

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

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

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CONFIDENTIAL  
VIDEOTAPED DEPOSITION OF  
JOHN BRANCA  
VOLUME I  
WEDNESDAY, OCTOBER 18, 2017  
10:35 A.M.

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF LOS ANGELES

WADE ROBSON, an individual, ) CASE NO.: BC508502

Plaintiff,

VS.

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

Defendants.

The videotaped deposition of JOHN BRANCA taken on behalf of the Plaintiff, before Louann Thibert, CSR No. 8152 for the State of California, commencing at 10:35 a.m., on Wednesday, October 18, 2017 at Manly, Stewart & Finaldi, 19100 Von Karman, Suite 800, Irvine, California.

1 APPEARANCES OF COUNSEL:

2 FOR THE PLAINTIFF WADE ROBSON:

3 MANLY, STEWART & FINALDI  
4 BY: VINCE W. FINALDI  
5 ALEX CUNNY  
6 JANE REILLEY  
7 Attorneys at Law  
8 19100 Von Karman, Suite 800  
9 Irvine, California 92612  
10 (949) 252-9990  
11 vfinaldi@manlystewart.com  
12

13 FOR THE DEFENDANTS:

14 KINSELLA WEITZMAN ISER KUMP & ALDISERT, LLP  
15 BY: JONATHAN STEINSAPIR  
16 Attorney at Law  
17 808 Wilshire Boulevard, Third Floor  
18 Santa Monica, California 90401  
19 (310) 566-9800  
20 jsteinsapir@kwikalaw.com  
21

22 ALSO PRESENT: GIGI FADICH, Videographer  
23  
24  
25

I N D E X

1		
2		PAGE
3	MR. FINALDI	6

E X H I B I T S

4			
5			
6	LETTER	DESCRIPTION	PAGE
7	A	Notice of Continuance of Taking Deposition	9
8		of John Branca and for Production of	
9		Documents; 12 pages	
10	B	Defendants' and Non-party the Estate of	10
11		Michael Jackson's Objections to Notice of	
12		Taking Deposition of John Branca and	
13		Request for Production of Documents;	
14		4 pages	
15	C	Declaration of John Branca; 7 pages	45
16	D	Declaration of J. Chandler; 4 pages	135

17

18 WITNESS INSTRUCTED NOT TO ANSWER/TRANSCRIPT MARKED

19 Page 27, Line 21

20 Page 66, Line 10

21 Page 76, Line 19

22 Page 102, Line 23

23 Page 113, Line 4

24 Page 152, Line 9

25

1                   WEDNESDAY, OCTOBER 18, 2017; 10:35 A.M.

2                   IRVINE, CALIFORNIA

3                   -o0o-

4  
5                   THE VIDEOGRAPHER: Good morning. This is the  
6 videotaped deposition of John Branca taken at 19100 Von  
7 Karman Avenue, Suite 800, Irvine, California on  
8 Wednesday, October 18th, 2017, in the matter of Robson  
9 versus MJJ Productions, Incorporated. Case number  
10 BC508502. This case is being heard in the Superior Court  
11 of the State of California, in and for the County of Los  
12 Angeles. This deposition is on behalf of the Plaintiff.

13                  My name is GiGi Fadich with Dean Jones Legal  
14 Videos, Incorporated, of Los Angeles and Santa Ana,  
10:35:02 15 California. This deposition is commencing at 10:35 a.m.

16                  Would all present please identify themselves  
17 beginning with the deponent.

18                  THE WITNESS: John Branca.

19                  MR. STEINSAPIR: Jonathan Steinsapir of  
10:35:15 20 Kinsella Weitzman for the Defendants MJJ Productions and  
21 MJJ Ventures and for the witness and the co-executors of  
22 the Estate of Michael Jackson.

23                  MR. CUNNY: Alex Cunny for the Plaintiff.

24                  MS. REILLEY: Jane Reilley for the Plaintiff.

10:35:30 25                  MR. FINALDI: Vince Finaldi for the Plaintiff.

10:35:39 1 THE VIDEOGRAPHER: Would the court reporter  
2 please administer the oath.

3  
4 JOHN BRANCA,  
10:35:39 5 CALLED AS A WITNESS BY AND ON BEHALF OF THE PLAINTIFF,  
6 AFTER BEING SWORN BY THE CERTIFIED SHORTHAND REPORTER,  
7 WAS EXAMINED AND TESTIFIED AS FOLLOWS:

8  
9 EXAMINATION

10:35:39 10  
11 BY MR. FINALDI:

12 Q Good morning. Could you please state and spell  
13 your full legal name.

14 A John Gregory Branca, B-R-A-N-C-A.

10:35:48 15 Q And what's your date of birth, sir?

16 A December 11, 1950.

17 Q Alrighty. It's my understanding you live in  
18 the Los Angeles area, correct?

19 A Beverly Hills.

10:36:00 20 Q All right. Do you have any intention of moving  
21 any time in the next six months?

22 A No.

23 Q All right. I'm going to -- you've had your  
24 deposition taken before, correct?

10:36:17 25 A Correct.

10:36:17 1 Q How many times?  
2 A I don't know.  
3 Q What's your best estimate?  
4 A I have no idea.  
10:36:21 5 Q No estimate, whatsoever?  
6 A No.  
7 Q More than 5 times?  
8 A Yes.  
9 Q More than 10?  
10:36:27 10 A Perhaps.  
11 Q Okay. So between 5, 10 -- 5 and 10 would be  
12 your best estimate?  
13 A I have no idea.  
14 Q Okay. You are an attorney, correct, sir?  
10:36:38 15 A Am I an attorney? Yes.  
16 Q You are an attorney. How long have you been an  
17 attorney?  
18 A Since 1975.  
19 Q Okay. And you have worked in the entertainment  
10:36:48 20 industry for how long?  
21 A Since 1977.  
22 Q All right. I wasn't at your prior depositions  
23 so I'm going to go through some of the ground rules for a  
24 deposition to make sure we're on the same page. Seated  
10:37:01 25 to your left is a court reporter. She's taking down

10:37:04 1 stenographically everything being said here today. So  
2 for that reason, it's important we get audible responses.  
3 Nods of the head, answers like uh-huh and huh-uh don't  
4 translate well into a written record. So if I remind you  
10:37:15 5 of that from time to time, I'm not trying to be rude.  
6 I'm trying to get a clear written record. Okay.

7 Do you understand the oath that you just took  
8 has the same force and effect as if it were said in a  
9 court of law?

10:37:26 10 A Yes.

11 Q Okay. And you understand that obliges you to  
12 tell you the truth under penalty of perjury, correct?

13 A Yes.

14 Q Okay. I'll ask questions. You'll be required  
10:37:33 15 to provide responses, unless your attorney instructs you  
16 not to answer a question and you choose to follow that  
17 instruction. So for that reason, if you do provide a  
18 response, I'll assume that you understood the question.

19 If any of my questions are vague or ambiguous  
10:37:46 20 or don't make much sense, let me know and I won't be  
21 offended. I want to make sure that we're getting answers  
22 to the questions that I'm trying to ask.

23 All right?

24 A Okay.

10:37:54 25 Q Okay. The last admonition. You can take a

10:37:57 1 break any time you'd like. There's refreshments here,  
2 there's a restroom outside. The only thing I ask is if a  
3 question is pending, please answer the question and then  
4 we can take a break. Okay?

10:38:07 5 A Okay.

6 Q Is there any reason why you would not be able  
7 to give your best, most truthful and accurate testimony  
8 here today?

9 A No.

10:38:13 10 Q Never been diagnosed with any memory problems?

11 A No.

12 Q Okay. I'm going to show you a document here  
13 we'll mark as Exhibit A for the record. And I'll provide  
14 a copy to your counsel as well. This is the Notice of  
10:38:28 15 Continuation of Taking Deposition of John Branca and for  
16 Production of Documents. Here you go, Mr. Steinsapir.

17 MR. STEINSAPIR: And for the record, we served  
18 objections to --

19 MR. FINALDI: Sure.

10:38:38 20 MR. STEINSAPIR: -- this yesterday.

21 MR. FINALDI: Sure.

22 MR. STEINSAPIR: I just want it on the record.

23 MR. FINALDI: Yeah. Do you want the objection  
24 on the record?

10:38:42 25 MR. STEINSAPIR: Sure. That would be nice.

10:38:43 1 MR. FINALDI: We can do that. We'll mark your  
2 objection as Exhibit B and place that on the record now.  
3 The objection is Defendants' and Non-party the Estate of  
4 Michael Jackson's Objections to Notice of Taking  
10:38:59 5 Deposition of John Branca and Request for Production of  
6 Documents which we received yesterday, I believe.

7 MR. STEINSAPIR: Correct.

8 BY MR. FINALDI:

9 Q While you're looking at that, I'm going to go  
10:39:13 10 ahead --

11 MR. FINALDI: Actually, Jane, could you do me a  
12 favor? Could you fill out -- oh, never mind. I've got  
13 it.

14 I'm going to go ahead and serve you with a  
10:39:36 15 deposition -- it's actually a trial subpoena for the  
16 trial in the case which is in March. Included with it is  
17 an on-call agreement so you don't have to show up the  
18 first day if you don't want to. Your attorney will  
19 explain that to you but you've been served with the  
10:39:53 20 subpoena for the trial in this case.

21 BY MR. FINALDI:

22 Q Getting back to Exhibit A, have you seen that  
23 document before today?

24 A No.

10:39:55 25 Q All right. Have you had a chance to thumb

10:39:56 1 through it and familiarize yourself with it?

2 A Not really.

3 Q Okay. So this is your notice of deposition for  
4 today which compels you -- it's the reason why you're  
10:40:06 5 here. Attached with it is a request for you to produce  
6 certain documents which may be in your possession,  
7 custody or control. And the requests for production  
8 begin on page 2 and continue through to page 10. Give  
9 you a chance to look through those.

10:40:25 10 MR. STEINSAPIR: I mean, I don't think you want  
11 him to read them all.

12 MR. FINALDI: I do. I want him to read them.

13 MR. STEINSAPIR: You want him to read all the  
14 requests?

10:40:32 15 MR. FINALDI: All the requests to produce.

16 MR. STEINSAPIR: Well, why don't we go through  
17 them one-by-one, if you want?

18 MR. FINALDI: Sure. Sure.

19 MR. STEINSAPIR: And for the record, I mean,  
10:40:37 20 our objections are we believe all this stuff was already  
21 requested, searched for and produced in the probate  
22 proceedings and in the -- in the -- in this case.

23 BY MR. FINALDI:

24 Q Did you know, Mr. Branca, that you were asked  
10:40:51 25 to bring certain documents within your possession,

10:40:53 1 custody or control today?

2 A I asked our attorneys to respond to any  
3 document requests that have been made.

4 Q Okay. But you didn't look through this  
10:41:01 5 yourself, correct?

6 A No.

7 Q Okay. And is it true that you did not make a  
8 search yourself for any documents that would be  
9 responsive to these because you never even looked at it?

10:41:11 10 A I did not myself make that search, no.

11 Q Okay. So let's go through it briefly.  
12 Documents are defined very broadly. It would include  
13 anything that's in hard format, electronic format. It  
14 would include e-mails, text communications, any online  
10:41:26 15 communications.

16 And the first would be for documents relating  
17 to allegations of any type of sexual misconduct involving  
18 MJJ Productions, Inc. or MJJ Ventures, Inc.

19 Have you ever been in possession of any of  
10:41:48 20 those types of documents?

21 A Our office has legal files relating to Mr.  
22 Jackson, yes.

23 Q Okay. And your office would be --

24 A Ziffren Brittenham.

10:42:05 25 Q Are those documents housed at the office there

10:42:11 1 in Los Angeles where you work?

2 A Some of them are in Los Angeles -- in the  
3 office and some of them, I believe, are in storage.

4 Q Where's the storage?

10:42:19 5 A I don't know.

6 Q Is it in the Los Angeles area, though?

7 A I believe so.

8 Q Okay. Have you ever made a search of your own  
9 computers, your electronic storage devices for documents  
10:42:33 10 that may be responsive in these cases?

11 A Have I?

12 Q Yeah.

13 A No.

14 Q Never searched your e-mails or anything like  
10:42:40 15 that?

16 A No.

17 Q When Michael Jackson was still alive, did you  
18 communicate with him on e-mail?

19 A I don't believe so.

10:42:56 20 Q How about on texts?

21 A I don't believe so. I stopped representing him  
22 in around 2004, 2005.

23 Q Okay. Do you know if any of the files of  
24 Ziffren related to MJJ Productions, MJJ Ventures or  
10:43:19 25 Michael Jackson, if there are any files dealing with

10:43:21 1 **sexual abuse allegations?**  
2 A Dealing with what?  
3 Q **Sexual abuse allegations.**  
4 A I don't believe so.  
10:43:34 5 Q **Okay. Do you know if a search was ever made**  
6 **through those documents?**  
7 A I asked our attorneys to make the search.  
8 Q **When was that?**  
9 A When the case was filed.  
10:43:51 10 Q **When the Robson case was filed?**  
11 A And when any -- when any case is filed, I  
12 ask -- I ask our attorneys to respond appropriately to  
13 any requests for documentation.  
14 Q **Okay. And your attorneys would be?**  
10:44:04 15 A The Weitzman firm.  
16 Q **All right. Do you use a personal computer?**  
17 A Excuse me?  
18 Q **Do you use a personal computer?**  
19 A I have an iPhone.  
10:44:21 20 Q **Okay. But do you have a computer you use as**  
21 **well?**  
22 A There's a computer in my office, yeah.  
23 Q **Okay. And do you have one at your home that**  
24 **you use to do work?**  
10:44:30 25 A Yeah.

10:44:31 1           **Q     Have you ever searched those personal**  
2           **computers?**

3           A     No.

4           MR. STEINSAPIR: For documents in this case,  
10:44:36 5           right?

6           MR. FINALDI: Yeah.

7           MR. STEINSAPIR: Yes. I think that's what he  
8           understood.

9           BY MR. FINALDI:

10:44:40 10           **Q     For documents responsive to the requests in**  
11           **these cases?**

12           A     I have no personal computer that's not related  
13           to the office computer.

14           MR. STEINSAPIR: Yeah.

10:44:47 15           BY MR. FINALDI:

16           **Q     Okay. So your -- well, you said you had one at**  
17           **home. That's an office computer?**

18           A     It's linked to the office computer. They're  
19           all linked together.

10:44:57 20           **Q     Okay. And do you have hard files as well?**

21           A     Excuse me?

22           **Q     Do you have hard files as well that you keep?**

23           A     You mean, documents --

24           **Q     Yes. Like --**

10:45:08 25           A     Pieces of paper?

10:45:10 1 Q Yeah. Like a file cabinet.  
2 A Well, we talked about the file room. Yep.  
3 Q Okay. Have you ever made a search through your  
4 files for documents responsive to these?  
10:45:18 5 A My files are the office files. They're one in  
6 the same.  
7 Q Do you have any personal files --  
8 A No.  
9 Q -- that you --  
10:45:23 10 So you don't keep any types of personal --  
11 A Related to clients, no.  
12 Q Well, so another admonition is because the  
13 court reporter's taking down everything being said, it's  
14 important that only one person speak at a time. If we  
10:45:41 15 speak at the same time, in ordinary conversation, it  
16 would be perfectly acceptable but today if we do that, it  
17 will make it really difficult for the court reporter.  
18 So a good rule of thumb is if you just let me  
19 finish my question, give it a second, it will give your  
10:45:51 20 attorney a chance to object if he would like to before  
21 you answer. It will give you a second to think about the  
22 question before you answer and it will make it easier for  
23 the court reporter today.  
24 A Okay.  
10:46:00 25 Q So you're saying you don't have any personal

10:46:02 1 files that you keep related to your representation of Mr.  
2 Jackson?

3 A Correct.

4 Q How about photos or photo albums?

10:46:17 5 A I have no photo albums related to Mr. Jackson.

6 Q Okay. So from the times that you've gone on  
7 tour with him or gone to different types of events, you  
8 never have documented that with photographs that you've  
9 kept?

10:46:30 10 A Me, personally?

11 Q Yes.

12 A No. There are pictures but not that I've  
13 taken, no.

14 Q Okay. You don't have copies of the photos  
10:46:37 15 you're saying?

16 A I have copies of photos of me and Mr. Jackson,  
17 yes.

18 Q Is it safe to say that -- well, let me just  
19 keep going through it. Is it safe to say that you never  
10:47:03 20 made a personal search for any documents responsive to  
21 any of these requests, so we can shortcut it?

22 A Correct.

23 Q And the requests are the ones noted in Exhibit

24 A.

10:47:15 25 MR. STEINSAPIR: Correct.

10:47:15 1 BY MR. FINALDI:  
2 Q Do you have a work e-mail address?  
3 A Yes.  
4 Q What's the work e-mail address?  
10:47:26 5 A [REDACTED]  
6 Q And --  
7 MR. STEINSAPIR: Hold on a second. I'm going  
8 to designate the deposition record as confidential.  
9 MR. FINALDI: The entire thing?  
10:47:37 10 MR. STEINSAPIR: For right now, yes. But  
11 especially his e-mail address.  
12 BY MR. FINALDI:  
13 Q Okay. How long have you used that e-mail  
14 address?  
10:47:46 15 A I don't recall.  
16 Q What's your best estimate?  
17 A Excuse me?  
18 Q What's your best estimate?  
19 A Probably since an e-mail address was  
10:47:57 20 established at our firm.  
21 Q Which would have been?  
22 A I have no idea.  
23 Q Early 2000s, maybe?  
24 A Excuse me?  
10:48:04 25 Q Does early 2000s sound about right?

10:48:07 1 A I don't know.

2 Q Certainly, you were using e-mail before Mr.  
3 Jackson passed away, correct?

4 A Yeah.

10:48:13 5 Q Okay. And do you use e-mail some time to  
6 conduct business regarding Mr. Jackson or his entities?

7 A Yeah.

8 Q All right. Have you read anything in  
9 preparation for your deposition here today?

10:48:31 10 A I looked at my declaration.

11 Q And which declaration would that be?

12 A The declaration in this case.

13 Q Okay. It's my understanding that there was a  
14 declaration filed in this case related to a motion for  
10:48:46 15 summary judgment.

16 Is that what you understand it to be?

17 A I believe so.

18 Q It was -- so it was filed in support of a  
19 motion essentially to dismiss Wade's case, right?

10:48:57 20 A I believe so.

21 Q And did you draft the declaration?

22 A No.

23 Q Did you sign the declaration?

24 A Yeah.

10:49:06 25 Q Did you have a chance to review it for accuracy

10:49:09 1 before you signed it?

2 A Yes.

3 Q And did you make a determination before you  
4 signed it that everything contained within the

10:49:15 5 declaration was true --

6 A Yes.

7 Q -- as you knew it to be? Yes?

8 A Yep.

9 Q Okay. Have you ever filed, signed -- strike  
10:49:23 10 that.

11 Have you ever signed another declaration in any  
12 child sexual abuse case related to Mr. Jackson?

13 A Not that I recall.

14 Q Have you ever been deposed in any other case  
10:49:36 15 involving child sexual abuse and Mr. Jackson?

16 A Not that I recall.

17 Q So you never were deposed in the Jordie  
18 Chandler case?

19 A I don't recall. I don't believe so.

10:49:52 20 Q Were you ever called to testify in front of any  
21 grand jury?

22 A No.

23 Q Do you know if you were asked -- actually, so  
24 you didn't actually testify in front of the grand jury,  
10:50:05 25 correct?

10:50:06 1 A Correct.

2 Q Do you know if you were asked to? Were you  
3 served with a subpoena or informally asked?

4 A No.

10:50:13 5 Q Okay. Besides this declaration, did you review  
6 anything else in preparation for your deposition?

7 A No.

8 Q Okay. This case has been proceeding for  
9 several years. Are you -- so you understand that there  
10:50:26 10 have been several cases for child sexual abuse filed  
11 against Mr. Jackson's companies, correct?

12 A I don't know that they were filed against his  
13 companies. I'm not sure.

14 Q Okay. So you know about the Wade Robson case  
10:50:39 15 that we're here for today, correct?

16 A Correct.

17 Q Okay. Are you aware of the case that Jimmy  
18 Safechuck filed against MJJ Productions and Ventures?

19 A I recall there was one.

10:50:50 20 Q Okay. And are you aware of the case that was  
21 filed by Jane Doe against MJJ Productions and MJJ  
22 Ventures?

23 A I'm not sure what you're referring to so I  
24 don't recall.

10:51:06 25 Q Sure. *Jane AA Doe* ?

10:51:09 1 A No.  
2 Q *JANE AA Doe* [REDACTED]?  
3 A I don't recall that.  
4 Q Do you not know that there was a case filed by  
10:51:16 5 our office on behalf of a woman who alleged she was  
6 sexually abused by Mr. Jackson?  
7 A No, I don't recall.  
8 Q Now, are you aware there have been several  
9 depositions taken in these cases?  
10:51:32 10 A I believe so.  
11 Q Have you read any of the depositions that have  
12 been taken in this case?  
13 A No.  
14 Q Have you read portions of any of the  
10:51:40 15 depositions that have been taken in this case?  
16 A Not a single line.  
17 Q Okay. Haven't read Wade's deposition?  
18 A I wouldn't bother to, no.  
19 Q Okay. Why not?  
10:51:48 20 A Because I wouldn't believe a word of it.  
21 Q Not a word?  
22 A No.  
23 Q Okay. Why not?  
24 A Because I think he's a liar. He's clearly --  
10:51:59 25 he's committed perjury one time or another.

10:52:04 1           **Q     What do you mean by that?**  
2           A     He testified in the criminal trial that Michael  
3 did not molest him and all of a sudden he's testifying  
4 now Michael did. He lied one time or the other. I  
10:52:17 5 suspect it was in this case.  
6           **Q     Why do you say that?**  
7           A     Because I think he told the truth when he was  
8 younger. I understand he had a nervous breakdown so  
9 maybe he doesn't remember, maybe he doesn't know what  
10:52:29 10 he's talking about. That's not my position to judge.  
11           **Q     Okay. Do you have any other information that**  
12 **leads you to believe that he was telling the truth when**  
13 **he was younger and not today?**  
14           A     I think he needs money.  
10:52:41 15           **Q     Needs money. Anything else?**  
16           A     No. That's it.  
17           **Q     All right. Did you watch any interviews he**  
18 **gave?**  
19           A     God, no.  
10:52:59 20           **Q     No? Are you aware that he has given**  
21 **interviews?**  
22           A     No, I didn't know that.  
23           **Q     Okay. Have you ever met Wade Robson?**  
24           A     Yeah.  
10:53:07 25           **Q     How many times have you met him?**

10:53:08 1 A I don't recall.  
2 Q The time you do remember meeting him, when was  
3 that?  
4 A I think he came to my office. It was around  
10:53:16 5 2011.  
6 Q And how did that come about?  
7 A He asked to meet with me.  
8 Q Why did he ask to meet with you?  
9 A He wanted a job as a choreographer and/or  
10:53:30 10 director or something in the Cirque de Soleil show we  
11 were preparing.  
12 Q Which Cirque de Soleil was that?  
13 A It's called Michael Jackson One.  
14 Q And how long was that meeting?  
10:53:46 15 A I don't recall.  
16 Q Do you know who set up the meeting?  
17 A No.  
18 Q Do you know if it was set up by your office or  
19 one of Wade's people?  
10:53:53 20 A He called us.  
21 Q Personally?  
22 A I don't answer my phones. You'd have to ask my  
23 secretary.  
24 Q Who would that be?  
10:54:02 25 A Well, at the time it would have been Marquis

10:54:05 1 Davis.

2 Q How do you spell that? Marquis?

3 A M-A-R-Q-U-I-S.

4 Q D-A-V-I-S?

10:54:12 5 A Q-U-I-S.

6 Q No. No. The last name Davis?

7 A D-A-V-I-S.

8 Q And is Marquis no longer your assistant?

9 A Correct.

10:54:21 10 Q Do you know where Marquis works now?

11 A No.

12 Q Okay. The interview with him, was that at your

13 office?

14 A Yes.

10:54:32 15 Q In Los Angeles?

16 A Yeah.

17 Q Is that the only place you have an office?

18 A Yeah.

19 Q Okay. And who was in the interview besides you

10:54:45 20 and him?

21 A I don't know if it was an interview but it was

22 Wade Robson and me.

23 Q Okay. And how long did that meeting last?

24 A I think you asked me that. I don't recall.

10:54:54 25 Q What was the outcome of the meeting?

10:54:56 1 A We did not hire him.

2 Q Was that your decision not to hire him?

3 A In the end. I discussed it, I believe, with  
4 somebody at Cirque de Soleil -- I don't recall exactly --  
10:55:05 5 but we determined that he wasn't really qualified.

6 Q And that was your decision, you felt he wasn't  
7 qualified?

8 A We thought there were better people for the  
9 job.

10:55:16 10 Q Ah. Do you have an e-mail or a letter or  
11 something --

12 A No.

13 Q -- substantiating that?

14 A No.

10:55:29 15 Q No? Was there ever an e-mail or a letter sent  
16 to Wade or Wade's representative telling him that he was  
17 not --

18 A Why would there be? We didn't hire him.

19 Q Well --

10:55:40 20 A I didn't have an obligation to send him an  
21 e-mail to tell him we were hiring Jamie King to direct or  
22 Rich and Tone Talauega to be the choreographers. They  
23 were just better for the job. I don't need to embarrass  
24 Wade by telling him he wasn't good enough.

10:55:55 25 Q No.

10:55:55 1 A I had no animosity for him. I didn't hardly  
2 know the guy.

3 Q Yeah. My question was --

4 A So, no, there was no email.

10:56:00 5 Q Well, you can tell someone that they're not  
6 getting the job without telling them you don't think  
7 they're qualified.

8 A I'm sure that's what I did.

9 Q Okay. So you do think there was an e-mail?

10:56:10 10 A No, I didn't. I might have called him. He  
11 might have called me back.

12 Q And would that have been on your office line or  
13 cellphone?

14 A I don't recall.

10:56:16 15 Q Could have been either one?

16 A One of thousands of calls. I really don't  
17 recall.

18 Q Okay. What's your office line?

19 A (310) 552-██████

10:56:27 20 Q And what's your cellphone?

21 MR. STEINSAPIR: I'm going to instruct him not  
22 to answer that. It's not relevant. If you do want it  
23 for some reason, we can talk about it off line and I can  
24 get it for you but I don't want to put it on the record.

25

10:56:40 1 MR. FINALDI: Sure. Well, you want to go off  
2 the record and give it to me?

3 MR. STEINSAPIR: We can talk about it after the  
4 deposition.

10:56:51 5 BY MR. FINALDI:

6 Q So it's true that you use your cellphone to  
7 conduct business, correct?

8 A Yeah.

9 Q Okay. And you've used your cellphone to  
10:56:55 10 conduct business for years?

11 A Sure.

12 Q Okay. Do you know if you ever talked with Wade  
13 Robson on your cellphone?

14 A I have no idea, whatsoever.

10:57:04 15 Q Who's your cellphone provider?

16 A I don't recall.

17 Q Do you know who pays the bill?

18 A My office.

19 Q It's an office cellphone then?

10:57:14 20 A Yeah.

21 Q Okay. Like an iPhone or something?

22 A I have an iPhone and I have a flip top.

23 Q All right. And what was it about Wade that  
24 made you feel like he was not qualified?

10:57:33 25 MR. STEINSAPIR: Asked and answered. Go ahead

10:57:33 1 and answer again.

2 THE WITNESS: If I recall, I think I discussed  
3 it with Cirque. He may have actually worked with Cirque.  
4 I don't recall exactly but we felt that Jamie King was  
10:57:45 5 the best person to be the director and we had other  
6 choreographers who were quite good.

7 BY MR. FINALDI:

8 Q Okay. Is it true that you took part in  
9 choosing some of the people who were going to be involved  
10:57:59 10 in that Cirque show?

11 A Yes.

12 Q Is it true that you wanted to involve some  
13 people who had either known or worked with Mr. Jackson --

14 A Correct.

10:58:11 15 Q -- such as members of his band?

16 A Yes.

17 MR. STEINSAPIR: Just wait for him to finish  
18 the question.

19 THE WITNESS: Absolutely.

10:58:18 20 MR. STEINSAPIR: I know. I know. It's -- it's  
21 natural.

22 BY MR. FINALDI:

23 Q Have you ever read any depositions in any of  
24 the child molestation cases involving Mr. Jackson?

10:58:31 25 A No, I don't believe so.

10:58:32 1 Q None of the -- you haven't read any of the  
2 Jordan Chandler depositions?  
3 A That was 1993. 24 years ago. I don't really  
4 recall.  
10:58:53 5 Q Have you ever spoken to anyone about their  
6 depositions in this case, the Wade Robson case?  
7 A No.  
8 Q Ever speak to Evvy Tavasci about her deposition  
9 in this case?  
10:59:00 10 A I haven't talked to Evvy in 25 years.  
11 Q Have you ever met Norma Staikos?  
12 A Yes.  
13 Q And that was -- was that in relation to her  
14 employment with Mr. Jackson?  
10:59:19 15 A Yes.  
16 Q Did she ever communicate with you regarding  
17 things involving Mr. Jackson?  
18 A Sure.  
19 Q Okay. When's the last time you spoke with her?  
10:59:31 20 A Oh, 20 years ago, 17 years ago. I don't  
21 recall.  
22 Q Do you know where she lives?  
23 A No.  
24 Q Do you have her contact information?  
10:59:48 25 A Excuse me?

10:59:49 1 Q Do you have her contact information?  
2 A Me, personally?  
3 Q Yes.  
4 A No.  
10:59:53 5 Q Do you know if your work does?  
6 A Excuse me?  
7 Q Do you know if your work does?  
8 A I don't know. I don't know.  
9 Q So aside from your attorneys at the Weitzman  
11:00:10 10 firm, have you spoken to anyone in preparation for your  
11 deposition?  
12 A No.  
13 Q And getting back to your depositions, you said  
14 you've been deposed somewhere north of 5, perhaps, south  
11:00:19 15 of 10 times. Let's go through them.  
16 You were deposed in the tax case involving the  
17 Michael Jackson Estate, correct?  
18 A Correct.  
19 Q Were you deposed in the Quincy Jones case?  
11:00:34 20 A Yes.  
21 Q Which other times have you been deposed?  
22 A In my career?  
23 Q Yes.  
24 A I can't -- I don't recall.  
11:00:46 25 Q Okay. How about involving Mr. Jackson?

11:00:50 1 A I don't recall.  
2 Q No idea?  
3 A No idea.  
4 Q Okay.  
11:00:54 5 A Talking a period of 37 years.  
6 Q Yeah. 37 years?  
7 A Yeah. Don't recall.  
8 Q Okay. And so you can't even give an estimate?  
9 A No.  
11:01:03 10 Q All right. How many times have you testified  
11 in any type of a trial or a hearing involving --  
12 A Are you referring to within the context of a  
13 courtroom or in a deposition?  
14 Q Well, no, not a deposition. I'm talking about  
11:01:16 15 any type of an administrative hearing, a grand jury  
16 hearing, a trial involving Michael Jackson or his  
17 companies.  
18 A Oh, just involving Mr. Jackson.  
19 Q And his companies.  
11:01:28 20 A I don't recall the exact number.  
21 Q What's your best estimate?  
22 A Three, four, five.  
23 Q Which cases would those have been?  
24 A Quincy Jones, IRS, Raymone Bain.  
11:01:45 25 MR. STEINSAPIR: Yeah.

11:01:48 1 THE WITNESS: That's all I recall.

2 BY MR. FINALDI:

3 Q Did you ever sit for a deposition in the AEG  
4 case?

11:01:58 5 A I don't recall -- actually, there was one other  
6 one, I think, when the probate was opened. I testified  
7 on the phone in a probate court hearing.

8 MR. STEINSAPIR: Yeah.

9 BY MR. FINALDI:

11:02:14 10 Q Okay. And those are all the times, as you sit  
11 here today, you can recall testifying either in a trial  
12 or any type of setting regarding Michael Jackson and his  
13 businesses, right?

14 A Other than a deposition, yeah.

11:02:32 15 Q Yes. All right. Do you have kids?

16 A Yes.

17 Q How many kids?

18 A Is this relevant?

19 MR. STEINSAPIR: You can answer. You can give  
11:02:42 20 him the number.

21 THE WITNESS: Three.

22 BY MR. FINALDI:

23 Q And ages?

24 MR. STEINSAPIR: I'm going to instruct -- well,  
11:02:47 25 you can answer it if --

11:02:49 1 THE WITNESS: 29, 15, 13.

2 BY MR. FINALDI:

3 Q All right. And you've lived in the Los Angeles  
4 area for over 20 years, correct?

11:02:59 5 A Yeah.

6 Q [REDACTED]  
7 [REDACTED]

8 A [REDACTED]  
9 mother.

11:03:14 10 Q [REDACTED]

11 A [REDACTED]

12 Q Okay. All right. Your kids, I don't need  
13 their names but could I get their genders?

14 A The 29-year-old is female and the 15- and  
11:03:29 15 13-year-olds are males.

16 Q I'd like to go through your employment history  
17 involving Michael Jackson and his companies. So it's my  
18 understanding you were an entertainment lawyer for  
19 several years prior to coming into touch with Mr.  
11:03:48 20 Jackson, correct?

21 A For three years.

22 Q Three years. Okay.

23 And were there any significant musicians,  
24 entertainers, bands that you represented in that time  
11:04:00 25 period?

11:04:01 1 A Yes.

2 Q Which?

3 A Bob Dylan, Neil Diamond, George Harrison, Brian

4 Wilson, the Beach Boys.

11:04:10 5 Q Okay. And so eventually -- how did you come

6 into contact with Mr. Jackson?

7 A A meeting was set up by an accountant who

8 handled the Beach Boys and also handled Michael Jackson.

9 Q Who was that?

11:04:27 10 A Michael Mesnick.

11 Q And did he say essentially that Mr. Jackson was

12 looking for a representative?

13 A Yeah. If I recall Michael was -- had turned 21

14 or about to turn 21 and he wanted to hire his own lawyer.

11:04:48 15 Q Was that during a time when he wanted to kind

16 of separate himself as an individual entertainer like

17 apart from the family?

18 A Yes.

19 Q All right. So you had a series of meetings

11:05:00 20 with him and eventually he hired you?

21 A One meeting.

22 Q One meeting. Hired you at the meeting?

23 A No. The next day, I believe.

24 Q And were you with Ziffren at the time?

11:05:10 25 A No. I was with Hardee, Barovick, Konecky and

11:05:15 1 Braun. I'm afraid you're going to ask me to spell it.  
2 Q No.  
3 A Maybe it was called Barovick, Konecky, Braun.  
4 Q I'm sure we can find it.  
11:05:21 5 A The shift at the time.  
6 Q I'll just go with Hardee.  
7 And so at the time, it's my understanding he  
8 had already had a corporation to run his business; is  
9 that correct?  
11:05:36 10 A I believe he had one but --  
11 Q Michael Jackson Productions, Inc.  
12 A Yes. MJJ Productions.  
13 Q Well, it's my understanding it was called  
14 Michael Jackson Productions, Inc. first.  
11:05:48 15 A Well, I'm sure you're correct. We refer to it  
16 as MJJ Productions.  
17 Q Okay. My understanding that in 1982, the name  
18 was changed to MJJ Productions, Inc.  
19 Does that refresh your recollection?  
11:05:58 20 A Well, you, obviously, know more about it than I  
21 do.  
22 Q Well, it's actually in your declaration.  
23 A Okay.  
24 Q That's where I got it.  
11:06:05 25 A I didn't recall that.

11:06:07 1 Q Okay. Were you ever involved in any of that  
2 paperwork and work related to the corporation?  
3 A Well, our office handled it.  
4 Q Okay. So it's true that throughout your career  
11:06:26 5 of representing Mr. Jackson and his companies, you've  
6 held different roles, right?  
7 A Well, I was always the lawyer.  
8 Q Okay. Always the lawyer. But sometimes in  
9 finding, negotiating and advising on deals?  
11:06:43 10 A That was always part of the job.  
11 Q Okay. And also in helping him to form and to  
12 do things with respect to his corporations, his corporate  
13 entities, correct?  
14 A We always maintain the corporate books,  
11:06:58 15 correct.  
16 Q Okay. You've held positions on some of his  
17 corporations at times, correct?  
18 A I guess in name, yes. The truth is that the  
19 companies were always owned by Michael. They were his  
11:07:11 20 personal companies.  
21 Q You've never had an ownership stake in any of  
22 his companies, correct?  
23 A Any of his companies?  
24 Q Yes.  
11:07:18 25 A Correct. I mean, I had a carried interest in

11:07:24 1 Sony ATV but not MJJ Productions, not MJJ Ventures.

2 Q Okay. With respect to Sony AEG --

3 A Sony ATV.

4 Q Sorry. ATV. You had a carried interest in

11:07:37 5 some of the --

6 A In Michael's half of the company.

7 Q Okay. So, essentially, you got a percentage of  
8 what Michael got?

9 A Correct.

11:07:44 10 Q And is it true that throughout your career of  
11 representing Michael Jackson, that's kind of how your  
12 compensation worked, it was on a percentage basis?

13 A [REDACTED].

14 Q Initially?

11:08:04 15 A And then it was a percentage on certain  
16 projects but not everything.

17 Q Which types of projects did you get a  
18 percentage of?

19 A Well, it was -- from time to time, [REDACTED]

11:08:19 20 [REDACTED],

21 [REDACTED] And then later on when we  
22 merged Sony and ATV, he gave us 5 percent on his half of  
23 the company but that was generally the situations where  
24 we had a percentage.

11:08:38 25 Q Okay. So your positions on -- with his

11:08:43 1 companies, whether as a director or an officer, were  
2 those non-paid positions?

3 A Correct.

4 Q So Michael Jackson hires you. Was it your  
11:09:04 5 decision or his decision to change the name of the  
6 company?

7 A To what?

8 Q To change the name of the company to MJJ  
9 Productions.

11:09:11 10 A I don't recall.

11 Q Okay. What was the company formed to do?

12 A MJJ Productions, provide his recording services  
13 to Epic Records now known as Sony.

14 Q Right. So I'm a non-entertainment industry  
11:09:35 15 insider. So could you put a little more flush on that  
16 for me so I can understand exactly what it was that his  
17 corporation did.

18 A It was a loan out company that Michael owned  
19 100 percent and controlled 100 percent and that is the  
11:09:48 20 company that contracted with the record company with  
21 regards to Michael's recordings.

22 Q Okay. And did it have employees?

23 A Excuse me?

24 Q Over the years, did it have employees?

11:10:05 25 A Oh, I don't recall. You know, Michael from

11:10:08 1 time to time had a few employees but whether they were  
2 employed by MJJ Productions or another one of his  
3 entities, I don't recall.

4 Q Did you ever draft documents for employees of  
11:10:26 5 MJJ Productions?

6 A I don't recall. We -- we -- we were involved  
7 in documentation of things like producer agreements with  
8 MJJ Productions but I don't recall employees. That's a  
9 different --

11:10:39 10 Q How about confidentiality agreements, NDAs  
11 involving MJJ employees?

12 A I don't recall.

13 Q Separation agreements or severance agreements?

14 A Again, I don't recall if MJJ Productions  
11:10:55 15 employed people or they were employed by other companies.

16 Q Okay. Did you ever handle any of the billing  
17 or accounting records for MJJ Productions?

18 A No.

19 Q All right. Did you know that MJJ Productions,  
11:11:14 20 the company, had employees on payroll?

21 A It wouldn't surprise me. Michael did have  
22 employees but there were several companies that Michael  
23 transacted business through. So whether the employees  
24 were of MJJ Productions or another company, I don't  
11:11:31 25 recall without going back to look.

11:11:34 1 Q Okay. Was one the first kind of big events  
2 that happened with Michael after you started representing  
3 him the whole Thriller video deal?

4 A That occurred in 1983 or 1984. I started  
11:12:01 5 representing him in January of 1980.

6 Q Okay. And was that a -- the Thriller, you  
7 know, evolution, was that a pivotal part of his career?

8 A Sure. Absolutely.

9 Q It's my understanding that you kind of played a  
11:12:18 10 key role in the video, is that correct, negotiating the  
11 video deal?

12 A Correct.

13 Q Because it was very expensive for the time,  
14 right?

11:12:25 15 A Correct.

16 Q And you found funding for it?

17 A Correct.

18 Q Okay. And then it's my understanding also that  
19 at one point in time -- so you know that Michael was a --  
11:12:34 20 at one point in time a member of the Jehovah's Witnesses,  
21 right?

22 A Correct.

23 Q He and his family were very devout members of  
24 the organization, correct?

11:12:45 25 A Well, he and his mom. [REDACTED]

11:12:48 1

[REDACTED]

2 Q Okay. And at one point in time, it's my  
3 understanding that he had -- I guess the video had been  
4 finished for Thriller but he had hesitation about putting  
11:13:01 5 it out because of his religious beliefs; is that true?

6 A Yes.

7 Q And could you explain what -- what the deal was  
8 with that essentially?

9 A I think the elders in the church heard about  
11:13:10 10 the video and Michael turning into a werewolf and they  
11 alarmed Michael that it could affect his standing in the  
12 church so Michael became very concerned.

13 Q And he essentially called you, said, Destroy  
14 the video, don't put it out, right?

11:13:30 15 A He did say that.

16 Q Okay. As of that time, you had already seen  
17 the video, right?

18 A I don't recall if I had seen it. It wasn't --  
19 there wasn't a final cut, I don't believe. I don't  
11:13:41 20 recall. But I obviously knew the contents of the video.

21 Q Gotcha. And you were able to work a solution  
22 to that, right?

23 A Yeah. Over a period of several days, Michael  
24 and I talked.

11:13:56 25 Q And what was the solution?

11:13:58 1 A We put a disclaimer on the video that the film  
2 and the content did not reflect his personal views.

3 Q Okay. And how did you get him to agree to do  
4 that?

11:14:13 5 A I came up with the idea of putting a disclaimer  
6 on it that would indicate that Michael was not endorsing  
7 a belief in werewolves and that seemed to satisfy him.

8 MR. STEINSAPIR: Counsel, just for the record,  
9 this story is public and so it's -- but it would  
11:14:36 10 otherwise be privileged and I just want to make it clear  
11 because it's public I'm, obviously, letting him testify  
12 about it but it's not a waiver of privilege for  
13 anything --

14 MR. FINALDI: Okay.

11:14:45 15 MR. STEINSAPIR: -- else.

16 BY MR. FINALDI:

17 Q Okay. It's my understanding that you told  
18 him that -- well, Bela Lugosi, who used to play Dracula  
19 and other monsters in horror films of the day was  
11:15:02 20 devoutly religious and he put disclaimers on his movies,  
21 correct?

22 A I did say that to Michael, correct.

23 Q And do you know if Bela Lugosi actually did put  
24 disclaimers on any of his movies?

11:15:15 25 A Honestly, I made that story up. I mean, I was

11:15:18 1 a fan of monster movies, so I watched Boris Karloff and  
2 Bela Lugosi and Lon Chaney, Jr. and Vincent Price, so I  
3 had a working understanding of monster movies and I knew  
4 they were for fun. They were not to be taken seriously  
11:15:40 5 and I was only trying to connect with Michael on an  
6 emotional level that would solve the emotional issues so  
7 that we could have a conversation about the business and  
8 intellectual aspect of it.

9 Q Okay. When you were providing Mr. Jackson  
11:15:48 10 advice regarding Thriller and all that kind of stuff,  
11 that was in your capacity as a lawyer, right?

12 A Yes. Lawyer/manager.

13 Q All right. So throughout -- throughout the  
14 tenure or the existence of MJJ Productions, Inc., do you  
11:16:13 15 know if there have ever been any shareholders other than  
16 Mr. Jackson as of the point in time where he passed away?

17 A No, I don't believe so.

18 Q Okay. He was the only shareholder that you've  
19 ever been aware of?

11:16:26 20 A Yes.

21 Q All right. And so the positions that you've  
22 held with that company, it's my understanding you were a  
23 director in one point in time, correct?

24 A I believe so.

11:16:47 25 Q Okay. And were you an officer at one point in

11:16:52 1 time as well, correct?

2 A Yes.

3 Q Okay. It's my understanding that Michael was  
4 the sole director of the MJJ Productions, Inc. until

11:17:09 5 June 1, 1994, correct?

6 A I don't recall.

7 Q Do you recall -- you can -- feel free to refer  
8 to your declaration. Do you have a copy of it?

9 MR. STEINSAPIR: I have a copy for him.

11:17:22 10 THE WITNESS: If I said that in my declaration,  
11 it's true.

12 BY MR. FINALDI:

13 Q All right. I'm going to mark this, just make  
14 sure we're all on the same page, so you can refer to your  
11:17:30 15 declaration from time to time if you'd like to and I'm on  
16 page 6 of it, which references MJJ Productions, Inc. So  
17 Exhibit C -- you can thumb through and familiarize  
18 yourself with it. This is the declaration that you  
19 signed in this case, correct?

11:17:46 20 A Correct.

21 MR. STEINSAPIR: Let me just make sure. Let me  
22 make sure it has all the pages on it.

23 MR. FINALDI: No problem.

24 MR. STEINSAPIR: I'm sure it does. I just want  
11:17:56 25 to -- and for the record, there's exhibits to the

11:17:58 1 declaration. They're not attached here but --  
2 MR. FINALDI: Correct.  
3 MR. STEINSAPIR: -- it's fine.  
4 THE WITNESS: Yes. Your statement's correct.  
11:18:04 5 BY MR. FINALDI:  
6 Q Okay. And the last page, can you double check  
7 that and make sure that is actually your signature that  
8 you signed?  
9 A Yes, looks like it.  
11:18:14 10 Q So page 6 it says Michael Jackson was the sole  
11 director of MJJ Productions, Inc. until June 1st, 1994.  
12 That's true?  
13 A Yes.  
14 Q Okay. And it says on that date he amended the  
11:18:24 15 bylaws to increase the number of directors to include  
16 yourself, Sandy Gallin and Marshall Gelfand. That's true?  
17 A I believe so, yeah.  
18 Q Do you know why that change was made?  
19 A I don't recall.  
11:18:41 20 Q Is that something -- did he ask you if you  
21 wanted to be a director?  
22 A I don't recall.  
23 Q Nevertheless, you agreed to be a director?  
24 A Yep.  
11:18:47 25 Q Okay. And after you became a director, it says

11:18:51 1 you remained a director of that corporation at least  
2 through the end of 1997, right?

3 A Correct.

4 Q Okay. So during that time period, June of '94,  
11:19:06 5 through December of '97, do you remember there being  
6 board meetings that you went to for this corporation?

7 A I don't recall. The people that were on the  
8 board were basically the people that worked for Michael  
9 and myself, Sandy Gallin and Marshall Gelfand, so we  
11:19:26 10 would occasionally have meetings together. I don't  
11 recall if they were designated and called as official  
12 board meetings or just meetings of Michael's team.

13 Q Were there ever minutes kept at those meetings?

14 A I believe my office maintained annual minutes  
11:19:42 15 to keep the corporate book up-to-date but I don't recall  
16 if we took actual minutes of occasional meetings.

17 Q Do you know where those minutes would be today?

18 A Well, they would have been kept in my office.

19 Q And they've never been destroyed that you know  
11:20:02 20 of?

21 A Not by me.

22 Q Gotcha. All right. And the next page it says,  
23 during various times, you were an officer of MJJ  
24 Productions, Inc., generally, the secretary, correct?

11:20:17 25 A I said yes.

11:20:18 1           **Q**     Okay. And what were your duties as a  
2           **secretary?**

3           A     I'm not sure I had any duties. It's pro forma.

4           **Q**     What do you mean by that?

11:20:30 5           A     I think as secretary, my office was expected to  
6           maintain the corporate books but since this was a -- in  
7           effect a sole proprietorship and a loan out corporation  
8           of Michael, it wasn't -- wasn't that the persons  
9           operating it had assignments other than what they were  
11:20:50 10          already doing for Michael as lawyer, accountant, manager.

11           **Q**     Okay. Now, in your capacity as either the  
12          **secretary or a director of MJJ Productions, Inc., did you**  
13          **ever come across any types of policies or procedures for**  
14          **the corporation?**

11:21:10 15          A     Not that I recall.

16           **Q**     No policy or procedure manuals that you can  
17          **be --**

18           A     I don't recall --

19           **Q**     -- remember?

11:21:19 20                   **The time that you did serve as a director of**  
21          **MJJ Productions, Inc. was after the first sexual abuse**  
22          **allegations arose against Mr. Jackson, correct?**

23           A     I think chronologically, that's correct.

24           **Q**     Okay. When is the first time you ever became  
11:21:42 25          **aware that Mr. Jackson was being accused of any sexual**

11:21:43 1 **impropriety involving a child?**

2 A I don't recall if I learned of the Jordan  
3 Chandler allegations in the newspaper or from -- or after  
4 Michael hired me back in '93. I don't recall.

11:22:02 5 **Q Okay. But the Chandler allegation would be the**  
6 **first one you were ever made aware of?**

7 A Correct.

8 **Q Okay. And so you were hired by him in 1980,**  
9 **you worked as his attorney until when was the first time**  
11:22:23 10 **that you stopped?**

11 A It was either late '89 or early '90, somewhere  
12 in that period.

13 **Q And what was the reason for that? The --**

14 A Michael made a decision to let us go.

11:22:33 15 **Q Was there any kind of event or something that,**  
16 **you know, transpired that you know of or was it just --**

17 A No.

18 **Q All right. And then when you were brought back**  
19 **on, it was my understanding, in '93 or so, do you know --**

11:22:52 20 A Late '93. Yeah, '93.

21 **Q Do you know what transpired to bring that**  
22 **about?**

23 A I think there were a couple of things. There  
24 was some conversation Michael was having with his music  
11:23:08 25 publishing lawyer about possibly selling part of his

11:23:11 1 interest in ATV music publishing. I think that there was  
2 some tour cancellations, Mexico, and then I think there  
3 were these Chandler allegations that Michael was quite  
4 disturbed about.

11:23:29 5 Q Is it true that in the first stage of your  
6 representation of Mr. Jackson that he had a good -- good  
7 business reputation, good reputation in the community?

8 A Yes.

11:23:45 10 Q Okay. And that held true through the time that  
11 your first period of service was terminated, right?

12 A Yes.

13 Q No major scandals or allegations or anything  
14 during that time period, right?

15 A Correct.

11:23:57 16 Q Now, the second time period that you  
17 represented him would cover, essentially, '93 through  
18 about 2005; is that right?

19 A Correct. Although there was a short period of  
20 time somewhere in the '90s where I was technically not  
21 representing him.

22 Q Okay. Do you know when in the '90s that was?

23 A No.

24 Q Do you know what that period was? Was there an  
album he was working on or --

11:24:23 25 A God. It was probably '99 or 2000, around

11:24:28 1       there. I don't really recall.

2           **Q     All right. So --**

3           A     And I would say also probably after 2002, I was  
4       hardly involved, I didn't have much contact with him even  
11:24:45 5       though, technically, I remained on the legal team until  
6       around 2005 or 2006.

7           **Q     Okay. So you come back on in 1993 and as -- in**  
8       **the entertainment industry as someone's attorney in the**  
9       **capacities that you held, is it true that one of your**  
11:25:07 10      **jobs is to market the talents of whoever the entertainer**  
11      **is?**

12          A     Well, that's really the manager's job more so  
13      than the lawyer but the lawyer participates.

14          **Q     Facilitate it through working deals --**

11:25:25 15          A     Yeah.

16          **Q     -- negotiating deals? Yes? Okay.**

17                 **And is it true that in this time period,**  
18      **especially, in the beginning, there were some issues**  
19      **related to Mr. Jackson's reputation that you had to deal**  
11:25:37 20      **with as his attorney that had resulted from the Chandler**  
21      **allegations?**

22                 MR. STEINSAPIR: Okay. Just for clarification,  
23      you said in the beginning and I think you mean in the  
24      beginning of his --

11:25:45 25                 MR. FINALDI: In the beginning of his -- yes,

11:25:45 1 '93.

2 MR. STEINSAPIR: Yeah. When he started to  
3 represent him again in late '93. So subject to that, you  
4 can answer.

11:25:52 5 THE WITNESS: Yeah. You know --

6 BY MR. FINALDI:

7 Q Does the question make sense? Because I can  
8 rephrase it.

9 A No.

11:25:59 10 Q Okay. All right. Now -- so you're working  
11 with Mr. Jackson until, you know, the late '80s. He has  
12 a good reputation, there's no allegations against him,  
13 for whatever reason the services discontinued. You come  
14 back in '93. And as of this point in time, there had  
11:26:14 15 been the Chandler allegations out, right? They're in the  
16 newspaper. They're in the press.

17 Is it true that you had to deal with these  
18 issues regarding his image?

19 A Again, he had a manager and that was his job  
11:26:27 20 primarily, not mine.

21 Q Okay.

22 A And because I do know that we mounted a  
23 successful tour in '97 and a successful album, so I don't  
24 know if that's true.

11:26:43 25 Q Okay. In 1993, '94, '95, were you dealing with

11:26:48 1     **issues such as certain sponsors not wanting to be related**  
2     **with him because the allegations?**

3           A     I don't -- I don't recall -- I don't know if  
4     that's true because you usually only get a sponsor when  
11:26:59 5     there's a tour and he didn't tour again until '97, I  
6     believe.

7           Q     **Isn't it true that at one point in time he had**  
8     **Pepsi as a title sponsor?**

9           A     Yes.

11:27:08 10          Q     **Okay. Isn't it true that afterwards there were**  
11     **several concerts where it was -- you couldn't get a main**  
12     **sponsor for the concerts because of the allegations?**

13          A     Honestly, I don't recall. The History Tour was  
14     a foreign tour. He only did two dates in Honolulu. And  
11:27:23 15     I don't even -- I don't recall. I think we may have had  
16     a sponsor. It might not have been Pepsi so I don't  
17     recall.

18                   I mean, if you're asking me would allegations  
19     like the Chandler allegations be a positive impact on an  
11:27:38 20     entertainer's career, the answer is of course not.

21          Q     **My question was a little different. In the IRS**  
22     **case, you testified that one of your jobs or one of the**  
23     **things you dealt with was, you know, trying to market --**  
24     **you know, find deals for Michael or his companies and**  
11:27:53 25     **that it was difficult because of the allegations; is that**

11:27:56 1 true?

2 A That's true. Well, you asked me about  
3 sponsorship.

4 Q Okay.

11:27:59 5 A Sponsorship relates to a tour.

6 Q Okay.

7 A If you're asking about endorsements and  
8 merchandising, yes, it became difficult to get  
9 endorsement deals.

11:28:09 10 Q There was some testimony about finding a title  
11 sponsor for a concert and it was difficult to do that  
12 because of the allegations?

13 A Yeah, that's true.

14 Q Okay. In any of the meetings that you were in  
11:28:23 15 as either a board member, director, officer for MJJ  
16 Productions, Inc., were the allegations ever discussed?

17 A Not -- again, we didn't have formal board  
18 meetings. The company was Michael's own company  
19 100 percent. We had meetings where Michael and his  
11:28:42 20 manager and I might meet to talk about opportunities and  
21 career things and just -- but they weren't formal board  
22 meetings, per se.

23 Q Okay. Were there ever any board -- any  
24 meetings of the board, directors, officers of MJJ  
11:28:58 25 Productions, Inc. after the first allegations of sexual

11:29:00 1 misconduct arose to discuss any changes to the way that  
2 MJJ Productions, Inc. does business?

3 A Not that I recall.

4 Q Were there ever any kind of changes to the  
11:29:15 5 policies and procedures of MJJ Productions, Inc. that  
6 came about as a result of the sexual abuse allegations?

7 A Well, you're referring to policies and  
8 procedures as if this was a large corporation. This was  
9 a sole shareholder company so policies and procedures  
11:29:32 10 is -- implies a large organization of people of which  
11 there wasn't.

12 Q Okay.

13 A So the answer's no.

14 Q Okay. Do you know Gary Hearn?

11:29:53 15 A Who?

16 Q Gary Hearn, Mr. Jackson's former limousine  
17 driver.

18 A No.

19 Q Don't remember ever meeting him?

11:30:01 20 A I might have but I don't -- generally don't  
21 recall names of limousine drivers. I don't mean that in  
22 any sort of --

23 Q Okay.

24 A -- derogatory way. I just -- I just don't.

11:30:12 25 MR. STEINSAPIR: Derogatory.

11:30:13 1 BY MR. FINALDI:

2 Q I'm not a limo driver so --

3 A If I had a limo driver and he worked for me  
4 every day, I would know his name.

11:30:19 5 Q Okay. Now, Mr. Hearn testified in this case.  
6 He testified that he was actually an employee of MJJ  
7 Productions, Inc. You had no knowledge of that?

8 A I don't recall.

9 Q Okay. He said he actually had an MJJ  
11:30:33 10 Productions, Inc. credit card that he would use to make  
11 purchases?

12 A That probably is a question Michael's  
13 accountants could answer but -- but I don't recall.

14 Q Gotcha. He said that from time to time, he  
11:30:48 15 would be tasked with doing things by Mr. Jackson. One of  
16 them would be to go out into the community and purchase  
17 toys for kids. Did you have any knowledge of that?

18 A What were the years he worked for -- claimed to  
19 work for Michael?

11:31:04 20 Q So he --

21 MR. STEINSAPIR: He worked for -- I can say it.  
22 Gary worked for Michael from '91 to 2005 around.

23 THE WITNESS: Okay.

24 MR. STEINSAPIR: He was Michael's driver.

11:31:15 25 THE WITNESS: I don't know if he bought toys

11:31:17 1 for Michael. I have no idea.

2 BY MR. FINALDI:

3 Q Okay. Is that a function that would  
4 traditionally be carried out by an employee of a loan out  
11:31:30 5 corporation such as MJJ Productions, Inc.?

6 A Might be carried out by a secretary, by a  
7 gofer, by, perhaps, a limousine driver. I don't know.

8 Q Okay. And what would the business function of  
9 that be?

11:31:41 10 MR. STEINSAPIR: It calls for a legal  
11 conclusion.

12 THE WITNESS: A business function?

13 BY MR. FINALDI:

14 Q Yeah. For the corporation?

11:31:46 15 A Goodwill, promotion.

16 Q Goodwill, promotion. Okay.

17 It's my understanding -- well, I think possibly  
18 the world's understanding that part of Mr. Jackson's  
19 probably persona, personality involved kids, right? He  
11:32:01 20 loved kids?

21 A Yes, he did.

22 Q Okay. And he would go on tour and have kids  
23 with him on tour, right?

24 A I don't know if that's true. He would have  
11:32:10 25 kids come up on stage occasionally.

11:32:12 1 Q A lot of his shows he'd have kids come up on  
2 stage with him, correct?  
3 A Yeah.  
4 Q Okay. He would -- well, he had a home that had  
11:32:19 5 rides and zoos and all that stuff for kids, right?  
6 A You're talking about later. I don't know -- I  
7 don't recall what happened on the '84, '87 tours. I  
8 wasn't there in the '92 tour but you're talking maybe  
9 later tours and then Neverland was purchased, I believe,  
11:32:36 10 in '85, yeah.  
11 Q He would --  
12 A Actually, maybe not.  
13 MR. STEINSAPIR: It's in your declaration but  
14 it's okay.  
11:32:45 15 BY MR. FINALDI:  
16 Q He would invite kids to Neverland?  
17 A Sick kids.  
18 Q Disadvantaged kids, right?  
19 A Dying kids, yes.  
11:32:52 20 Q Okay. And that was widely known, there was  
21 cameras, there was videos and it was known in the public,  
22 correct? It's not a secret?  
23 A Yeah. It was known.  
24 Q Mr. Hearn said that he also was tasked with  
11:33:15 25 using that corporate credit card to buy jewelry for a

11:33:21 1 parent of a child. Did you have any knowledge of that?  
2 A No.  
3 Q Do you know what the corporate purpose of that  
4 would be?  
11:33:28 5 A No.  
6 Q Okay. Could you think of one as you sit here  
7 today?  
8 MR. STEINSAPIR: It calls for speculation. Go  
9 ahead.  
11:33:38 10 THE WITNESS: I don't want to speculate.  
11 BY MR. FINALDI:  
12 Q Okay. You've heard the name Blanca Francia  
13 before?  
14 A Vaguely so.  
11:33:54 15 Q One of Michael Jackson's maids, his  
16 housekeeper, whatever term you would like to use. Have  
17 you ever met her?  
18 A Not that I recall.  
19 Q When you first met Michael, was he living at  
11:34:05 20 Hayvenhurst?  
21 A No -- well, yes. But he renovated Hayvenhurst  
22 after I first started representing him so I don't recall  
23 where he lived during the renovation.  
24 Q During the time you worked with Michael, he had  
11:34:24 25 resided at Hayvenhurst at a period of time, correct?

11:34:28 1 A Correct.

2 Q With his family members?

3 A Correct.

4 Q He had also resided at a place -- did you know

11:34:34 5 he resided at a place that he called the Hideout?

6 A In Westwood?

7 Q One in Westwood in a high-rise, correct?

8 A Yeah.

9 Q And then also one in Century City off Galaxy

11:34:44 10 Way?

11 A I don't recall that one.

12 Q You don't know that one, 2-story condo?

13 A I don't recall.

14 Q Okay. And you know about Neverland as well,

11:34:52 15 correct?

16 A Yeah. I helped buy Neverland.

17 Q You helped him negotiate that deal, right?

18 A Yeah.

19 Q Okay. Did you ever hold any type of an

11:35:00 20 interest in Neverland?

21 A No.

22 Q Never were on title or --

23 A No.

24 Q Okay. Never gave any loans on the property?

11:35:07 25 A No.

11:35:07 1 Q Held any kind of liens?  
2 A No.  
3 Q You doing okay on time?  
4 A Yeah.  
11:35:16 5 Q If you need a break, let me know.  
6 A Okay.  
7 Q So Blanca Francia said that she was actually an  
8 employee of MJJ Productions, you know, her checks when  
9 she got them said MJJ Productions, Inc. when she got  
11:35:34 10 them.  
11 Did you have any knowledge of that while you --  
12 A No.  
13 Q -- were officer or director? No?  
14 When you -- is it true that when you were an  
11:35:40 15 officer or director of MJJ Productions, Inc., you really  
16 had no knowledge of who the employees of the corporation  
17 were?  
18 A I wouldn't say I had no knowledge. But at this  
19 point in time, I don't recall who the employees were.  
11:35:56 20 Q Do you know of anything you can reference that  
21 could refresh your recollection?  
22 A You know, I suppose if one went back into the  
23 accounting records, one could find out.  
24 Q And that would be -- it would be held by which  
11:36:18 25 firm?

11:36:19 1 A Michael Kane.  
2 Q When's the last time you spoke with Michael  
3 Kane?  
4 A Last week.  
11:36:27 5 Q Does he still do work for the estate?  
6 A Yes.  
7 Q And you brought him in to work with the estate,  
8 correct?  
9 A No. Michael did. I inherited Michael Kane.  
11:36:39 10 Q Michael Kane came in on essentially the same  
11 time you came in which is a couple days before he died;  
12 is that right?  
13 A I don't know. Michael Kane was, to my  
14 knowledge, Michael Jackson's accountant prior to  
11:36:53 15 Michael's passing away. I don't know when he was hired  
16 because I wasn't involved and we've kept him.  
17 Q Mr. DiLeo brought him in?  
18 A DiLeo?  
19 Q Yes.  
11:37:04 20 A I don't know. I wasn't there.  
21 Q Did you know Mr. Kane before he began working  
22 for Mr. Jackson?  
23 A No.  
24 Q Didn't know him when he worked for Mr. Gelfand?  
11:37:18 25 A No.

11:37:19 1 Q Are you -- is Mr. Gelfand still alive?  
2 A I believe he is.  
3 Q Are you still in touch with him?  
4 A No, I haven't talked to him in quite sometime.  
11:37:31 5 Q How long would that be?  
6 A I haven't talked to him since Michael passed  
7 away.  
8 Q Okay. So, essentially, what you're saying is  
9 Michael Jackson is -- you know, perhaps, you can put it  
11:37:54 10 in better words -- correct me if I'm wrong -- but he's  
11 the only one who's running this corporation; is that  
12 correct?  
13 A Correct.  
14 Q Okay. Right?  
11:38:04 15 A Correct.  
16 Q He's the head honcho, he makes all the  
17 decisions, he's running the entire thing?  
18 A He's the head honcho.  
19 Q Okay. And if he knows about something  
11:38:14 20 happening in the corporation then the corporation knows  
21 about it, correct?  
22 MR. STEINSAPIR: That calls for a legal  
23 conclusion. You can answer.  
24 THE WITNESS: Yeah. I -- I don't want to --  
25

11:38:22 1 BY MR. FINALDI:

2 Q Essentially, you're saying he is the  
3 corporation?

4 A Yeah.

11:38:26 5 Q Okay. Let's talk about MJJ Ventures, Inc.  
6 briefly.

7 A Okay.

8 Q My understanding it was incorporated in 1991?

9 A Yes.

11:38:41 10 Q Did you or your firm assist in the formation of  
11 that company?

12 A No.

13 Q Do you know who did?

14 A I don't recall. We were not representing

11:38:51 15 Michael at the time it was formed.

16 Q Okay. It's my understanding the business  
17 purpose of that was to be kind of a joint venture with  
18 Sony?

19 A Correct.

11:39:00 20 Q Okay. So any types of projects that were done  
21 between Mr. Jackson and Sony would be done through that  
22 company; is that right?

23 A Correct.

24 Q Okay. And which types of projects were those?

11:39:13 25 A Michael signed the recording artist known as

11:39:16 1 3Ts. I think he had the rights to a sound track album to  
2 Free Willy. There was some talk about some other  
3 projects.

4 Q 3T would be his nephews Taj, Taryll and --

11:39:29 5 A TJ.

6 Q -- TJ?

7 A Correct.

8 Q You ever met them?

9 A Yeah.

11:39:34 10 Q Did you ever represent them?

11 A No.

12 Q Okay. Did you ever have any knowledge of MJJ  
13 Productions, Inc. employing children?

14 A Employing who?

11:39:47 15 Q Children.

16 A Not -- I don't -- I don't recall.

17 Q As you sit here today, do you have any  
18 understanding that MJJ Productions, Inc. actually did  
19 employ kids?

11:39:59 20 A I don't know.

21 Q Okay. So they may have but you just --

22 A I don't recall. I don't know.

23 Q Okay. Same question as to MJJ Ventures, Inc.?

24 A Yeah. I don't know. I don't know.

11:40:15 25 Q That being said, you don't remember there being

11:40:18 1 any specific policies or procedures of either corporation  
2 relating to children --

3 A No.

4 Q -- specifically?

11:40:27 5 Do you remember ever discussing issues related  
6 to children as a director or an officer of either MJJ  
7 Ventures, Inc. or MJJ Productions, Inc.?

8 A As an attorney.

9 MR. STEINSAPIR: As an attorney, then, I  
11:40:44 10 instruct you not to answer the question.

11 BY MR. FINALDI:

12 Q How about just as a board member or as an  
13 officer?

14 A My -- my role and my function with Michael  
11:40:55 15 Jackson was as his attorney.

16 Q Okay. So is the answer --

17 A There was no additional duty that I had as a  
18 director or of an officer that was separate from what I  
19 did for him as his attorney.

11:41:15 20 Q Okay. So as just a director or an officer, you  
21 never remember dealing with any issues related to  
22 children involving any of the corporations, right?

23 A Correct.

24 Q Okay. So MJJ Ventures, Inc. -- so it's my  
11:41:41 25 understanding during essentially the same time period,

11:41:43 1 1994 June through the end of '97, that's when you were a  
2 director of MJJ Ventures, Inc., correct?  
3 A Correct.  
4 Q All right. So you served as the director for  
11:41:54 5 MJJ Ventures, Inc. at the same time you were serving as a  
6 director of MJJ Productions, Inc.?  
7 A Correct.  
8 Q Okay. Next page. And also is it the same  
9 answer regarding your being an officer of MJJ Ventures,  
11:42:08 10 Inc.?  
11 A Same answer.  
12 Q Okay. Now, as of 2005, had you ever done any  
13 kind of training in childhood sexual abuse?  
14 A No.  
11:42:40 15 Q No professional training or certifications or  
16 anything on the issue, right?  
17 A Absolutely not.  
18 Q Okay. Do you know what a mandated reporter is?  
19 A No.  
11:42:50 20 Q Do you know what the definition of child sexual  
21 abuse is?  
22 A I wouldn't try to even formulate it.  
23 Q Okay. So you don't -- is it true that as you  
24 sit here today you don't know how many employees MJJ  
11:43:13 25 Productions had?

11:43:14 1 A Correct.

2 Q All right. Do you know of an individual named

3 Morris Williams?

4 A No.

11:43:21 5 Q Security guard for Mr. Jackson?

6 A I don't recall him.

7 Q Did you ever go visit Mr. Jackson at the

8 Hayvenhurst estate?

9 A Yes.

11:43:31 10 Q And it's my understanding there was a gate

11 there with a guard shack, right?

12 A Yes.

13 Q And there was security guards that worked

14 there?

11:43:38 15 A Yes.

16 Q Did you have any understanding as to who or

17 what entity employed them?

18 A No.

19 Q Do you know that they were actually employed by

11:43:45 20 MJJ Productions, Inc.?

21 A I don't recall.

22 Q Okay. You don't remember any discussions of

23 that nature in your capacity as a director or officer of

24 MJJ Productions, Inc --

11:44:00 25 A No.

11:44:01 1 Q -- or MJJ Ventures, Inc.? Okay.  
2 And you've been to Neverland, correct?  
3 A Yes.  
4 Q Just a few times or had you been there --  
11:44:17 5 A Few times.  
6 Q -- many times?  
7 A A few times.  
8 Q While Michael was there?  
9 A Yes.  
11:44:25 10 Q And not including his own children, at the  
11 times that you went to Neverland when Michael Jackson was  
12 there, were there ever any children there?  
13 A Not that I recall.  
14 Q Never saw Wade Robson there?  
11:44:40 15 A Not that I know of.  
16 Q Okay. Did you ever bring your own children  
17 there?  
18 A Well, certainly not my two boys.  
19 Q Why not?  
11:44:51 20 A They were just -- they're only 13 and 15 years  
21 old. I wasn't representing Michael after they were born.  
22 Q Okay. So you don't remember ever bringing your  
23 children to Neverland?  
24 A I'm trying to recall if I brought my daughter  
11:45:10 25 there but I don't think I did.

11:45:14 1           Q     Safe to say your children never spent the night  
2     at Michael Jackson's residences?

3           A     No.

4           Q     Did you ever spend the night at any of Michael  
11:45:27 5     Jackson's residences?

6           A     No.

7           MR. FINALDI: Okay. All right. We've been  
8     going -- about time for a restroom break. So let's take  
9     a quick break.

11:45:46 10          MR. STEINSAPIR: That's fine.

11          THE VIDEOGRAPHER: Video deposition off the  
12     record at 11:46. Conclusion of tape 1.

13          (Off the record.)

14          THE VIDEOGRAPHER: Video deposition returning  
11:55:13 15     to the record at 11:55. Beginning of tape 2.

16     BY MR. FINALDI:

17          Q     You understand you're still under oath,  
18     correct?

19          A     Correct.

11:55:35 20          Q     In your declaration here, Exhibit C, in several  
21     different places, you make the statement -- one of the  
22     places on line 8 -- I'm sorry -- page 8, line 27, it  
23     says, "I had no authority to tell Michael what to do in  
24     his business life, his personal life or otherwise."

11:56:00 25                 You make that declaration, correct?

11:56:01 1 A Correct.

2 Q Okay. But isn't it true that you actually did,  
3 in fact, sometimes tell Michael your opinions on what he  
4 should do?

11:56:13 5 A Giving an opinion is different than telling  
6 somebody what to do. They make their own decision.

7 Q Okay. So it's true that from time to time you  
8 would give him -- oops -- your opinions on what he should  
9 do, correct? Advice?

11:56:29 10 A Correct.

11 Q And sometimes he would follow it and times he  
12 wouldn't, correct?

13 A Correct.

14 Q And you would give him opinions regarding his  
11:56:43 15 business life, his personal life as well sometimes?

16 A I was really a business attorney. I wasn't  
17 involved in Michael's personal life.

18 Q Did you ever give him advice on his personal  
19 life in 27 years you represented him?

11:56:54 20 A Is that privileged?

21 MR. STEINSAPIR: The answer yes or no is not.

22 THE WITNESS: Yes.

23 BY MR. FINALDI:

24 Q The answer is yes, right?

11:57:01 25 A Yes.

11:57:01 1 Q Okay. So having had no --

2 THE VIDEOGRAPHER: I'm sorry.

3 BY MR. FINALDI:

4 Q -- no formal training or experience in child  
11:57:14 5 sexual abuse, child molestation, anything like that,  
6 that's a true statement, right --

7 A Correct.

8 Q -- as to you? All right.

9 Do you know that it's common for child sexual  
11:57:28 10 abuse victims to actually not report their abuse because  
11 of shame, humiliation, embarrassment?

12 A I'm not sure why you're asking me that. I'm  
13 not an expert.

14 Q So you don't know that's the case?

11:57:41 15 MR. STEINSAPIR: Assumes facts but you can  
16 answer.

17 THE WITNESS: I don't know.

18 BY MR. FINALDI:

19 Q Don't know. Do you know what sexual grooming  
11:57:49 20 is?

21 A No.

22 Q Have you heard that sometimes child sexual  
23 abusers, pedophiles, they will groom their victims,  
24 buying them gifts, giving them favors, keeping secrets,  
11:58:05 25 distancing themselves from their family and loved ones?

11:58:10 1 Have you ever heard anything of that nature?

2 A I'm not an expert on this subject.

3 Q I understand you're not an expert on the  
4 subject. You've actually had no training or experience  
11:58:19 5 in it, whatsoever, so that's been established. But my  
6 question is different. My question is: Have you ever  
7 heard that child sexual abusers will groom their victims  
8 in the way that I testified -- I talked about a little  
9 bit earlier?

11:58:36 10 A I may have heard that, yes.

11 Q Where?

12 A I'm not sure.

13 Q All right. And you said you never spoke to  
14 Wade Robson about his allegations. Did you ever speak to  
11:58:54 15 James Safechuck about his allegations?

16 A I don't think I've ever spoken to Jimmy  
17 Safechuck about anything. I don't think I've met Jimmy  
18 Safechuck.

19 Q Were you representing Mr. Jackson when he was  
11:59:09 20 on the Bad Tour?

21 A Yes.

22 Q Did you ever go to see him on tour when he was  
23 out of the United States?

24 A On the Bad Tour?

11:59:21 25 Q Yes.

11:59:22 1 A Yes.

2 Q Do you know which cities?

3 A London for sure and Tokyo.

4 Q Anywhere else?

11:59:36 5 A On the tour itself --

6 Q On the Bad Tour, yeah.

7 A -- when he performed concerts on the Bad Tour,

8 I don't recall.

9 Q Okay. You went to several of the international

11:59:46 10 Bad Tour stops to see him, right?

11 A I recall being in London and being in Tokyo. I

12 mean, he did multiple, multiple dates in both cities so

13 I'm not saying I was there for every concert.

14 Q Okay. And when you would go to, you know, see

12:00:05 15 Michael while he was on the Bad Tour at an international

16 location, would you stay in the same hotel as him?

17 A Correct.

18 Q Yes?

19 A Yep.

12:00:13 20 Q Who would set that up?

21 A That was set up by -- I don't recall if that

22 was Bill Bray or a travel agent.

23 Q And Bill Bray was?

24 A Chief of Michael's security.

12:00:30 25 Q Do you know if he was an MJJ Productions

12:00:32 1 employee?

2 A He might have been.

3 Q Okay. And so when he's on the Bad Tour, do you  
4 recall there being children on the stage with him?

12:00:47 5 A No, I don't recall.

6 Q Do you recall -- well, so Jimmy Safechuck was  
7 with him on the Bad Tour in the international locations.

8 Do you have any recollection of that?

9 A No.

12:00:57 10 Q You didn't see Mr. Jackson traveling with any  
11 child?

12 A Not that I recall.

13 Q Okay. You didn't see any child in -- did you  
14 actually go into Mr. Jackson's hotel room during that  
15 tour?

16 A I'm sure we must have had meetings.

17 Q And do you remember seeing any child in his  
18 hotel room?

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

12:01:18 20 Q Do you recall there being any kind of rule,  
21 policy, procedure, regulation of MJJ Productions, Inc. or  
22 MJJ Ventures, Inc. that prevented Mr. Jackson from having  
23 a child sleep with him in his room?

24 A I don't recall any policy or procedures of any  
12:01:32 25 kind.

12:01:33 1           **Q     So that would have been allowed?**  
2           MR. STEINSAPIR:  Objection; assumes facts.  
3           THE WITNESS:  Could Michael have had his nephew  
4           visit him?  Sure, of course.  He was an adult.  
12:01:45 5       BY MR. FINALDI:  
6           **Q     How about a non-family member?**  
7           A     I don't know.  
8           **Q     All right.  You wouldn't have had any issue**  
9           **with that?**  
12:01:58 10          A     No.  
11          **Q     As a director or officer of the company?**  
12          A     As his lawyer, I functioned as his lawyer, no,  
13          I wouldn't have had a problem with that.  
14          **Q     Okay.  So if Mr. Jackson, for example, was**  
12:02:04 15          **touring on the Bad Tour and he had a child who was not**  
16          **his relative sleeping in his bed with him in his hotel**  
17          **room every night, you wouldn't have had a problem with?**  
18          MR. STEINSAPIR:  Objection; improper  
19          hypothetical.  On that I'm going to instruct the witness  
12:02:16 20          not to answer.  It calls for his legal opinion.  It calls  
21          for his attorney work product in connection with his  
22          representation of Michael Jackson.  
23          MR. FINALDI:  That's not what I'm asking for.  
24          MR. STEINSAPIR:  Well, I'm confident in my  
12:02:25 25          instructions.  Ask another question.

12:02:27 1 BY MR. FINALDI:

2 Q So as a director or officer of that  
3 corporation, you would have no qualms with Mr. Jackson  
4 sleeping in his bed with a child who is not his relative?

12:02:42 5 MR. STEINSAPIR: To the extent you can answer  
6 that separate from your representation of Michael  
7 Jackson, you can.

8 THE WITNESS: I functioned as an attorney, not  
9 as an officer or director and I -- you're assuming  
12:02:53 10 something that I don't know is the case.

11 BY MR. FINALDI:

12 Q What am I assuming that you don't know is the  
13 case?

14 A You're assuming somebody slept in his bed. I  
12:03:01 15 have no knowledge of that. This is your statement, not  
16 mine.

17 Q Well, it's actually --

18 A I never saw it. I don't recall any kids being  
19 with Michael on the tour.

12:03:09 20 Q Okay. Well, actually, it's the testimony of  
21 several individuals. Do you know that Blanca Francia --

22 A Who?

23 Q Blanca Francia, his maid, testified that she  
24 saw Michael with kids sleeping in his bed on numerous  
12:03:21 25 occasions?

12:03:22 1 A And you're assuming she's a bastion of  
2 credibility. I'm not. Sorry.

3 Q Okay. So you think that she's not credible?

4 A I have no idea whether she's credible or not.  
12:03:33 5 If you had seen all of the people that made things up  
6 about Michael Jackson that I've seen, you would doubt  
7 most of them.

8 Q Oh, yeah? So if anyone makes something up  
9 about Michael Jackson, you just don't believe it?

12:03:52 10 A I never said that.

11 Q Well, what makes you choose to not believe  
12 Miss Francia?

13 A I don't know who she is. What chooses -- why  
14 do you choose to believe her? I don't know.

12:04:03 15 Q Okay.

16 A But just because she said something doesn't  
17 make it true. Whereas, Michael said in lyrics just  
18 because you read it in a magazine doesn't make it  
19 factual.

12:04:16 20 Q Huh. Some of the things the magazines printed  
21 were actually true about him, though, correct?

22 A I don't know. We would have to take a survey,  
23 wouldn't we?

24 Q So you don't know exactly what the allegations  
12:04:37 25 being made by Wade and Jimmy Safechuck are?

12:04:41 1 A Excuse me?

2 Q You don't know what the exact allegations are  
3 that those two individuals are making against Michael,  
4 other than he sexually abused me as a child?

12:04:51 5 A Correct.

6 Q You don't know specifically what it is they're  
7 alleging that he did, when he did it, how he did that?

8 A I left that to the lawyers because I just don't  
9 believe it.

12:05:07 10 Q And why is it that you just don't believe it?

11 A Because I don't. Because your client testified  
12 under perjury that none of this ever happened. So if a  
13 person's willing to perjure themselves, I'm not sure  
14 that's the kind of person I would put much credibility  
12:05:25 15 in.

16 Q Let's talk about that. So when Wade first  
17 testified, how old was he?

18 A I don't know. You tell me.

19 Q 12.

12:05:33 20 A When he first testified?

21 MR. STEINSAPIR: Assumes facts.

22 THE WITNESS: I think he was 23, wasn't he?

23 BY MR. FINALDI:

24 Q When he first was approached, how old was he?

12:05:43 25 When he was first approached?

12:05:45 1 A I have no idea.

2 Q Do you know that as a child he was actually  
3 held in contempt for refusing to talk about Mr. Jackson?

4 MR. STEINSAPIR: Objection; assumes facts. You  
12:05:54 5 can answer the question, though.

6 THE WITNESS: I don't recall.

7 BY MR. FINALDI:

8 Q Did you know that his statements were being  
9 sought by the District Attorney in the Chandler  
12:06:11 10 allegations?

11 MR. STEINSAPIR: Same objections. You can  
12 answer.

13 THE WITNESS: I don't recall. I wasn't the  
14 criminal attorney or the civil attorney.

12:06:21 15 BY MR. FINALDI:

16 Q Gotcha. Do you know Mr. Pellicano?

17 A No.

18 Q Never met him?

19 A No.

12:06:32 20 Q Did he ever work for you?

21 A No.

22 Q Did you ever know that he was working for  
23 Michael Jackson?

24 A Correct.

12:06:38 25 Q You did?

12:06:39 1 A Yeah.

2 Q How did you know that?

3 A I mean, everybody knew that.

4 Q Did you ever communicate with him about the

12:06:50 5 things he was doing for Mr. Jackson?

6 A No. I'm not a litigator.

7 Q Did the FBI ever speak to you about Mr.

8 Pellicano?

9 A No.

12:07:03 10 Q Did they ever try to speak with you about Mr.

11 Pellicano?

12 A No.

13 Q Did you -- do you know where Mr. Pellicano is

14 now?

12:07:10 15 A I believe he's in prison; is he not?

16 Q He's actually in prison, yeah.

17 MR. STEINSAPIR: We both saw him there.

18 BY MR. FINALDI:

19 Q Do you know what he's in prison for?

12:07:18 20 A Wire -- unauthorized wire tap.

21 Q Uh-huh. And?

22 A I don't know. I'm not his attorney and I don't

23 follow his career.

24 Q Okay.

12:07:25 25 A I just read the newspapers like everybody else.

12:07:28 1           **Q     Extortion?**  
2           A     If you say so. I don't know the man.  
3           **Q     Do you know that he was the person who was**  
4           **contacting these children who are in contact with Michael**  
12:07:44 5           **Jackson during the Chandler allegations?**  
6           MR. STEINSAPIR: Assumes facts but you can  
7           answer.  
8           THE WITNESS: Those are questions better  
9           addressed to either Howard Weitzman, or if he was with  
12:07:52 10          us, Johnnie Cochran or Burt Fields. That's not my role.  
11          BY MR. FINALDI:  
12          **Q     Okay. You didn't know Mr. Pellicano was**  
13          **actually interviewing these kids sometimes alone --**  
14          A     No.  
12:08:01 15          **Q     -- and recording them? No?**  
16          A     No.  
17          MR. STEINSAPIR: Same objections.  
18          BY MR. FINALDI:  
19          **Q     So do you know if there was a business purpose**  
12:08:16 20          **of MJJ Productions or Ventures to buy toys for kids?**  
21          MR. STEINSAPIR: Asked and answered, calls for  
22          a legal conclusion and calls for speculation. You can  
23          answer.  
24          THE WITNESS: We distribute toys to kids on  
12:08:31 25          occasion right now. Michael Jackson, Michael Jackson

12:08:34 1 Estate, we always want to make new fans. We're throwing  
2 a Halloween party for kids from the intercity on  
3 October 27th.

4 BY MR. FINALDI:

12:08:45 5 Q So that could be one of the business purposes,  
6 to make new fans?

7 A Absolutely. Yeah.

8 Q Okay.

9 A We've just made a cartoon show that will be  
12:08:59 10 prime telecast on CBS on October 27th intended to obtain  
11 new young fans for Michael Jackson.

12 Q And why is it important to try and get new  
13 young fans?

14 A Well, because if you study what's happened to  
12:09:16 15 some of the older artists like Elvis and the Beatles,  
16 their fans -- their fans age. They don't make new fans  
17 and if you ask anybody under the age of 40 who Elvis is,  
18 they may not even know.

19 If you ask them who The King is, they will say  
12:09:33 20 it's Michael Jackson, not Elvis. If you ask any kid  
21 under the age of 20 who Paul McCartney is, they may not  
22 be able to tell you. I would not want that to happen to  
23 Michael Jackson and I happen to be an Elvis and a Beatles  
24 fan.

12:09:48 25 Q And one of your obligations for the

12:09:51 1 corporations is to monetize the assets, correct?  
2 A For the Estate.  
3 Q Correct?  
4 A Correct.  
12:09:55 5 Q And so that helps with that, right? Making  
6 sure people --  
7 A Making sure he acquires new fans --  
8 Q Yes?  
9 A -- yes.  
12:10:02 10 Q Okay. Now, if Michael had a housekeeper who  
11 was cleaning up his bedroom for him, who was employed by  
12 MJJ Productions, Inc., is that how things work with a  
13 loan out corporation?  
14 A I don't know.  
12:10:24 15 Q Would that be a standard business practice for  
16 a loan out corporation that you know of?  
17 A Well, most entertainers, their income comes  
18 into the loan out corporation. So outside the  
19 corporation, that's how they earn their money. So that's  
12:10:38 20 how the bills get paid so that is not surprising.  
21 Q Isn't it true that one of the reasons why  
22 celebrities, entertainers use loan out corporations is to  
23 protect themselves personally?  
24 A Isn't that why lawyers and doctors do exactly  
12:10:54 25 the same thing? Of course.

12:10:56 1 Q So they transact business through the  
2 corporation in order to protect themselves personally?

3 A If I understand the history of the American  
4 corporate system, corporations were invented to promote  
12:11:06 5 commerce and provide for limited liability.

6 Q Okay. And that's something that you encourage  
7 with your clients, correct?

8 A I'm sure you do the same.

9 Q Okay. Would you agree that if MJJ Productions,  
12:11:26 10 Inc. or MJJ Ventures, Inc. employed children then it  
11 would have an obligation to keep them safe in that  
12 employment?

13 MR. STEINSAPIR: Objection; improper  
14 hypothetical, also calls for a legal conclusion. You can  
12:11:41 15 answer.

16 THE WITNESS: Well, I'm not sure that MJJ  
17 Productions employed children. And if so, I would have  
18 to understand what the capacity was.

19 BY MR. FINALDI:

12:11:52 20 Q Well, for example, if MJJ Productions, Inc.,  
21 MJJ Ventures, Inc. employed a child to dance as a dancer?

22 A I'm not sure that would have an employee. That  
23 sounds more like an independent contractor situation.

24 Q Okay. Same thing. So even if it was an  
12:12:12 25 independent contractor, you know, say there's a child

12:12:15 1 who's been, you know, hired by MJJ Productions, Inc. or  
2 MJJ Ventures, Inc. to do some work as a dancer, wouldn't  
3 you agree that those corporations have a duty to keep the  
4 kids safe while he's doing the work for the corporation?

12:12:28 5 MR. STEINSAPIR: Objection; calls for a legal  
6 conclusion. Duty is an issue of law. You can answer in  
7 your personal opinion, if you have one.

8 THE WITNESS: Sounds like speculation. I don't  
9 know who you're talking about.

12:12:39 10 BY MR. FINALDI:

11 Q So Michael Jackson at one point in time did a  
12 commercial for Pepsi. You remember that?

13 A Yes. Pepsi would have hired those people, not  
14 Michael.

12:12:48 15 Q And he -- and the one commercial went awry when  
16 he got injured --

17 A Yes.

18 Q -- as a result of a firework explosion, right?

19 A Correct.

12:12:55 20 Q Okay. And that's something that, you know,  
21 Pepsi would have a duty to keep people safe from  
22 explosions on set if they're filming a commercial, right?

23 MR. STEINSAPIR: Objection; calls for a legal  
24 conclusion. You can answer whether in your personal  
12:13:11 25 opinion they have some moral duty to do that. I don't

12:13:13 1 know.

2 THE WITNESS: I don't want to -- you know, what  
3 Pepsi feels they should have done or shouldn't have done  
4 is beyond the scope.

12:13:20 5 BY MR. FINALDI:

6 Q Okay. So I'll ask you the specific question.  
7 So as an officer or director of MJJ Productions, Inc., or  
8 MJJ Ventures, Inc., did you feel that the corporation --  
9 either the corporation had any duty to protect kids that  
10 were, you know, doing work for the corporation or that in  
11 any way came under the umbrella of the corporation?

12 MR. STEINSAPIR: Same objections. You can  
13 answer to the extent you understand the question.

14 THE WITNESS: I'm sorry. Now we're in double  
12:13:54 15 and triple hypotheticals. My role with Michael was as  
16 his attorney, not as a director or officer of his  
17 corporation. I don't know that children were hired as  
18 employees of the company so I will really don't want to  
19 speculate.

12:14:02 20 BY MR. FINALDI:

21 Q Okay. So my question was limited to -- it's  
22 not disputed that you were an officer and director of  
23 these corporations during time period of June of '93  
24 through the end of '97, correct?

12:14:14 25 A No. I don't think that's correct. I don't

12:14:17 1 think I was an officer and a director of these  
2 corporations through 2007.

3 Q '97?

4 A '97.

12:14:24 5 Q Okay. Thanks for the correction.

6 So it's not disputed that you were an officer  
7 and director of these corporations during that time  
8 period --

9 A Correct.

12:14:31 10 Q -- right?

11 So my question is in those capacities as  
12 officer and director, do you believe that the  
13 corporations had a duty to protect kids?

14 MR. STEINSAPIR: Same objections. If you  
12:14:45 15 understand the question -- it's also been asked and  
16 answered -- you can answer it.

17 THE WITNESS: I don't have an opinion. I would  
18 invite you to have a labor lawyer address that question.  
19 And as I said, I functioned as a lawyer, not as an  
12:14:58 20 officer and director. If I talked to Michael, I would  
21 speak to him as his attorney, not as an officer or  
22 director of his corporation.

23 BY MR. FINALDI:

24 Q So you didn't know that those companies were  
12:15:11 25 employing kids?

12:15:12 1 MR. STEINSAPIR: That's been asked and  
2 answered.  
3 THE WITNESS: I don't recall.  
4 MR. STEINSAPIR: But you can answer again. It  
12:15:22 5 also assumes facts.  
6 BY MR. FINALDI:  
7 Q Michael's bodyguards, his security staff, what  
8 was their job? What was their job to do?  
9 A To protect Michael.  
12:15:41 10 Q To protect Michael from who?  
11 A Sometimes when Michael would go places, there  
12 would be big crowds and pushing and shoving, so they were  
13 there both to protect Michael but also to get him from  
14 point A to point B. Michael generally didn't drive his  
12:16:00 15 own car.  
16 Q Was it ever their job to control access to  
17 Michael?  
18 A Yeah.  
19 Q For example, if he's in a green room or  
12:16:12 20 something, his security would stand outside and say who's  
21 allowed in and who's not. Mr. Branca's allowed in. Joe  
22 Blow's not allowed in, right?  
23 A Correct.  
24 Q Okay. Were you involved at all in the Pepsi  
12:16:34 25 commercials that Mr. Jackson filmed using kids, Jimmy

12:16:39 1       **Safechuck, Alfonso Ribeiro, any of the other kids was --**

2           A       I was not involved --

3           Q       -- Wade Robson?

4           A       Sorry.

12:16:47 5           Q       **Sorry. Go ahead.**

6           A       I was not involved in casting or production. I  
7 negotiated the deal between Michael and Pepsi, yes, in  
8 '94 and '97. Not in 2001 or '2, whenever that one  
9 occurred.

12:17:01 10          Q       **So that would be a deal between MJJ**  
11 **Productions, Inc. and Pepsi?**

12          A       I don't recall if it was MJJ Productions. It  
13 might have been one of Michael's other companies.

14          Q       **Which one?**

12:17:17 15          A       I'm trying to remember. Would it be Triumph  
16 Merchandising? Perhaps.

17          Q       **For a video? For a commercial?**

18          A       Perhaps. Yeah, I don't recall.

19          Q       **All right.**

12:17:24 20          MR. STEINSAPIR: Optimum.

21       BY MR. FINALDI:

22          Q       **And --**

23          A       There was Optimum Productions. There was  
24 Triumph Productions. So I don't recall. There might  
12:17:31 25 have been multiple companies.

12:17:33 1 Q All right. Now, when you went to Hayvenhurst  
2 at any of the times, did you ever see a studio there?  
3 A Recording studio?  
4 Q Michael's studio.  
12:17:42 5 A Yeah.  
6 Q And did you ever see him working there?  
7 A No, not that I recall.  
8 Q Did you ever see like a dance room that he had  
9 there at Hayvenhurst?  
12:17:55 10 A I don't recall.  
11 Q How about the same questions as to Neverland.  
12 Did you ever see the dance room he had at Neverland?  
13 A You know, I don't recall.  
14 Q Do you know whether he was ever practicing  
12:18:13 15 dancing with children in preparation for a Pepsi movie --  
16 commercials either at Neverland or at Hayvenhurst?  
17 A I don't know.  
18 Q If Mr. Jackson were practicing rehearsing with  
19 children at either Hayvenhurst or Neverland, would you  
12:18:35 20 agree that MJJ Productions or Ventures would have a duty  
21 to keep those kids safe during those rehearsals?  
22 A I honestly don't know what MJJ Ventures would  
23 have to do with any of that. As far as MJJ Productions,  
24 I'm not sure what their role would have been. If there  
12:18:56 25 was a Pepsi commercial, the people working on the Pepsi

12:19:00 1 commercial would have been contracted by either Pepsi or  
2 some independent company, I believe.

3 Q So it would be the independent company or  
4 Pepsi's duty?

12:19:16 5 A To do what?

6 MR. STEINSAPIR: Objection; assumes facts.

7 BY MR. FINALDI:

8 Q To protect the kids during these rehearsals?

9 A You asked me that question earlier. I would  
12:19:22 10 defer to a labor lawyer.

11 Q Alrighty. Did you ever meet Gayle Goforth?

12 A I don't know who that is.

13 Q One of the employees that Michael had who  
14 worked at Neverland.

12:20:02 15 A No, I don't believe so.

16 Q How about Charlie Michaels?

17 A I don't -- the name doesn't ring a bell.

18 Q Do you know if MJJ Productions or MJJ Ventures  
19 had any types of policies or procedures that related to  
12:20:30 20 employees who were not U.S. citizens?

21 A That were not U.S.? I don't know.

22 Q Who were foreigners? Don't know?

23 Do you know where Wade Robson's from?

24 A Where is he from?

12:20:49 25 Q Uh-huh.

12:20:49 1 A No, I don't recall.

2 Q Do you know how it was that he came into  
3 contact with Michael Jackson?

4 A No, I don't.

12:20:56 5 Q All right. Wade says that he was actually  
6 hired to do the Cirque show?

7 A Huh. That's another -- another Wade Robson  
8 fantasy.

9 Q Okay. Well, we've got e-mails that show that  
12:21:07 10 he was actually hired to and he was doing work for -- you  
11 know, meetings for the Cirque show.

12 Do you have any knowledge of that?

13 A Which Cirque show?

14 Q Cirque One.

12:21:16 15 MR. STEINSAPIR: I disagree with the premise of  
16 the question but you can answer it.

17 THE WITNESS: I don't believe that's the case.

18 BY MR. FINALDI:

19 Q And he said he actually pulled out of the show  
12:21:23 20 several times because of a breakdown he was having. So  
21 you would disagree with that, correct?

22 A Completely.

23 Q All right. And would you say that he was  
24 actually never hired for the project, right?

12:21:33 25 A Correct.

12:21:33 1 Q So he never would have actually been fired from  
2 the project?

3 A Correct.

4 Q And the only involvement he ever had with the  
12:21:41 5 project was that one meeting with you?

6 A To my knowledge.

7 Q Okay.

8 A Now, it's possible Jamie King might have hired  
9 him as a dancer. But --

12:21:52 10 MR. STEINSAPIR: That' spec- --

11 THE WITNESS: Jamie King was the director.

12 MR. STEINSAPIR: That's just speculation. You  
13 don't need to --

14 THE WITNESS: Not to my knowledge.

12:22:00 15 BY MR. FINALDI:

16 Q Do you have any understanding that he was hired  
17 to be a dancer on any of the shows?

18 A No. I shouldn't speculate.

19 Q Okay. Just making that up?

12:22:09 20 A No.

21 Q Okay.

22 A Well, you asked me if he had been hired on the  
23 show. He was not hired as director and he was not hired  
24 as a choreographer so --

12:22:18 25 Q Yeah. A choreographer is what I was asking

12:22:21 1 about. Mr. King was not a choreographer, he was hired as  
2 a director, right?

3 A Correct.

4 Q And he was only hired as a director after the  
12:22:27 5 prior director had been pulled out, right?

6 A No. We had conversations with a French or  
7 Montreal French director about possibly directing the  
8 show but he -- we never finally approved him.

9 Q [REDACTED]

12:22:46 10 [REDACTED]

11 [REDACTED]

12 A [REDACTED]

13 [REDACTED]

14 [REDACTED]

12:23:10 15 Q Did you have an opinion of Wade Robson as of  
16 the time that you had met with him in the whole Cirque  
17 evolution because now you're saying he's a liar, he's a  
18 perjurer? Did you have the same opinion of him at the  
19 time?

12:23:25 20 A No.

21 Q Was your opinion of him at the time generally  
22 favorable or --

23 A It was neutral.

24 Q -- did you just not like him? Neutral?

12:23:34 25 The only reason you're saying that you didn't

12:23:38 1 want him on the Cirque show is due to his experience,  
2 right? Nothing having to do with him personally?  
3 A Had nothing to do with him personally, yeah.  
4 It's related to qualifications and, I believe, some input  
12:23:53 5 from Cirque.  
6 Q Okay. Were there ever any rules of MJJ  
7 Productions, Inc. regarding transportation of minors in  
8 vehicles?  
9 A Not that I recall.  
12:24:20 10 Q Okay. Were there any kind of changes to any  
11 rules of MJJ Productions or Inc. made after the Chandler  
12 allegations arose regarding transportation of minors?  
13 A Not that I recall.  
14 Q Okay. Were there ever any rules regarding  
12:24:41 15 members or employees of MJJ Productions, Inc. or MJJ  
16 Ventures, Inc. being alone with minors?  
17 A No.  
18 Q Were there any kinds of changes to rules  
19 regarding employees or members being alone with minors  
12:24:59 20 initiated after the Chandler allegations?  
21 A No. You keep talking about these companies as  
22 if they were distinct from Michael Jackson. They were  
23 Michael Jackson.  
24 Q What do you mean by that?  
12:25:10 25 A They were Michael's loan out companies. They

12:25:12 1 were not General Motors with a bunch of shareholders and  
2 independent directors and a business that ran separate  
3 from the sole owner of the company. Michael was the sole  
4 owner of the company who had the right to make his own  
12:25:27 5 rules, hire and fire everybody.

6 Q Okay. But he still had employees working for  
7 him under the company, right?

8 A Probably. You asked me that. I don't recall  
9 the specifics.

12:25:35 10 Q Okay. So it's not true that he was the entire  
11 company? He's got employees working for him --

12 A He owned the company.

13 Q Okay. He owned the company? He owned the  
14 company?

12:25:40 15 A Correct.

16 Q But he's not -- the company is a fiction,  
17 right?

18 A Correct.

19 Q Okay. And so you're saying that, you know, for  
12:26:02 20 example, what if you're, you know, at a meeting for MJJ  
21 Productions, for example, right, and you see the security  
22 guard just beating someone up, could you tell him not to  
23 do that?

24 MR. STEINSAPIR: You can answer.

12:26:21 25 THE WITNESS: That's a hypothetical.

12:26:22 1 BY MR. FINALDI:

2 Q As the officer or director of the corporation,  
3 is that something you could do?

4 A Michael could do that, correct.

12:26:29 5 Q But you couldn't?

6 A Could I order somebody -- I was Michael's  
7 attorney. And I functioned as attorney, so I wouldn't be  
8 sitting there as an officer/director of MJJ Productions.

9 I'd be sitting there as Michael's attorney. Now, if  
12:26:47 10 somebody was beating somebody up, I am sure Michael would  
11 have said stop it, right.

12 Q What if he wasn't in the room, though?

13 A Would I have said stop beating this man up?

14 Q Yes.

12:26:53 15 A Probably.

16 Q Okay.

17 A As Michael -- as a human being, yeah.

18 Q How about as an officer of the corporation?

19 A No, as an attorney -- I do not recall attending  
12:27:02 20 a single meeting as an officer or director. I attended a  
21 meeting as Michael Jackson's attorney.

22 Q You still were an officer and director of the  
23 corporation. So if you saw, you know, one of these  
24 employees just beating a citizen senseless as an officer  
12:27:22 25 or director, would you have stopped it?

12:27:25 1 A Sir, that is a crazy question. Okay. If  
2 you're asking me as a member of the human race, would I  
3 speak up?

4 Q No, that's not what I am asking.

12:27:35 5 A Absolutely.

6 MR. STEINSAPIR: No. But there's no way to  
7 separate --

8 MR. FINALDI: That's a different question.

9 THE WITNESS: Never, ever did I ever say  
10 anything, hey, I'm secretary of this company, don't -- do  
11 not -- I'm officer. Never happened. Michael Jackson's  
12 attorney, different. Would I talk to a record company  
13 executive to suggest something in a negotiation as  
14 Michael's attorney? Yes. Never as an officer. Never as  
12:27:53 15 a director.

16 BY MR. FINALDI:

17 Q So what if you're in a meeting for MJJ  
18 Productions or Ventures, right, and you see Michael  
19 Jackson come into the room and he starts raping a child,  
12:28:02 20 starts raping a child, is that something --

21 A Sir, Michael would -- Michael would never do  
22 that so I never really have to think about that.

23 Q Is that something that you feel you would have  
24 the ability to stop as a director and officer of the  
12:28:18 25 corporation?

12:28:19 1           A     I'm glad this is on tape because that may be  
2           the most obnoxious question I've ever heard.

3           Q     Okay.

4           A     Okay. And I will not answer it.

12:28:27 5           Q     Do you know that that's an allegation in the  
6           case that Mr. Jackson actually raped children?

7           A     I do not believe that for a second. That's not  
8           the Michael Jackson I knew.

9           Q     Yeah. Well --

12:28:34 10          A     That's an absurd allegation.

11          Q     -- actually did you ever stay with Michael  
12          Jackson in his bedroom --

13                 MR. STEINSAPIR: That's been asked and  
14                 answered.

12:28:40 15          BY MR. FINALDI:

16          Q     -- while he was sleeping?

17          A     Why in the world would I do that?

18          Q     Okay. Never did it, right?

19          A     Never did it. Never would. It would be  
12:28:47 20          inappropriate.

21          Q     And you don't know why he would ever have a  
22          child that's not his relative sleep in his room with him  
23          either, right?

24                 MR. STEINSAPIR: Calls for speculation. It's  
12:28:54 25          been asked and answered.

12:28:56 1 THE WITNESS: I have no answer.

2 BY MR. FINALDI:

3 Q Well, if it would be inappropriate for his  
4 lawyer to do, wouldn't it be inappropriate for a child  
12:29:04 5 who's not his relative to do as well?

6 A I was speaking for myself.

7 Q So you have no opinion as to the question  
8 regarding a child?

9 A Correct.

12:29:14 10 Q All right. So getting back to my hypothetical,  
11 you just have no answer regarding if, you know, you saw  
12 Michael Jackson -- so you're in a board meeting for MJJ  
13 Productions or Ventures, you see Michael Jackson raping a  
14 child, you feel like you could have done anything,  
12:29:31 15 whatsoever?

16 A The question speaks for itself. I'm not going  
17 to answer that question.

18 Q Okay. And is it because you don't understand  
19 or something or you just found the question to be  
12:29:41 20 repugnant?

21 A The question's repugnant and it's an absurd  
22 hypothetical.

23 Q Okay. Do you know that there are employees who  
24 testified that they saw Michael Jackson in Neverland  
12:29:55 25 inside of a tent with a child and there were sex noises

12:29:58 1     **coming out of the tent?**

2                   MR. STEINSAPIR:  Okay.  That assumes facts and  
3     I don't believe that's true.  But you can answer whether  
4     you know that.

12:30:05 5                   THE WITNESS:  I do not know that.

6                   MR. FINALDI:  Charlie Michaels.

7                   THE WITNESS:  And I'm quite sure that never  
8     happened.

9     BY MR. FINALDI:

12:30:10 10           **Q     Okay.  So if it did, in that instance --**

11           A     It didn't.

12           **Q     You weren't there, sir, right?**

13           A     And neither were you.  So can we move on to the  
14     next question?

12:30:20 15           **Q     But I've heard the testimony and you haven't,**  
16     **right?**

17                   MR. STEINSAPIR:  Okay.  I'm actually going to  
18     -- hold on.

19                   THE WITNESS:  Consider the source.

12:30:24 20           MR. STEINSAPIR:  Hold on.

21                   THE WITNESS:  Consider the source.

22                   MR. STEINSAPIR:  I'm going to instruct -- I'm  
23     going to instruct him not to answer.  It's an improper  
24     hypothetical.  It's just completely calling for

12:30:30 25     speculation.  And it's also manifestly irrelevant about

12:30:32 1 what he would do in these hypothetical situations we all  
2 know he wasn't in. I'm going to instruct him to not to  
3 answer. I'm going to sit on that objection. I'm happy  
4 to defend it before Judge Beckloff.

12:30:44 5 BY MR. FINALDI:

6 Q So your testimony is that regardless of what  
7 Mr. Jackson did, right, regardless of what he did, no  
8 employee of MJJ Productions or Ventures could ever stop  
9 him from doing something or tell him not to do something,  
12:30:59 10 right?

11 A That is not my testimony. Why are you making  
12 things up? Look, I don't want to be harassed. That was  
13 not my testimony. Stop harassing me.

14 Q Is that your testimony?

12:31:11 15 A I said it was not my testimony.

16 Q So Mr. --

17 A And you damn well know it.

18 Q So let me --

19 A Look, I'm ready to leave. Let's go to  
12:31:15 20 Beckloff. I'm not here to be harassed.

21 MR. STEINSAPIR: Hold on. You can -- let's  
22 move on. We're not going to ask these questions.

23 THE WITNESS: I'm not here for you to put words  
24 in my mouth, so if you don't stop it, I'm out of here.

12:31:23 25 MR. STEINSAPIR: I will terminate the

12:31:23 1 deposition.

2 BY MR. FINALDI:

3 Q Mr. Branca --

4 MR. STEINSAPIR: You need to move on.

12:31:25 5 BY MR. FINALDI:

6 Q So first of all, I'm not harassing you.

7 MR. STEINSAPIR: Yes, you are. Hold on a  
8 second.

9 THE WITNESS: You are harassing me. That is  
12:31:35 10 not --

11 MR. STEINSAPIR: John, let me -- let me handle  
12 it. Vince, you're asking improper hypotheticals and I'm  
13 going to ask you to move on or I will terminate the  
14 deposition on this point.

12:31:39 15 THE WITNESS: I'd like you to show this video  
16 to Judge Beckloff.

17 MR. FINALDI: You can show it to him.

18 MR. STEINSAPIR: Let me handle it. You can  
19 either move on or I will terminate the deposition.

12:31:42 20 MR. FINALDI: I'm going to ask my questions.  
21 Okay.

22 MR. STEINSAPIR: I will just instruct not to  
23 answer on those questions. If you want to take this line  
24 of questioning to the judge, I'm happy to do it and I'm  
12:31:52 25 happy to defend it. But I'm asking you to move on to

12:31:55 1 another subject or we will leave.

2 MR. FINALDI: Okay. Now --

3 MR. STEINSAPIR: It's that easy.

4 MR. FINALDI: All right. Now, I'm going to ask  
12:32:00 5 my questions and, you know, you're going to act as you  
6 deem fit but I'm going to put on the record I'm not  
7 harassing Mr. Branca.

8 MR. STEINSAPIR: These questions are absurd.  
9 You're asking him about hypotheticals. You're just  
12:32:11 10 asking him to opine on hypothetical facts. He's not here  
11 to opine on what would happen if someone walked into a  
12 room and was raping a child. That is not something he is  
13 here to give opinions on. He's not an expert witness.  
14 He's here to testify about facts.

12:32:26 15 There are no facts to support that Mr. Branca  
16 was ever in a situation where he saw anything like that.  
17 Whether you believe stuff like that actually happened in  
18 the presence of others and whether we don't believe it is  
19 irrelevant. You can ask him about facts. You can't ask  
12:32:41 20 him about these kind of hypotheticals.

21 MR. FINALDI: I understand your point.

22 MR. STEINSAPIR: I will terminate this  
23 deposition if this continues. We will ask for a  
24 discovery referee and we will convene it at Mr. Branca's  
12:32:49 25 office if it goes forward but I'm telling you to move on

12:32:53 1 to your next subject.

2 MR. FINALDI: Now, first, stop yelling. It's  
3 not necessary. I'm sitting right across from you.

4 Okay. Number two, please don't cut me off. All right.

12:32:58 5 I let you talk. Just don't cut me off.

6 MR. STEINSAPIR: I'm not cutting you off so  
7 make your --

8 MR. FINALDI: You're cutting me off right now.

9 MR. STEINSAPIR: -- speech and you can go on.

12:33:05 10 MR. FINALDI: This is cutting me off. So it's  
11 rude. It's not necessary. Third, I'm not harassing

12 anyone. I'm asking him proper questions regarding his  
13 capacity as an officer and director of the corporation  
14 and if he doesn't have an answer, that's fine, or if he

12:33:18 15 thinks that I'm trying to put words into his mouth, he  
16 can correct me. Okay.

17 And if he thinks I'm saying something that's  
18 untrue, he can say it's untrue. There's no reason to  
19 get upset. There's no reason to yell. There's no reason

12:33:29 20 to threat to do things with Mr. -- you know, bring it to  
21 Judge Beckloff's, you know, attention. I have no problem  
22 with that. I have no problem with you bringing a motion,  
23 whatsoever.

24 We'll respond to it. So you --

12:33:40 25 MR. STEINSAPIR: There's no motion to bring. I

12:33:42 1 will stop the deposition and you can bring your motion.

2 MR. FINALDI: Okay.

3 MR. STEINSAPIR: Because you've run out of  
4 topics to ask him about --

12:33:47 5 MR. FINALDI: No. No.

6 MR. STEINSAPIR: -- factual stuff.

7 MR. FINALDI: No.

8 MR. STEINSAPIR: You're asking improper  
9 hypotheticals.

12:33:49 10 MR. FINALDI: No, I haven't. No, I haven't.

11 MR. STEINSAPIR: Okay. Well, then move on.

12 MR. FINALDI: You have no idea.

13 MR. STEINSAPIR: Okay. What's your next  
14 question?

12:33:54 15 MR. FINALDI: All right. So my next question  
16 is actually the last question that I asked. So I'd like  
17 to ask that that last question be read.

18 MR. STEINSAPIR: Okay. I'm going to instruct  
19 the witness not to answer that question because I heard  
12:34:02 20 it and it was improper.

21 MR. FINALDI: I'd like to have it read into the  
22 record.

23 MR. STEINSAPIR: Okay. This is wasting time.

24 I -- I mean, I don't know what to tell you. You're just

12:34:11 25 wasting time here. I mean, I will terminate this

12:34:13 1 deposition.

2 MR. FINALDI: I'm going to have the question

3 asked.

4 MR. STEINSAPIR: Okay. This deposition is

12:34:15 5 terminated. We're going.

6 MR. FINALDI: Okay.

7 MR. STEINSAPIR: You are refusing -- I'm still

8 on the record. Counsel's refusing to honor --

9 MR. FINALDI: No. No.

12:34:22 10 MR. STEINSAPIR: -- an instruction not to

11 answer. He's continuing to ask questions --

12 MR. FINALDI: No. I -- I --

13 MR. STEINSAPIR: -- that are completely

14 inappropriate --

12:34:26 15 MR. FINALDI: No. No.

16 MR. STEINSAPIR: -- of this witness and we will

17 take this up --

18 MR. FINALDI: No.

19 MR. STEINSAPIR: -- with the court as

12:34:30 20 appropriate.

21 MR. FINALDI: We've only gone --

22 MR. STEINSAPIR: The deposition is terminated.

23 MR. FINALDI: Look, we've only gone for one

24 hour. Okay. I have not harassed this man. I have not

12:34:38 25 said anything improper.

12:34:39 1 MR. STEINSAPIR: If you want to move on to a  
2 different subject, I'm happy to do it but if not, this  
3 deposition is terminated.

4 MR. FINALDI: Jonathan, I'd like to finish my  
12:34:45 5 deposition. So you know --

6 MR. STEINSAPIR: You can finish your deposition  
7 if you move on to the next subject.

8 MR. FINALDI: I will.

9 MR. STEINSAPIR: I just --

12:34:48 10 MR. FINALDI: Look -- look --

11 MR. STEINSAPIR: -- instructed him not to  
12 answer.

13 MR. FINALDI: Look -- look --

14 MR. STEINSAPIR: You can take that --

12:34:51 15 MR. FINALDI: Look.

16 MR. STEINSAPIR: -- to the judge.

17 MR. FINALDI: Look, that question was --

18 MR. STEINSAPIR: No, it's not.

19 MR. FINALDI: -- was directly taken from your  
12:34:55 20 positions in all the papers.

21 MR. STEINSAPIR: No.

22 MR. FINALDI: Your position in the papers was  
23 that no one can tell Michael what to do. Look --

24 MR. STEINSAPIR: You can argue with me about  
12:35:04 25 what our positions are.

12:35:04 1 MR. FINALDI: Okay. Okay.  
2 MR. STEINSAPIR: You can argue with me about  
3 what my positions are all day, every day, in every  
4 pleading you want. But you are not here to ask my client  
12:35:12 5 questions that are --  
6 MR. FINALDI: Don't yell.  
7 MR. STEINSAPIR: -- basically what our --  
8 MR. FINALDI: Don't yell.  
9 MR. STEINSAPIR: I will speak the way I speak.  
12:35:17 10 MR. FINALDI: Don't yell.  
11 MR. STEINSAPIR: This is the way I speak.  
12 MR. FINALDI: Don't yell.  
13 MR. STEINSAPIR: It doesn't matter.  
14 MR. FINALDI: Don't yell.  
12:35:19 15 MR. STEINSAPIR: You are not allowed --  
16 MR. FINALDI: It's not necessary.  
17 MR. STEINSAPIR: -- to ask questions because  
18 it's very clear you are not allowed to ask questions that  
19 are asking him to apply law to facts. You are asking him  
12:35:27 20 for legal contentions. You are not allowed --  
21 MR. FINALDI: I'm not asking for legal  
22 contentions.  
23 MR. STEINSAPIR: I am -- I am instructing him  
24 not to answer the question.  
12:35:34 25 MR. FINALDI: I am not --

12:35:34 1 MR. STEINSAPIR: You can ask another question  
2 or you can say that you are not going to ask another  
3 question and I will terminate this deposition.

4 MR. FINALDI: I'm not asking legal contentions.  
12:35:43 5 I'm asking him the way that these corporations worked,  
6 what the policies were, what the procedures --

7 MR. STEINSAPIR: And he has answered that about  
8 15 times.

9 MR. FINALDI: You're cutting me off again.  
12:35:58 10 And so it's a very simple question about what  
11 these employees were allowed to do and what they were not  
12 allowed to do, what they could do, what they could not do  
13 under the policies and procedures of the corporation.

14 So either they could tell him or they couldn't  
12:36:04 15 or they were allowed to or they weren't. Because it's  
16 been the corporation's position that none of these  
17 employees could ever tell him what to do or stop him from  
18 doing anything and if that's their position, that's fine.

19 MR. STEINSAPIR: And he has --

12:36:15 20 MR. FINALDI: That's fine.

21 MR. STEINSAPIR: -- answered that question and  
22 applies --

23 MR. FINALDI: He hasn't --

24 MR. STEINSAPIR: -- exactly what you just said.

12:36:19 25 MR. FINALDI: No. Because --

12:36:19 1 MR. STEINSAPIR: So I don't understand why  
2 you're asking him to apply those situations to  
3 hypothetical facts.  
4 MR. FINALDI: Let's just have the last question  
12:36:23 5 read. Okay. And --  
6 MR. STEINSAPIR: No.  
7 MR. FINALDI: -- if you want to give the same  
8 instruction.  
9 MR. STEINSAPIR: No. I've instructed not to  
12:36:26 10 answer.  
11 MR. FINALDI: Let's just have it read.  
12 MR. STEINSAPIR: You want it read so I can say  
13 instruction not to answer?  
14 MR. FINALDI: Sure.  
12:36:32 15 MR. STEINSAPIR: Okay. Read it and I'll  
16 instruct him not to answer.  
17 MR. FINALDI: Let's just have that last  
18 question read.  
19 (The record was read as follows:  
12:37:33 20 "Question: So your testimony is  
21 that regardless of what Mr. Jackson  
22 did, right, regardless of what he did,  
23 no employee of MJJ Productions or  
24 Ventures could ever stop him from  
12:37:33 25 doing something or tell him not to

12:37:33 1 do something, right?")  
2 MR. STEINSAPIR: Okay. The witness did answer  
3 the question. To the extent you're asking for a further  
4 answer, I'm instructing him not to answer it. Next  
12:37:39 5 question.  
6 BY MR. FINALDI:  
7 Q Okay. And you're going to follow that  
8 instruction, correct?  
9 MR. STEINSAPIR: Absolutely.  
12:37:44 10 THE WITNESS: Correct.  
11 BY MR. FINALDI:  
12 Q So is it standard for a loan out corporation  
13 such as MJJ Productions to have a driver on its payroll  
14 for the --  
12:38:10 15 MR. STEINSAPIR: That's asked and answered.  
16 You can ask it again. It also calls for expert  
17 testimony. You can answer the question again.  
18 THE WITNESS: It's expert testimony. But for  
19 an entertainer, yeah, that is normal.  
12:38:22 20 MR. STEINSAPIR: That question was asked.  
21 MR. FINALDI: Okay.  
22 THE WITNESS: That's not unusual. Let's put it  
23 like that.  
24 BY MR. FINALDI:  
12:38:25 25 Q All right. And as an officer or director of

12:38:27 1 the corporation, did you know that Mr. Jackson was using  
2 that driver and the vehicle to transport children?

3 MR. STEINSAPIR: That's been asked and answered  
4 as well. Answer it again.

12:38:37 5 THE WITNESS: I operated as Michael Jackson's  
6 attorney, not as an officer or director of the company.  
7 BY MR. FINALDI:

8 Q Okay. So you didn't know or you did know?

9 A I don't recall.

12:39:04 10 Q Do you know if there were ever any sexual  
11 harassment policies and procedures? So earlier I asked  
12 about sexual abuse. This is about sexual harassment  
13 policies or procedures for MJJ Productions, Inc. or MJJ  
14 Ventures?

12:39:20 15 MR. STEINSAPIR: Just answer no.

16 THE WITNESS: I don't recall.

17 MR. STEINSAPIR: Do you know?

18 BY MR. FINALDI:

19 Q As you sit here today, you can't recall any  
12:39:27 20 policy or procedure manuals --

21 A No.

22 Q -- for those companies?

23 A I can't.

24 Q As you sit here today, could you recall any  
12:39:34 25 kind of changes to those corporations related to sexual

12:39:40 1 harassment after the Chandler allegations?

2 A No, I don't.

3 Q Do you have any knowledge that these  
4 corporations were purchasing airline tickets for children  
12:40:15 5 such as Jimmy Safechuck to go on tour with Mr. Jackson?

6 MR. STEINSAPIR: Assumes facts. You can  
7 answer.

8 THE WITNESS: I don't recall.

9 BY MR. FINALDI:

12:40:21 10 Q Did you have any knowledge that these  
11 corporations were funding outfits for kids such as Jimmy  
12 Safechuck so they can dance on stage in the same kind of  
13 clothing as Mr. Jackson?

14 MR. STEINSAPIR: Assumes facts. You can  
12:40:35 15 answer.

16 THE WITNESS: I don't recall.

17 BY MR. FINALDI:

18 Q Have you ever met Jason Francia, Blanca  
19 Francia's son?

12:40:47 20 A No.

21 Q Do you know that he brought a claim against Mr.  
22 Jackson related to sexual misconduct?

23 A No, I don't recall that.

24 Q Do you know that Mr. Jackson actually paid  
12:40:59 25 him --

12:40:59 1 A No, I don't.  
2 Q -- as a result of that sexual abuse claim?  
3 A No, I don't.  
4 Q He was deposed in this case and testified. Did  
12:41:10 5 you ever review any of that testimony?  
6 A No.  
7 MR. STEINSAPIR: Asked and answered. He's  
8 already said he hasn't reviewed any deposition  
9 transcripts for this case.  
12:41:20 10 BY MR. FINALDI:  
11 Q Now, at the times that you would go to  
12 Neverland, what would the purpose be?  
13 A Business meetings.  
14 Q Where would they be held at Neverland?  
12:41:33 15 A There was an office adjacent to the main house.  
16 Occasionally there. Perhaps -- perhaps, a screening room  
17 maybe one time. Maybe the living room.  
18 Q The office adjacent to the main house, so it  
19 wasn't actually in the main house?  
12:41:56 20 A I don't recall if it was connected or not.  
21 Q If you were looking at the front of house, was  
22 it towards the right?  
23 A No. It's toward the left.  
24 Q Okay. And would you generally travel there  
12:42:12 25 alone for business meetings or would you bring other,

12:42:16 1 like, business managers or anything like that, account  
2 managers?

3 A I don't recall.

4 Q Okay. How often would you go to Neverland for  
12:42:24 5 business meetings?

6 A While Michael was alive maybe there were three  
7 or four meetings.

8 Q Did you ever go to Hayvenhurst for business  
9 meetings?

12:42:35 10 A Yes.

11 Q How many times?

12 A I don't recall.

13 Q More than a handful?

14 A Yeah.

12:42:43 15 Q Did you ever go to either of the hideouts for  
16 business meetings?

17 A I recall at least one meeting at the  
18 condominium on Wilshire Boulevard in Westwood.

19 Q Did you ever go to either of the Hideouts to  
12:43:03 20 discuss business, even if it wasn't for a particular  
21 meeting, just to sign this, look at this, I don't know?

22 A For what?

23 Q Any other type of business purpose, even if it  
24 wasn't just a formal meeting.

12:43:17 25 A No.

12:43:18 1 Q Okay. Did you ever conduct business with  
2 Mr. Jackson over the phone?  
3 A Of course.  
4 Q Okay. And sometimes he would be at Neverland,  
12:43:38 5 correct?  
6 A I don't know his whereabouts.  
7 Q Did you ever send and receive business faxes  
8 with Mr. Jackson?  
9 A Faxes?  
12:43:46 10 Q Uh-huh.  
11 A I don't recall.  
12 Q Did you ever see Mr. Jackson rehearsing --  
13 rehearsing dancing --  
14 A Yes.  
12:43:59 15 Q -- practicing at Neverland?  
16 A Oh, at Neverland? Not that I recall. No.  
17 Q How about at Hayvenhurst?  
18 A No. The only places I think I saw him  
19 rehearsing dancing would be at an arena or a rehearsal  
12:44:15 20 studio.  
21 Q Have you ever met Jonathan Spence?  
22 A Who?  
23 Q Jonathan Spence.  
24 A Not that I know of.  
12:44:52 25 Q How about a female name Jenna Rosher?

12:44:56 1 A Not that I know of.  
2 Q Now for Jordie Chandler, do you have any  
3 knowledge of the settlement of that case?  
4 A Yes.  
12:45:12 5 Q And a certain amount of money was paid to  
6 Jordan Chandler, correct?  
7 A Correct.  
8 Q And do you know if funds are still being paid  
9 to Jordan Chandler?  
12:45:22 10 A I don't believe so but I don't recall.  
11 Q Do you have any knowledge of Norma Staikos'  
12 separation from MJJ Productions?  
13 A I don't recall much about it.  
14 Q Do you know if she quit or if she was fired?  
12:46:02 15 A I don't recall.  
16 Q Blanca Francia. Do you know if she quit or was  
17 fired?  
18 A I don't know.  
19 Q So during the 1993 Chandler allegations, that  
12:46:33 20 time period, do you know if you ever met Wade Robson?  
21 A I don't believe I did.  
22 Q Okay. How about during the 2005, the criminal  
23 investigation?  
24 A No.  
12:46:42 25 Q No? Okay.

12:46:46 1 Did you ever testify in that case, in the  
2 Arvizo case?

3 A No.

4 Q Were you ever deposed in that case?

12:46:52 5 A No.

6 Q Do you know if you were ever approached to  
7 testify in this case?

8 A No, I was not.

9 Q Okay. Did you ever meet Gavin Arvizo?

12:46:59 10 A Who?

11 Q Gavin Arvizo.

12 A No, I don't think so.

13 Q Okay. So other than the Chandler allegation --  
14 so you know about the Chandler allegation, you know about  
12:47:12 15 the Wade Robson allegation, you know about the Jimmy  
16 Safechuck allegation, correct?

17 A Correct.

18 Q You said you didn't know about the [REDACTED]  
19 <sup>JANE AA Dec</sup> [REDACTED] one, you didn't know about the Jason Francia  
12:47:29 20 one.

21 Which other sexual abuse -- child sexual abuse  
22 allegations are you aware of involving Michael Jackson  
23 besides the Chandler, the Robson and the Safechuck one?

24 A Those are the only ones I recall.

12:47:43 25 Q Okay. You are aware of the Arvizo one as well,

12:47:47 1 **though, correct?**  
2 A I don't recall.  
3 MR. STEINSAPIR: It's the 2005 criminal trial  
4 was Arvizo.  
12:47:59 5 THE WITNESS: Oh. Yeah.  
6 BY MR. FINALDI:  
7 Q So you are aware of that one, right?  
8 A Sure. Of course.  
9 Q Okay. Aside from the Chandler allegation, are  
12:48:10 10 you aware of any settlements related to Michael Jackson  
11 and child sexual abuse allegations?  
12 A Not that I recall.  
13 Q You think there may have been other ones that  
14 you just don't recall?  
12:48:27 15 A I wouldn't want to speculate.  
16 Q Were you involved in the L.A. Gear deal with  
17 Michael Jackson?  
18 A Yes.  
19 Q And so that was essentially a shoe line deal  
12:48:49 20 with Michael Jackson, right?  
21 A Yes.  
22 Q And were you involved at all in setting up or,  
23 you know, arranging for the photo shoots for that L.A.  
24 Gear deal?  
12:49:04 25 A No.

12:49:04 1 Q Okay. Did you know that there were children  
2 involved in the photo shoots for that?  
3 A I don't recall.  
4 Q Did you know that Wade Robson was involved with  
12:49:15 5 that?  
6 A No.  
7 Q No? Okay.  
8 The Jam video with Michael Jackson and Michael  
9 Jordan, were you involved in that?  
12:49:31 10 A I was not representing Michael at that time.  
11 Q Okay. Did you ever write or negotiate any  
12 contracts involving Wade Robson?  
13 A No.  
14 Q How about his mother Joy Robson?  
12:49:47 15 A I don't know who she is.  
16 Q Were you ever involved at all in any of the  
17 immigration work for Wade Robson or Joy Robson?  
18 A I'm not an immigration attorney.  
19 Q Okay. I understand that. But were you  
12:50:00 20 involved at all in that process?  
21 A Not that I recall.  
22 Q Okay. Did you know that Mr. Jackson -- do you  
23 know of any secret rooms that he had in his Neverland  
24 residence?  
12:50:29 25 A No.

12:50:29 1 Q How about alarms on doors?  
2 A I was not personally aware of it, no.  
3 Q Okay. Do you have any knowledge of  
4 Mr. Pellicano doing work on behalf of MJJ Productions or  
12:50:52 5 Ventures?  
6 A I knew he had done some investigative work but  
7 I don't know the nature of it.  
8 Q Do you know if he was following people?  
9 A I don't know. I did not hire him.  
12:51:04 10 Q Do you know who did?  
11 A I thought it was Burt Fields but I don't know  
12 for sure.  
13 Q [REDACTED]  
14 A [REDACTED]  
12:51:16 15 Q Okay. Now, getting back to Jane AA Doe [REDACTED], are  
16 you aware that Michael Jackson and/or his entities paid  
17 her the sum of about \$1 million?  
18 A Paid who?  
19 Q Jane AA Doe [REDACTED].  
12:51:33 20 A No.  
21 Q In the late '90s?  
22 A I'm not familiar with that.  
23 MR. STEINSAPIR: That assumes facts but --  
24 BY MR. FINALDI:  
12:51:46 25 Q Okay. So you weren't involved in that at all,

12:51:47 1 right?  
2 A No.  
3 Q Any kind of a payment by those corporations to  
4 a minor, right?  
12:51:49 5 A No.  
6 Q Okay.  
7 MR. STEINSAPIR: Same objections.  
8 BY MR. FINALDI:  
9 Q Are you aware that Michael Jackson wrote songs  
12:51:58 10 involving the name Susie?  
11 A The name what?  
12 Q Susie. Wrote a song Little Susie?  
13 A Yeah.  
14 Q And the song Blood on the Dance Floor involves  
12:52:09 15 the name Susie as well?  
16 A The name Susie, yeah.  
17 Q Okay. Did you ever meet a Susie --  
18 A I don't know who Susie is.  
19 Q -- that Mr. Jackson knew?  
12:52:17 20 A No.  
21 Q And he wrote those songs, right?  
22 A Michael wrote Blood on the Dance Floor, yeah.  
23 Q Okay. Did you ever write or negotiate any  
24 contracts involving Jimmy Safechuck?  
12:52:36 25 A Not that I know of.

12:52:41 1 MR. STEINSAPIR: Counsel, for clarification is  
2 the name *Jane AA Doe* [REDACTED], is that public or should that  
3 part of this deposition --  
4 MR. FINALDI: No, it's not public.  
12:52:48 5 MR. STEINSAPIR: Okay. So then --  
6 MR. FINALDI: I think you made the whole --  
7 MR. STEINSAPIR: Yeah, that's fine. I am  
8 making the whole thing confidential. But I told you I  
9 would get back to you and de-designate portions of it but  
12:52:57 10 I want to make that clear.

11 MR. FINALDI: Okay.  
12 BY MR. FINALDI:  
13 Q So *Jane AA Doe* [REDACTED], she's the one who had filed  
14 earlier with my firm. She recently dismissed her case  
12:53:06 15 without prejudice.  
16 Did you know that Mr. Cochran -- Johnnie  
17 Cochran was actually asking Blanca Francia questions  
18 about *Jane AA Doe* [REDACTED] way back in the Chandler allegations?

19 A No. No.  
12:53:21 20 MR. STEINSAPIR: Assumes facts but yeah.  
21 BY MR. FINALDI:

22 Q Okay. Do you remember a security guard that  
23 worked for Mr. Jackson by the name of Hilary?  
24 A No.  
12:53:32 25 Q A gentleman that wore a top hat, African

12:53:35 1 **American gentleman?**  
2 A I don't recall him.  
3 Q Okay. Do you know a lawyer -- a lawyer named  
4 Sean Hardy at Freedman and Taitelman?  
12:53:49 5 A Not that I know of.  
6 Q How about Bryan Freedman?  
7 A I know Bryan Freedman.  
8 Q How do you know him?  
9 A We were in a men's group together.  
12:53:58 10 Q What kind of men's group?  
11 A It's personal. Men's group. Get together once  
12 a week and talk.  
13 Q Just a general men's group?  
14 A It's kind of personal.  
12:54:07 15 MR. STEINSAPIR: Well, you can just say how you  
16 know him.  
17 THE WITNESS: Yeah. A general men's group.  
18 Get together and talk about men issues. Our wives, our  
19 girlfriends, our kids, his son being a good basketball  
12:54:17 20 player, blah-blah-blah.  
21 BY MR. FINALDI:  
22 Q Gotcha.  
23 MR. STEINSAPIR: You know him personally?  
24 THE WITNESS: Yeah. He's a personal friend.  
25

12:54:23 1 BY MR. FINALDI:

2 Q Okay. Do you know that he's representing  
3 Jonathan Spence, who's a person that we tried to depose  
4 in this case?

12:54:30 5 A No, I did not know that.

6 Q Are you involved at all in arranging --

7 A No.

8 Q -- for that? No?

9 Do you know he also is representing now

12:54:39 10 Jonathan Spence's mother Marion Fox?

11 A And I don't even know who Jonathan Spence is  
12 much less Bryan Freedman representing them.

13 Q Do you know Marion Fox?

14 A No, never heard the name.

12:54:51 15 Q Okay.

16 A People I don't --

17 Q Do you know an attorney named Gerald Siegel at  
18 Tharpe & Howell?

19 A A lot of attorneys in the world. No, I don't  
12:54:59 20 know that one either.

21 Q You don't know Mr. Siegel?

22 MR. STEINSAPIR: I don't think you do.

23 BY MR. FINALDI:

24 Q Have you ever communicated with attorneys for  
12:55:13 25 Jordan or Lily Chandler at any time in the last two

12:55:16 1 **years?**  
2 A How about never in the last 20 years.  
3 **Q Okay. But before then you had?**  
4 A No. But I'm --  
12:55:26 5 **Q Okay.**  
6 A -- just saying I don't think I've ever  
7 communicated with them.  
8 **Q Okay.**  
9 A I think I had a meeting with Jordan Chandler's  
12:55:33 10 attorney with Johnnie Cochran maybe 25 years ago but  
11 whatever.  
12 **Q Which attorney would that have been?**  
13 A I don't know the name. It was 24 years ago.  
14 **Q Did you ever meet Jordan Chandler?**  
12:55:43 15 A No.  
16 **Q How about Lily Chandler?**  
17 A I don't even know her name.  
18 **Q Okay. So at Hayvenhurst did you ever see any**  
19 **children there with Mr. Jackson?**  
12:56:04 20 A Not that I recall other than his nieces and  
21 nephews.  
22 **Q Okay. The nephews being Taj, TJ and Taryll?**  
23 A You know, I don't even recall specifically  
24 seeing them. The only minor I saw at Neverland was Janet  
12:56:22 25 Jackson.

12:56:23 1 Q Okay. You saw Janet Jackson at Neverland as a  
2 minor?

3 A Not at Neverland. I thought you meant  
4 Hayvenhurst.

12:56:32 5 MR. STEINSAPIR: I think you misspoke.

6 BY MR. FINALDI:

7 Q You said Neverland. Okay.

8 So the only minor you remember seeing at  
9 Hayvenhurst was Janet Jackson?

12:56:38 10 A Correct.

11 Q Did you know Jolie Levine?

12 A Jolie Levine, yeah.

13 Q How do you know her?

14 A I believe she was Michael's secretary. She was  
12:56:47 15 Quincy's secretary at one time.

16 Q When's the last time you spoke with her?

17 A I don't recall. Maybe 20, 25 years ago.

18 Q Do you know what she does for a living now?

19 A No.

12:57:01 20 Q Did you know she has son named Yoshi?

21 A No.

22 Q Never met Yoshi?

23 MR. STEINSAPIR: Audibly. That's a no? Just  
24 say no.

12:57:09 25 THE WITNESS: Oh, no.

12:57:11 1 MR. FINALDI: Okay.  
2 MR. STEINSAPIR: You were shaking your head.  
3 BY MR. FINALDI:  
4 Q Are you aware of any type of a confidentiality  
12:57:36 5 agreement in the settlement involving Jordan Chandler?  
6 A I don't recall specifically. I'm sure there  
7 was one.  
8 Q Is it your understanding that's still in  
9 effect?  
12:58:01 10 A I don't have a current understanding.  
11 Q Okay. Do you have any knowledge of -- so  
12 there's a -- there are certain websites related to  
13 Michael Jackson that are run by the estate, correct?  
14 A Yes.  
12:58:14 15 Q Okay. Do you know which websites they are?  
16 A Well, we have MJJ.com or Michael Jackson.com.  
17 We have a Facebook site.  
18 Q And who runs those?  
19 A Run by Sony Music and the estate.  
12:58:38 20 Q Who, in particular, for the estate?  
21 A Karen Langford.  
22 Q And who is she employed by?  
23 A My law firm.  
24 Q Is she an attorney?  
12:58:49 25 A Paralegal.

12:58:52 1 Q Is she your new assistant?  
2 A Excuse me?  
3 Q Is she your new assistant?  
4 A A new assistant?  
12:58:58 5 Q Is she your assistant?  
6 A She's a paralegal.  
7 Q Okay. Who's your assistant now?  
8 A Michelle.  
9 Q Michelle what?  
12:59:05 10 A Huslein.  
11 Q How do you spell that last name?  
12 A H-U-S-L-E-I-N.  
13 Q Any other websites that you are aware of that  
14 the estate either runs or funds?  
12:59:20 15 A No.  
16 Q How about MJJfacts or you know --  
17 A I don't --  
18 Q -- anything like that?  
19 A I don't recall, no.  
12:59:28 20 Q VindicateMJ, any of those types --  
21 A No --  
22 Q -- of websites?  
23 A -- not the estate.  
24 Q No?  
12:59:33 25 A No.

12:59:33 1 Q And is -- MJJ Productions is still a company,  
2 correct?  
3 A Yes.  
4 Q Okay. How about MJJ Ventures?  
12:59:45 5 A Yes.  
6 Q Has there ever been -- so since 2013, when this  
7 case was filed, has there been any major transfer of  
8 assets outside of MJJ Productions?  
9 A No.  
01:00:04 10 Q Okay. Is there any anticipated?  
11 A No.  
12 Q Same question for Ventures?  
13 A Nope.  
14 MR. FINALDI: Okay. Let's take a quick break.  
01:00:22 15 THE WITNESS: I don't need a break. Keep  
16 going.  
17 MR. STEINSAPIR: Want to take a five-minute  
18 break?  
19 MR. FINALDI: Let's go off the record real  
01:00:28 20 quick.  
21 MR. STEINSAPIR: Okay. Off the record.  
22 MR. FINALDI: I think it will help you.  
23 THE VIDEOGRAPHER: Video deposition off the  
24 record at 1 p.m. Conclusion of tape 2.  
01:00:33 25 (Off the record.)

01:00:33 1 THE VIDEOGRAPHER: Video deposition returning  
2 to the record at 1:08.  
3 BY MR. FINALDI:  
4 Q You understand you're still under oath?  
01:08:17 5 A Correct.  
6 Q Did Michael Jackson -- where did he generally  
7 conduct business from?  
8 A Where did he conduct business from?  
9 Q Yeah, in your experience.  
01:08:33 10 MR. STEINSAPIR: Vague as to time.  
11 BY MR. FINALDI:  
12 Q Just wherever he was?  
13 A Yeah, from his house. Sometimes he came to our  
14 office. If he was on tour, it was in his suite.  
01:08:48 15 Q Did you ever go to the MJJ Productions'  
16 offices?  
17 A First of all, I don't know if there was always  
18 an MJJ Productions' office but, generally speaking, our  
19 meetings were either at his house or at my office or out  
01:09:04 20 of town.  
21 Q Okay. Do you know that MJJ Productions had an  
22 office in Westwood?  
23 A I remember they did but that -- that took place  
24 while I was not involved.  
01:09:18 25 Q Gotcha. So you never did any type of business

01:09:20 1 meeting with Mr. Jackson at that MJJ Productions' offices  
2 that you can recall?

3 A Not that I recall.

4 Q Okay. So when you were brought back in to work  
01:09:39 5 for Mr. Jackson, was that after Chandler allegations had  
6 resolved or were they still kind of going on?

7 A They were not resolved.

8 Q Okay. And were you ever made aware of exactly  
9 what the allegations were that Jordie was making?

01:09:59 10 A Well --

11 MR. STEINSAPIR: You can answer that yes or no,  
12 by the way.

13 THE WITNESS: I don't -- I don't -- generally.  
14 It was 24 years ago, so I don't recall my specific  
01:10:08 15 recollection.

16 BY MR. FINALDI:

17 Q But you knew the general allegations?

18 A Correct.

19 Q Okay. Did you know that he submitted a  
01:10:13 20 declaration under oath as to his abuse in that case?

21 A I don't recall.

22 Q You don't know if you read it?

23 A I don't think I did. When I came back  
24 involved, I changed Michael's legal team.

01:10:34 25 MR. FINALDI: Alex, can you find that?

01:10:34 1 BY MR. FINALDI:  
2 Q [REDACTED]  
3 [REDACTED]  
4 A [REDACTED]  
01:10:47 5 [REDACTED]  
6 Q [REDACTED]  
7 [REDACTED]  
8 [REDACTED]  
9 [REDACTED]  
01:11:08 10 Q Okay. Do you know one of the allegations of  
11 Jordie Chandler was that he was abused by Mr. Jackson in  
12 a hotel room abroad?  
13 A No.  
14 Q Okay. I'm going to mark as Exhibit D for the  
01:11:31 15 record and give a copy to the witness and to counsel.  
16 This is the Declaration of J. Chandler.  
17 A Isn't --  
18 MR. STEINSAPIR: Just let him ask the  
19 questions.  
01:11:44 20 BY MR. FINALDI:  
21 Q [REDACTED]  
22 [REDACTED]  
23 [REDACTED]  
24 [REDACTED]  
01:12:06 25 [REDACTED]

01:12:10

1

2

3

4

A

01:12:19

5

Q

Okay. I'll need that one back, please. Thank  
you.

6

7

8

Did you know one of the allegations was that he  
was masturbating Jordan Chandler or with him?

9

A

No.

01:12:57

10

Q

Did you ever know that Jason Francia alleged  
that he was sexually abused by Michael Jackson in the  
Hideout?

11

12

13

A

No.

14

Q

After the Chandler allegations arose, was there  
any kind of notice given to the employees of MJJ  
Productions or Ventures regarding what the allegations  
were?

01:13:28

15

16

17

18

A

I don't recall.

19

Q

Okay. Was there ever any notice given to the  
children that Mr. Jackson came into contact with  
afterwards or their parents regarding what the  
allegations were?

01:13:41

20

21

22

23

A

I don't recall.

24

Q

So there may have been a notice?

01:13:57

25

A

I don't know.

01:13:58 1 Q Like a warning?  
2 A I don't know.  
3 Q You don't know?  
4 Are you aware of any sexual misconduct  
01:14:21 5 allegations involving Michael Jackson and Emmanuel Lewis?  
6 A No.  
7 Q Same question regarding Rodney Allen Rippy?  
8 A No.  
9 Q How about regarding Siggys Jackson?  
01:14:32 10 A No.  
11 Q Alfonso Ribeiro?  
12 A No.  
13 Q Sean Lennon?  
14 A No.  
01:14:38 15 Q Corey Feldman?  
16 A No.  
17 Q Macaulay Culkin?  
18 A No.  
19 Q Bryton McClure?  
01:14:44 20 A I don't know who that is.  
21 Q Evan Ross?  
22 A No.  
23 Q Eric Trump?  
24 A I don't know who -- no.  
01:14:50 25 MR. STEINSAPIR: Is that the president's son?

01:14:52 1 MR. FINALDI: Yes.  
2 MR. STEINSAPIR: Oh, that's a new one. Okay.  
3 BY MR. FINALDI:  
4 Q Aaron Carter?  
01:14:55 5 A No.  
6 Q Brett Barnes?  
7 A These questions are like when did you stop  
8 beating your wife? My God.  
9 MR. STEINSAPIR: Just answer it and --  
01:15:03 10 THE WITNESS: No.  
11 MR. STEINSAPIR: He's asking his questions and  
12 just give him his answers.  
13 BY MR. FINALDI:  
14 Q Have you ever met Brett Barnes?  
01:15:10 15 A No.  
16 Q Brett Barnes? Australian?  
17 A No.  
18 Q His -- Elijah or Levon?  
19 A I don't know who that is.  
01:15:22 20 Q Okay. Taj, TJ or Taryll?  
21 A No.  
22 Q Frank or Eddie Cascio?  
23 A No.  
24 Q Gavin Arvizo?  
01:15:29 25 A No.

01:15:30 1 Q Omer Bhatti?  
2 A I don't know who that is.  
3 Q Rashida or Quedada Jones?  
4 A No.  
01:15:41 5 Q Have you ever met Miko Brando?  
6 A Yes.  
7 Q And when is the last time you spoke with him?  
8 A I think just after Michael passed away.  
9 Q Did you ever speak with him about the  
01:15:57 10 allegations?  
11 A No. Why would I?  
12 Q Have you ever spoken with any parents of  
13 children that were around Michael about the allegations?  
14 A Other than my wife, no.  
01:16:14 15 Q Okay. Do you know if -- so there were  
16 telephones at Neverland, correct?  
17 A Yeah.  
18 Q And there was security staff there as well?  
19 A Yeah.  
01:16:51 20 Q You would see the security staff when you went  
21 there?  
22 A Yeah.  
23 Q They would let you in and out of the gate,  
24 right?  
01:16:56 25 A Well, I'm sure they knew I was coming.

01:16:59 1           Q     Okay. And was there house staff as well at  
2     Neverland?  
3           A     Yeah.  
4           Q     Like cooks and maids and things of that nature?  
01:17:09 5           A     Yeah.  
6           Q     Okay. And so the employees there at Neverland,  
7     if they were employees of MJJ Productions or Ventures,  
8     for example, if they saw a fire break out, they would be  
9     able to call the police, right?  
01:17:30 10          A     Well, I would assume they would call the fire  
11     department but --  
12          Q     Okay. You don't remember any policies or  
13     procedures of those corporations that would prevent that?  
14          A     I don't know that the employees of Neverland  
01:17:46 15     were employees of MJJ Productions. They might have been  
16     employees of another company or Michael, personally. I  
17     don't know. I don't recall.  
18          Q     What other company could it have been?  
19          A     Could be Michael, personally, or I believe  
01:17:59 20     there was a company called Neverland Ventures but I just  
21     don't want to speculate.  
22          Q     And Neverland Ventures, that would be what type  
23     of a -- well, a corporation?  
24          A     You know what, I don't recall.  
01:18:13 25          Q     While you were an officer or director of those

01:18:25 1 corporations, you did know that Michael Jackson from time  
2 to time would bring large groups of kids to Neverland,  
3 right?

4 A I don't recall what I would know as officer or  
01:18:36 5 director. As Michael's attorney, I knew sometimes he had  
6 underprivileged and sick and ill children come up to the  
7 ranch, yes.

8 Q And do you know if there were any kind of  
9 protocols or procedures in place to make sure they were  
01:18:50 10 safe while the kids were there?

11 A I was not involved in Michael's personal life.

12 Q You say, "personal life." What do you mean by  
13 that?

14 A Well, Michael used to bring up kids that  
01:19:05 15 couldn't walk, that had to be -- had diseases that could  
16 die if they were -- Michael did a lot of things that were  
17 very, very kind in his personal life by bringing people  
18 up to Neverland. I was not involved in that.

19 Q How do you -- you said that was done in his  
01:19:22 20 personal life. How do you differentiate that from his  
21 business life?

22 A When Michael's out on tour and singing on stage  
23 and making money, I call that business. When he's making  
24 a record in a recording studio, I call that business.  
01:19:34 25 What he does on Saturday and Sunday or, you know, when

01:19:38 1 he's not working is his personal life.

2 Q What if he's reh- --

3 A Probably the same way when you are in your  
4 office, I would call that probably your business life.

01:19:46 5 When you're home, if you're married, that would be your  
6 personal life.

7 Q What if he's rehearsing, would that be  
8 business?

9 A Depends. I mean, you're asking me for an  
01:19:59 10 opinion that I'm not sure I understand but if Michael was  
11 rehearsing for a show, that would probably be business.

12 Q The reason I ask is because he didn't have a  
13 traditional job. It's not like he went to an office  
14 every day where he's conducting business out of, fair?

01:20:12 15 A Correct.

16 Q Okay. So you would agree that it's difficult  
17 to decipher when it was personal and when it was  
18 business?

19 A Some things would be easy to decipher. And if  
01:20:21 20 you're positing that Michael was rehearsing for a video  
21 or something at his house, I would agree that that could  
22 go either way.

23 Q Okay. Did you ever hear that Michael Jackson  
24 sexually assaulted children while he was rehearsing with  
01:20:42 25 them?

01:20:43 1 A No.

2 Q So you are aware of one of Michael's -- Mr.  
3 Jackson's dance moves where he would grab his crotch,  
4 right?

01:20:54 5 A Yeah.

6 Q Okay. Did you ever hear that he was teaching  
7 that to children by grabbing their crotch?

8 A No.

9 Q Would you consider that abuse?

01:21:03 10 MR. STEINSAPIR: Calls for a legal conclusion.  
11 You can answer.

12 THE WITNESS: I'm not an expert on child abuse.

13 BY MR. FINALDI:

14 Q Don't have an opinion one way or another?

01:21:12 15 A No.

16 Q So if he had been doing that with an  
17 employee -- a minor employee of MJJ Productions, you  
18 would not have an issue with that as an officer or  
19 director of the company?

01:21:28 20 MR. STEINSAPIR: It's an improper hypothetical.  
21 If you understand the question, you can answer.

22 THE WITNESS: I don't believe he would do that.

23 BY MR. FINALDI:

24 Q But what if he did?

01:21:34 25 A I don't believe he did. I don't want to answer

01:21:36 1 a hypothetical.

2 Q Because it would be improper to do, that's why  
3 you don't think he would do it, right?

4 MR. STEINSAPIR: Objection.

01:21:43 5 THE WITNESS: I'm not sure I know what you're  
6 talking about.

7 BY MR. FINALDI:

8 Q It would be improper for him to grab a child's  
9 genitals, right? That's why you don't think he would do  
01:21:51 10 it?

11 A Correct.

12 Q Because he's a decent person, right?

13 A Correct.

14 Q Or he was a decent person? Okay.

01:22:05 15 And your carried interest in the publishing  
16 company, how long is that?

17 A That was bought out in 2006.

18 Q Presently, you are the -- what's your title for  
19 the Estate?

01:22:20 20 A Coexecutor of the Estate and co-manager of the  
21 Estate.

22 Q Do you hold any other titles or positions with  
23 any of Michael's -- formerly Michael's assets?

24 A Well, on the companies we're talking about, I'm  
01:22:37 25 president or CEO.

01:22:40 1 Q President and the CEO of --  
2 A President or CEO. I don't know the exact  
3 title.  
4 Q Of MJJ Ventures and --  
01:22:48 5 A MJJ Productions.  
6 Q -- MJJ Productions?  
7 A Correct.  
8 Q Are there any other officers or directors of  
9 those two companies?  
01:22:53 10 A I believe my co-executor John McClain is also  
11 an officer.  
12 Q All right. And I don't need to know amounts,  
13 but are you compensated for your positions on MJJ  
14 Ventures and --  
01:23:07 15 A Not as offic- --  
16 Q -- and MJJ Productions?  
17 A Not as officers, no.  
18 Q Okay. You are compensated for your position  
19 with the Estate, right?  
01:23:16 20 A The court appointed us as co-managers and set  
21 our compensation, correct.  
22 Q Okay. And that compensation is tied in some  
23 respect to the performance of the Estate's assets,  
24 correct?  
01:23:34 25 A Correct.

01:23:36 1 Q And you have a fiduciary duty to the Estate and  
2 those assets, right?

3 A I would defer to my counsel to tell me that.

4 MR. STEINSAPIR: Essentially, the beneficiaries  
01:23:44 5 of the estate.

6 BY MR. FINALDI:

7 Q Well, your job is to manage the assets, make  
8 sure they're performing, correct?

9 A Correct.

01:23:49 10 Q Okay. Monetize them for lack of better terms,  
11 right?

12 A To manage them.

13 Q And part of that is protecting Mr. Jackson's  
14 image and likeness, right?

01:24:06 15 A Correct.

16 Q From poachers or people trying to use it  
17 inappropriately, right?

18 A Correct.

19 Q Okay. Mr. Kane testified in the IRS case. Do  
01:24:36 20 you know that?

21 A Yes.

22 Q And he testified that he was brought on -- back  
23 onto Michael's team around the same time that you were  
24 brought back on when he was rehearsing for the This is It  
01:24:50 25 tour. Do you understand that?

01:24:53 1 A I haven't read his deposition so --

2 Q He said at that point in time Michael, I guess,  
3 had not paid his taxes for several years. He was in some  
4 financial difficulties. You know that?

01:25:04 5 A Yes.

6 Q Okay. He said that he -- actually, there was a  
7 meeting at the Forum and he wanted Michael to sign a  
8 power of attorney so he can take care of those tax  
9 records. And Michael said I won't sign anything unless  
01:25:18 10 John tells me to. And you reviewed it. You said, yeah,  
11 you should probably sign this.

12 Do you agree with that testimony or disagree?

13 A I don't recall that.

14 Q Did you ever review powers of attorney for Mr.  
01:25:28 15 Jackson and recommend whether he should sign them or not?

16 A I'm not a fan of powers of attorneys, so I  
17 tried to recommend against him.

18 Q Well, you had them for Michael from different  
19 times, correct?

01:25:38 20 A I only had it for a short period of time for  
21 one transaction.

22 Q Okay. Nevertheless, you would recommend for  
23 Mr. Jackson sometimes to sign things and not to sign  
24 things, right?

01:25:52 25 A Yes.

01:25:52 1 Q To enter into some deals and not enter into  
2 some deals?

3 A I would give my recommendation.

4 Q Okay. And sometimes you knew that your advice  
01:25:56 5 would be unfavorable to Mr. Jackson, correct?

6 A I'm not sure what you mean by that.

7 Q You testified about the good Branca, the bad  
8 Branca, sometimes you'd have to tell him things that you  
9 knew he's not going to like, right?

01:26:08 10 MR. STEINSAPIR: That's different --

11 THE WITNESS: Okay.

12 BY MR. FINALDI:

13 Q But you would give the advice any way because  
14 you knew it was the best for the company?

01:26:13 15 A Correct.

16 Q Okay. Do you know how -- how Michael -- so if  
17 Michael Jackson was, for example, loaned out to Pepsi  
18 Company for a commercial, right, through MJJ Productions,  
19 how would that compensation work?

01:26:40 20 MR. STEINSAPIR: It's a hypothetical but you  
21 can go ahead and answer.

22 THE WITNESS: MJJ Productions loaned out  
23 services to Pepsi -- and I don't recall if that was the  
24 case -- Pepsi would pay MJJ Productions and then that  
01:26:52 25 money would get distributed -- MJJ Productions might pay

01:26:57 1 expenses and distribute the balance to Michael.

2 BY MR. FINALDI:

3 Q Okay. And sometimes did you have the  
4 opportunity to negotiate and draft up those deals?

01:27:13 5 A The Pepsi deal?

6 Q Deals between MJJ Productions and any type of a  
7 business entity for Mr. Jackson.

8 A Well, I negotiated his deals with his record  
9 company, yes.

01:27:25 10 Q How about other types deals for, like,  
11 commercials, movie shoots, things like that?

12 A Yeah. But MJJ Productions primarily was to  
13 loan out his services to the record company.

14 Q Okay. How about for the things like the  
01:27:39 15 commercials or, you know, Captain EO, other projects like  
16 that?

17 A Yeah. I did the Captain EO deal and the Pepsi  
18 deal.

19 Q Getting close. I'm almost done.

01:28:01 20 In 2003, it's my understanding Mr. Jackson  
21 terminated your services again, right?

22 A I don't recall the exact date.

23 Q Do you know the reason why?

24 A No.

01:28:13 25 Q At one point in time you filed UCC claims

01:28:20 1 **against MJJ Productions and his trusts, right?**

2 A I think in 2005 or '6, yeah.

3 MR. STEINSAPIR: The question assumes facts as  
4 to who it was filed against.

01:28:34 5 BY MR. FINALDI:

6 **Q Were those lawsuits or were they just claims;**  
7 **do you know?**

8 A The UCC file- -- I would never sue Michael  
9 Jackson.

01:28:41 10 **Q They were again his entities?**

11 A The UCC filing I don't recall if it was against  
12 him personally, against the publisher. I don't recall  
13 what companies. It was just to make sure if there was a  
14 sale of Sony of his interest in ATV, we would get paid  
01:28:56 15 what we were owed. But it certainly wasn't a lawsuit.

16 **Q Did you ever meet Dieter Weisner?**

17 A Yeah, I did.

18 MR. STEINSAPIR: Sorry.

19 BY MR. FINALDI:

01:29:10 20 **Q And it's my understanding that that gentleman**  
21 **was Mr. Jackson's advisor for some point in time?**

22 A His what?

23 **Q Advisor. I don't know how else to put it.**

24 A He started as a licensee and he was a

01:29:25 25 consultant or advisor in some capacity but -- yeah.

01:29:32 1 Q Did you know about his involvement in  
2 pornography, gay pornography?

3 A No. [REDACTED]  
4 [REDACTED].

01:29:44 5 Q Gotcha. And do you know how it was that  
6 Michael came to be involved with him in a business  
7 relationship?

8 A Yeah. Dieter Weisner and his partner, whatever  
9 that other guy's name was, pitched a drink, a Michael  
01:30:00 10 Jackson drink for Germany. A beverage or drink, a milk  
11 drink so we signed a license with this man and he  
12 defaulted on the payments. And -- but that's how it  
13 started. This was a -- it was a name and likeness  
14 license.

01:30:21 15 Q Okay. Give me just a minute. I think I'm  
16 finished.

17 So just to finalize, you don't remember there  
18 being any kind of training policies or procedures for  
19 employees of MJJ Productions or Ventures related to child  
01:30:47 20 sexual abuse or protecting children, correct?

21 A Not that I know of.

22 Q Okay. And as a result, there were no changes  
23 to any types of policies or procedures after the Chandler  
24 allegations, correct?

01:31:02 25 A MJJ Productions, MJJ Ventures were just -- they

01:31:07 1 were different forms of Michael doing business as opposed  
2 to Michael himself, so were there policies or changes in  
3 policies? I don't believe so.

4 Q Okay. And did you ever make the  
01:31:21 5 recommendation, Michael, you know, stop putting yourself  
6 alone with kids to protect yourself, anything of that  
7 nature?

8 MR. STEINSAPIR: Objection; assumes facts and  
9 instruct witness not to answer. You're asking --

01:31:32 10 THE WITNESS: That's attorney-client privilege,  
11 isn't it?

12 MR. STEINSAPIR: That's my objection,  
13 attorney-client privilege.

14 BY MR. FINALDI:

01:31:36 15 Q Well, it could be in a business capacity or it  
16 could be as a friend so you know --

17 A I was Michael's lawyer.

18 Q Okay. You were his best man in his wedding.  
19 You were a little more than just a lawyer, right?

01:31:45 20 A No. He was the best man in my wedding.

21 Q Okay.

22 A But -- that was in '87. But --

23 Q So --

24 A My relationship with him was as an attorney.

01:31:54 25 Q Well, he was your best man so --

01:32:04 1 A Yeah.

2 Q -- it's a little more than just --

3 A Well, the other best man was Ken Ziffren, who  
4 was my partner. So you can be an attorney and still have  
01:32:07 5 a relationship, a friendship but any advice that one  
6 would give would be as an attorney.

7 Q Was he one of your best friends?

8 MR. STEINSAPIR: Vague as to time.

9 BY MR. FINALDI:

01:32:14 10 Q When he was your best man?

11 A You know, you're an attorney. I had a lot of  
12 fondness for Michael. He had a lot of respect for me but  
13 that relationship is inherently a business relationship  
14 of attorney to client. Even if you feel friendship  
01:32:32 15 toward them, that is not the nature. Friends don't pay  
16 somebody for their services. So the nature of that  
17 relationship was attorney-client.

18 Q Okay. Where was that wedding?

19 A At my house at the time.

01:32:44 20 Q Okay. So with this whole -- you know, the  
21 Thriller movie thing, you essentially lied to Michael,  
22 right?

23 A No.

24 Q Well, you told him something that wasn't true  
01:33:01 25 in order to make sure that the film didn't get destroyed,

01:33:04 1 **right?**

2 A Well, you call that a creative fiction. But in  
3 the end, obviously, lie would be too strong a word. Lie  
4 would imply I had some personal interest that I was  
01:33:20 5 trying to foist on Michael to get him to do something as  
6 opposed to trying to help him navigate through a  
7 difficult emotional situation, which when he came out the  
8 other end of it, he understood how we had talked about  
9 it. He left the church. And it wasn't something that  
01:33:37 10 hung out there as something that I lied to him about.

11 Q You remained his attorney for quite a few years  
12 after that event, correct?

13 A Yes.

14 Q And you ended up making quite a bit of money as  
01:33:47 15 a result of that, right?

16 A Yes.

17 MR. FINALDI: Okay. I think I'm -- just give  
18 me a couple seconds here. Anything you guys? No. Okay.  
19 Then I believe I'm finished. So I'd like to -- actually,  
01:34:16 20 let me see the exhibits, please. Thank you. Make sure  
21 they're all here. We've got A through D, correct? So  
22 the exhibits are all here. He's been served with the  
23 trial subpoena.

24 So I'd like to go ahead and suspend the  
01:34:37 25 deposition. There were, I believe, a few questions he

01:34:39 1 was instructed not to answer so we're going to reserve on  
2 that. We're probably going to bring a motion on it. But  
3 we'll meet and confer with you either way.

4 That being said, I don't want to close out the  
01:34:48 5 deposition but I would be willing to close out this  
6 volume and offer a stipulation so he doesn't have to go  
7 to the court reporter's office.

8 Is that what you would like to do?

9 MR. STEINSAPIR: Yeah. Go ahead.

01:34:56 10 MR. FINALDI: Okay. So the stipulation would  
11 be that the court reporter be relieved of her duties  
12 under the Code. She will prepare the transcript and have  
13 it sent to Mr. Steinsapir's office. He will see to it  
14 that Mr. Branca receive the deposition transcript, review  
01:35:08 15 it, make any corrections he deems necessary thereto, sign  
16 it under penalty of perjury and return it back to Mr.  
17 Steinsapir, who will return it to my office within 30  
18 days of Mr. Branca's receipt, thereof.

19 We will maintain custody of the original. We  
01:35:24 20 will lodge it with the court for the trial and upon  
21 reasonable request. If the original is lost, misplaced,  
22 stolen or otherwise unavailable, a certified copy can be  
23 used in lieu thereof for any and all purposes, including  
24 trial.

01:35:39 25 MR. STEINSAPIR: So stipulated. Just one

01:35:41 1 comment which is that you have an opposition to a summary  
2 judgment motion that you might want to use some portions  
3 of this transcript.

4 MR. FINALDI: If we can do it quicker then --

01:35:49 5 MR. STEINSAPIR: So if you want to ask for a  
6 quicker turnaround and also a quicker thing from Mr.  
7 Branca, why don't -- why don't you do that off line?

8 MR. FINALDI: Could we do 15 days?

9 MR. STEINSAPIR: Yeah. 15 days is a fine.

01:35:59 10 MR. FINALDI: So we'll do 15 days. And  
11 Mr. Branca, you can make any corrections you deem  
12 necessary to the transcript. If you do need to make a  
13 correction, I would ask you to make it right on  
14 transcript itself, instead of on errata sheet.

01:36:12 15 And I'd caution you if you change something  
16 like a yes to a no, something that's material in nature,  
17 it can be seen as negatively affecting your credibility,  
18 it can be commented on in motion practice and at the time  
19 of trial.

01:36:21 20 Do you understand that?

21 THE WITNESS: Okay.

22 MR. FINALDI: Thank you, sir.

23 THE WITNESS: Thanks.

24 MR. STEINSAPIR: Thank you.

01:36:25 25 THE VIDEOGRAPHER: Video deposition off the

01:36:25 1 record --

2 MR. FINALDI: Let's put a rush on that.

3 Expedite. Thank you.

4 THE VIDEOGRAPHER: -- at 1:36. Deposition

01:36:29 5 adjourned on October 18th, 2017. Conclusion of tape 3 of  
6 3 used in today's deposition.

7 (Deposition concluded at 1:36 p.m.)

8 (Exhibits A through D were marked by the

9 Certified Shorthand Reporter.)

10 (Deposition to be signed under penalty of  
11 perjury.)

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I do solemnly declare under penalty of perjury under the laws of the State of California that the foregoing is my deposition under oath; are the questions asked of me and my answers thereto; that I have read same and have made the necessary corrections, additions or changes to my answers that I deem necessary.

Executed this \_\_\_\_\_ day of \_\_\_\_\_, \_\_\_\_\_.

\_\_\_\_\_

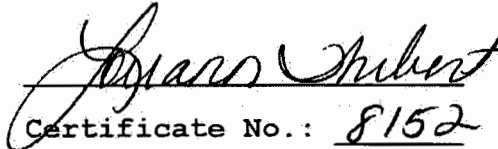
CERTIFICATION  
OF  
CERTIFIED SHORTHAND REPORTER

The undersigned certified shorthand reporter  
of the state of California does hereby certify:

That the foregoing deposition was taken before  
me at the time and place therein set forth, at which  
time the witness was duly sworn by me;

That the testimony of the witness and all  
objections made at the time of the deposition were  
recorded stenographically by me and thereafter  
transcribed, said transcript being a true copy of my  
shorthand notes thereof.

In witness whereof, I have subscribed my name  
this date OCT 23 2017.

  
Certificate No.: 8152

Date Taken: \_\_\_\_\_

1. To clarify the record;
2. To conform to the facts;
3. To correct major transcription errors.

AA - 755