when you came in the room?

2 Answer, you said:

3 "They were normally around the
4 fireplace playing games."

5 Did you say that?

6 A. Yes.

7 Q. And it says:

8 "Were they ever in bed?"

9 And you said:

10 "No."

11 Do you see that?

12 A. Yes.

13 Q. "Have you ever seen Mr. Jackson in his bed with
14 any child?"

15 And you said:

16 "Yes.

17 "Which children?

18 "One time I saw him with Brett Barnes.

19 They were sick at the time and I brought
20 medicine in."

21 Do you recall giving that testimony?

22 A. No, I don't recall saying this, but apparently I
23 did.

24 Q. Do you recall seeing Mr. Jackson in bed with any
25 kids?

1 A. I don't remember seeing anybody with him. I
2 don't recall this occasion.

3 Q. It says, they were wearing pajamas. Still don't
4 recall it?

5 A. No, I don't.

6 Q. Okay. Another one:

7 "Any other occasion when you came
8 into Mr. Jackson's room and he was in bed
9 with a child?

10 "Answer: I have seen him lying on
11 the bed. One time I recall coming in and
12 Mr. Jackson and Jordie and June and Lily
13 were all lying on the bed watching
14 television."

15 Do you recall that happening?

16 A. No, I don't recall that happening.

17 Q. Do you think you were telling the truth here?

18 A. I believe so. If I said it at the time, I
19 believe I was telling the truth.

20 Q. Okay.

21 A. I just don't recall it happening now. It was 23
22 years ago, or however many years ago.

23 Q. Okay. The next page here, page 33.

24 MR. LISKIN: What page, I'm sorry?

25 MR. FINALDI: 33, line 3, upper left. There you

1 go.

2 Mr. Turner:

3 "Did you ever have an occasion when
4 you went into the room after Mr. Jackson had
5 spent the night and a child had spent
6 the night in the room.

7 "Answer: Yes."

8 Q. So do you remember that occurring, you going
9 into his room to clean up after a child had slept there
10 with him?

11 A. Yes.

12 Q. Okay. Down at the bottom of 33, line 25:

13 "Did you ever have an occasion to go
14 into the" -- and the second page --
15 "bedroom after Brett Barnes had spent the
16 night with Mr. Jackson?"

17 "Answer: Not that I recall.

18 "Question: What about Wade Robson?

19 "Answer: I think it was after Wade
20 had been in there. I said I thought that
21 it was after Wade had been there at one time.

22 "Question: Okay. And on how many
23 occasions did this occur after Wade Robson had
24 spent the night and you came in to clean?

25 "Answer: It depended. Adrian McManus

1 is primarily responsible for his room, and she
2 was on vacation so I cleaned his room while
3 she was gone on vacation."

4 Do you remember giving that testimony?

5 A. Yes.

6 Q. And do you remember that occurring, cleaning up
7 after Wade had spent the night there?

8 A. No. I don't recall that, but --

9 Q. Page 35, on line 11, lower left-hand corner, it
10 says:

11 "On this one occasion at least one
12 occasion when you went into the room after
13 Wade Robson had spent the night, what did
14 you do in order to clean up the room?

15 "Answer: I made the beds, cleaned the
16 bathrooms, picked up clothing, wet towels,
17 cleaned showers, you know, the sinks, and the
18 normal housecleaning."

19 Do you remember giving that testimony?

20 A. I don't remember giving the testimony, no.

21 Q. Is that generally what you did?

22 A. Yes.

23 Q. Okay.

24 A. Yes. When any guest stayed any room, that's
25 generally what we did.

1 Q. Question on line 17. Okay.

2 "And you found clothing around
3 Mr. Jackson's bed just sort of thrown on
4 the floor; is that correct?"

5 And then your answer below on line 23:

6 "There was clothing, yes.

7 "Question: Yes. And it was
8 Mr. Jackson's clothing, some of it?"

9 You answered:

10 "Some of it, yes.

11 "And some of it was Wade Robson's
12 clothing?

13 "Answer: Yes."

14 Do you remember giving that testimony?

15 A. I guess.

16 Q. Okay.

17 A. I don't remember giving this testimony, no.

18 Q. But you don't have any reason to dispute it,
19 correct?

20 A. No.

21 Q. "Question: And did you find dirty underwear
22 lying on the floor around the bed?

23 "Answer: That's part of clothing.

24 "Question: Yes; but I mean
25 specifically dirty underwear?

1 "Answer: There would be underwear, yes.

2 "Question: And you would find Michael
3 Jackson's underwear?

4 "Answer: Yes.

5 "Question: And you would find Wade
6 Robson's underwear?

7 "Answer: Yes."

8 Do you remember giving that testimony?

9 A. I don't recall giving this testimony, no.

10 Q. All right.

11 "Question: Did you ever find any
12 dirty clothes of Wade Robson around the
13 bed in the upstairs area?

14 "Answer: Generally around his suitcase.

15 "Question: And his suitcase was in the
16 ground level, correct?

17 "Answer: Yes."

18 Do you remember giving that testimony?

19 A. I don't recall giving this testimony, no.

20 Q. Do you remember Wade Robson's suitcase being on
21 the ground level of Mr. Jackson's bedroom by his bed?

22 A. I don't recall giving this testimony, no.

23 Q. But do you remember -- I'm not talking about the
24 testimony. I'm talking about --

25 A. No, I don't recall his suitcase being there.

1 Q. Okay. It says:

2 "In the bedroom?"

3 "Yes."

4 "Did any of the child visitors have
5 drawers where their clothes were kept in
6 Mr. Jackson's bureaus or closets?"

7 "Answer: Not that I recall."

8 Do you remember giving that testimony?

9 A. No.

10 MR. LISKIN: By the way, Mr. Finaldi hadn't
11 mentioned it but if you need a break or anything, just let
12 us know. We've been going for a pretty solid amount of
13 time.

14 THE WITNESS: Okay.

15 BY MR. FINALDI:

16 Q. So page 37, line No. 5, it says:

17 "I understand; but I mean did you on
18 occasion find dirty clothing from children
19 other than Wade in Mr. Jackson's bedroom?"

20 "Answer: Do you mean when Wade was
21 there or do you mean when other children
22 were there?"

23 "Question: When other children were
24 there.

25 "Answer: Yes."

1 So do you recall finding other kid's clothes in
2 the bedroom other than Wade's?

3 A. I don't recall exactly but when anybody stayed
4 in the room, there was always clothing thrown around, and
5 it didn't necessarily mean it was around the bed. It was
6 in the bathroom, it was near the shower, or the bathtub,
7 or whatever.

8 Q. So you saw kid's clothing --

9 A. I saw everybody's clothing around.

10 Q. But you saw kid's clothing by Mr. Jackson's
11 shower in this bedroom?

12 A. I believe so.

13 MR. LISKIN: Objection; leading.

14 THE WITNESS: Usually, I would pick up towels,
15 and clothes, and everything all in one and just take it
16 into the laundry room and wash it.

17 BY MR. FINALDI:

18 Q. Did you ever wonder why there's kid's underwear
19 on the floor in Mr. Jackson's bedroom when he was an
20 adult?

21 MR. LISKIN: Objection; calls for speculation.

22 THE WITNESS: Well, I assume it was because they
23 were changing clothes. You have to change clothes into
24 clean clothes every day, and after they had taken a
25 shower. I don't know anything for a fact that, you know,

1 who took showers where, when or how or what bed they slept
2 in because generally both beds would be unmade so I don't
3 know who slept where.

4 BY MR. FINALDI:

5 Q. What do you mean by that? Say it again. So
6 Wade said that he would always sleep in Mr. Jackson's bed
7 downstairs. He never slept upstairs.

8 A. Okay.

9 Q. And the bed upstairs was always made, so --

10 A. It was always made?

11 MR. LISKIN: Objection; that's not a question
12 and it's leading.

13 MR. FINALDI: Well, if you let me finish my
14 question, then I could answer it.

15 Q. So Wade said whenever he spent the night with
16 Mr. Jackson in his room, he would sleep in Mr. Jackson's
17 bed on the ground floor with Mr. Jackson. He never slept
18 upstairs in that bed, so it would always be made.

19 So do you remember whether the bed upstairs was
20 ever unmade when Wade slept with Mr. Jackson?

21 MR. LISKIN: Objection; leading.

22 THE WITNESS: Okay. I do recall many times
23 going into Mr. Jackson's bathroom, and a chase lounge
24 there, and there would be blankets there and stacks of
25 books that I had put away the previous day or whatever.

1 And so it was very obvious he had slept there.

2 BY MR. FINALDI:

3 Q. Mr. Jackson would sleep in the bathroom?

4 A. On the chase lounge. It was a large bathroom.

5 Q. What years was this?

6 A. I don't recall what years, but it was more often
7 than not.

8 Q. You didn't talk about that in your deposition
9 anywhere.

10 A. Nobody asked me about anything like that. They
11 didn't ask me where he slept. I don't know for a fact. I
12 wasn't there when they went to sleep.

13 Q. Did you ever see a sleeping bag on his floor?

14 A. Yes.

15 Q. How often?

16 A. I would take sleeping bags -- when there were
17 groups of kids there, I would take sleeping bags and
18 blankets for them, and they would sprawl out wherever.

19 Q. Did you ever ask Mr. Jackson if he had the kids
20 sleeping in his bed with him?

21 A. No. I had no reason to ask him that. It was
22 none of my business.

23 Q. Well, were you ever concerned about the kids?

24 A. No, I wasn't.

25 Q. Why not?

1 A. Because I believed in Mr. Jackson. I didn't
2 believe anything was going on. I believed that when the
3 children were there, he was the same age as them, and he
4 could act like a kid and be a kid like them. They could
5 stay up all night.

6 Q. How old was Mr. Jackson at the time?

7 A. I don't remember.

8 Q. At least 30, 35 years old?

9 A. Probably.

10 MR. LISKIN: Vague as to time.

11 BY MR. FINALDI:

12 Q. So he, in fact, was an adult, correct?

13 A. Yes, he was an adult.

14 Q. Did any of the staff ever talk about, you know,
15 were kids sleeping in the bed or are they not in the bed?

16 A. No.

17 Q. Well, at one point in time, a television special
18 came on and he admitted he was sleeping with kids in his
19 bed. Do you recall that?

20 MR. LISKIN: Objection; lacks foundation.

21 THE WITNESS: I admitted it?

22 BY MR. FINALDI:

23 Q. No. Mr. Jackson admitted he said "I share my
24 bed with kids. Beautiful thing to do and nothing wrong
25 with it." Do you remember that happening?

1 MR. LISKIN: Objection; lacks foundation.

2 THE WITNESS: Well, that was after I left, and I
3 do remember the special.

4 BY MR. FINALDI:

5 Q. Uh-huh. Did any staff at Neverland ever tell
6 you not to leave your kids alone with Mr. Jackson?

7 A. Anybody on the staff?

8 Q. Yeah.

9 A. Of course not.

10 Q. Mr. Quindoy never told you that?

11 A. Mr. Quindoy?

12 Q. Yes.

13 A. No, not that I remember.

14 Q. How about Norma?

15 A. Norma?

16 Q. Yes.

17 A. No.

18 Q. They never warned you at all about anything
19 about Mr. Jackson?

20 A. No. That's something I would have remembered.

21 Q. Did you ever wonder why he was always hanging
22 around with little boys?

23 A. Well, like I stated --

24 MR. LISKIN: Objection; calls for speculation.

25 THE WITNESS: Well, I stated before that I

1 believed that it was so he could act like a kid too
2 because he didn't have a childhood.

3 BY MR. FINALDI:

4 Q. Who told you that? Did he tell you that?

5 A. No, he did not tell me that. That was just my
6 feeling.

7 Q. Did you ever meet his brothers?

8 A. Yes.

9 Q. Tito and Marlon, Jermaine?

10 A. Yes.

11 Q. Did you see them running around with little boys
12 everywhere?

13 A. No.

14 Q. And acting like children?

15 A. No.

16 Q. Well, did you ever wonder why it was they never
17 acted like that when they had, basically, the same
18 childhood as him?

19 MR. LISKIN: Objection; calls for speculation.

20 THE WITNESS: No.

21 BY MR. FINALDI:

22 Q. You knew they were all part of the Jackson 5 as
23 well, correct?

24 A. Yes, did.

25 Q. And they all worked as very young kids, correct?

1 A. Yes.

2 Q. And Marlon was actually very, very young as
3 well, correct?

4 A. Yes, I believe so.

5 Q. Do you have any knowledge that any of them were
6 sleeping with little kids on 40 percent of their nights?

7 A. No. I would not have any knowledge of that.

8 Q. Have you ever had any kind of training, any
9 training at all on child sexual abuse?

10 A. My son was sexually abused. Okay? So I do know
11 about it.

12 Q. When did you become aware of this?

13 A. When my son -- he was like 14. This was my
14 middle son, Doug, and it was a baseball coach.

15 Q. I'm sorry that happened to him.

16 A. So am I.

17 Q. What year did you find out about this?

18 A. I don't recall what year it was. It was in the
19 '90s somehow.

20 Q. Did you find out when it happened or later?

21 A. No, I found out later, but then I could recall
22 when it happened because of the way he was acting and
23 stuff.

24 Q. Okay. So which boy was this?

25 A. Doug, my middle son.

1 Q. Your middle son, Doug. Okay. And do you know
2 the year you found out, your best estimate?

3 A. Okay. I am going to have to backtrack here
4 trying to remember. He was born in '77, so '87 he would
5 have been 10, so --

6 Q. '91, he would have been 14?

7 A. Yeah. It was like '91-'92, area. He was 14 or
8 15. I'm not sure exactly. He was playing Babe Ruth
9 baseball.

10 Q. That's when the abuse happened?

11 A. Yes.

12 Q. But when did you find out about it?

13 A. Right around the same time.

14 Q. And how did you find out about it?

15 A. I found out because there was an investigator.
16 There were other boys that had come forward.

17 Q. Did your son come forward or did they find your
18 son?

19 A. They found my son and they questioned him
20 without me being there. I was not aware of it until after
21 the fact.

22 Q. Gotcha. And did you get some kind of training
23 on child sexual abuse at that time?

24 A. No, I did not.

25 Q. You said this was his coach?

1 A. Yes.

2 Q. A male?

3 A. Yes.

4 Q. And what was the outcome of that?

5 A. He was found guilty.

6 Q. And put in prison?

7 A. Yes.

8 Q. Do you know how long?

9 A. I don't recall how long.

10 Q. Do you recall his name, the coach?

11 A. Mike -- what the heck was his last name? No, I
12 don't remember what his last name was. If I thought about
13 it long and hard, I probably could recall what it was.

14 Q. And was your son abused at like a sleepover?

15 A. Actually, he was going to his house to work out
16 on equipment, and I wasn't aware. I thought that he was
17 just working out. And apparently, this coach was giving
18 him massages after he worked out and he told him to get
19 into a Jacuzzi at one time, and then he climbed into the
20 Jacuzzi with him.

21 Q. Uh-huh. And is that where the abuse happened?

22 A. Yes, in his home.

23 Q. Gotcha.

24 A. And I knew after the fact because I picked my --
25 I drove him there and I picked him up. And I could tell

1 by his demeanor that something had happened, but he
2 wouldn't tell me what.

3 Q. By your son's demeanor?

4 A. Yes.

5 Q. Was this coach married?

6 A. Yes. And he had sons the same age as my son.

7 Q. Now, did Mr. Jackson have a Jacuzzi at
8 Neverland?

9 A. Yes, he did.

10 Q. How many?

11 A. He had one in the bedroom, and then later on
12 they put one out in the patio area.

13 Q. Did you ever see Mr. Jackson in the Jacuzzis?

14 A. No, I did not.

15 Q. Did you ever see him buy the Jacuzzi when kids
16 were in the Jacuzzi?

17 A. No, I did not. I did not ever see anybody in
18 the Jacuzzis.

19 Q. All right. Let's go back to your deposition
20 testimony. 39, line 19:

21 "And when you found that clothing of
22 Brett Barnes, you also found clothing of
23 Michael Jackson at the same time?

24 "Answer: I guess, yes."

25 Do you remember giving that testimony?

1 A. No, I don't remember giving any of this
2 testimony.

3 Q. Do you remember finding Brett Barnes' clothes?

4 A. No, I don't.

5 Q. Okay. Page 40:

6 "The majority of the time, it was
7 like dirty socks that sort of thing,
8 shirts, pants.

9 "Question: Socks, shirts, pants,
10 underwear?

11 "Answer: Sometimes, sometimes not.

12 "Question: Okay. You thought it was
13 unusual that Mr. Jackson would so often
14 spend the night in his bedroom with young
15 children, did you?

16 "Answer: No, I have not.

17 "Question: Okay. You have known lots
18 of 30-, 35-year-old men who sleep with
19 children?"

20 And your answer is:

21 "Mr. Jackson is not -- knowing him,
22 he is different than other 35-year-old
23 gentlemen?"

24 Do you remember giving that testimony?

25 A. Probably. I just stated that myself a few

1 minutes ago.

2 Q. Okay. Do you need a break for the restroom or
3 anything?

4 A. No. I'm okay.

5 Q. Okay.

6 A. I do need to get some Chapstick, though.

7 Q. Sure.

8 MR. LISKIN: Typically at deposition, people
9 take a break every hour or so. We have been going for an
10 hour 40.

11 MR. FINALDI: If you need one, let me know.

12 MR. LISKIN: I am just letting her know.

13 THE WITNESS: Okay.

14 BY MR. FINALDI:

15 Q. Can you turn to page 70, please.

16 A. I forget these are on the same pages.

17 Q. All right. Line 12:

18 "Okay. And when you've seen him
19 in the outside Jacuzzi, was he with some
20 other person?

21 "Answer: Yes.

22 "Question: And who was that?

23 "Answer: I don't recall at this time.

24 I really don't remember who it was at that
25 time.

1 "Question: But it was a child?

2 "Answer: There was two children.

3 "Question: Male children?

4 "Answer: I believe so."

5 Do you remember giving that testimony?

6 A. No, I don't. Like I just stated, I didn't
7 recall him being in the Jacuzzi with anybody.

8 Q. All right. Did you ever report to anyone that
9 Mr. Jackson was in a Jacuzzi with children?

10 A. No. I wouldn't have any --

11 MR. LISKIN: Objection; vague and ambiguous.

12 THE WITNESS: -- any reason to.

13 MR. FINALDI: All right. Let's take a quick
14 break, five minutes or so.

15 THE VIDEOGRAPHER: Okay. This marks the end of
16 Media No. 1 in the deposition of Gayle Goforth. We are
17 going off the record at 11:45 a.m.

18 (Break taken.)

19 THE VIDEOGRAPHER: We are back on the record at
20 11:54 a.m. And this marks the beginning of media No. 2 in
21 the deposition of Gayle Goforth.

22 BY MR. FINALDI:

23 Q. You understand you are still under oath, right?

24 A. Yes, I do.

25 Q. So getting back to your transcript here.

1 A. Which page are we on?

2 Q. I'm on page 44 now.

3 A. Okay.

4 Q. They are talking about the reasons why
5 Mr. Quindoy left. Do you remember the reasons why he left
6 Neverland employment?

7 A. I don't remember specifically. I remember I was
8 on vacation at the time that he left, and I don't know
9 exactly what took place.

10 Q. Here it says -- do you recall an employee named
11 Karen Edder Dobbin?

12 A. Yes.

13 Q. She so told you that there was an incident that
14 occurred with Sophia Loren, Chris Tucker and Mr. Quindoy
15 not wanting to bring them coffee?

16 A. Yeah.

17 Q. Do you remember hearing about that?

18 A. Yeah. I kind of remember the instance. There
19 was something that went on while I was gone.

20 Q. And was it your understanding that he quit or
21 that he was fired over it?

22 A. I believe he quit.

23 Q. Okay.

24 A. I don't know if I said different here, but --

25 Q. And did you ever hear from anyone a different

1 story as to why they left?

2 A. I don't recall that, no.

3 Q. Okay. As far as you are concerned, that's the
4 only reason why they left?

5 A. As far as I know, yes.

6 Q. Okay. After they left, then, is that when you
7 got promoted to the supervisor of the housekeepers?

8 A. Yes.

9 Q. And you got an office?

10 A. There was a little alcove like that was called
11 the office.

12 Q. Was it in the main house?

13 A. Yes.

14 Q. Where? On which floor?

15 A. On the first floor.

16 Q. So if you go in the front door of the house, it
17 would be straight ahead, to the left or to the right?

18 A. It was closer to the back door.

19 Q. Back door, by the kitchen?

20 A. Yes, right by the kitchen. You came in the back
21 door and there is -- the housekeepers' room was here and
22 there was a powder room, and the office was right here and
23 then the kitchen was right there (indicating).

24 Q. Okay. So if you go through the back door,
25 housekeepers' office is on the left?

1 A. Yes.

2 Q. Okay. And who else was in that office besides
3 you? Who else had a desk there?

4 A. There was just one desk. Everybody used the
5 office, basically. I did my paperwork and stuff there.

6 Q. What kind of paperwork did you have to do?

7 A. Well, I was in charge of -- I was responsible
8 for buying supplies for the ranch and stuff, and so I had
9 to keep track of what I had spent and that sort of thing.
10 I had to send in an expense report to the accountants
11 every now and then. When I was low on funds or whatever,
12 they would send a check and reimburse me for that.

13 Q. Would you use your money or would it be like --

14 A. I did use my own money sometimes when I didn't
15 have any money in my account and things needed to be
16 purchased.

17 Q. And who would you -- you said you would send
18 them to them?

19 A. The accountants.

20 Q. Where were they located?

21 A. No idea. In L.A., I believe.

22 Q. Were they with MJJ Productions?

23 A. I don't know who they were with.

24 Q. Okay. When you would get these checks, who
25 would the checks come from? From what entity?

1 A. I don't recall.

2 Q. Were they from MJJ Productions?

3 A. I don't recall if that was the case or not.

4 Q. Do you remember ever getting checks from MJJ
5 Productions?

6 A. I don't recall where the checks came from. I
7 got checks but, you know, I don't remember what.

8 Q. Well, he didn't pay you personally?

9 A. No, he did not.

10 Q. They didn't come from Michael Jackson?

11 A. No, he did not pay me personally.

12 Q. When you were in charge of the housekeepers,
13 were you in charge of hiring and firing them as well?

14 A. I did do hiring.

15 Q. Did you do firing?

16 A. Did I fire anybody? I can't recall that I
17 actually fired anybody.

18 Q. Who would do the firing?

19 A. Nikki or -- and like I said, I don't remember if
20 Norma fired anybody or not, but I saw people fired. The
21 ranch manager usually did it. Well, Lance Brown was the
22 ranch manager at one time, too, before Nikki was. Jim
23 Zimmerman was there first, and then Lance Brown, and then
24 Nikki.

25 Q. And would you set their pay?

1 A. Pardon?

2 Q. The housekeepers, would you set their pay?

3 A. It was generally, it was set at \$8.00 an hour
4 when I started, and it was \$8.00 an hour when I left.

5 Q. Did people ever ask you for raises?

6 A. Well, everybody wanted a raise.

7 Q. And did you have the authority to give raises?

8 A. No.

9 Q. Who would do that?

10 A. Pardon me?

11 Q. Sorry. If someone wanted a bonus, or a raise,
12 or an advance, or something like that, who would you
13 contact?

14 MR. LISKIN: Objection; assumes facts.

15 BY MR. FINALDI:

16 Q. You can answer.

17 A. I would talk to Nikki, the ranch manager.

18 Q. Did you ever talk to Norma or Evy about those
19 issues?

20 A. I don't remember if I did that or not.

21 Q. When you spoke with this John person over the
22 telephone before your deposition today --

23 A. Uh-huh.

24 Q. Yes?

25 A. I'm sorry, yes.

1 Q. -- how long was that phone call?

2 A. I don't know. Five minutes or so.

3 Q. Did you guys talk about anything else that you
4 haven't discussed already?

5 A. Not that I believe.

6 Q. Did you wonder why they wanted to get you an
7 attorney?

8 MR. LISKIN: Objection; misstates prior
9 testimony. Leading.

10 BY MR. FINALDI:

11 Q. You can answer.

12 A. No. He just said that I was entitled to it
13 because I had signed a confidentiality.

14 Q. Are you withholding any information based upon
15 that confidentiality agreement?

16 A. Not that I think I am.

17 Q. You understand that doesn't bind you here today?

18 A. Correct. I am no longer an employee of
19 Neverland, but I still hold to that. I would never like
20 write a book or anything like that.

21 Q. Okay. But you are not withholding any
22 information today based upon that confidentiality
23 agreement?

24 A. Not as far as I know, no. If I am misstating
25 anything, it's something I don't recall. That's all.

1 Q. Okay. Do you remember Janelle Wall being fired?

2 A. I don't remember her being fired, no.

3 Q. Okay.

4 A. I remember her leaving, but I thought she left
5 on her own accord.

6 Q. Do you remember when Blanca left?

7 A. Yes, I do.

8 Q. Okay. You had gotten into an argument with her,
9 correct?

10 A. Yes, I did.

11 Q. Before she left, before this argument, did you
12 get along with her?

13 A. No.

14 Q. For what reason?

15 A. She didn't feel that she had to answer to me
16 because she was Michael's personal housekeeper.

17 Q. All right. Any other reason other than that?

18 A. I just didn't care for her personality. There
19 was another instance when one of the other housekeepers --
20 I don't even recall what the instance was or why it came
21 about or whatever -- anyway, I reported it to the office.
22 And at that time, I believe Mr. Brown had left and Sandy
23 and Nikki were fighting over who was going to be ranch
24 manager, so it was kind of like I could go to one or the
25 other. And Sandy told me that I needed to write -- her

1 name was Vangie, Evangeline -- I don't recall her last
2 name -- write her up for whatever occurred. And so I did
3 write her up and I gave her the write-up, but she was the
4 only one I ever wrote up.

5 I had been out and about and I came back in and
6 the girls had all been in and had lunch, and I found the
7 write-up notice was torn into shreds in a sandwich bag and
8 was pinned in the bulletin board. And when I questioned
9 it, then I was told that Bianca was the one that tore it
10 up.

11 Q. Who told you that?

12 A. I don't recall who told me that. I don't know
13 if she admitted it or if Vangie told me.

14 Q. Blanca said she didn't tear it up; she found the
15 papers on the floor in there or on the table.

16 MR. LISKIN: That's not true. She testified --

17 MR. FINALDI: Hang on.

18 MR. LISKIN: That misstates her testimony.

19 MR. FINALDI: Then wait until I am done with the
20 question.

21 Q. -- and she put them in the plastic bag and
22 pinned them up for someone to find. Do you know if Blanca
23 actually tore up the papers?

24 MR. LISKIN: Objection; mischaracterizes
25 testimony.

1 THE WITNESS: I don't know that for a fact. I
2 don't know that for a fact. That's what I was told.

3 BY MR. FINALDI:

4 Q. So other than this paper incident and her not
5 wanting to listen to you because she said she that doesn't
6 answer to you, any other reasons you didn't like Blanca?

7 A. No. That's basically it. She did her job.
8 Like I stated previously, that I was called stating that
9 Mr. Jackson's fax machine wasn't working properly and I
10 went and asked her if she would check it. And she came
11 out and she looked at me and then walked out towards the
12 door and she turned around and said, "Mr. Jackson's fax
13 machine is working properly." And she turned around and
14 stalked out the door. So it was a mutual. She didn't
15 like me either.

16 Q. So Mr. Jackson had a fax machine inside his
17 bedroom?

18 A. In his bedroom, yes.

19 Q. Where in his bedroom?

20 A. It was in the closet.

21 Q. It is my understanding there were two closets?

22 A. It was the closet. If you walked in the door,
23 it was the closet on the right-hand side.

24 Q. Was there like a male closet?

25 A. No.

1 Q. On the right-hand side, is that where he had the
2 boy's pictures and everything, the same one?

3 A. The boys' pictures?

4 MR. LISKIN: Objection; lacks foundation.

5 BY MR. FINALDI:

6 Q. Yeah. In one of closets they testified that
7 there were pictures of Emmanuel Lewis, Macauley Culkin,
8 maybe 40 different pictures of kids in frames. Do you
9 remember that?

10 MR. LISKIN: Objection; misstates prior
11 testimony.

12 THE WITNESS: He had all kinds of everything.
13 He had memorabilia in both closets.

14 BY MR. FINALDI:

15 Q. So you are saying he had photos of kids in both
16 closets?

17 MR. LISKIN: Objection; misstates prior
18 testimony.

19 THE WITNESS: I don't know if it was more than
20 just photos. There was all kinds of different things in
21 these closets.

22 BY MR. FINALDI:

23 Q. Which closet had the photos of the kids?
24 Specifically, Macauley Culkin and Emmanuel Lewis.

25 A. I don't remember. It would probably be the same

1 one. I'm not sure. The other one --

2 Q. The one on the right?

3 A. Yes.

4 Q. And the one on the left had the videos in it?

5 MR. LISKIN: Objection; lack of foundation.

6 THE WITNESS: I don't remember there being
7 videos in there. I stated that.

8 BY MR. FINALDI:

9 Q. Let's go back to your deposition.

10 A. Well, like I said, this was a lot of years ago.

11 Q. A long time ago, but you actually worked in his
12 personal bedroom --

13 A. Yes, I did.

14 Q. -- for at least five years, right?

15 A. Yes, I did.

16 MR. LISKIN: But if she doesn't remember
17 something, that's completely fair.

18 BY MR. FINALDI:

19 Q. So if we go to page No. 62 --

20 A. Okay.

21 Q. -- line No. 22:

22 "In Mr. Jackson's bedroom, there is a
23 walk-in closet; is that correct?"

24 You answered:

25 "Yes."

1 That's true, right?

2 A. Yes.

3 Q. All right. It says:

4 "And then inside that walk-in closet,
5 there is like an inner closet?

6 "Answer: Not that I'm aware of."

7 Did you know about when you go inside of the
8 closet on the right, you can kind of push a door and there
9 is an inner like room?

10 A. I knew about it after this.

11 Q. How did you find out about it afterwards?

12 A. I was when I was taking care of his room, the
13 maintenance were coming in to do some shower work in one
14 of the bathrooms and they went in through there.

15 Q. And you saw that little inner room?

16 A. Yes.

17 Q. And what was in there?

18 A. Books, a lot of books. A safe. I believe a
19 file cabinet.

20 Q. Do you know what the books were?

21 A. No.

22 Q. Did you see any of the titles?

23 A. No.

24 Q. Were there any photos in there?

25 A. Not that I recall, no.

1 Q. Were there documents and records and things?

2 A. There was a file cabinet, so I didn't look in
3 the file cabinets. He sent me in there one time to
4 retrieve a watch that was in the safe.

5 Q. What else was in the safe?

6 A. I don't know. I was looking for the watch.

7 Q. Did he know whether you knew about that secret
8 room?

9 A. It wasn't something we had discussed, no.

10 Q. Okay. Then how did you know -- how did he know
11 that you knew where it was?

12 A. He told me.

13 Q. What did he say?

14 A. He told me that in his closet behind the
15 clothes, that there was a door.

16 Q. And it was behind his jackets with the sequins
17 and stuff, right?

18 A. Yes.

19 Q. But did you already know about this door?

20 A. I don't recall if this was before or when I got
21 the watch. It was before or after the plumbing instance.

22 Q. Okay.

23 A. I was only in there twice, and those were the
24 only times.

25 Q. Do you remember anything else being in that

1 closet?

2 A. There was a lot of stuff in that closet. There
3 was books, a lot of books. He had books everywhere.
4 Clothes. I don't remember specifics on what was in there.

5 Q. Okay. So going to page 63 here, line 14:

6 "Question: And in either of those
7 closets, are there pictures of children on
8 the wall?

9 "Answer: Yes.

10 "Question: Which closet?

11 "Answer: In the men's room."

12 Do you remember giving that testimony?

13 A. No, I don't remember giving that testimony.

14 Q. And "Question: In other words, the closets are
15 off the bathrooms; is that correct?

16 "Answer: Yes.

17 "Question: And these pictures of
18 children, do you recognize any of the children
19 whose pictures are up there?

20 "Answer: Some, yes.

21 "Question: Can you tell us which
22 children's pictures are up there that you
23 recognize?

24 "Answer: Macauley Culkin's."

25 Do you remember giving that testimony?

1 A. I don't remember giving this testimony, no.

2 Q. "Question: Anyone else?

3 "Answer: Emmanuel Lewis."

4 Do you remember giving that testimony?

5 A. No.

6 Q. Did you ever wonder why Mr. Jackson had pictures
7 of children up in his closet?

8 A. I never questioned it. They were friends of
9 his.

10 Q. Didn't seem weird to you?

11 A. No.

12 Q. Or unusual?

13 A. No. He had pictures of Muhammad Ali in there.
14 There was other pictures in there.

15 Q. Page 65, actually going back -- sorry. Before
16 we get there, page 59.

17 A. Okay.

18 Q. You see line No. 7, Kiki, do you recall an
19 employee name Kiki?

20 A. Yes.

21 Q. And it says:

22 "Were you the person that laid off
23 Francine?

24 "Answer: No.

25 "Question: Were you present when

1 she was laid off?

2 "Answer: I believe so.

3 "Question: Who actually laid her off?

4 "Answer: MJJ Productions did, Norma."

5 Do you remember giving that testimony?

6 A. I don't remember giving that testimony, no.

7 Q. Do you recall Norma or MJJ Productions coming to
8 the ranch to lay people off?

9 A. I remember Norma coming a few times, but I don't
10 remember this instance.

11 Q. Okay. Going down to page No. 65 here.

12 A. 65?

13 Q. Yeah. Did you ever remember speaking to an
14 attorney names Howard Weitzman?

15 A. I don't remember speaking to him directly, no.

16 Q. Page 65 here, line 20.

17 A. Okay.

18 Q. It says:

19 "Since she is here. Are there any --
20 and you've talked to Howard Weitzman, of
21 course?

22 "Answer: Yes."

23 Does that refresh your recollection as to
24 whether you had spoke to Mr. Howard Weitzman before
25 your --

1 A. I might have talked to him on the phone. I
2 don't recall.

3 Q. And do you remember what you spoke with him
4 about?

5 A. No, I do not.

6 MR. LISKIN: Objection. That would be
7 attorney-client privilege if you spoke with him and he was
8 acting as your attorney in relation to a depo.

9 MR. FINALDI: She didn't say anything about --
10 she said nothing about being an attorney.

11 MR. LISKIN: You shouldn't be revealing any
12 communications --

13 MR. FINALDI: She didn't say anything about who
14 represented who or anything.

15 Q. So your testimony was you don't remember?

16 A. I don't recall --

17 Q. Okay.

18 A. -- speaking with him, no.

19 Q. Do you remember speaking with several different
20 attorneys for Mr. Jackson prior to this '93 deposition?

21 A. No, I don't. I don't even remember -- I don't
22 know who I talked to.

23 Q. You were represented at the deposition, though,
24 correct?

25 A. Yes, I was. I don't remember the gal that took

1 me. She took me to the deposition.

2 Q. Ms. Fan was your attorney, correct?

3 A. Okay, yeah. Like I said, I don't remember her
4 name. I just remember her taking me.

5 Q. And you didn't pay her. She was paid by the
6 company, correct?

7 MR. LISKIN: Objection; calls for speculation.
8 Lack of foundation.

9 THE WITNESS: I have no idea who paid her.

10 BY MR. FINALDI:

11 Q. Well, you didn't pay her, right?

12 A. No. I did not.

13 Q. Page No. 66, line 18:

14 "In either one of these closets,
15 are there like stacks of photographs?

16 "Answer: Yes.

17 "Question: Which closet is that?

18 "Answer: The men's room closet."

19 Do you remember giving that testimony?

20 A. I don't remember giving any of this testimony.

21 Q. Do you remember there being stacks of
22 photographs in the closet?

23 A. Stacks of photographs, no. That's what I said?
24 No. That's what he said was "stacks of photographs."

25 Q. And you said "Yes."

1 Do you see that?

2 A. Okay.

3 Q. You don't remember that, though?

4 A. I don't remember this, no.

5 Q. Page 67, line 5:

6 "And they're in frames stacked up or
7 frames hanging up?

8 "Answer: They are sitting on a shelf.

9 "Question: So are they flat or propped
10 up?

11 "Answer: They are propped up.

12 "Question: Okay. And these are also
13 pictures of children?

14 "Answer: Yes."

15 Do you remember him having frames with children
16 in them propped up inside of his closet?

17 A. Like I said, there were all kinds of pictures in
18 there. There were adults. There were kids. There -- I
19 don't recall other -- who exactly was in there, but there
20 were a lot of pictures on the shelves. And then there was
21 another big shelf across the top where those clothes were
22 hung up that had things on them.

23 Q. Page 67, line 24, at the bottom, and it says:

24 "Okay. And how many pictures?

25 Estimate?

1 "Answer: I don't know. 25, 30."

2 Do you remember that there was about that many
3 pictures in there?

4 A. Probably.

5 Q. The next page says:

6 "Okay?

7 "There is just pictures of movie stars
8 in there also. It's not just children.

9 "Question: Okay. How many of the
10 pictures are pictures of adults rather than
11 children?

12 "Answer: I would say half."

13 Is that your understanding about half of them
14 were pictures of kids?

15 A. Yes.

16 Q. Okay. Page 68, line 10:

17 "Are there videotapes anywhere in his
18 bedroom?

19 "Answer: They are in the other closet."

20 Do you remember giving that testimony?

21 A. I don't remember giving any of this testimony
22 but I do recall there being videos in that closet, now
23 that I think of it.

24 Q. It says:

25 "Question: They are in the other

1 closet?

2 "Answer: Uh-huh.

3 "Question: How are they stored?

4 "Answer: On shelves and there is
5 some in boxes.

6 "Question: Okay. Are these commercial
7 videotapes, like 'Dancing with Wolves' or
8 popular movies, or are they just videotapes
9 where someone has taped something?"

10 Do you remember giving that testimony?

11 A. No.

12 Q. What kind of videotapes do you remember seeing
13 in the bedroom?

14 A. I don't remember any titles of anything. I
15 remember them being black.

16 Q. Like blank videos?

17 A. I don't think they were blank, no. I think they
18 had titles on them, but I didn't sit down and look at them
19 and say "Oh, this is such and such and this is such and
20 such."

21 Q. Page 69, line No. 5, and it says:

22 "That just says 'VHS Sony.' And
23 then if you go and spend and you buy a
24 movie, then it says 'Dancing with Wolves'?

25 "Answer: Yes. They are marked.

1 "Question: They are marked?

2 "Answer: Yes.

3 "Question: And so when you say they are
4 marked, what do you mean by that?
5 Marked in handwritten notations?

6 "Answer: No. Most of them are typed,
7 I believe."

8 Do you recall what kind of videos they were?
9 Were they the kind you buy in a store?

10 A. I thought they were betas. I'm not sure.

11 Q. Okay.

12 A. I remember later on, we put in, off of the
13 upstairs bedroom, there was another room off of that that
14 we made into a library, and the tapes were all moved to
15 there at that time. And then later on, they changed the
16 gym into the video library, then everything was moved
17 there.

18 Q. Okay. Page 74, you talk about when a search
19 warrant was served at Neverland ranch. You said you
20 arrived at the gate as they were serving it. Do you
21 remember that?

22 A. I vaguely remember that. I don't remember where
23 I was at the time, no.

24 Q. And it's page 76 at the top, it says:

25 "Well, she was" --

1 And you are talking about Adrian McManus.

2 Actually --

3 A. Which --

4 Q. Hang on. Page 74 at line 16, it says:

5 "I talked to Adrian a little bit

6 because I was concerned about her."

7 Do you remember giving that testimony?

8 A. No, I don't remember that.

9 Q. Do you ever remember being concerned about
10 Adrian McManus?

11 A. No, I don't.

12 Q. Page 76, line 1, you say:

13 "Well, she was -- she was in the room

14 with them the whole time they were searching

15 the room, his room. And I was just concerned

16 for her because it was very -- it was a very

17 traumatic ordeal."

18 Do you remember giving that testimony?

19 A. I don't remember giving the testimony, no,
20 but --

21 Q. Do you remember that occurring?

22 A. I remember them coming to the ranch and
23 searching the ranch.

24 Q. Do you remember it being traumatic for Adrian
25 McManus?

1 A. It was traumatic for everybody. I don't recall
2 it being for Adrian but as her supervisor, I was concerned
3 for her. I can see that.

4 Q. It was traumatic for you?

5 A. Well, yes.

6 Q. For what reason?

7 A. When a bunch of police come into a home like
8 that and they are going through everything, it's very
9 traumatic. You know, "What's going on? What are they
10 looking for? Why is this happening," you know.

11 Q. Well, earlier you said that you knew that they
12 were looking for stuff related to child molestation
13 because you saw the subpoena at the gate. Do you remember
14 giving that testimony?

15 A. Did I see it? I don't recall that. I don't
16 recall seeing the subpoena.

17 Q. When do you remember first hearing that this was
18 an investigation into child molestation? Actually, let me
19 go -- strike that.

20 A. I was at the gate when they came in.

21 Q. So page 75, line No. 12.

22 A. Okay.

23 Q. "When these people came, did you think the
24 search had something to do with sexual molestation of
25 children?

1 "Answer: No.

2 "Question: When did you first have
3 that thought or learn from anybody that it
4 might have something to do with that?

5 "Answer: While I was at the gate, I
6 was shown the search warrant and it stated
7 that."

8 Do you remember giving that testimony?

9 A. No, I don't remember giving the testimony.

10 Q. Do you remember seeing the search warrant that
11 talked about it was related to child --

12 A. No, I don't recall that --

13 Q. Do you know if that's --

14 A. -- at all.

15 Q. Do you know if that's when you first learned
16 that it was about child molestation?

17 A. Well, it must have been; otherwise, I wouldn't
18 have known anything if I didn't see the whatever it is.

19 Q. Did you ever speak with the police?

20 A. Did I speak with the police? Not directly, no,
21 that I recall.

22 Q. What do you mean "not directly"?

23 A. Nobody came up to me and said, "What do you know
24 about this" or "do you know where anything is," or
25 whatever. I think I went in and I went up to the ranch

1 office.

2 Q. Did you go and talk to the police to assist --

3 A. No.

4 Q. -- them with their investigation?

5 A. I don't believe so.

6 Q. Why not?

7 A. I wasn't asked to.

8 Q. Okay. But you could have done that on your own,
9 though, right?

10 MR. LISKIN: Objection; leading.

11 THE WITNESS: Why would I do that?

12 BY MR. FINALDI:

13 Q. Well, didn't you want to help the police?

14 A. I wasn't called to do anything like that. If
15 they needed my help, they would have called for me.

16 Q. But how would they know?

17 A. I don't know. How would I know?

18 Q. Well, you saw the police going around the area.
19 You knew they were investigating child molestation. Did
20 you feel that it would be important for you to go and tell
21 the police about the things that you knew about
22 Mr. Jackson sleeping in his bedroom with kids, about there
23 being kids underwear on the floor in his bedroom, kids
24 underwear by the Jacuzzi, by the shower, pictures of kids
25 in his closet? Did you feel that it would be important to

1 tell the police about that kind of stuff?

2 MR. LISKIN: Objection; argumentative and
3 leading. Lacks foundation.

4 THE WITNESS: When I was finding underwear and
5 clothing on the floor and stuff, I did not think anything
6 of it --

7 BY MR. FINALDI:

8 Q. Yeah.

9 A. -- honestly because, to me, it was innocent.
10 There was nothing going on. I would not ever have
11 believed anything was going on. I stated the fact to my
12 husband that if I believed anything like that was going
13 on, I wouldn't have allowed my children to have been
14 there. I would not have been there. I wouldn't have
15 worked there. And I still was working there after my son
16 was molested, so I did not see anything wrong with what
17 was happening. And so I had no reason whatsoever to go
18 and contact the police and say, "Oh, I know he has been
19 sleeping with children and there is underwear on the floor
20 and stuff," because everybody was going in there. They
21 were staying there. They were normal kids. They throw
22 their clothes around.

23 Q. And you don't know exactly what was going on in
24 that bedroom --

25 A. No, I did not. I was not there.

1 Q. -- at night after the doors were closed,
2 correct?

3 A. That's right, I was not.

4 Q. And you never asked any of the kids?

5 A. No, I did not ask them. I didn't have any
6 reason to ask them.

7 Q. And you never even asked them what bed they were
8 sleeping in?

9 A. No. I had no reason to ask them.

10 Q. Well, didn't you feel -- didn't you feel any
11 kind of duty to these kids to help make sure they are safe
12 or protected?

13 MR. LISKIN: Objection; calls for a legal
14 conclusion. Lacks foundation.

15 THE WITNESS: Like I said, I did not believe
16 anything was happening. I did not believe that I had to
17 protect them. Their parents were on the property. Their
18 parents allowed them to stay in his room. It was an honor
19 to get to stay in Mr. Jackson's room. All the kids wanted
20 to stay in his room.

21 BY MR. FINALDI:

22 Q. Who told you it was an honor?

23 A. Nobody had to tell me that. It was just kind of
24 a given, you know.

25 Q. Do you know why he let kids stay in his room?

1 MR. LISKIN: Objection; calls for speculation.

2 THE WITNESS: Because he didn't know how to say
3 no.

4 BY MR. FINALDI:

5 Q. Who told you that?

6 A. I know that for a fact because he never -- if he
7 had to tell a child no, he would ask me to tell them that
8 or something. I could use for an instance when they put
9 in the new code, there was some children he didn't want in
10 his room, and he told me he did not want them in his room
11 but he gave them the code anyway because they asked for it
12 and he couldn't tell them no.

13 Q. Well, do you know if he gave them the code
14 because he had abused them and he didn't want them to tell
15 anyone?

16 MR. LISKIN: Objection; leading and
17 argumentative.

18 THE WITNESS: No. That is not why I said that.
19 BY MR. FINALDI:

20 Q. So as you sit here today, you don't think he
21 ever abused any child?

22 A. I don't believe so, no. I don't know that for a
23 fact.

24 Q. But you never saw a girl, a young girl sleeping
25 in his room, correct?

1 MR. LISKIN: Objection; mischaracterizes prior
2 testimony.

3 THE WITNESS: I never saw anybody actually
4 sleeping in his room, other than his son.

5 BY MR. FINALDI:

6 Q. But you never knew that a girl, a young girl
7 slept in his room?

8 MR. LISKIN: Objection; mischaracterizes prior
9 testimony.

10 THE WITNESS: Like I said, they had slumber
11 parties. I don't know who slept in his room.

12 BY MR. FINALDI:

13 Q. Had you ever heard about any payouts Mr. Jackson
14 had made to children?

15 A. No, I do not.

16 Q. You never heard that he had paid children as a
17 result of allegations of sexual abuse?

18 A. No.

19 MR. LISKIN: Objection; lack of foundation.

20 BY MR. FINALDI:

21 Q. You never heard that he had paid Jordan
22 Chandler?

23 A. I did hear something to that effect about money.

24 Q. All right. And did you hear about any of the
25 others?

1 MR. LISKIN: Objection; lacks foundation.

2 THE WITNESS: There was only one other.

3 BY MR. FINALDI:

4 Q. Which is the other one?

5 A. Gavin.

6 Q. Gavin?

7 A. Yes.

8 Q. It's your understanding he paid Gavin?

9 A. No. That's not what I said. I said there was
10 only one other accuser.

11 Q. Did you ever meet Jason Francia?

12 A. I met him once, I think. Bianca's son, is that
13 who you are referring to?

14 Q. Yeah.

15 A. I think I met him once.

16 Q. Where did you meet him?

17 A. Family day, I believe.

18 Q. Was he a nice kid?

19 A. No.

20 Q. No?

21 A. I didn't think so, no.

22 Q. How old was he when you met him?

23 A. I don't recall. I think he was like 10, 11.

24 Q. And why wasn't he a nice kid?

25 A. He acted like a little brat.

1 Q. What did he do?

2 A. I don't know specifically what he did, but it
3 was just the way he acted.

4 Q. Could you describe it a little bit for us?

5 A. I can't recall any instance. That was just the
6 impression that I got of him.

7 Q. Did you ever see him with Mr. Jackson?

8 A. Not that I recall.

9 Q. Did you know that he was sexually abused by
10 Mr. Jackson?

11 MR. LISKIN: Objection; lack of foundation.

12 THE WITNESS: I heard that was alleged after the
13 fact years later.

14 BY MR. FINALDI:

15 Q. Oh, years later?

16 A. Yes.

17 Q. How many years later?

18 A. I don't know. It was long after Bianca had left
19 the ranch. I think it came up during Gavin's.

20 Q. Oh, that's when you think he had a case?

21 A. Pardon?

22 Q. That's when you think Mr. Francia's allegations
23 came up?

24 A. I think I might have heard about it then. I'm
25 not sure.

1 Q. You never heard that Mr. Jackson paid Jason
2 Francia a settlement, over a million dollars?

3 MR. LISKIN: Objection; lacks foundation.

4 THE WITNESS: No, I did not hear that.

5 MR. FINALDI: Hmmm.

6 Q. Did you ever hear about any of the other ones?

7 MR. LISKIN: Objection; lacks foundation.

8 THE WITNESS: No, I never heard of any. Jordan
9 was the only one.

10 BY MR. FINALDI:

11 Q. Now, after '93, when you testified at this
12 deposition, you worked for MJJ Productions for a number of
13 years afterward, correct?

14 A. I worked for Neverland.

15 Q. Neverland? Say it again.

16 A. Neverland Valley Ranch.

17 Q. Yeah. So was that a business entity? Was that
18 a business entity? Was that a corporation or an LLC?

19 A. I don't know, but that's who I worked for,
20 Neverland ranch.

21 Q. Who told you that?

22 A. I was told that when I was hired there.

23 Q. Who told you that?

24 A. I don't recall. It was just a known.

25 Q. So we wouldn't ever see a pay stub of yours that

1 says "MJJ Productions," right?

2 A. I don't recall.

3 Q. It should say "Neverland Valley Ranch," right?

4 A. I don't recall if it said "Neverland," it said,
5 "MJJ," it said "Joe Blow." I don't know. I didn't keep
6 anything. I do not remember.

7 Q. But when you spoke with this attorney, John, the
8 other day, you guys did mention MJJ Productions and
9 Neverland Valley Ranch, right?

10 A. Yes, he did mention that.

11 Q. All right. And you don't remember his last
12 name?

13 A. No, I do not.

14 Q. Getting back to your deposition here. Page 78,
15 lines 10 through 12:

16 "I have seen him hug children?

17 "Okay. Have you seen him hold their
18 hands?

19 "Yeah, little children."

20 So you had seen Mr. Jackson hug children and
21 hold their hands at the ranch, correct?

22 A. Yes.

23 Q. Page 79, line 3:

24 "Did you ever see any children sit
25 in his lap?

1 "Answer: Little girls."

2 Do you remember giving that testimony?

3 A. I don't recall giving any of this testimony, no.

4 Q. Do you remember little girls sitting in his lap?

5 A. I remember Amy Agajanian sitting in his lap and
6 I remember -- I don't remember -- what's her name -- Marie
7 Nicole Cascio sitting in his lap.

8 Q. Okay. Do you remember how you found out that
9 Norma was leaving MJJ Productions?

10 A. No, I don't recall.

11 Q. It says here on page 80 that she read -- Nikki
12 Wimsatt read a letter from Norma saying, "Good-Bye. I
13 will miss you all. I love you everyone. Take care and
14 keep doing a great job for Mr. Jackson, like you have been
15 doing."

16 Do you remember that?

17 A. I don't remember this, no.

18 Q. Do you remember --

19 A. I remember Norma left. I believe she had gone
20 to Greece and stayed there.

21 Q. Who told you that?

22 A. I believe Nikki did.

23 Q. After Norma left the company, did you ever see
24 her again?

25 A. I don't recall that I ever did.

1 Q. Did you ever speak with her again?

2 A. I don't believe so.

3 Q. Did you ever hear anything about what became of
4 Norma?

5 A. No, I did not.

6 Q. Okay. You never knew she came back?

7 A. No, I did not.

8 MR. LISKIN: I am going for interpose an
9 objection. Lacks foundation.

10 MR. FINALDI: Well, Mr. Hern said it.

11 Q. So you never spoke -- you never spoke with Norma
12 over the phone, or e-mail, or anything after she left?

13 A. I don't believe so, no.

14 Q. Okay. Now, getting back to page 83 here. It
15 says:

16 "Did anybody at the -- after the
17 search warrant was served" --

18 A. Which line are you on?

19 Q. Line 14.

20 It says:

21 "-- after the search warrant was
22 served, did anybody at the ranch or anybody
23 at MJJ Productions, or anybody associated
24 with Mr. Jackson, give you instructions as to
25 who you should or shouldn't talk to?

1 "Answer: No. They just asked that we
2 try not for speculate and discuss it amongst
3 ourselves.

4 "Question: Okay. Did they ask you
5 not to talk to investigators who worked
6 for the plaintiff?

7 "Answer: Yes.

8 "Question: Okay. And who asked you
9 not to do that?

10 "Answer: It was in a memo."

11 Do you remember giving that testimony?

12 A. I don't remember any of all this.

13 Q. Okay.

14 "Question: It was in a memo?

15 "Answer: Yes.

16 "Question: They sent out a memo to
17 everybody telling you what to do?

18 "Answer: Yeah."

19 You don't remember getting a memo telling you
20 not to talk to the plaintiff or investigators?

21 A. No. I don't recall that, no.

22 Q. And the memo had the name and phone number for
23 Anthony Pellicano. Did you know that?

24 MR. LISKIN: Objection; lack of foundation.

25 THE WITNESS: I have no idea who it had on

1 there.

2 BY MR. FINALDI:

3 Q. Do you know who Anthony Pellicano is?

4 A. No, I do not.

5 Q. Okay.

6 A. Can I ask who he is, or I don't need to know?

7 Q. Sure. He was his investigator.

8 Go to page 103. I will help you. Do you recall
9 Hard Copy coming to the door?

10 A. Yes, I do. I do remember that.

11 Q. They wanted to talk to you?

12 A. Yes, they did.

13 Q. And you didn't talk to them?

14 A. No, I did not.

15 Q. And you testified that -- go to page 103, line
16 No. 9.

17 A. Okay.

18 Q. "Why did you call Mr. Pellicano when Hard Copy
19 came to your door?

20 "Answer: We were instructed to
21 contact Mr. Pellicano at first, when this
22 first happened, if we were contacted by
23 anyone.

24 "By anyone?

25 "Uh-huh.

1 "And those instructions were written
2 or oral?

3 "Answer: It was a memo."

4 Do you remember giving that testimony?

5 A. I do not recall giving any of this testimony.

6 Q. So what did you tell Mr. Pellicano?

7 MR. LISKIN: I just want to interpose an
8 objection that Mr. Pellicano was hired by Bert Fields, who
9 was a lawyer, and that any interviews that Mr. Pellicano
10 did are work product. I'm not going to attempt to prevent
11 her from testifying but to the extent that she has any
12 current recollection of such testimony, I am just going to
13 preserve our right to strike any such testimony from the
14 record.

15 BY MR. FINALDI:

16 Q. So do you remember what you told him?

17 A. I didn't even remember who he was. How could I
18 remember what I told him?

19 Q. Does this refresh your recollection as to
20 whether you spoke to him?

21 A. No, it does not. I remember Hard Copy coming to
22 my door. That's all I remember about it.

23 Q. Do you know where he is now?

24 A. No, I have no idea.

25 Q. Oh, okay. You never heard that he ended up

1 going to prison for racketeering and wiretapping?

2 A. No, I did not.

3 MR. LISKIN: Objection; argumentative. It has
4 nothing to do with anything. She already testified she
5 didn't remember his name.

6 MR. FINALDI: Doesn't have anything to do with
7 anything, yeah. In this case? You're mistaken.

8 Okay. Put that one down, if you like, because I
9 think I am finished with that transcript.

10 Q. You doing okay?

11 A. Yeah.

12 Q. Okay. Do you know if Mr. Quindoy had children?

13 A. I don't recall if he did or not.

14 Q. And after they left working for -- at Neverland,
15 did you ever speak with them again?

16 A. No, I did not.

17 Q. When you left Neverland, what did you do with
18 your records and files? Did you have a chance to get them
19 and bring them with you?

20 A. I don't remember if I had any files. I left
21 what I had there. I had some personal letters that guests
22 had left saying what a wonderful stay they had had, and I
23 kept those things as like mementoes.

24 Q. Which guests?

25 A. I don't recall which guests.

1 Q. Famous guests?

2 A. I know Gregory Peck left a letter for sure.

3 Q. All right. Were you ever given any kind of
4 memorabilia, or items, or autographs, or pictures by
5 Michael Jackson?

6 A. Yes. Not specifically by Michael Jackson, but
7 he gave me gifts every year for Christmas and that.

8 Q. What kinds of gifts?

9 A. He gave me a video camera. He gave me a DVD
10 player. He gave me a whole basket that had a bunch of
11 movies, pardon me, and candy and stuff like that. It was
12 just a movie basket.

13 Q. And did he ever give you anything autographed,
14 or any jackets or the hats he wore?

15 A. I got a -- shoot, what is it called? Was it a
16 "Bad" jacket.

17 Q. You still have it?

18 A. Yes, I do.

19 Q. All right. Have you ever sold any of the gifts
20 or autographs?

21 A. No, no. I have never sold anything.

22 Q. You still have all the stuff that he gave you?

23 A. I have all of the Neverland stuff that was given
24 to me. Whenever they brought in any shipment of stuff,
25 then Nikki would allow certain people to take a few

1 things.

2 Q. What do you mean "Neverland stuff"? What do you
3 mean by that? What kind of things? T-shirts? Jackets?

4 A. T-shirts, not jackets. What else do I have?
5 Bags. They were all like souvenirs. When we had groups
6 of children come, we made up like snack bags for them. We
7 put sandwiches and chips and a drink and candy in them,
8 and they were all given like a bag. They had pencils and
9 cards and different things like that in it.

10 Q. How often would groups of children come to
11 Neverland?

12 A. Oh, like once a month.

13 Q. And when they would come, would Mr. Jackson
14 always be there or would sometimes he be there?

15 A. Oh, he would be there, but most of the time not.

16 Q. All right. And on the sometimes that he was
17 there when groups of kids were there, how many kids we
18 talking about?

19 A. Oh, a couple hundred.

20 MR. LISKIN: Objection --

21 THE REPORTER: Counsel?

22 MR. LISKIN: That's fine.

23 BY MR. FINALDI:

24 Q. And did he ever take the kids into his room?

25 MR. LISKIN: Objection; calls for speculation.

1 Lack of foundation.

2 THE WITNESS: No. No children went in the
3 house.

4 MR. LISKIN: Try and give a little pause so I
5 can get my objection out.

6 THE WITNESS: I'm sorry. I'm sorry.

7 MR. LISKIN: It's okay. It's a normal part of
8 depositions. I happens all the time.

9 THE WITNESS: Okay.

10 BY MR. FINALDI:

11 Q. So he would not take the kids in the house?

12 A. No.

13 Q. How do you know?

14 A. I don't know that for a fact, but nobody went in
15 the house.

16 Q. Okay. You weren't watching to make sure no one
17 went in the house, right?

18 A. No, I was not.

19 Q. You were busy working?

20 A. Yes, I was.

21 Q. All right. And did MJJ Productions, Neverland
22 or MJJ Ventures ever provide you any kind of training on
23 child sexual abuse?

24 A. No. They had no reason to.

25 Q. Uh-huh. Did they ever give you any kind of

1 training on mandatory reporting?

2 A. I don't know what you mean by that.

3 Q. You ever heard what a mandated reporter is?

4 A. No.

5 Q. Were you ever trained on anything related to
6 having a duty to report reasonable suspicions of child
7 sexual abuse?

8 A. No.

9 Q. Who would supervise all these kids when they
10 would come?

11 A. They all had teachers and adults with them, and
12 we kept them in groups. Basically, the only time I dealt
13 with them, they were in the park and in the theater, that
14 sort of thing. And they went -- they toured the zoo, but
15 my only contact with them was when they were going through
16 the food line. I helped serve food, and theater to give
17 them candy and that sort of thing.

18 Q. And would like the security staff help to
19 supervise the kids, make sure they are not going in the
20 wrong spots or going in the house?

21 A. Yes. Everybody did. It was part of the whole
22 ranch, you know.

23 Q. All the employees had to help with that?

24 A. Right. The gardeners and everybody, they came
25 in and they helped serve food and stuff. A lot of the

1 gardeners worked in the kitchen also.

2 Q. So when kids like Wade, or Jimmy Safechuck, or
3 Brett Barnes would come to Neverland, how long would they
4 stay?

5 A. It varied. I'm not sure. I never kept track of
6 how long they stayed. When Brett would come, he would
7 come with his mom and his sister, and they would stay for
8 a few weeks or a month. They were from Australia also.

9 Q. What's the most days in a row that you remember
10 one kid sleeping in the same room as Mr. Jackson?

11 A. I really don't know.

12 Q. What's your best estimate?

13 MR. LISKIN: Objection; calls for speculation.

14 THE WITNESS: Well, there were times when they
15 would come and Mr. Jackson wouldn't even be there, so.

16 BY MR. FINALDI:

17 Q. And they couldn't sleep in the bedroom with him?

18 A. No.

19 Q. My question is, when he would sleep in the
20 bedroom with a child, what is the most number of days you
21 recall that happening?

22 A. Probably 30.

23 Q. Okay. How did you become aware that Mr. Jackson
24 passed away?

25 A. I heard it on the news.

1 Q. Did you go to any of his memorials?

2 A. No, I did not.

3 Q. Did you talk to anyone from MJJ Productions?

4 A. No, I did not.

5 Q. Okay. Did you see, during your time at
6 Neverland, from the beginning towards the end, did you see
7 Mr. Jackson's behavior begin to change?

8 MR. LISKIN: Objection; vague and ambiguous.

9 THE WITNESS: Pardon? I don't know what you
10 mean by "change."

11 BY MR. FINALDI:

12 Q. Sure. It seems like throughout the years, his
13 behavior, his appearance started to change. Did you
14 notice that?

15 A. Yeah. It changed some over the years, yes.

16 Q. Okay. His face was kind of changing a little
17 bit?

18 A. Yes.

19 Q. All right. And did you notice his -- just the
20 way he acted throughout the years starting to change,
21 becoming more reclusive, less reclusive, maybe seeming
22 medicated, or drinking, or anything like that?

23 A. I never saw him drinking, but I know he was
24 medicated. There was doctors that did come to the ranch.

25 Q. Never saw him drinking alcohol?

1 A. If -- I saw him drinking something. I don't
2 know what was in the cup. I did not ask.

3 Q. Okay. Do you remember testifying that you
4 remember him -- actually, you testified at the trial. You
5 remember doing that, right?

6 A. Yes.

7 Q. And do you remember testifying at the trial that
8 he would drink alcohol at the dinner table?

9 A. I don't remember him drinking alcohol at the
10 table.

11 Q. Okay. I will read it to you. Page 9458 at the
12 trial:

13 "Going back to the entire time that
14 you worked at the ranch, did you have the
15 occasion to see Mr. Jackson drink alcohol?

16 "Answer: A few occasions.

17 "Question: All right. And roughly --
18 let's put this in this way. When did you
19 see him drink? What occasions would you see
20 him drink alcohol?

21 "Answer: At meal time, dinnertime.

22 "Answer: Okay. At some point during" --

23 MR. LISKIN: That's a question.

24 BY MR. FINALDI:

25 Q. -- "during this period or from time to time, you

1 actually took care of Mr. Jackson's room as well; is that
2 correct?

3 "Answer: Yes, I did."

4 So does that refresh your recollection as to --

5 A. Yes, but I don't recall saying that either.
6 Like I said, that one was a long time ago, too.

7 Q. Does that refresh your recollection as to
8 whether he drank alcohol?

9 A. I don't know. If I served it to him, I would
10 know. So I must have served it to him at that time, but
11 he didn't normally drink.

12 Q. Do you recall hearing any rumors about
13 Mr. Jackson and kids the entire time you worked at
14 Neverland?

15 A. Rumors?

16 Q. Yeah.

17 A. Other than the children that came forward, is
18 that what you are stating?

19 Q. Just rumors generally. I understand you didn't
20 believe them, but what kind of rumors did you hear about
21 Mr. Jackson when you worked there?

22 MR. LISKIN: Objection; lacks foundation.

23 THE WITNESS: I don't remember hearing any
24 rumors other than from -- about the kids that did come
25 forward.

1 BY MR. FINALDI:

2 Q. What rumors do you remember hearing about the
3 kids that came forward?

4 A. I don't know. I heard about with Jordie said
5 the reason it was brought about was because of a movie
6 deal or something. And my understanding was that
7 Mr. Jackson paid him because of the movie thing, that he
8 was basically blackmailing him. I don't recall who told
9 me that, so.

10 Q. It could have been one of the lawyers?

11 A. No. I don't think it was one of the lawyers.

12 Q. Why not?

13 A. Because I didn't generally talk to the lawyers.

14 Q. Oh. Who do you think told you that?

15 A. I don't know.

16 Q. Do you think Mr. Jackson told you?

17 MR. LISKIN: Objection; asked and answered.

18 THE WITNESS: No.

19 BY MR. FINALDI:

20 Q. Which other kids? You said "rumors about the
21 other kids that came forward." So that's about Jordie.
22 Which were the other kids?

23 A. Gavin.

24 Q. And what did you hear rumors about Gavin?

25 A. I didn't hear any rumors about Gavin. I just

1 knew he had come forward. I testified. That's the one
2 you were just reading from.

3 Q. Okay. Do you know who was in charge of
4 supervising Mr. Jackson when he was at Neverland? Do you
5 know if anyone was?

6 A. Supervising who?

7 MR. LISKIN: Lack of foundation.

8 BY MR. FINALDI:

9 Q. Supervising Mr. Jackson.

10 A. Why would Mr. Jackson need someone to supervise
11 him?

12 Q. Do you know if there was anyone who supervised
13 him?

14 A. No. Why should there? It was his home.

15 Q. All right. So no one was in charge of making
16 sure he wasn't doing anything improper, right?

17 A. Of course not. It was his home.

18 Q. Okay. You said there were groups that brought
19 kids there. Which groups do you recall bringing kids
20 there? Which types of organizations or do you know?

21 A. The only one I can recall offhand was -- I think
22 it was MacLaren Hall, which is an orphanage. I know there
23 was like groups of like cancer children, Make A Wish
24 Foundation, those sorts of things. Schools from the area
25 would come.

1 Q. Do you have any of those documents that you were
2 given when you were working at Neverland ranch still?

3 A. No.

4 Q. Did you get rid of them?

5 A. I don't remember having any. I didn't take
6 anything with me.

7 Q. Well, in your deposition earlier you talked
8 about being given memos about who to talk to, who not to
9 talk to.

10 A. I know, but I didn't save those.

11 Q. You didn't save them?

12 A. I don't know if I threw them away, or shredded
13 them, or what I did with them.

14 Q. So as we sit here today, we don't know what
15 actually was written on those memos?

16 A. No, we do not.

17 Q. You don't remember anything else that was
18 written on them?

19 A. No. It was just an explanation of who was
20 coming, when they were coming and when they were leaving.

21 MR. FINALDI: I have to take a quick break.

22 THE VIDEOGRAPHER: The time is 12:50 p.m. We
23 are now off the record.

24 (Lunch break.)

25 THE VIDEOGRAPHER: We are back on the record.

1 The time is 1:53 p.m.

2 BY MR. FINALDI:

3 Q. You understand you are still under oath,
4 correct?

5 A. Yes, I do.

6 Q. All right. Now, when you first began working at
7 Neverland, do you know how many employees -- can you
8 estimate for us how many employees were there, that worked
9 there at any given time?

10 A. When I started at the ranch, there were two
11 other housekeepers and Bianca working in the house.

12 Q. But I mean total employees on the ranch.

13 A. No.

14 Q. What's your best estimate at the time? At one
15 point in your deposition, you stated about 40 employees.

16 A. That was in '93?

17 MR. LISKIN: Objection; vague as to time.

18 THE WITNESS: When I first started working
19 there, I don't think there was that many because I
20 remember we took -- when I got the jacket -- I don't even
21 remember what year that was -- there was about
22 30-something there, and then it increased as the years
23 went on.

24 BY MR. FINALDI:

25 Q. What is the most employees you think worked

1 there?

2 A. Forty, fifty, maybe fifty.

3 Q. At one time -- actually, when you began, was
4 there the fire department there?

5 A. No.

6 Q. Later on, the fire department came?

7 A. Uh-huh.

8 Q. Do you know when they started?

9 A. I don't remember what year, no.

10 Q. Okay. Now, was there a procedure on the ranch
11 for if someone got hurt? If someone fell down and cut
12 their leg open or something, broken arm or something, like
13 were there procedures for that?

14 MR. LISKIN: Objection; vague and ambiguous.

15 THE WITNESS: That I remember, not until the
16 fire department came in. I know there was an incident
17 when the Agajanians were there and Amy and Francie were
18 riding horses and -- but that was in back, in the back of
19 the ranch so I was not involved in that at all. And
20 then --

21 BY MR. FINALDI:

22 Q. The horse ran away with the kids?

23 A. Yes. And they immediately called an ambulance.

24 Q. But do you recall there being any kind of
25 manuals, policy procedure manuals telling you, "If this

1 happens, here is how you go about addressing it. If a
2 fire happens, here is who you call first, here is who you
3 call second. If an injury happens," anything like that?

4 A. There may have been, but I don't recall that,
5 not until the fire department went into effect.

6 Q. Okay.

7 A. Then there was different procedures and stuff.

8 Q. What kind of procedures do you remember after
9 the fire department came in?

10 A. I don't remember anything specific.

11 Q. Were you given any manuals on that or was it
12 just verbal?

13 A. No. No. We had meetings and stuff, and they
14 would meet with us and we went over different things. I
15 remember going over fire extinguisher training with them.
16 And it was mostly like OSHA, OSHA facts.

17 Q. Okay. Anything having to do with supervising
18 kids?

19 A. No.

20 Q. Nothing regarding kids at all?

21 A. No, not that I recall.

22 Q. Okay. And so during your entire time working at
23 Neverland, you don't remember ever being trained on any
24 kind of policies or procedures relating to kids; is that
25 true?

1 A. That's true.

2 Q. Even after the 93 allegations against him, there
3 were no changes to any policy or procedures?

4 A. No, not that I recall.

5 Q. There was a head of the park at one time named
6 Ray Roblato. Do you remember him?

7 A. Yes, uh-huh.

8 Q. Is he still alive?

9 A. As far as I know.

10 Q. Are you still in contact with him?

11 A. No. I knew him when I worked at the ranch.
12 That's all.

13 Q. Aside from your children, do you stay in contact
14 with anyone else who worked at the ranch with you?

15 A. No. Occasionally I run into employees and
16 stuff, and I will stop and say "Hi" and, you know,
17 security guards and gardeners and stuff like that.

18 Q. But no one that you like stay in contact with,
19 like writing an e-mail or dinners?

20 A. No. Kiki has called me before.

21 Q. What is Kiki's last name?

22 A. It was Fournier at that time. I don't know if
23 she's remarried or not. I haven't spoke to her in several
24 years.

25 Q. And why was she calling you, do you know?

1 A. Just to say "Hi." We were friends.

2 Q. Okay. When you called the attorney, John,
3 that's at Weitzman's office, the other day, do you
4 remember that?

5 A. I spoke to a John.

6 Q. Did he call you?

7 A. Yes, he called me.

8 Q. What phone number did he call you on?

9 A. I don't recall. It was --

10 Q. Do you have a land line?

11 A. He called on my land line, yes.

12 Q. What is that phone number?

13 A. It's 937 -- 805, sorry, 937-2773.

14 Q. And who is the provider?

15 A. My husband, Joseph Goforth.

16 Q. I'm sorry, unclear question. Who is the phone
17 provider?

18 A. I believe my phone is through Comcast. I have
19 one of those bundle deals.

20 Q. Gotcha. And so if we were to look on the
21 Comcast bill, approximately how long ago did this person
22 call you, this John?

23 A. I believe I spoke to him on Thursday.

24 Q. Thursday of last week?

25 A. Uh-huh.

1 Q. So Thursday would have been the 20th?

2 A. Yes.

3 Q. 20th. Okay. And there was just one call?

4 A. Yes.

5 Q. And the records would reflect that that phone
6 call was about five minutes; is that correct?

7 A. I'm approximating that. It might have been
8 more. It might have been less. I'm not sure.

9 Q. What's your best estimate?

10 MR. LISKIN: Asked and answered.

11 BY MR. FINALDI:

12 Q. Like if you tried to give a really good
13 estimate --

14 A. Well, I think I said before about five minutes.

15 Q. And was anyone else on that phone call?

16 A. Anyone else?

17 Q. Yeah, that you know of --

18 A. Not that I know of.

19 Q. -- besides the two of you?

20 A. Yeah. Nobody -- I didn't talk to anybody else,
21 other than him.

22 Q. Okay. And the only specific testimony he
23 referenced was the MJJ Production stuff, correct?

24 A. That's correct.

25 Q. And you still don't remember his last name?

1 A. No, I do not.

2 Q. Did you take any notes at all?

3 A. No, I didn't. I didn't have any reason to.

4 Q. Okay. Did he get your e-mail address?

5 A. I don't have an e-mail address.

6 Q. Okay. So that's a no?

7 A. That's a no.

8 Q. Now, did you ever see Miko Brando at the ranch?

9 A. Yes, I did.

10 Q. And what is your understanding of who his
11 employer was at the time?

12 A. I believed he worked for MJJ Productions at that
13 time.

14 Q. Do you know what his job title was?

15 A. No, I do not.

16 Q. How often would he come to the ranch?

17 A. Not very often. He would come with his dad. I
18 don't recall if he came by himself. He may have. I think
19 he did bring his family one time as a guest.

20 Q. Do you know what his job duties were with MJJ
21 Productions?

22 A. No, I do not.

23 MR. LISKIN: Objection; calls for speculation.

24 BY MR. FINALDI:

25 Q. Do you remember an occasion where -- so Jordan

1 Chandler, do you recall he had a sister named Lily?

2 A. Well, just hearing the testimony, I just
3 recalled that, that her name was Lily. I didn't remember
4 his mom's name either until it came up.

5 Q. Do you remember that you helped set up a
6 birthday party for Lily at Neverland?

7 A. I don't recall that, but I probably did because
8 that was my job.

9 Q. Did you organize birthday parties for kids often
10 there?

11 A. Yes.

12 Q. And kids that were not related to Mr. Jackson?

13 A. Not usually. It was mostly his children or if
14 they were staying at the ranch at the time of their
15 birthday, then I would, per his direction, buy gifts and
16 that sort of thing.

17 Q. Okay. When you were responsible for
18 Mr. Jackson's room, did he have any pets living in it?

19 A. Pets?

20 Q. Yeah.

21 A. Not at that time, no.

22 Q. Before you were responsible for cleaning his
23 room, do you remember there being pets in his room?

24 A. No, I don't remember any. I know towards the
25 end, they did get a dog, I believe. It's when the kids

1 were little.

2 Q. Do you remember Mr. Jackson ever having any pets
3 to his room for the night? Not that they lived there, but
4 he would bring them in?

5 A. Oh, the chimps and that and the orangoutangs and
6 stuff, but I don't believe they stayed in his room. They
7 would bring them to the house to see him and stuff.

8 Q. Okay. Do you remember having -- do you remember
9 seeing any kind of lotions inside of Mr. Jackson's
10 bedroom?

11 A. Lotions?

12 Q. Yeah. Skin lotion, moisturizer lotion?

13 A. He had creams and makeups and stuff like that.

14 Q. Where did he keep the lotions and creams?

15 A. In his bathroom, the one on the left.

16 Q. Okay. And did he keep any lotions anywhere else
17 in his bedroom? By the bed, or on the counters, or
18 bookcases?

19 A. Not that I recall.

20 Q. Do you remember the brands of any of the lotions
21 that he had?

22 A. No. Most of them were like prescription and
23 stuff like that.

24 Q. The bleaching creams?

25 A. It may have been. I don't know.

1 Q. Do you remember there being bleaching creams?

2 A. I didn't look in them to see what they were. I
3 have no idea what was in them.

4 Q. Okay. We've gone to lunch. After you have had
5 a chance to think about it a little bit, do you remember
6 anything else about Mr. Pellicano, that investigator that
7 you spoke with?

8 A. No, I don't. I don't recall him at all.

9 Q. Okay. Did Michael ever send you letters, or
10 notes, or anything like that? Cards?

11 A. No.

12 Q. Postcards?

13 A. No.

14 Q. You said you still have some memorabilia, the
15 Neverland stuff?

16 A. Yes.

17 Q. Jackets? Do you have like a collection or
18 something at your house?

19 A. It's in a box.

20 Q. It's all in a box?

21 A. Yeah.

22 Q. Do you have any photos with him?

23 A. With him, no.

24 Q. Or photos of him with kids or anything like
25 that?

1 A. I think I have an autographed picture of him
2 that Miko signed. He didn't sign it himself.

3 Q. Miko signed Miko's signature?

4 A. No. He signed Michael Jackson's signature.

5 Q. Why did he sign Michael Jackson's signature?

6 A. Because that was -- I guess he had a signature
7 that was similar to Michael's, I guess.

8 Q. So Miko would do the signatures for Michael to
9 give out to kids and stuff?

10 A. I don't know if he did all of them. He did
11 that.

12 Q. How did you know that?

13 A. Because I saw him do it. He did it in front of
14 me.

15 Q. But he signed Michael's name?

16 A. Yes.

17 Q. Do you remember anything else about Wade Robson
18 that you haven't spoken about today?

19 A. I remember him coming when he was little and
20 then, you know, several times in between, and then when he
21 was older. I remember him there to testify for the trial.

22 Q. Okay. And you said when Wade -- when you first
23 met Wade when he was little, you said he was a nice kid,
24 good kid, something like that?

25 A. He was a nice kid all the way through.

1 Q. All the way through?

2 A. Yes.

3 Q. How about Jimmy Safechuck?

4 A. Jimmy Safechuck?

5 Q. Yes.

6 A. He was a nice kid. He was spoiled.

7 Q. Spoiled how?

8 A. Because he was an only child.

9 Q. And what things would he do?

10 A. Well, it was just he was like his parents. He
11 expected -- it was like he would snap his fingers and "I
12 want this" and "I want that" and "I want the other."

13 Q. Okay. Not a bad kid, just a little demanding?

14 A. No. He wasn't a bad kid. He was just, you
15 know, he was wasteful with things and --

16 Q. Like with food or something?

17 A. Yeah. Michael had a special drink that he
18 drank. It was called Dr. Tima at that time. It was an
19 orange. And he would get one and he would take one drink
20 of it and throw it in the bushes and stuff like that.

21 Q. Do you remember Macauley Culkin?

22 A. Yes.

23 Q. And how was he when he was at the ranch?

24 A. Oh, he was a joy.

25 Q. Okay. He wasn't difficult, or boisterous, or

1 anything like that?

2 A. Not with me, no. His parents, on the other
3 hand, were.

4 Q. What were they like?

5 A. They were fighting all the time and drinking
6 heavily, yeah.

7 Q. It's my understanding that his dad spent a lot
8 of time in the winery?

9 A. Wine cellar, yes, he did.

10 Q. Did you ever hear that some of the parents were
11 smoking marijuana at Neverland?

12 A. I never heard about that.

13 Q. You never heard about that?

14 A. No.

15 Q. What would Macauley's parents be fighting about,
16 do you know?

17 A. I have no idea.

18 Q. Just yelling and screaming?

19 A. Yeah, yeah.

20 Q. When is the last time you spoke with Adrian
21 McManus?

22 A. Let's see, Adrian works at Costco, and I saw her
23 about three or four months ago, and I spoke to her then.
24 It was, basically, "Hi. How are you doing?" And she,
25 basically, said the same to me, and that was about it.

1 Q. All right. Evy Tavasci, when is the last time
2 you spoke with her?

3 A. When I called to quit.

4 Q. Is that who you told?

5 A. Yes.

6 Q. You said "I quit"?

7 A. Uh-huh.

8 Q. And what did she say when you told her that?

9 A. She just said that she was really sorry the way
10 things turned out and everything, so.

11 Q. Are you upset at all with MJJ Productions, or
12 MJJ Ventures, or Michael Jackson with respect to the way
13 that you were -- you ended up leaving?

14 A. I can't say that I'm upset with them. I was
15 upset with Michael at the time, of course. Like I said, I
16 was offended. I was very hurt by how it happened and
17 everything because I felt like I was a trustworthy
18 employee, and that I got thrown under the bus.

19 Q. Why did you keep all the stuff, all the MJJ
20 memorabilia?

21 A. Because it means a lot to me. I spent 12 1/2
22 years there.

23 Q. And did you ever have a chance to have any kind
24 of resolution of that issue with the company or anyone
25 from the company other than Michael waving at you from the

1 trial?

2 MR. LISKIN: Objection; vague and ambiguous.

3 THE WITNESS: No, no. That was it.

4 BY MR. FINALDI:

5 Q. Did you ever speak with Mr. Zia after that,
6 after he told you what they were going to be doing?

7 A. No.

8 Q. Did you ever speak with Mr. Branca, John Branca?

9 A. No. I don't know who that is.

10 Q. Michael's attorney?

11 A. Michael's attorney?

12 Q. Yeah.

13 A. Not that I remember.

14 Q. Did you ever see kids practicing dancing in the
15 dance room there at Neverland?

16 A. No. Usually when he was in the dance studio or
17 anybody was in the dance studio, the door was closed.

18 Q. When Michael -- did he have to do phone calls
19 sometimes, like business phone calls and things?

20 A. I believe so.

21 Q. Where would he do those from?

22 A. Usually from his room or his office. He had a
23 private phone in the dance studio, or whatever. There
24 were phones everywhere.

25 Q. I understand that you said his fax machine was

1 in his bedroom. Did he work from his bedroom sometimes?

2 A. I guess. I don't know. I have no idea what he
3 did.

4 Q. But you would see him on the phone? Would he be
5 on the bed doing business calls or whatever?

6 MR. LISKIN: Objection; lacks foundation.

7 THE WITNESS: I have no idea.

8 BY MR. FINALDI:

9 Q. Like, for example, when Norma would call for
10 him, would you ever put her through to him or put him
11 through to her?

12 A. There were instances, yes.

13 Q. So where is the place on the property that he
14 did most of his business type work from, that you
15 remember?

16 A. He stayed in his room mostly or in his office.

17 Q. Where was his office?

18 A. It was just right outside the back door. There
19 was like a breezeway between the house and his office.

20 Q. And he had a desk there?

21 A. Yes.

22 Q. And how often would he be there?

23 A. Not real often.

24 Q. Did he have a computer in his room?

25 A. I don't -- I don't recall seeing a computer.

1 Q. How about in his office?

2 A. I don't recall seeing a computer in his office
3 either.

4 Q. Did you have a computer at his house?

5 A. Did I?

6 Q. Yeah.

7 A. No.

8 Q. You had to do all your paperwork written?

9 A. Yes.

10 Q. Okay. When you would get paid while you were an
11 employee there, how often would you get paid?

12 A. Once a week.

13 Q. And was it through a check or direct deposit?

14 A. It was a check.

15 Q. And who would give you the checks?

16 A. They would come from the office.

17 Q. What office?

18 A. The Neverland Valley Ranch office.

19 Q. Where is that?

20 A. It was on the property.

21 Q. Okay. Where on the property?

22 A. Well, I don't know how far it was from the
23 house. It was a ways.

24 Q. Was it closer to the front gate or farther away?

25 A. Oh, no. The front gate was way far away.

1 Q. Okay.

2 A. You had to drive down a long road and then up
3 over the hill and down to the property. Yeah, the guests
4 would come around to the front of the house, and there was
5 another driveway that came around the back of the house.
6 And the office was like about right here, and the driveway
7 to the house was about here (indicating).

8 Q. Okay. So kind of on the way to the back of the
9 house?

10 A. Uh-huh.

11 Q. Yes.

12 A. Yes. Sorry.

13 Q. And who at Neverland office would give you the
14 actual check? Was there a certain person?

15 A. I had a box. I had a box at the office.

16 Q. In the office?

17 A. Yes.

18 Q. And who was in charge of that office?

19 A. Nikki, at that time, and Lance before that, and
20 Jim Zimmerman before that.

21 Q. So at the time you were at Neverland Valley, who
22 was your direct supervisor?

23 A. My direct supervisor, who was the ranch manager.

24 Q. Who was that?

25 A. Like I said, it was Jim Zimmerman first, and

1 then Lance Brown, and then Nikki Wimsatt.

2 Q. Okay. And who were their direct supervisors?

3 MR. LISKIN: Objection; calls for speculation.
4 Lacks foundation.

5 THE WITNESS: I don't know.

6 BY MR. FINALDI:

7 Q. Okay.

8 A. We were all employees of Neverland Valley Ranch,
9 so I don't know.

10 Q. How do you know that?

11 A. What?

12 Q. How do you know that?

13 A. Because that's who we worked for was Neverland
14 Valley Ranch.

15 Q. Did you ever hear there was a business entity
16 called "Neverland Valley Ranch," like an LLC?

17 A. No, I didn't hear that.

18 Q. Now, Norma didn't have an office at Neverland,
19 did she?

20 A. No, she did not.

21 Q. So why would you listen to her when she would
22 call if she wasn't your supervisor?

23 MR. LISKIN: Objection; vague and ambiguous.

24 THE WITNESS: I thought she was the next in line
25 to Michael.

1 BY MR. FINALDI:

2 Q. So she would be above Nikki, Lance and Jim is
3 your understanding?

4 MR. LISKIN: Objection; calls for speculation.
5 Lacks foundation.

6 THE WITNESS: That's my understanding, yes.

7 BY MR. FINALDI:

8 Q. And how about Evy, where would she have fallen
9 on that?

10 A. Evy was in the same capacity as Norma. Evy took
11 Norma's place.

12 MR. LISKIN: Same objections.

13 BY MR. FINALDI:

14 Q. How about before Norma left, while Evy was still
15 there, who was above whom? Was Norma Evy's supervisor or
16 was Evy Norma's supervisor?

17 A. Yes, Norma was Evy's supervisor.

18 Q. And while Norma and Evy were there, did Evy ever
19 call giving instructions to people at the ranch?

20 A. She may have called on behalf of Norma. I don't
21 know --

22 Q. Okay.

23 A. -- for sure.

24 Q. And did you feel at the time that Evy was above
25 Nikki, Lance or Jim, like next level?

1 A. At that time, no, no. I just felt -- I knew
2 that she was part of the office staff at MJJ Productions.
3 That's all I knew.

4 Q. Do you know who was the head of the office staff
5 at MJJ Productions?

6 A. At one time, I believe it was Bob Jones.

7 Q. Michael's press person?

8 A. Pardon?

9 Q. Michael PR person?

10 A. I'm guessing. I have no idea.

11 Q. Who else were some of the people in charge at
12 MJJ Productions?

13 MR. LISKIN: Objection; calls for speculation.

14 THE WITNESS: I believe Bill Bray was.

15 BY MR. FINALDI:

16 Q. Okay. Did you ever hear he was the head of
17 security?

18 A. I believe so.

19 Q. Was there a special security unit that he was in
20 charge of?

21 MR. LISKIN: Objection; vague and ambiguous.

22 THE WITNESS: He did have security guards.

23 BY MR. FINALDI:

24 Q. And what were they called? What were they known
25 as?

1 A. They were known by their names.

2 Q. Did he ever come down to investigate things and
3 talk to people?

4 A. They came to the ranch occasionally, yeah.
5 Mostly when Mr. Jackson was there.

6 Q. Yeah.

7 A. There was a time when Jimmy -- I'm terrible
8 about last names. He came and he stayed for an indefinite
9 amount of time just to make sure that things were running
10 correctly and stuff. So he was -- basically, he became an
11 employee of Neverland.

12 Q. Jimmy was a security guy?

13 A. Yes.

14 Q. Do you remember one of the security people or
15 bodyguard named Chucky?

16 A. Chucky?

17 Q. Yeah.

18 A. No, I don't.

19 Q. Okay.

20 A. I just remember Jimmy and Marcus.

21 Q. Did you ever get a referral letter or a letter
22 of recommendation from Neverland after you left?

23 A. I got a letter from Nikki -- no, I didn't
24 because Nikki -- she was suspended at the same time I was.

25 Q. How did you know that?

1 A. Because she told me.

2 Q. Did she quit as well?

3 A. No.

4 Q. Did she end up getting fired?

5 A. I don't know. I wasn't -- I just talked to her
6 a few times after that happened, and I don't know what
7 happened after that.

8 Q. How did you speak with her?

9 A. Over the phone.

10 Q. Okay.

11 A. And she, basically, just said that she was going
12 to fight it, so.

13 Q. Did you know Gary Hearne, the limo driver?

14 A. I knew Gary. I didn't know what his last name
15 was.

16 Q. Did you get along with him?

17 A. Oh, yeah. Gary was very nice, easygoing guy.

18 Q. Did you ever have to work with him doing
19 anything like driving people, anything like that?

20 A. I drove with him one time when Michael got upset
21 with him over the keys being locked in the van.

22 Q. Other than that, did you work with Gary on any
23 projects or anything?

24 A. No, not that I recall anyway.

25 Q. Okay. Did you ever see any pornography at

1 Neverland?

2 A. No.

3 Q. Never saw any videos, magazines, anything of
4 that nature?

5 A. No, I don't recall seeing anything like that.

6 Q. When the police executed the search warrant --
7 you remember we talked about that earlier?

8 A. Yes.

9 Q. -- they found some pornography, some videos,
10 magazines, things of that nature. Do you have any idea
11 where those were kept on the property?

12 MR. LISKIN: Objection; lacks foundation.

13 THE WITNESS: I have no idea. I never witnessed
14 any myself.

15 BY MR. FINALDI:

16 Q. How about any books that contained nude images
17 that might not have been pornography? Like art books,
18 stuff like that, photographs and stuff?

19 A. He had all kinds of art books.

20 Q. Where were those located?

21 A. All over the house, in the libraries.

22 Q. Did he ever give you any books?

23 A. No.

24 Q. Did you ever see any art books with pictures of
25 naked kids?

1 A. Naked kids, no. They were all like statues. He
2 had several statues in the home.

3 Q. Of kids and things?

4 A. Kids, but not naked. Like cherub-type things.

5 Q. Bronze statues of kids all over the property,
6 right?

7 A. Yes. But they had clothes on and there was like
8 cherub kids.

9 MR. FINALDI: Okay. I am going to hand over the
10 questioning to check over my notes, but I think I am
11 pretty close to being done.

12 MR. LISKIN: Why don't we take a 10-minute
13 break.

14 THE VIDEOGRAPHER: The time is 2:21 p.m. We are
15 now off the record.

16 (Break taken.)

17 THE VIDEOGRAPHER: We are back on the record.
18 The time is 2:29 p.m.

19 MR. LISKIN: Good afternoon, Ms. Goforth.

20 THE WITNESS: Good afternoon.

21 MR. LISKIN: Thanks for your time today.

22 THE WITNESS: Thank you.

23 EXAMINATION

24 BY MR. LISKIN:

25 Q. Did you ever work out of -- strike that.

1 Have you ever been to MJJ Productions offices?

2 A. Yes, I have.

3 Q. And was that your primary place of work?

4 A. No, it's not.

5 Q. What was your primary place of work?

6 A. Neverland Valley Ranch.

7 Q. And was it your understanding that was Michael
8 Jackson's personal residence?

9 A. Yes, it was.

10 Q. So he lived there?

11 A. Yes, he did.

12 Q. Counsel has mentioned or asked you some
13 questions about a phone conversation that you had with
14 someone named John from my office.

15 A. Yes.

16 Q. Did John ask you to lie under oath?

17 A. No, he did not.

18 Q. Did John tell you how to testify today?

19 A. No, he did not.

20 Q. There was some testimony about groups coming to
21 the ranch at times.

22 A. Yes.

23 Q. I'm not sure if I remember this correctly, did
24 you say that more often than not, Michael was not even
25 there when the groups came?

1 A. That's correct.

2 Q. And when these groups came, did a group of
3 children show up by themselves or did they have adults
4 with them?

5 A. They had adults with them. They came in buses
6 so they were all chaperoned.

7 Q. So they had chaperones that were responsible for
8 the children?

9 A. Yes.

10 MR. FINALDI: Calls for speculation. Assumes
11 facts not in evidence. Calls for a legal conclusion.
12 BY MR. LISKIN:

13 Q. Did you ever see behavior by kids at the ranch
14 that made you concerned that Michael might be abusing
15 them?

16 A. No.

17 MR. FINALDI: Calls for expert opinion.
18 BY MR. LISKIN:

19 Q. Did you have a relationship with Norma Staikos?

20 MR. FINALDI: Vague and ambiguous.

21 THE WITNESS: Not really. I didn't have a
22 relationship with her. I was friendly with her. When she
23 would call, I would talk to her but not a relationship, I
24 would say.

25 /

1 BY MR. LISKIN:

2 Q. Do you know whether she was Michael's personal
3 assistant?

4 A. I kind of felt that she was. I didn't know
5 exactly what her capacities were.

6 Q. Counsel asked you a little about the hierarchy
7 of people, of certain employees. Did you have any
8 understanding as to whether Norma worked for Michael?

9 MR. FINALDI: Vague and ambiguous. Calls for a
10 legal conclusion.

11 THE WITNESS: I assume she worked for Michael.

12 BY MR. LISKIN:

13 Q. And I will ask it another way also. In this
14 theoretical hierarchy, was Norma above or below Michael in
15 the hierarchy?

16 MR. FINALDI: Same objections. Vague and
17 ambiguous.

18 THE WITNESS: I believe she was --

19 BY MR. LISKIN:

20 Q. You can answer.

21 A. I believe she was below him.

22 Q. And do you know whether Ms. Staikos had the
23 ability to fire Michael Jackson?

24 MR. FINALDI: Same objection. Calls for
25 speculation. Calls for a legal conclusion.

1 THE WITNESS: Of course not.

2 BY MR. LISKIN:

3 Q. And do you believe Michael Jackson had the
4 ability to fire Ms. Staikos if he was unhappy with her
5 performance?

6 MR. FINALDI: Same objections.

7 THE WITNESS: Yes.

8 BY MR. LISKIN:

9 Q. Do you know anything about an entity, MJJ
10 Ventures?

11 A. No, I don't.

12 Q. Are you aware that Mr. Robson has sued two
13 entities, MJJ Productions and MJJ Ventures?

14 A. I was told by John that it was MJJ Productions.
15 I didn't hear about the other. He just said two.

16 Q. So you haven't seen the complaint or anything?

17 A. No, I have not.

18 Q. And you don't know why, specifically, Mr. Robson
19 is suing these specific corporate entities?

20 A. No, I don't.

21 Q. Was Neverland ranch -- strike that.

22 You call it "Neverland Valley Ranch"; is that
23 correct?

24 A. Yes.

25 Q. Was Neverland Valley Ranch a high school?

1 A. A high school?

2 Q. Yes.

3 A. No.

4 Q. Was it a middle school?

5 A. No.

6 Q. Was it an elementary school?

7 A. No, it was not.

8 Q. It was not a school, correct?

9 A. No, it was not a school. It was a private home.

10 Q. Did you believe you had the authority to tell
11 Michael what kids could or could not stay at Neverland
12 Valley Ranch?

13 A. Of course not.

14 Q. Do you believe that Blanca Francia had the
15 ability to tell Michael what kids could or could not stay
16 at the ranch?

17 A. I don't believe.

18 Q. Do you believe Ms. Staikos could tell Michael
19 what kids could or could not stay at the ranch?

20 A. No. That was entirely up to him.

21 Q. Michael was in charge of things at the ranch,
22 correct?

23 A. Yes.

24 Q. And ultimately, did you believe that you worked
25 for Michael?

1 A. Yes, I did.

2 Q. You said you don't know what entity specifically
3 signed your check, correct?

4 A. No, I don't recall. I don't recall who signed
5 it.

6 Q. But ultimately, you worked for Michael?

7 A. Yes.

8 Q. You testified in the 2005 trial of Michael
9 Jackson, correct?

10 A. Yes, I did.

11 Q. And did anyone tell you to lie on his behalf?

12 A. Of course not.

13 Q. And would you have lied on Michael's behalf if
14 you were asked to?

15 A. No, I would not.

16 Q. As I go through, Counsel asked a lot of the
17 questions on topics that I am going to be asking so I am
18 going to be trying to skip over things and avoid being
19 duplicative but, undoubtedly, I am going to ask questions
20 on some of the things he already asked because I don't
21 have any perfect memory of everything he asked.

22 A. Okay.

23 MR. LISKIN: I am going to introduce a new
24 exhibit. It's 551, Exhibit No. 551, starting with Bates
25 label MES036877. It's really the same document that you

1 went over with Mr. Finaldi. It's just that he used a
2 condensed version.

3 MR. FINALDI: What are you going to mark this
4 as?

5 MR. LISKIN: It's 551.

6 (Deposition Exhibit No. 551 was marked for
7 identification.)

8 BY MR. LISKIN:

9 Q. This one is just a little easier on my eyes, and
10 I haven't taken my own notes on this one so even though
11 it's the same document, I am giving you a different number
12 and putting it in the record.

13 You turn to the first page of this document, the
14 cover.

15 A. The cover, okay.

16 Q. You see that it says "Videotaped Deposition of
17 Gayle Goforth --

18 A. Yes.

19 Q. -- Thursday, December 16, 1993"?

20 A. Yes.

21 Q. And you see at the top, it mentions "J.
22 Chandler"?

23 A. Yes.

24 Q. And you remember being deposed in the Chandler
25 matter, correct?

1 A. Of course, yes.

2 Q. And please turn to pages 6 of this document. In
3 addition to those Bates labels, I read you a long number,
4 there is also numbers 1, 2, 3, 4, 5, 6, and I will refer
5 to those numbers.

6 A. Okay. I can see those numbers here at the
7 bottom.

8 Q. So when you were deposed in this case, you were
9 asked:

10 "Are you currently employed?"

11 And you answered:

12 "Yes, I am.

13 "And who is your employer?

14 "Answer: Michael Jackson."

15 And that's a true statement, correct?

16 A. Yes.

17 Q. And you say you didn't know whether or not there
18 was a -- strike that.

19 You said that you specifically worked for
20 Neverland Valley Ranch; is that correct?

21 A. Yes.

22 Q. And when you say that, are you referring
23 generally to the location or is that what you were told
24 that you worked for?

25 MR. FINALDI: Vague and ambiguous. Calls for

1 expert opinion and legal conclusion.

2 THE WITNESS: Well, because of the location and
3 everything, I believe that that's who I worked for was
4 Neverland Valley Ranch and Michael Jackson.

5 BY MR. LISKIN:

6 Q. You were asked to estimate or speculate what
7 percentage of the time --

8 MR. FINALDI: I didn't ask her to speculate.

9 MR. LISKIN: I will ask the questions. You can
10 object.

11 MR. FINALDI: You are saying that I am asking
12 her to speculate.

13 MR. LISKIN: Well, then you can say I'm
14 mischaracterizing --

15 MR. FINALDI: No. I never asked her to
16 speculate. I asked her to estimate, so don't misrepresent
17 my questions. It's improper.

18 MR. LISKIN: As I said, I will ask the questions
19 and you can object.

20 MR. FINALDI: Ask proper questions, then.

21 BY MR. LISKIN:

22 Q. You were asked about prior testimony about how
23 often Mr. Jackson had kids staying in the room. Do you
24 know if there was ever more than one kid staying at a time
25 in his room?

1 MR. FINALDI: Vague and ambiguous.

2 THE WITNESS: Yes.

3 BY MR. LISKIN:

4 Q. Yes, there were more than one?

5 A. Yes.

6 Q. Was that a regular occurrence?

7 A. Yes.

8 Q. Can you turn to page 33.

9 A. 33?

10 Q. Yeah.

11 A. Okay.

12 Q. So you were asked about Mr. Jackson's room and
13 times that you cleaned his room, and you were asked about
14 the beds and whether there was one upstairs. And I am
15 going to read you a little section of your testimony.

16 "Question: And there was one upstairs?

17 "Answer: Yes.

18 "On those occasions after you went to
19 the bedroom after a child had spent the night
20 in the bedroom, which beds were messed up?

21 "Answer: Both.

22 "And they both looked like they had been
23 slept in?

24 "Yes."

25 Is that consistent with your recollection?

1 A. Yes, the majority of the time, yes.

2 Q. And you personally don't know for a fact whether
3 Mr. Jackson was sleeping in the same bed with children, in
4 a different bed, or I think you also mentioned a chase
5 lounge in the bathroom?

6 A. Yes. I don't know where he slept. I wasn't in
7 there, so.

8 Q. You became supervisor of housekeeping when
9 Mr. Quindoy left; is that correct?

10 A. Yes.

11 Q. And how did your role change at that time?

12 A. Basically, I was put in charge of all the
13 housekeepers when I had answered to Mr. Quindoy before
14 that. And basically, I was in charge of the guest
15 services and, you know, organizing with the kitchen about
16 meals and everything that pertained to running the ranch
17 from the house perspective.

18 Q. Were you running a licensed daycare center?

19 A. Of course not.

20 Q. And I believe you said -- you had testified that
21 Ms. Staikos worked for MJJ Productions. Do you know
22 whether Mr. Staikos typically worked out of MJJ Production
23 offices?

24 MR. FINALDI: Calls for speculation.

25 THE WITNESS: I believe so.

1 BY MR. LISKIN:

2 Q. And do you know where those offices were
3 located?

4 A. In Los Angeles.

5 Q. Did you consider Blanca to be an honest person?

6 A. No.

7 Q. And I believe you had mentioned or testified
8 about a time, an issue with the timecards or with
9 something getting ripped up. Can you explain to me your
10 recollection of what happened?

11 A. It was a notice of a write-up to one of the
12 other employees. And I asked who had torn it up, and I
13 was told that Bianca had torn it up.

14 Q. And did you have an argument or discussion with
15 Bianca about that?

16 A. I believe so. I believe that was -- is that
17 when she quit? I'm not sure.

18 Yeah, it was. That was when she quit. I told
19 her she didn't have any right to do that. It was given to
20 Vangie and not to her, and it wasn't her right, and we got
21 into an argument. I don't remember exactly. I remember
22 the argument and stuff and it was, basically, "I don't
23 have to listen to you. I work for Michael. I don't work
24 for you and I don't have to listen to you."

25 Q. And is it your understanding that you were her

1 supervisor?

2 A. Yes. I was told that I was supervisor of the
3 whole entire housekeeping staff.

4 Q. And did Blanca ever deny that she tore up the
5 notice?

6 A. Not to me. The first I heard of her saying that
7 she didn't -- I'm sorry, I forgot.

8 Q. Mr. Finaldi?

9 A. Yes.

10 Q. I just want to read into the record from Blanca
11 Francia's deposition in January 1994 in the Chandler
12 litigation:

13 "Question: That Gayle later found out
14 it was you who had torn up the time card and
15 that Vangie got fired for something you had
16 done and that Vangie was innocent; isn't
17 that correct?

18 "Answer: We made a photocopy, yes.

19 "Question: Can you answer that, yes
20 or no?

21 "Answer: No.

22 "Question: That's not true?

23 "Answer: I ripped it up?

24 "Question: Yes.

25 "Answer: But I didn't put it on the

1 bulletin board.

2 "Question: But you tore it up, right?

3 "Answer: Yes.

4 "Question: And you saw your friend,
5 Vangie, get fired for doing this, right?

6 "Answer: Yes."

7 I just wanted to put that into the record.

8 MR. FINALDI: Do you have a question pending?

9 BY MR. LISKIN:

10 Q. You hear that she testified that she did, in
11 fact, tear it up?

12 A. Okay. I didn't remember Vangie being fired over
13 that fact, though.

14 Q. But it sounds that she was fired for something
15 that Blanca did?

16 A. Yes.

17 MR. FINALDI: Calls for speculation.

18 BY MR. LISKIN:

19 Q. Are you aware that Blanca acknowledged under
20 oath in multiple depositions that she also went through
21 your purse?

22 A. My purse?

23 Q. To look at your check?

24 MR. FINALDI: Misstates testimony.

25 THE WITNESS: That doesn't surprise me.

1 BY MR. LISKIN:

2 Q. Do you go around looking through other people's
3 purses?

4 A. Of course not.

5 Q. That's a bad sign about character, correct?

6 A. Yes.

7 Q. And so to the best of your recollection, she
8 quit after you guys had a dispute over the incident with
9 the write-up?

10 A. Yes. I think. I'm not sure. I know we got in
11 a dispute about something and I think it was over her
12 having to listen to me or whatever and I told her -- oh, I
13 know what it was. I recall it now. I was trying to
14 schedule her to come in at certain times to help out with
15 the housekeeping, you know, like when we had guests and
16 stuff like that. I was trying to get all the girls on a
17 schedule to make it fair to everybody instead of everybody
18 coming in at every day and we would have guests and we
19 would need to stay to like serve dinner and turn down beds
20 and that sort of thing.

21 And so I was told, I believe by Norma, that I
22 needed to have all of the girls involved in this, and so I
23 was trying to discuss with her that I needed her to be on
24 the schedule. And she told me she didn't -- she wasn't
25 going to be on the schedule; that she was Michael's

1 personal -- and that she wasn't going to be on the
2 schedule. And so that's what we were arguing about, and
3 that's when she up and quit.

4 Q. And after she quit, did you ever have
5 interaction with her again?

6 A. No, not that I recall, anyway.

7 Q. And you said you don't remember -- you don't
8 have any specific recollection of your -- what your checks
9 -- what your checks said on them, correct?

10 A. No, I don't.

11 Q. But your understanding was that you worked for
12 Neverland Valley Ranch. Would it surprise you if your
13 checks came from Neverland Valley Ranch?

14 MR. FINALDI: Assumes facts not in evidence.

15 BY MR. LISKIN:

16 Q. You can answer.

17 A. It wouldn't surprise me because I believe the
18 accountants sent the checks out. But whether they came
19 out as under Neverland or under MJJ, I don't know. I
20 don't remember. I didn't keep a check, so I have no idea.

21 Q. Mr. Finaldi asked you about pictures that were
22 in a, I believe, a closet --

23 A. Yes.

24 Q. -- attached to Michael's room?

25 A. Yes.

1 Q. And I believe there was testimony that there was
2 a framed picture of Macauley Culkin; is that correct?

3 A. I believe so.

4 Q. And also Emmanuel Lewis?

5 A. Yes, I believe so.

6 Q. And also Muhammad Ali, correct?

7 A. Yes. I believe there was a picture of Muhammad
8 Ali. There was several pictures there. He had all kinds
9 of posters and pictures and all kinds of memorabilia. He
10 had a pair of boxing gloves from Muhammad Ali that were
11 signed in a case, too, with his picture.

12 Q. Do you know if Michael Jackson was friends with
13 Muhammad Ali?

14 A. No. I don't know that for a fact.

15 Q. But Macauley Culkin and Emmanuel Lewis were
16 celebrities, correct?

17 A. Yes.

18 Q. And did you think it was at all odd for
19 Mr. Jackson to have framed photographs of Mr. Culkin and
20 Mr. Lewis?

21 A. No. I just assumed that they had given them to
22 him.

23 Q. And there was some discussion about photographs
24 or stacks of photographs which included kids and adults,
25 correct?

1 A. Yeah. I read over -- the lawyer is the one that
2 mentioned stacks. I never mentioned stacks.

3 Q. But you never saw any nude photograph of a
4 child --

5 A. No.

6 Q. -- that ever visited the ranch, correct?

7 A. No.

8 Q. And you never saw nude photographs of children
9 in Mr. Jackson's room, correct?

10 A. No, I did not.

11 Q. Did you ever see Mr. Jackson give alcohol to
12 children?

13 A. No, I did not. If they got into alcohol, it was
14 on their own.

15 Q. The kind of thing that teenagers might try to
16 do?

17 A. Well, yes. There was pantries there that things
18 were kept in, food, and they would get into food. In the
19 hallway, there was a cooler that had all kinds of
20 different kinds of drinks in it. Not beer, but there was
21 wine in the kitchen and stuff. And you know, at night the
22 kids would come out and they would get into whatever they
23 wanted to.

24 Q. But do you know of kids getting specifically
25 into alcohol at the ranch?

1 A. No, I don't know specifically about that, no.

2 Q. As you sit here today, do you recall how you
3 first learned that anyone had accused Mr. Jackson of child
4 molestation?

5 A. Do I remember how? No, not per se. I don't
6 remember exactly.

7 Q. Can you turn to page 73. It's a little obscured
8 so probably easier to turn to 72.

9 A. I have got it, okay.

10 Q. At the bottom of 73, you were asked:

11 "How did you first learn that people
12 were accusing Michael Jackson of molesting
13 children?"

14 A. Which line was that?

15 Q. The second line, 24. Strike that. Let me start
16 if over.

17 You were asked:

18 "How did you first learn that people
19 were accusing Michael Jackson of molesting
20 children?"

21 "Answer: When they came to the ranch
22 and served the search warrant."

23 Do you know approximately what year that was?

24 A. Well, it was shortly before I did this
25 deposition, I believe, so '92, '93. I'm not positive.

1 Q. And do you know if -- do you know whether
2 Mr. Robson and his family were coming to the ranch during
3 that time period?

4 A. I don't recall that, no.

5 Q. Do you know whether Mr. Robson started coming to
6 the ranch before 1993?

7 A. I don't believe so. I don't know exactly.

8 Q. Do you believe you had any more knowledge than
9 Ms. Robson, Joy Robson, as to whether Mr. Jackson was
10 doing anything inappropriate with children?

11 MR. FINALDI: Calls for speculation. Assumes
12 facts not in evidence. Calls for a legal conclusion.

13 THE WITNESS: No, I don't.

14 BY MR. LISKIN:

15 Q. Did you think it was your place to -- during the
16 time that you were employed at the ranch, did you think it
17 was your place to tell parents whether or not they should
18 have their children stay at the ranch?

19 A. Of course not.

20 Q. Did you believe it was your place to tell
21 parents whether they should have their children stay in
22 Michael's room?

23 A. No, I did not.

24 Q. And did you believe it was your place to tell
25 Michael whether children should stay in his room?

1 A. No.

2 Q. There was some discussion about an alarm. Do
3 you remember an alarm going off or are you just referring
4 to a punch code to get in a room?

5 MR. FINALDI: Misstates testimony.

6 THE WITNESS: That was later on. There was a
7 little bell. It was like a motion. If you walked down
8 the hallway, it went ding-ding, ding-ding.

9 BY MR. LISKIN:

10 Q. You aren't talking about some blaring alarm?

11 A. No. There was no blaring alarm.

12 Q. When you worked at Neverland, did you believe
13 that children needed to be warned about Michael?

14 A. No.

15 Q. So presumably you never warned anyone to stay
16 away from Michael?

17 A. Of course not.

18 Q. And I believe you testified that you had four
19 kids. And did you ever tell any of your kids to stay away
20 from Michael?

21 A. No, I did not.

22 Q. And did any employee of Michael Jackson or any
23 entity that you understand to be affiliated with Michael
24 Jackson ever tell you to keep your children away from
25 Michael?

1 A. No.

2 Q. We've discussed MJJ Productions and briefly MJJ
3 Ventures. Do you know what the "MJJ" stands for in those
4 entities?

5 A. Michael Joseph Jackson.

6 Q. And do you have an understanding as to whether
7 Mr. Jackson owned those entities?

8 MR. FINALDI: Calls for speculation. Calls for
9 a legal conclusion.

10 BY MR. LISKIN:

11 Q. You can answer.

12 A. I believe so. It's his initials.

13 Q. And Michael Jackson was a huge celebrity,
14 correct?

15 A. Yes, he was.

16 Q. So it wouldn't be weird to you for Michael to
17 own some entities associated with his business?

18 A. No, not at all.

19 May I say something?

20 Q. Yes.

21 A. I thought that MJJ was no more since Michael had
22 passed.

23 Q. Could you turn to page 87 of your deposition.

24 A. Okay.

25 Q. Actually, turn back to page 86. Do you see,

1 down at the bottom, there is a bunch of names referenced?

2 A. On line 22?

3 Q. Yeah. And even going back to line 13, there is
4 a bunch of names of individuals mentioned. Do you see
5 that?

6 A. Oh, yeah.

7 Q. On page 87, you are asked:

8 "Okay. Have all those people that
9 you have identified -- have they all worked
10 at the ranch for at least, seven, eight,
11 nine months?

12 "Answer: Yes, I believe so.

13 "Question: And these are all people
14 who are employed by MJJ Productions, if you
15 know?

16 "Answer: Neverland Valley, yes."

17 Was it your understanding that all these people
18 were employed by Neverland ranch?

19 MR. FINALDI: Objection; misstates testimony.

20 THE WITNESS: Yes.

21 BY MR. LISKIN:

22 Q. At some point, you were asked to sign a
23 confidentiality agreement in relation to things at the
24 ranch; is that correct?

25 A. Yes.

1 Q. You said Michael Jackson was a private person,
2 correct?

3 A. Yes.

4 Q. And do you have any understanding as to whether
5 Michael Jackson's name and copyright and trademark had
6 value?

7 MR. FINALDI: Calls for speculation. Calls for
8 an expert opinion.

9 THE WITNESS: I believe so.

10 BY MR. LISKIN:

11 Q. Did you have an understanding of why you were
12 being asked to sign a confidentiality agreement?

13 MR. FINALDI: Same objections.

14 THE WITNESS: To protect him.

15 BY MR. LISKIN:

16 Q. If you had believed the Jordie Chandler
17 allegations, would you have continued to work at the
18 ranch?

19 MR. FINALDI: Speculation.

20 THE WITNESS: No, I would not.

21 BY MR. LISKIN:

22 Q. But you continued to work there for several
23 years, even after those allegations, correct?

24 A. Yes.

25 Q. And you believe child molestation is a horrible

1 crime, correct?

2 A. Yes, I do. I would have never brought up my son
3 if I didn't.

4 MR. LISKIN: Why don't we go ahead and change
5 the tape because I am going to switch topics.

6 THE VIDEOGRAPHER: Okay. This marks the end of
7 Media No. 2 in the deposition of Gayle Goforth. We are
8 going off the record. The time is 2:00 p.m.

9 I'm sorry, the time is 3:00 p.m. We are off the
10 record.

11 (Break taken.)

12 (Deposition Exhibit No. 552 was marked for
13 identification.)

14 THE VIDEOGRAPHER: We are back on the record at
15 3:07 p.m. This marks the beginning of Media No. 3 in the
16 deposition of Gayle Goforth.

17 BY MR. LISKIN:

18 Q. Exhibit 552 is a multipage document, starting
19 with MES016637. At the top, it says, "Superior Court in
20 the State of California, in and for the County of
21 Santa Barbara." And it says, "The people of the State of
22 California versus Michael Jackson, Monday, May 9th, 2005."

23 Do you see that?

24 A. On the first page?

25 Q. On the first page.

1 A. Okay.

2 Q. And do you recall that you testified in the 2005
3 trial?

4 A. Yes, I do.

5 Q. And if you turn to page MES016649, I think it's
6 about the third page here.

7 A. Okay.

8 Q. You see about two-thirds towards the bottom, at
9 line 22:

10 "Mr. Singer calls Gayle Goforth."

11 Do you see that, line 22?

12 A. 22, okay. Sorry. Okay.

13 Q. And is Mr. Sanger the attorney that called you
14 to testify in this matter?

15 A. Yes.

16 Q. And you understood that you were under oath in
17 the 2005 trial, correct?

18 A. Yes.

19 Q. And did you give truthful testimony during that
20 trial?

21 A. I believe so.

22 Q. And do you know what the outcome of the trial
23 was?

24 A. I believe he was acquitted.

25 Q. And were you in the court when Mr. Robson

1 testified?

2 A. No, I was not.

3 Q. Are you aware that Mr. Robson testified as an
4 adult on behalf of Michael Jackson's defense?

5 A. Yes, I was. He was in the holding room.

6 Q. I don't have any other questions about this
7 document right now. You can put it to the side.

8 A. Okay.

9 MR. LISKIN: I would like to introduce a new
10 document. It will be No. 553.

11 (Deposition Exhibit No. 553 was marked for
12 identification.)

13 BY MR. LISKIN:

14 Q. Exhibit 553 is entitled, "Declaration of Gayle
15 Goforth." That is you, correct?

16 A. Yes, it is.

17 Q. And if you turn to the second page, do you see
18 that that's your signature on the bottom?

19 A. Yes, it is.

20 Q. And do you see that it says, "Signed this 14th
21 day January of 2004 at Santa Maria, California"?

22 A. Where is that?

23 Q. The last line.

24 A. Oh, okay. Yes, I see that.

25 Q. And do you know if this is around the time of

1 the Arvizo trial?

2 A. I believe so. I'm not sure exactly when it took
3 place.

4 Q. What was your general impression of the Arvizos?

5 MR. FINALDI: Vague and ambiguous.

6 BY MR. LISKIN:

7 Q. You can answer.

8 A. Okay. Well, at first, the mother and the father
9 both came with the boys, and I believe there was an older
10 daughter too. And when I first met them, the mother
11 wanted a job at the ranch and I tried to tell her, you
12 know, no, discourage her is all.

13 Q. She had a kid who was ill, correct?

14 A. Yes. Gavin was ill.

15 Q. And if you will see, starting at line 5 on this
16 page, it says, "I was employed at Neverland Valley Ranch
17 for approximately 13 years, from August 1989 to
18 February 2002."

19 A. Yes.

20 Q. That is a true statement, correct?

21 A. Yes, it is.

22 Q. And if you go down to line 17, there is a
23 sentence that starts, "At know time did I observe Gavin,
24 Star, Davellin, or any Star in Michael Jackson's bed."

25 Is that true?

1 A. That's true.

2 Q. And the next line is, "At no occasions did I
3 observe Michael Jackson touch any child inappropriately."
4 Is that true?

5 A. Yes.

6 Q. And did you ever see any child behave in any
7 manner at the ranch that made you concerned that they were
8 being abused by Mr. Jackson?

9 A. No.

10 Q. And everything that you are saying today is
11 truthful, even though you were not completely happy with
12 the way things ended with you at the ranch, correct?

13 A. Yes. Yeah. I didn't have any reason to defend
14 or deny anything. I was doing my best to say what I
15 thought was true.

16 Q. And you were never asked to lie under oath,
17 correct?

18 A. Of course not.

19 Q. There was some discussion of Confidentiality
20 Agreements. Do you remember ever having signed a
21 Confidentiality Agreement?

22 A. Yes. I do remember that I signed one, but I
23 don't remember when, when I first started, or later on, or
24 whenever. I think that was when I first started.

25 MR. LISKIN: I am going to say there is a

1 protective order in this case. I don't know anything will
2 be designated specifically in this confidential but in the
3 interim period, mark the entire deposition as
4 confidential, and we will let you know if there is
5 anything specific that needs to be designated.

6 I am going to introduce the next exhibit in
7 order. It should be Exhibit No. 554.

8 (Deposition Exhibit No. 554 was marked for
9 identification.)

10 MR. LISKIN: It appears to be an employee or is
11 titled "Employee Confidentiality Agreement," a multipage
12 document, Bates labeled MES031310.

13 Q. If you look at the last page, it doesn't look --
14 I don't believe this is your Confidential Agreement. That
15 is not your signature on the last page of this document,
16 correct?

17 A. No, it's not.

18 Q. But does this look like the type of
19 confidentiality agreement that you were asked to sign?

20 MR. FINALDI: Calls for speculation. Assumes
21 facts not in evidence. The document speaks for itself.

22 THE WITNESS: I don't remember exactly, but yes,
23 it does look similar to.

24 BY MR. LISKIN:

25 Q. And did you work at the ranch in 1991?

1 A. '91, yes, I did.

2 Q. Do you see that the first line of this document
3 says, "This agreement, dated as of March 24th, 1991, is
4 between Michael Jackson, NVR, the company, and the
5 undersigned"? Do you see that?

6 A. Yes.

7 Q. And you see that Michael Jackson is specifically
8 the person identified as the company?

9 A. Yes.

10 MR. FINALDI: Irrelevant.

11 BY MR. LISKIN:

12 Q. And you see also that NVR is --

13 I think irrelevance objections are preserved.

14 MR. FINALDI: She has never seen this document
15 before. There's no foundation for the document
16 whatsoever. It's completely irrelevant.

17 MR. LISKIN: Well, I asked her if she'd seen a
18 document that looks like this. She said this looks like a
19 confidentiality agreement she signed.

20 MR. FINALDI: Why don't you get hers?

21 MR. LISKIN: I don't know if it's in the record
22 or not. I haven't seen every document in the record
23 itself.

24 MR. FINALDI: Because you know what it says.

25 MR. LISKIN: You're just making things up to ask

1 as if there is something there that's not there.

2 MR. FINALDI: You're the one who is making
3 things up. Neverland ranch is not a legal entity. It's a
4 trade name for MJJ Productions, but go ahead.

5 BY MR. LISKIN:

6 Q. You see that that identifies "Michael
7 Jackson/NVR"?

8 A. Yes.

9 Q. And it's your understanding that NVR is
10 Neverland Valley Ranch?

11 MR. FINALDI: Calls for speculation. Calls for
12 a legal conclusion. Lacks foundation.

13 THE WITNESS: That's what I would assume, yes.

14 BY MR. LISKIN:

15 Q. And it was your understanding that all Neverland
16 Valley Ranch employees were asked to sign a similar
17 agreement?

18 A. Yes, they were.

19 MR. FINALDI: Calls for speculation.

20 BY MR. LISKIN:

21 Q. I believe you testified -- or actually, it's
22 possible Mr. Finaldi gave the substance of this
23 conversation, but did you call Mr. Finaldi's office in
24 regard to the subpoena that you received?

25 A. Yes, I did.

1 Q. And about how long was the conversation that you
2 had with Mr. Finaldi, to the best of your estimate?

3 A. I believe approximately five minutes or so.

4 Q. And was there any discussion of the substance of
5 the case?

6 A. Yes.

7 Q. And what's your best recollection of the
8 conversation?

9 A. I believe he just stated that he was
10 representing Wade Robson in this matter and that I was
11 being deposed and whether I would be able to attend the
12 deposition on this day. And I just told him as far as I
13 know, I don't have anything planned for then.

14 Q. And did he discuss with you at all why you were
15 being deposed?

16 A. Not that I recall, no.

17 Q. And did you have any discussion of the substance
18 of Mr. Robson's allegations?

19 A. I don't remember if I did or not. I don't
20 believe so, yeah.

21 Q. All the time that you worked at the ranch, did
22 you ever see someone tell Michael what he could or
23 couldn't do?

24 A. No.

25 Q. That was functionally incomprehensible, right?

1 It was his place?

2 A. It's his home.

3 Q. And do you personally know whether Michael had a
4 boss at the home?

5 MR. FINALDI: Vague and ambiguous.

6 THE WITNESS: No, not that I would know of.

7 BY MR. LISKIN:

8 Q. Do you know whether Mr. Jackson had a boss at
9 any of the companies that he owned?

10 A. I believe Mr. Jackson was the boss.

11 Q. There was some discussion about people, earlier
12 in your testimony or in the depo today, about people being
13 fired for insubordination. Do you remember that?

14 A. Yes.

15 Q. Do you believe anyone could fire Mr. Jackson for
16 insubordination.

17 MR. FINALDI: Calls for expert opinion.

18 THE WITNESS: No, I do not.

19 BY MR. LISKIN:

20 Q. And do you believe there was any employee that
21 you have dealt with that Michael could not fire if he felt
22 that they were insubordinate?

23 A. No.

24 MR. LISKIN: Let's take a break, just two or
25 three minutes.

1 THE VIDEOGRAPHER: The time is 3:20 p.m. We are
2 now off the record.

3 (Break taken.)

4 THE VIDEOGRAPHER: We are back on the record.
5 The time is 3:20 p.m.

6 FURTHER EXAMINATION

7 BY MR. FINALDI:

8 Q. Okay. All right. You understand you are still
9 under oath, right?

10 A. Yes, I do.

11 Q. Now, I want to get back a little bit more into
12 the policies and procedures during the time that you were
13 working at the ranch.

14 A. Okay.

15 Q. Now, if, for example, you were walking on the
16 property and, say, for example, you saw the zookeeper
17 beating a kid up, what would the policies and procedures
18 at the ranch call for you to do?

19 MR. LISKIN: Calls for speculation and -- if you
20 know -- lack of foundation.

21 THE WITNESS: I never had that instance, but I
22 would first call security and then I would contact the
23 ranch office.

24 BY MR. FINALDI:

25 Q. So you would do something about it?

1 A. Yes, I would.

2 Q. Okay. Did you ever have the occasion while you
3 were on the property to observe anyone doing something
4 that you thought was either illegal, or improper, or
5 against the rules?

6 A. Not that I recall, no.

7 Q. You never saw a housekeeper breaking any kind of
8 a rule? Coming in late? Leaving early?

9 A. Oh, well, you are talking about small, little
10 things. I thought you were talking about -- you said
11 illegal or something like that. Yeah, they came in late.
12 Everybody came in late. I came in late a few times
13 myself.

14 Q. Did you ever report anyone who came in late or
15 left early?

16 A. Probably.

17 Q. Okay. What other kind of things did you report?
18 Did you ever report anyone for stealing?

19 A. Myself personally?

20 Q. Uh-huh.

21 A. No.

22 Q. Did you ever hear of other people reported for
23 stealing?

24 A. Yes.

25 Q. Was that a policy that if you saw someone

1 stealing, that you were to report it?

2 A. Of course.

3 Q. And was that to be reported to security?

4 A. Either security or to the main office. Not the
5 main office, but the Neverland Valley Ranch office.

6 Q. Okay. And was it one of the policies that
7 employees were not to beat people up or physically injure
8 one another?

9 A. Well, of course.

10 Q. And if that happened, is that something that you
11 were supposed to report?

12 A. Of course.

13 Q. Would that include, for example, if you saw --
14 do you remember there being a sexual harassment policy?

15 A. There probably was. I remember I testified in
16 the trial with security guards and Sandy and Adrian.

17 Q. Okay. And you remember issues of sexual
18 harassment coming up?

19 A. Yes. And that was against Jimmy and Marcus, the
20 security guards.

21 Q. Did they ever sexually harass you?

22 A. No.

23 Q. Did you ever hear them sexually harass anyone?

24 A. No.

25 Q. But you do remember being trained about sexual

1 harassment when you were an employee there?

2 MR. LISKIN: Objection; mischaracterizes
3 testimony.

4 THE WITNESS: I don't remember being trained for
5 anything like that.

6 BY MR. FINALDI:

7 Q. Do you recall seeing an employee handbook that
8 talked about sexual harassment and you were not supposed
9 to sexually harass one another?

10 A. I remember I had an employee handbook, yes, but
11 I don't remember what it said.

12 Q. Okay. If, for example, you were on the property
13 and you saw one of the security guards sexually harassing
14 one of the housekeepers that you were in charge of, that's
15 something that you would report, correct?

16 A. Of course.

17 Q. Who would you report that to?

18 A. I would have reported it to their superior and
19 to the office.

20 Q. Whose superior?

21 A. The security guard's superior.

22 Q. Who would that have been?

23 A. There was different people in charge of security
24 at different times.

25 Q. What are some of the names?

1 A. Well, Violet Silva was the last one that I
2 remember. Oh, gosh. There were several others before
3 that, but I do not recall names.

4 Q. And you said "the office." What office would
5 you report it to?

6 A. Neverland Valley Ranch office.

7 Q. Would you ever call MJJ Productions or report it
8 there?

9 A. I may have. I don't believe I did. I don't
10 know.

11 Q. Did you ever call and report anything to Norma?

12 A. I believe so, over Nikki and Sandy's suggestion
13 to talk to Norma about the Vangie situation.

14 Q. Okay.

15 A. And then there was another time when Adrian had
16 said something about Kiki and, yeah, and Norma came to the
17 ranch at that time.

18 Q. Okay. Now, if, for example, you were walking on
19 the ranch and you saw Michael Jackson beating a kid with a
20 stick, is that something that you would report?

21 A. I believe I would, yes.

22 Q. And who would you report that to?

23 A. Like I said, the security office.

24 Q. How about the police?

25 A. Would I report it to the police?

1 Q. Yes.

2 A. That I would that it to the police? I would
3 leave it to them to report it to the police.

4 Q. So if you saw Mr. Jackson beating up a kid with
5 a baseball bat, bashing his head in --

6 A. Well, I'd try to stop him.

7 Q. But would you report it to the police?

8 A. Me directly?

9 Q. Yes.

10 A. No, I wouldn't directly, but I would ask
11 security, or the ranch, or something because they were my
12 superiors. You know, I didn't feel like I had the -- I
13 never was faced with that so, of course, I didn't.

14 Q. What if you came around the corner and you saw
15 Mr. Jackson raping a child?

16 A. Raping a child?

17 Q. Yes.

18 A. Oh, my God.

19 Q. Would you report that?

20 A. Yes, I believe I would.

21 Q. Who would you report it to?

22 A. The same entities.

23 Q. Security?

24 A. Yes, and the office.

25 Q. Would you call the police?

1 A. I don't know if I would or not. I probably
2 would. I don't know.

3 No, I don't think I would because of being an
4 employee and stuff. I would go through the proper
5 channels, I believe. And like I said, I would try and
6 stop him.

7 Q. Okay. But why wouldn't you want to call the
8 police in that instance?

9 MR. LISKIN: Objection; misstates the prior
10 testimony.

11 THE WITNESS: I was never faced with that. I
12 don't know how I would react to it. I am trying to tell
13 you honestly.

14 BY MR. FINALDI:

15 Q. Did the policies or procedures at the ranch at
16 the time give you any instruction on whether you are
17 supposed to call the police or not?

18 A. No, no.

19 MR. LISKIN: Objection; vague and ambiguous.
20 Incomplete hypothetical.

21 BY MR. FINALDI:

22 Q. Did the policies and procedures, for example,
23 say that you are not supposed to bring in the police
24 unless it is absolutely necessary or anything like that?

25 A. No.

1 Q. So it's not true that Michael Jackson could just
2 do whatever he wanted on the property, right, without you
3 reporting something?

4 A. If I felt myself that it was something like
5 raping a child or beating a child, pardon me, I would
6 probably quit on the spot. Okay.

7 Q. Before you report or after?

8 A. Pardon?

9 Q. Before you report or after?

10 A. I would report it first, and then I would leave.

11 Q. Now, when Blanca told you, "I work for Michael,"
12 you said, "You know, I'm your supervisor." And she said,
13 "No. I work directly for Michael."

14 A. Yes.

15 Q. Did you do anything to inquire as to whether she
16 actually worked, indeed, for Michael directly or not?

17 A. Yes. I spoke to Norma about it because I
18 believe that before Michael bought the ranch, that he had
19 a property in Santa Monica, Hayvenhurst, and he had
20 something else -- I don't know -- and she worked for him.

21 Q. The Hideout?

22 A. Yeah, the Hideout. And she worked for him
23 personally there, and that he had brought her from there
24 to Neverland.

25 Q. And what did Norma say about that? Did she say,

1 "Yeah, it's true. Blanca works directly for him," or did
2 she say she works --

3 A. She said "She is part of the housekeeping
4 staff." That's what she told me.

5 Q. And that you are her boss, basically, or you are
6 her supervisor?

7 A. Yes; otherwise, I wouldn't have pursued it.

8 Q. And did you tell Blanca that afterwards?

9 A. Yes, I did.

10 Q. What did Blanca say?

11 A. That was part of our argument, she kept telling
12 me, "No, I work for Michael. No, I work for Michael."

13 Q. Did you ask Michael what his opinion was on the
14 issue?

15 A. No. I spoke to him about it after the fact.

16 Q. How long after the fact?

17 A. I'm not sure.

18 Q. Okay.

19 A. I just apologized to him.

20 Q. What did you apologize to him for?

21 A. Because Bianca had been with him for 15 years.

22 Q. What did he say?

23 A. He said, "That's okay, Gayle. Don't worry about
24 it." And Norma had stated to me that she figured she was
25 going to -- Bianca was going to go crying to Michael

1 figuring that he would beg her to come back.

2 Q. Do you know if she did that?

3 A. I don't know if she did or not, but she didn't
4 come back.

5 Q. Do you know that she got a letter of
6 recommendation?

7 A. She did?

8 MR. LISKIN: Objection; lack of foundation.

9 THE WITNESS: I had no idea.

10 BY MR. FINALDI:

11 Q. Did you take a part in that?

12 A. In what?

13 Q. Did you take a part in her recommendation to get
14 the job?

15 A. No, I did not?

16 Q. You didn't know she got a job within like a day
17 or two?

18 A. No, I did not.

19 MR. LISKIN: Objection; lack of foundation.

20 BY MR. FINALDI:

21 Q. Regarding your purse, did you hear that your
22 paycheck was sticking out of a pocket in your purse and
23 Blanca picked it up and looked at it?

24 A. I don't believe I left it sticking out. I
25 usually put it down inside my purse.

1 Q. How do you know that?

2 A. Because I didn't want people going by and
3 looking at my check. It was personal property.

4 Q. So as you sit here today, you are saying you
5 remember on that day --

6 A. No, I --

7 Q. Let me finish.

8 A. Okay.

9 Q. As you sit here today, you remember on that day
10 when you received that paycheck, 30-plus years ago, that
11 it was not sticking out at all. Is that what you are
12 saying?

13 A. No. I don't remember that because I didn't even
14 know about her looking in my purse and looking at my check
15 until you told me that.

16 Q. Okay. You didn't know anything about that
17 allegation, right?

18 A. No, I did not. If somebody told me that, it was
19 a long time ago, but I don't remember that language but I
20 did put my check away.

21 Q. Now, you started working at the ranch after
22 Blanca started working for Michael, correct?

23 A. Yes.

24 Q. And do you know how much Blanca was making as of
25 the time that she quit?

1 A. I have no idea.

2 Q. Do you know how much were you making as of the
3 time that she quit?

4 A. When I started, I was making \$8.00 an hour and,
5 I think, I got a raise to \$10 an hour when I became in
6 charge of the house.

7 Q. Do you know if you were making more than Blanca?

8 A. I have no idea.

9 Q. Did she ever ask you?

10 A. She may have asked me. I don't know if she did
11 or not.

12 Q. Okay. So Blanca -- do you know who pinned the
13 write-up -- if Blanca didn't pin it up, and she did tear
14 it up, do you know who is the one that actually pinned it
15 up?

16 A. No, I do not.

17 Q. Did you ask her why she ripped it up?

18 A. I don't recall if I did nor not.

19 Q. Was that important to you?

20 A. What? That she had --

21 Q. Knowing why she ripped it up.

22 A. I think she was doing it as a sign of defiance.
23 That's what I felt.

24 Q. That was your speculation, right?

25 A. Yes, that was my speculation, that it was a sign

1 of defiance against me.

2 Q. You don't know, for example, if she found it on
3 the floor and thought it was trash, do you?

4 A. I don't think she found it on the floor. Her
5 and Vangie were very good friends, and they ate lunch
6 together all the time.

7 Q. So do you know for a fact where she got it from?

8 A. No, I do not.

9 Q. Were there any language barriers between
10 yourself and Blanca that made it difficult for you guys to
11 communicate?

12 A. No. She was very fluid in English.

13 Q. You said -- did your kids ever stay the night at
14 Neverland?

15 A. No, they did not.

16 Q. Would you have let your kids stay the night in
17 Michael's room?

18 A. Yes, I would have.

19 Q. Throughout the entire time that you worked
20 there, you would have?

21 A. Yes, I believe so.

22 Q. Despite the allegations?

23 A. Yes, despite the allegations.

24 Q. Okay. Now, MJJ Productions, do you know who the
25 officers of that corporation were?

1 A. No, I do not.

2 Q. Oh. Did you know that there were several
3 different officers at different times?

4 MR. LISKIN: Objection; lacks foundation.

5 THE WITNESS: I don't know what you mean by
6 "officers."

7 BY MR. FINALDI:

8 Q. Officers of the corporation, like a secretary,
9 president, things like that.

10 MR. LISKIN: Objection; lacks foundation.

11 THE WITNESS: No. I don't know who was in what
12 capacity.

13 BY MR. FINALDI:

14 Q. Did you know that Mr. Branca, his attorney, was
15 actually an officer of the corporation?

16 MR. LISKIN: Objection; lacks foundation. Vague
17 as to time.

18 BY MR. FINALDI:

19 Q. Did you know there was a Mr. Gelfand who was an
20 officer of the company?

21 MR. LISKIN: Objection; lacks foundation.

22 THE WITNESS: I remember hearing the name, yes,
23 but I don't know in what capacity.

24 BY MR. FINALDI:

25 Q. Did you ever meet him before?

1 A. I don't know if I did or not.

2 Q. Did Michael ever tell you that the Jordan
3 Chandler allegations were false and don't believe it, it's
4 is just false and distortion?

5 A. No. He never told me directly.

6 Q. You ever hear him telling anyone that?

7 A. No.

8 Q. Did you ever ask him about the allegations?

9 A. Of course not.

10 Q. Why not?

11 A. It wasn't my business.

12 Q. Well, didn't you want to know, given the fact
13 that you were working for this man?

14 MR. LISKIN: Objection; argumentative.

15 THE WITNESS: I didn't believe it, so there was
16 no reason to ask about it. I felt that Jordie was a brat.
17 BY MR. FINALDI:

18 Q. Ah. For what reason?

19 A. Just the way he acted.

20 Q. So Jason Francia was a brat. Jordie was a brat,
21 right?

22 A. Yeah, I believe so.

23 Q. Which other kids do you remember coming on the
24 property that were brats?

25 A. Gavin was a brat, too.

1 Q. Anyone else?

2 A. No.

3 Q. Those were the only three that you remember were
4 brats?

5 A. Yeah. Wade was not a brat.

6 Q. Do you have any idea why -- do you believe
7 Wade's allegations or do you believe they are not true as
8 well?

9 MR. LISKIN: Objection; calls for speculation.

10 THE WITNESS: I don't know.

11 BY MR. FINALDI:

12 Q. You do know Wade was alone with Mr. Jackson from
13 time to time, correct?

14 A. Yes, I do. I'm assuming that. I don't know
15 anything for a fact.

16 Q. Well, you know he stayed at the ranch several
17 different times?

18 A. Yes, I know he stayed.

19 Q. Sometimes he stayed without his mother there,
20 correct?

21 A. Yes.

22 Q. This declaration of yours --

23 A. Which one is that? This one here?

24 Q. The two-page declaration.

25 A. Okay.

1 Q. Who typed this up, do you know?

2 A. I have no idea.

3 Q. You didn't type it up, correct?

4 A. Of course not.

5 Q. And was this one of the attorneys for
6 Mr. Jackson who typed it up?

7 MR. LISKIN: Objection; calls for speculation
8 and lack of foundation.

9 THE WITNESS: I guess. I have no idea.

10 BY MR. FINALDI:

11 Q. And did you read it before you signed it?

12 A. I believe I did.

13 Q. Okay. At the end, it says, "I give this
14 declaration consisting of this page and one other, of my
15 own free will without threats, corrosion and inducement of
16 any kind. I certify under penalty of perjury under the
17 laws of the State of California, that the foregoing is
18 true and correct to the best of my knowledge."

19 Did you read that before you signed it?

20 A. Yes.

21 Q. And you read the whole declaration before you
22 signed it?

23 A. I believe I did.

24 Q. So going up to line 17 of the first page.

25 A. Okay.

1 Q. It says, "At know time did I observe Gavin,
2 Star, Davellin or any child in Michael Jackson's bed."

3 Do you see that?

4 A. Yes.

5 Q. That is not a true statement, is it? You have
6 seen children in Michael Jackson's bed? You testified
7 about it today, correct?

8 MR. LISKIN: Objection; misstates the testimony.

9 THE WITNESS: It was in the testimony that I saw
10 of Jordie and his mon and his sister on the bed with him.
11 They were watching TV.

12 Q. So of the children you have seen in Michael
13 Jackson's bed, you have seen Jordie, as a child, in his
14 bed, correct?

15 A. With his mother and his sister.

16 Q. I just want to hear about the children. So you
17 saw Lily in Michael Jackson's bed, right?

18 A. They are weren't in the bed. They were on the
19 bed. There is a difference.

20 Q. What is the difference?

21 A. Lying on the bed watching TV and being in bed is
22 like you are going to sleep in bed.

23 Q. And what is the significance between the two for
24 you? For what reason are you pointing that out?

25 A. I am pointing that out because being on top of

1 the bed is just innocently watching TV. And being in bed,
2 there is more --

3 Q. In bed is worse?

4 MR. LISKIN: Objection; misstates prior
5 testimony.

6 THE WITNESS: Okay.

7 BY MR. FINALDI:

8 Q. You said on the bed is innocently watching TV.

9 A. Right.

10 Q. So is there something not innocent about being
11 inside his bed?

12 A. Well, I would assume they were going to sleep or
13 something, if they are in bed.

14 Q. Now, in your earlier testimony, you said that
15 you saw Brett Barnes in the bed with Michael Jackson and
16 they were sick. Do you remember saying that?

17 A. I read that. I don't remember saying it. I
18 don't remember seeing it.

19 Q. All right. So which other kid do you remember
20 -- I think you testified earlier today that there were two
21 girls that you saw on his bed, right? Pia Zadora's kids?

22 A. No. I testified that I saw on his lap.

23 Q. Which other kids do you recall seeing on his bed
24 besides those three?

25 A. I don't remember. I saw Prince in his bed.

1 Q. Prince Jackson?

2 A. Yes.

3 Q. Okay.

4 A. When he was little.

5 Q. Anyone else?

6 A. Not that I recall. I wasn't normally in his
7 room when they were in bed. They were up.

8 Q. So this part of the statement on your
9 declaration where it says "or any child in Michael's bed,"
10 is not true, right?

11 A. I don't know.

12 Q. Well, you just told me you saw other kids in his
13 bed. Do you know why that is?

14 A. No, I don't.

15 Q. Okay.

16 A. You know, from '93 to 2000, whenever I gave this
17 one. Was this 2005?

18 Q. Yes.

19 MR. LISKIN: 2004.

20 BY MR. FINALDI:

21 Q. You signed it in 2004.

22 A. '04?

23 Q. Yes.

24 A. Well, that's another nine years, you know. I
25 don't remember what I said from one to the other. I

1 didn't have the paper in front of me to remember. And
2 like I said, from a day-to-day -- I can't tell you what I
3 did yesterday. You know I can't remember exactly what I
4 said or what I didn't say, and I don't remember who I saw
5 and who I didn't see.

6 Q. Well, you don't say that in here. The
7 declaration doesn't say, "I don't remember if kids were in
8 his bed." You're saying "I didn't observe them." Would
9 you agree with that?

10 A. If that's what that says, yes.

11 Q. When was the last time you received any kind of
12 pay from Michael Jackson or any of his company?

13 A. 2002 when I left the ranch.

14 MR. FINALDI: Okay. I don't have anything
15 further.

16 MR. LISKIN: Oh, yeah. I am going to ask a
17 couple questions, then I am going to take a few-minute
18 break to look through my notes because I had to listen to
19 your questions and not go through my notes.

20 FURTHER EXAMINATION

21 BY MR. LISKIN:

22 Q. Assuming for this question that the check was
23 sitting partially out of your purse, does that make it
24 okay for Blanca to go and grab it and pull it out of your
25 purse?

1 A. No.

2 Q. It's still the same issue, correct?

3 A. Yes.

4 Q. And you don't know whether she went further into
5 your purse and looked at other things in your purse,
6 right?

7 A. This's true. I wasn't in the room at the time.

8 Q. And is it true that you did not see Gavin, Star
9 or Davellin in Michael's bed?

10 A. That's true, I did not see them in his bed.

11 Q. And I can't remember, out of the kids that you
12 mentioned, did you see kids alone with Michael in bed?

13 A. Not as far as I remember. I guess it was in one
14 of these many statements that I saw Brett Barnes in bed
15 with him when they were sick or something.

16 Q. But you didn't see anything nefarious happen
17 between Michael and Brett Barnes?

18 A. Of course not.

19 MR. FINALDI: Vague and ambiguous.

20 BY MR. LISKIN:

21 Q. And you didn't see anything nefarious happen
22 between Michael and any kid, right?

23 A. No, I did not.

24 Q. And so if anything, this is a slight
25 overstatement or misstatement, at most, or possibly you

1 are not remembering the same 10 years later from your 1994
2 testimony?

3 MR. FINALDI: Vague and ambiguous.

4 THE WITNESS: Apparently, yeah.

5 MR. LISKIN: Let's take a five-minute break. I
6 will just have a few more questions after that.

7 THE VIDEOGRAPHER: The time is 3:42 p.m. We are
8 now off the record.

9 (Break taken.)

10 THE VIDEOGRAPHER: We are back on the record.
11 The time is 3:45 -- I'm sorry, 3:46 p.m.

12 BY MR. LISKIN:

13 Q. It's your understanding that Mr. Robson
14 testified as an adult in Michael Jackson's defense that
15 nobody ever touched him inappropriately, correct?

16 MR. FINALDI: Calls for speculation.

17 THE WITNESS: That was my understanding, yes.

18 BY MR. LISKIN:

19 Q. And did you have any understanding to think that
20 Mr. Robson was lying?

21 A. No, I did not.

22 Q. And Mr. Jackson is no longer with us, correct?

23 A. That's correct.

24 Q. So you understand that Mr. Robson, now with
25 Michael dead, is suing certain entities that were

1 associated with Michael? Do you understand that?

2 A. That's what I have been told, yes.

3 Q. And you do understand Michael a not available to
4 defend himself in this litigation, correct?

5 A. That's right.

6 Q. Does that seem fair to you?

7 A. Yes.

8 Q. That seems fair to you that he is not able -- he
9 is not alive --

10 A. Yes, that seems fair to me.

11 Q. What do you mean?

12 A. Yes. I said it seems fair to me that -- wait a
13 minute. Now I am getting confused.

14 Q. I think you might not have understood my
15 question. Does it seem fair to you that he is being sued
16 or that entities that he owned are being sued now that he
17 is not here to defend himself?

18 A. What I said was it is not fair that he was being
19 sued and he was not here to defend himself. That's what I
20 was saying.

21 Q. And Mr. Robson testified in his defense when he
22 was alive, correct?

23 A. Yes.

24 Q. Was it your understanding that MJJ Productions
25 and MJJ Ventures were engaged in a child procurement ring,

1 and they went and sought out children to deliver them to
2 Michael for the purpose of sexual gifts?

3 MR. FINALDI: Calls for speculation and calls
4 for expert opinion.

5 THE WITNESS: No.

6 BY MR. LISKIN:

7 Q. No employee that you ever dealt with gave you
8 that impression, correct?

9 A. No.

10 MR. LISKIN: I don't have any further questions.

11 MR. FINALDI: No further questions.

12 I offer a stipulation that the court reporter be
13 relieved of her duties under the code. She will prepare
14 the transcript and we will have it sent to your home; is
15 that okay?

16 THE WITNESS: That's fine.

17 MR. FINALDI: Is 30 days enough time for you to
18 review the transcript and make any corrections you deem
19 necessary thereto, sign it under penalty of perjury, and
20 then put it back into a self-addressed, stamped envelope
21 so it can be sent to my office?

22 THE WITNESS: Okay.

23 MR. FINALDI: Is that enough time?

24 THE WITNESS: I wanted to bring this up, that
25 you are stating that I had never observed any children. I

1 did not --

2 MR. FINALDI: Your declaration?

3 THE WITNESS: I did not write it. Somebody else
4 wrote this up, and he asked me yes-or-no questions, and so
5 whoever wrote it up, I didn't try and change it or
6 anything. The only thing elaborated on was the thing at
7 the end about having a blood drive.

8 MR. FINALDI: Well, you also changed a couple of
9 dates too, right? You changed "2002" to "2001" and your
10 initial, GG; correct?

11 THE WITNESS: Yes.

12 MR. LISKIN: So if that's just slightly
13 incorrect, you may have just missed it.

14 THE WITNESS: Yes.

15 MR. FINALDI: Hold on. If you want to ask
16 questions, that's fine.

17 So the second page, you also corrected a date as
18 well, right? "2002," you changed, and you initialed it,
19 right?

20 THE WITNESS: Yes. I initialed it.

21 MR. FINALDI: And this wasn't drafted up by some
22 attorney for the Arvizos, right?

23 THE WITNESS: No, I don't believe.

24 MR. FINALDI: It would have been one of Michael
25 Jackson's legal team, correct?

1 THE WITNESS: Yes.

2 MR. FINALDI: And do you think they -- you said
3 they called and asked you yes-or-no questions. So are you
4 saying you feel like they pulled one over on you or
5 something?

6 THE WITNESS: No. That's not what I am saying.
7 I don't recall from my previous testimony that I had
8 stated that I had seen children in Mr. Jackson's bed,
9 okay. And this is saying that I -- "at no time did I
10 observe." I thought I was saying at no time did I observe
11 Gavin, Star, Davellin, or any child in Michael Jackson's
12 bed. And I don't remember stating this "on no occasion
13 did I observe," yeah. I just want to -- I just feel like
14 you are stating that I'm a liar.

15 MR. LISKIN: So it is possible that it's an
16 oversight that you didn't catch.

17 THE WITNESS: No. Because when you're handed a
18 document like this, you kind of scan over it, "Yeah, that
19 looks approximate." I am not a lawyer. I don't take
20 words for word and what they say. You know what I mean?

21 MR. FINALDI: Hang on.

22 Do you have anything else to state about that
23 document?

24 THE WITNESS: No.

25 MR. FINALDI: Do you see anything else in that

1 declaration that's false?

2 THE WITNESS: Well, let me read it again. Okay?

3 MR. FINALDI: Yeah. Go ahead.

4 THE WITNESS: I said -- this was in 2000 --

5 MR. FINALDI: If you have anything whatsoever,
6 let me know.

7 THE WITNESS: Well, it says I was employed for
8 13 years. I was only employed for 12 1/2, okay.

9 MR. FINALDI: Okay.

10 THE WITNESS: Okay. That's the best. I don't
11 see any other things.

12 MR. FINALDI: All right. So if you have any
13 corrections to make to the transcript, just go ahead and
14 make them right on the transcript and initial if you want.
15 You don't have to do it on a corrections page.

16 THE WITNESS: Okay.

17 MR. FINALDI: Sign it under penalty of perjury.
18 You can put it back in the self-addressed, stamped
19 envelope, and it will be sent directly to my office. My
20 office will maintain custody of the original, and we will
21 lodge it with the court for the trial and also upon
22 reasonable request. We will also notify opposing counsel
23 within five days receipt, thereof, the fact that it has
24 been signed. We will send you a copy of the signature
25 page, along with any corrections that have been made.

1 If the original has been lost, misplaced, stolen
2 or otherwise unavailable, a certified copy can be used in
3 lieu thereof for any and all purposes, including trial.

4 MR. LISKIN: I just want to follow up on this
5 briefly.

6 FURTHER EXAMINATION

7 BY MR. LISKIN:

8 Q. Just to be clear, you never testified at trial,
9 or deposition, or anything to that effect that there were
10 never any children in his bed, correct? You weren't asked
11 to testify either way about that, correct?

12 A. I don't believe so. I don't know. I don't
13 remember.

14 Q. You don't remember that being the purpose of
15 your testimony? You weren't in there at night, correct?

16 A. No, I was not.

17 MR. LISKIN: Okay. I don't have any further
18 questions.

19 THE VIDEOGRAPHER: One moment.

20 This concludes today's deposition of Gayle
21 Goforth. The total number of media used is three, and we
22 are going off the record. The time is 3:54 p.m.

23 THE REPORTER: Counsel, do you need a copy?

24 MR. LISKIN: Yes, definitely.

25 (Deposition concluded at 3:54 p.m.)

* * * *

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 _____, _____.

CERTIFICATE

OF

CERTIFIED SHORTHAND REPORTER

* * * * *

I, THE UNDERSIGNED CERTIFIED SHORTHAND REPORTER IN AND FOR
THE STATE OF CALIFORNIA, DO HEREBY CERTIFY:

THAT THE FOREGOING PROCEEDINGS WERE TAKEN BEFORE ME AT THE
TIME AND PLACE THEREIN SET FORTH, AT WHICH TIME THE WITNESS
WAS PUT UNDER OATH BY ME; THAT THE TESTIMONY OF THE WITNESS
AND ALL OBJECTIONS MADE AT THE TIME OF THE PROCEEDINGS WERE
RECORDED STENOGRAPHICALLY BY ME AND WERE THEREAFTER
TRANSCRIBED UNDER MY DIRECTION; THAT THE FOREGOING IS A
TRUE RECORD OF THE TESTIMONY AND OF ALL OBJECTIONS MADE AT
THE TIME OF THE PROCEEDINGS.

I FURTHER CERTIFY THAT I AM A DISINTERESTED PERSON
AND AM IN NO WAY INTERESTED IN THE OUTCOME OF SAID ACTION, OR
CONNECTED WITH OR RELATED TO ANY OF THE PARTIES IN SAID ACTION,
OR TO THEIR RESPECTIVE COUNSEL.

THE DISMANTLING, UNSEALING OR UNBINDING OF THE
ORIGINAL TRANSCRIPT WILL RENDER THE REPORTER'S CERTIFICATE NULL
AND VOID.

IN WITNESS WHEREOF, I HAVE SUBSCRIBED MY NAME ON THIS

DATE: NOV 03 2016

Carolyn Elser
CSR NO. 10091