

JOLIE LEVINE,

CALLED AS A WITNESS BY AND ON BEHALF OF THE PLAINTIFF,
AFTER BEING DULY SWORN, WAS EXAMINED AND TESTIFIED AS
FOLLOWS:

UNIDENTIFIED SPEAKER: I have someone dropping
off paperwork for you.

MR. JOHNSON: And the next set, there's copies
on the back.

MR. FINALDI: Okay. Thank you.

MR. JOHNSON: Cool.

EXAMINATION

BY MR. FINALDI:

Q Good morning.

A Good morning.

Q How are you?

A I'm okay.

Q Alrighty. You understand that the oath that
you just took has the same force and effect as if it were
said in a court of law?

A Yes, I do.

Q Okay. You understand that oath compels you to
tell the truth under penalty of perjury?

A Yes.

Q And you have agreed to tell the truth under penalty of perjury, correct?

A Yes.

Q All right. Have you ever had your deposition taken before?

A Yes.

Q How many times?

A Once.

Q Have you ever testified in a trial?

A No.

Q Okay. I'll ask questions. You'll be required to provide responses. If you do provide a response, I'll assume that you understood the question. So for that reason, if any of my questions are vague or ambiguous, let me know and I'll rephrase the question because I want to make sure we're getting answers to the questions I'm trying to ask. Okay?

A Okay.

Q And I won't be offended.

Some of the things we may be talking may have happened two, three, four years ago. The way ordinary memory works, you may not remember exact dates and times and that's perfectly acceptable. In those instances, I don't want any wild guesses that are not based upon your

own personal experience but I am entitled to your best estimate.

So, for example, if I was to ask you when something happened maybe ten years ago, you may not remember an exact date but you may remember, well, it was around Christmas time. That's an area where you can give an estimate without being a total guess.

Does that make sense?

A Yes.

Q Okay. Have you ever been diagnosed with any memory problems?

A Oh, yes. I have lupus and --

Q Okay.

A -- osteoporosis and migraines and --

Q Have you ever been told by any medical professional that your lupus negatively affects your memory?

A Yes.

Q All right. And who's your treating physician who told you that?

A I go to Harbor UCLA and they're a teaching hospital. So there is an overseeing -- I forget what the word is. Sorry. There it goes. But there's an attending but there's -- they rotate.

Q Okay.

A It's a teaching hospital. So I go every three months but I don't always -- I don't see the same --

Q You don't have a primary?

A I do have a primary but my specialist that oversees my lupus is my rheumatologist.

Q Okay.

A And there is an attending but I see a different doctor every time.

Q Do you ever treat with Dr. Allan Metzger?

A No, not that I know of.

MS. MacISAAC: I'm going to object on confidentiality grounds -- I don't see -- and relevance. This witness -- I think it's completely legitimate that you ask about any memory issues but specific names of doctors and treatments, I'm going to object as confidential and private.

BY MR. FINALDI:

Q So do you have a lawyer here today?

MS. MacISAAC: Yes. I've said on the record that I'm representing --

MR. FINALDI: I'm not asking you. If you want to go under oath, we can put you under oath.

BY MR. FINALDI:

Q Miss Levine, do you have an attorney here today?

A Yes, I do.

Q Okay. And who's your attorney?

A Suann.

MS. MacISAAC: MacIsaac.

BY MR. FINALDI:

Q And when did you first get into contact with Miss MacIsaac?

MS. MacISAAC: If you recall.

THE WITNESS: Pardon?

MS. MacISAAC: If you recall.

THE WITNESS: I can't remember exactly.

BY MR. FINALDI:

Q How did you first get into contact with her?

A I don't really remember.

Q Okay. You don't remember at all, whatsoever, how you became familiar with Miss MacIsaac?

MS. MacISAAC: I was communicating with the witness's son, Yoshi Whaley.

MR. FINALDI: I don't need to hear this. I don't need to hear this. Okay. I need to hear the witness's statements under oath. That's why we took her deposition so --

BY MR. FINALDI:

Q You remember you were served with a deposition subpoena for this deposition today, correct?

A Correct.

Q Okay. Did you contact someone from MJJ?

A No.

Q Did you contact the attorneys for MJJ or Michael's estate?

A No.

Q Did they contact you?

A No.

Q Okay. Well, then how did the contact happen where --

MS. MacISAAC: I've just explained it.

MR. FINALDI: Ma'am --

THE WITNESS: My son --

BY MR. FINALDI:

Q Yoshi?

A Yes.

Q Please explain to me how Yoshi orchestrated this.

A I don't really know.

Q Okay. Tell me what you do know, though.

A My -- my understanding is my son contacted someone to ask questions about what was going on.

Q And who did he contact?

MS. MacISAAC: If you -- calls for speculation.

THE WITNESS: Yeah. I don't know.

BY MR. FINALDI:

Q Did he tell you?

A No. I've been very sick so --

Q I understand that. What exactly did he tell you? So he said he contacted someone?

A And he said --

Q Someone from who? From Michael's --

MS. MacISAAC: Calls for speculation. You're deposing --

MR. FINALDI: Ma'am -- ma'am, I have not finished my question.

MS. MacISAAC: You know what, you're being very argumentative and you're wasting time with a witness who's already told us that she's sick. I've said to you that we communicated with Yoshi Whaley. You can ask the son about it. You can ask these questions. But if the witness has to go because she's not feeling well, then she has to go.

MR. FINALDI: Suann, you're being obstreperous. All right. I'm asking perfectly legitimate questions and you keep testifying for the witness which is improper.

MS. MacISAAC: I'm not testifying.

MR. FINALDI: You are. You're telling -- you're saying things about what happened and I don't need to hear it. Okay.

MS. MacISAAC: Jolie, just whatever you can recall about what your son told you, just tell him.

MR. FINALDI: And the second thing you're doing is you're talking while I'm talking which is completely improper because you know the court reporter's taking down everything being said. So I'd ask that you please do not do it. Please act professional. And if you have an objection for the record, lodge a proper objection that's not a speaking objection. Thank you.

BY MR. FINALDI:

Q Now, your son's name, he goes by the name Yoshi, correct?

A Yes.

Q What's his true legal name?

A Leroy Del Yoshi Whaley.

Q And how do you spell the first name?

A L-E-R-O-Y.

Q All right. And how do you spell Whaley?

A W-H-A-L-E-Y.

Q Okay. Does he live with you?

A Yes.

Q How long has he lived with you?

A I don't know.

MS. MacISAAC: Vague and ambiguous. As an adult?

THE WITNESS: I'm not sure. It's been -- he's been kind of helping me out since I got sick.

BY MR. FINALDI:

Q Okay. What's your best estimate as to how long he's lived with you in your current residence?

A In my current residence?

Q Yeah.

A Four and a half years.

Q Okay. And in the residence you lived in prior to that, did he live with you as well?

A Yes.

Q Okay. And how long was that?

A That was maybe a year or so -- a year or two.

Q Okay.

A Sorry. My memory's very bad.

Q Okay. Just do your best. That's all you can do.

A Okay.

Q All right. Alrighty.

So Yoshi said that he called someone. Did he intimate that he called someone from Michael Jackson's team or companies?

A Yes.

Q Okay. And did he say how he got a hold of someone?

A No, he didn't.

Q Okay. And so did you speak with someone from one of those attorneys before today or is this the first time you've spoken with Miss MacIsaac?

A No. I spoke to Miss MacIsaac.

MS. MacISAAC: MacIsaac.

THE WITNESS: Yeah, sorry. That's a little tongue twister.

MS. MacISAAC: It's a tongue twister, yeah.

BY MR. FINALDI:

Q Okay. How many times did you speak to her before today?

A Twice.

Q Okay. And do you remember when those occasions were?

A Recently.

Q After Christmas?

A After Christmas, yes.

Q After New Years?

A After New Years.

Q All right. And were those conversations over the phone or in person?

A In person -- I can't remember. I -- you know, I'm sorry. I -- in person once and I can't remember if I spoke to her on the phone or --

Q All right.

A Sorry.

Q No problem.

A I'm just not --

Q The time in person, where was that?

A For cof- -- at a coffee shop.

Q In Gardena or close to where you live?

A Yes.

Q Was anyone else there at the meeting besides you and Suann?

A No.

Q Alrighty.

A Does all this matter? I'm sorry. I'm just curious.

Q Sure. You can ask your lawyer about it on the break.

MS. MacISAAC: Yeah. Unfortunately.

MR. FINALDI: I can't give you advice.

MS. MacISAAC: You know, we'll get through it faster. If there's something that's so far afield, I will instruct you not to answer. But these are background questions that all are legitimate.

THE WITNESS: Oh, okay.

MS. MacISAAC: So we'll just go through them.

THE WITNESS: All right.

BY MR. FINALDI:

Q So are you paying Miss MacIsaac?

A No.

Q All right. And you understand that she represents MJJ Productions and MJJ Ventures, right?

A Yes.

Q Okay. Are you currently employed?

A No.

Q When were you last employed?

A Oh. That was a long time ago. I'm -- I'm disabled.

Q I understand that. You have lupus and you're disabled due to that and the complications that arise from it, correct?

A Correct.

Q Okay. When is the last time you were employed? And you can give your best estimate. Five years ago, ten years ago, fifteen?

A Sorry. I have to think about this. 2008, maybe, or '9. Something like that.

Q Okay. And what, generally, was your occupation at the last time you were employed?

A Oh, music contractor, production manager.

Q Okay. What does Yoshi do for a living?

A He -- I don't know what the exact title is. He

works at a company that wholesales exotic fish to aquariums. Imports, exports -- imports fish to exotic aquariums.

Q Do you know the name of the business?

A No, I don't.

Q Have you ever been to his work?

A No.

Q Do you know which city it's in?

A No. I think -- no. I think it's close by but I don't know what city it's in, technically.

Q And how long has he worked there?

A I'm not sure.

MS. MacISAAC: Calls for speculation.

BY MR. FINALDI:

Q Do you know --

MS. MacISAAC: Vince, I just want to say for the record that this is a witness that has said several times that she suffers from lupus. She's walked in here with a cane. She is disabled. You are deposing Yoshi in a few weeks. So where his office location is seems that that's something we could leave to that day.

MR. FINALDI: Ma'am, that's another speaking objection. I'm going ask you one more time --

MS. MacISAAC: I'm asking --

MR. FINALDI: -- not to do that.

MS. MacISAAC: -- we're going to walk out.

We're going to ask that the witness not have to continue and waste her time.

MR. FINALDI: This is my deposition. This is my deposition and I'm going to take my deposition until I'm finished with it. And you know --

MS. MacISAAC: Okay.

MR. FINALDI: -- so if the witness needs --

MS. MacISAAC: And if you ask -- if you keep asking irrelevant questions of a disabled witness, at some point we will stop the deposition and we will seek a protective order.

MR. FINALDI: Okay.

MS. MacISAAC: But so far keep going.

MR. FINALDI: If you need to do that, then do it.

MS. MacISAAC: Okay.

MR. FINALDI: Okay. I invite you.

BY MR. FINALDI:

Q Now, do you know how long he's worked there?

A No, not exactly.

Q Okay. Did he go to college?

A No.

Q Okay. Did he finish high school?

A Yes.

Q Okay. This is a question I have to ask all deponents. Do you have any criminal record at all?

A No.

Q Okay. Never been charged with any kind of felony or any kind of a crime involving deceit or dishonesty, right?

A No, not that I know of.

Q Okay. And your son, do you know if he has any criminal record, whatsoever?

A Not that I know of.

Q Alrighty. You're currently not married, right?

A Correct.

Q Okay. Your ex-husband, Mr. Levine, his name was Martin; is that correct?

A Right.

Q What was his occupation?

A He -- he was -- he was in real estate and he taught music. He was my second husband.

Q Okay. Was he Yoshi's father?

A No.

Q Okay. Was your first husband Yoshi's father?

A Yes.

Q And what was his name?

A Frank Whaley.

Q It's my understanding he's deceased?

A Yes. And so is Marty Levine.

Q When did Frank Whaley pass away?

A Oh, when Yoshi was just young, very young.

Q How young?

A I'm going to guess. This is a very long time ago now.

Q Yeah. Yeah. Just your best estimate.

A Maybe a few years old.

Q Okay. Three -- three, four years old?

A Yeah. Something like that.

Q Okay. Where did Mr. Whaley live, in which state?

A In Oregon.

Q Where?

A Oregon.

Q And what did he do for a living?

A Commercial fisherman.

Q Okay. Martin Levine. Do you know when he passed away?

A Oh, he passed away -- I can't remember exactly when but it was sometime in the '90s, I think.

Q Do you know when you divorced with Mr. Levine?

A No. I'm sorry. I can't remember that far back.

Q Do you know how long before he passed away?

Was it a couple years before he passed away or just before?

A I -- we had been divorced for quite some time before he passed away.

Q All right.

A Many, many years.

Q All right. It's my understanding at one point in time you worked for MJJ Productions, correct?

A Yes.

Q And while you worked for MJJ Productions were you married?

A No.

Q Okay. So you had already divorced from Mr. Levine?

A Yes.

Q Before you worked for MJJ Productions, it's my understanding you were working in a capacity kind of with Michael Jackson on the Bad Tour, is that correct, or the Bad album?

A Yes.

Q And how long did you work in that capacity on the Bad album? This is before you got hired at MJJ.

A However long it took us to record that album which was -- you know, my memory's really hazy on this but it was a long time.

Q Yeah. A long time meaning more than a year?

A It seemed -- okay. I can't remember this for sure.

Q Yeah.

A So --

Q Yeah.

A -- it seemed like maybe close to a year.

Q Okay. And you're credited as a coordinator on the Bad album?

A Right. The titles are production coordinator, music contractor, you know, production manager, whatever. So, yeah.

Q Okay. Were you married at all during the time that you were working on the Bad album?

A No.

Q And you never remarried after Mr. Levine, correct?

A Yes, I did.

Q Who did you marry next?

A Tim Aller.

Q A-L-L-E-R?

A Yes.

Q Okay. And what did he do for a living?

A He was an engineer and a tour manager.

Q Music engineer?

A Yes.

Q Okay. Tour manager for any particular artist?

A Mostly jazz artists.

Q Okay. And did you two divorce?

A Yes.

Q What year?

A My memory's so bad. I'm going say around 2- --
okay. This is just a guess.

Q This is your best estimate, right?

A Okay. My best estimate.

Q Yeah.

A 2003 or '4, something like that.

Q Okay. So more than ten years ago?

A Yeah. Yeah.

Q Alrighty. Getting back to your time at MJJ,
how long did you work for MJJ Productions?

A Two or three years, something like that maybe.

Q Alrighty. And what was your position?

A I was Michael's personal assistant.

Q Can you tell me some of the types of tasks that
you would do in your job as his personal assistant?
Michael being Michael Jackson.

A Yes. I would -- I was the liaison between
Michael and, you know, the accountants or his publicist
and -- you know, typical secretarial things, you know.

You know, arranging meetings, giving -- you know, fielding phone calls.

Sorry. I'm just really having a bad lupus day and I'm in a lot of pain. You know, the typical things, you know, a secretary would do.

Q Yeah.

A Personal assistant. So, yeah, you know, arranging meetings. You know, giving him a list of his phone calls. That kind of thing, you know.

Q Okay.

A Taking care of the mail, you know. Sending the fan mail to the fan club. You know, that kind of thing. Your typical secretarial duties.

Q You said sending fan mail to fan club. Can you explain that a little bit more?

A Oh, there was a fan club.

Q Okay.

A And I never really had any -- a lot of contact with them, if any. So I would just, you know, bundle up the fan mail and send it to them.

Q What was the name of the fan club?

A I don't know. You know, it was just like some Michael Jackson fan club and there was somebody who, you know, sorted it all up. I was amazed that something could come to you in the mail, like, addressed to Michael

Jackson, the world's greatest singer.

Q Do you know who ran the fan club or who --

A I don't know who ran the fan club.

Q Do you know where this person was?

A No, I don't.

Q You don't know if it was in California or somewhere else in the world?

A I'm assuming it was in California but I don't know.

Q And how would you know it was fan mail that he received such that you would send it on?

A It was really obvious, you know. It was in kid's writing. It had little stickers all over it. It was to Michael Jackson, the greatest singer in the world. And, you know, it was obviously not business mail.

Q Okay. Did you ever open it and read it?

A Yeah. Sometimes to -- you know, if it looked like business mail, I would open it but usually, you know, you could tell.

Q Okay. But you would never give that mail to Mr. Jackson?

A No. That had to go to the fan club.

Q Okay. Did you ever send mail on behalf of Michael Jackson to any fans, kids?

A I don't remember.

Q Did you send any notes or letters to kids on his behalf?

A I don't remember. You know, this was more than 30 years ago.

Q Uh-huh. Okay.

Now, when you were paid from MJJ Productions, you were paid by MJJ Productions, right?

A Yes.

Q Okay. And it's my understanding at one point in time -- excuse me -- you went on the Bad Tour?

A Yes.

Q And that was about a two-year tour; is that correct?

A Yeah. That was a long time.

Q All right. And you toured all around the world with him, right?

A Yes.

Q And you were still employed with MJJ Productions?

A Yes.

Q And MJJ Productions paid you during that time on the Bad Tour, correct?

A Yes.

Q Okay. And did you ever handle the payroll or was that not a task that you handled?

A No, I didn't handle that.

Q Okay. Did you ever work with Norma Staikos?

A Yes.

Q Did you get along with her?

A We got along okay.

Q She could be a little prickly at times?

A Yes.

Q Did you ever work with Evvy Tavasci?

A No.

Q How about Mary Coller?

A Yeah, I knew Mary Coller. She was there before I was.

Q Okay. Was she still working when you got hired or had she already left?

A She was still working there when I got hired.

Q Did she help to train you at all?

A No.

Q Okay. It's my understanding when you first started working for MJJ Productions, you worked out of a room at the Hayvenhurst compound; is that correct?

A Correct.

Q Okay. And it wasn't in the main house. It was in, like, a separate house that was next to it, right?

A Yes.

Q And you worked out of that Hayvenhurst property

for about how long? It was a little bit less than a year?

A I can't remember.

Q What's your best estimate? It wasn't, like, two years, right?

MS. MacISAAC: If you recall.

THE WITNESS: I can't really recall because it seemed like we went on tour fairly soon after I was hired. So I can't recall the full amount of time I worked out of the Hayvenhurst property.

BY MR. FINALDI:

Q Okay. Did Mary Collier work out of the Hayvenhurst property when you were first hired?

A I don't know.

Q Who else worked out of there in that office area that you were in at the time?

A Liz Gilbert. I hired -- she was my assistant.

Q Okay. And so it was just the two of you there?

A Yes.

Q Are you still in contact with Miss Gilbert?

A No.

Q Is there a reason why not?

A No.

Q Okay. When did you stop working for MJJ Productions?

A Oh, I don't remember the year.

Q What's your best estimate?

A That's a hard one. I can't remember.

Q Okay. All right. Let me see if I can jog your testimony. You remember you were deposed. Your deposition was taken many years ago, right?

A Yes.

MR. FINALDI: Okay. And here is a copy for you, Suann.

BY MR. FINALDI:

Q It's my understanding your deposition was taken -- and here's a copy for you.

A Okay.

Q A little bit small but I can help you read it.

A That's okay. I've got my glasses.

Q It was my understanding that your deposition was taken January 7th, 1994.

Does that sound about correct?

A About, yeah.

Q Okay. And this was in the Jordan Chandler case, correct?

A Correct.

Q All right. And at the deposition, you obviously knew you were under oath, correct?

A Yes.

Q Okay. And you were told about that and you promised to tell the truth under penalty of perjury during that deposition, right?

A Of course.

Q And so everything you said in the deposition was true, correct?

A Correct.

Q Okay.

MS. MacISAAC: Is this a full copy of the deposition, Vince?

MR. FINALDI: Yes.

BY MR. FINALDI:

Q And at the time you said you lived at Coldwater Canyon?

MS. MacISAAC: Do you want to direct the witness to a page?

MR. FINALDI: Yeah. It's page number 6.

THE WITNESS: 6.

BY MR. FINALDI:

Q Yeah. Do you recall living at 5055 Coldwater Canyon ever?

A Yeah.

Q Okay. And you said that your date of birth is November 9th, 1958; is that correct?

A Correct.

Q Okay. It's my understanding you did not graduate from high school?

A Correct.

Q Okay. Do you have any college?

A No.

Q Okay. And -- okay. So after -- so your first job after high school you worked at a restaurant, Norms restaurant, correct?

MS. MacISAAC: It might be easier, Vince, if you direct the witness to a page.

MR. FINALDI: It's just going to say exactly what I told her.

BY MR. FINALDI:

Q So do you recall working at Norms restaurant after high school?

A I worked at Norms restaurant while I was in high school.

Q Okay. And what was your first job outside of high school after you worked at Norms?

A I worked at a seafood restaurant in Oregon.

Q Okay. What was your first job in the music industry?

A Quincy Jones Productions. Quest Records.

Q And what was your position there?

A I was assistant to the business manager.

Q How did you get that job?

A Quincy was working on Thriller and he asked -- at a studio where my sister worked. He asked her to come work for him and she declined but told him she had a sister who might be interested. And I interviewed and they offered me the job and I took it.

Q Gotcha. Who was the business manager that you were assistant to?

A Pam Crocchetti.

Q Do you know how to spell that?

A I'm going to guess here. Okay?

Q Sure.

A CRO- -- I think it was C-R-O-C-C-E-T-T-I.

Q Okay.

A That's my best guess.

Q Alrighty. Do you know if she's still alive?

A I have no idea.

Q Haven't been in contact with her for a while?

A Not since -- not since she left.

Q Okay. In your deposition you said you reported to Howard Childs while you were at Quest Records?

A Actually, his name was Harold Childs.

Q What was his position in relation to Pam Crocchetti?

A Oh, he was the just like the president of Quest

Records or whatever, acting, whatever. CEO, whatever.

Q Okay. Did you ever work directly for Mr. Childs?

A Yes, I did.

Q After Pam?

A Yeah. She was just, you know, business manager.

Q Okay. When you were hired at Quest, did you already have Yoshi?

A Uh-huh.

Q Yes?

A Yes.

Q Okay.

A I'm sorry. Yes.

Q And before you worked at Quest Records, it says here that you worked for a company that distributed greeting cards, The Thought Factory?

A Yes.

Q Yes? Okay.

MS. MacISAAC: Just for the record, if you want to ask the witness if she remembers something, great. If you want to ask her if her deposition says something, you know --

MR. FINALDI: Ma'am --

MS. MacISAAC: -- we're conflating them. So if

you say it says in your deposition, then you should point her to it so she can say, yes, it says that in my deposition. It may be true that she did work there but it's just creating confusion on the record.

MR. FINALDI: Ma'am, I don't need instructions on how to take a deposition.

MS. MacISAAC: Well, it's creating a confusing record and it's vague and ambiguous.

MR. FINALDI: Okay. Now you're cutting me off so we're both speaking at the same time and it's making it really hard for the court reporter so I would ask you to please not do that. This is the second time I've asked you.

MS. MacISAAC: Okay. Well, I'm, as a professional courtesy, asking you if you ask the witness it says in your deposition to direct her to a page and line just like I've done with witnesses.

MR. FINALDI: You're wasting time. Thank you.

MS. MacISAAC: No. You're wasting time.

MR. FINALDI: Okay. That's just juvenile. I mean, that's just a juvenile thing to say.

MS. MacISAAC: It's not a juvenile --

MR. FINALDI: So please just --

MS. MacISAAC: What was a juvenile thing to say, Vince?

MR. FINALDI: Well, you're wasting time. All right. You're saying things that I don't --

MS. MacISAAC: You just told me that I'm wasting time and I'm saying if you're asking the witness to confirm whether she testified to something almost 30 years ago or 25 years ago or whatever it was, I would like you to take her to page and line.

MR. FINALDI: Ma'am --

MS. MacISAAC: It's a simple request and it will keep the record clean because it may be that this witness, who's been deposed only once before, remembers, yes, I did work at Norms. She may not remember whether she testified to it.

MR. FINALDI: Ma'am, you've cut me off again. Okay. And I don't know where this anger is coming from but I think you need to get a hold of it because --

MS. MacISAAC: I don't have an anger problem and I'm very calm.

MR. FINALDI: Cut me off one more time again. Okay. You've wasted another two minutes on the record. Please don't. If you have an objection, state your objection.

MS. MacISAAC: I did.

MR. FINALDI: Okay.

MS. MacISAAC: I'd like you if you ask the

witness if she testified --

MR. FINALDI: Ma'am --

MS. MacISAAC: -- to something --

MR. FINALDI: Ma'am --

MS. MacISAAC: -- to take her to page and line.

MR. FINALDI: Vague and ambiguous. Okay.

That's the objection.

MS. MacISAAC: No. You're not going to tell me how to object.

MR. FINALDI: Speaking objections are improper. All right. You're not supposed to do it. Just play by the rules.

MS. MacISAAC: Oh, for God sakes, Vince.

MR. FINALDI: Just play by the rules.

MS. MacISAAC: Honestly, why don't you just get on with the deposition.

MR. FINALDI: You're cutting me off again. You know, you just can't help yourself. So please get this anger under control.

MS. MacISAAC: Oh, you know what. How dare you. It is absolutely insulting for you to say that I need to get my anger out of control (sic) because I made a professional request that when you ask the witness, you testified in your deposition that you worked at Norms, that you could take her to a page and line. It was from

1994. Okay. That's all I'm asking. Are you refusing to do that?

MR. FINALDI: Ma'am, you're proving my point.

MS. MacISAAC: Are you refusing to do it, Vince?

MR. FINALDI: You're proving my point and don't

--

MS. MacISAAC: If this gets in front of the judge, Judge Beckloff, I would like you to say on the record --

MR. FINALDI: Ma'am --

MS. MacISAAC: -- whether you're refusing to do that --

MR. FINALDI: Ma'am --

MS. MacISAAC: -- simple and professional request.

MR. FINALDI: Ma'am, do not raise your voice. Act professionally. Conduct yourself according to the rules of civil procedure and the ethical guidelines.

Thank you.

BY MR. FINALDI:

Q Now, who asked you to go work for MJJ Productions; do you remember?

A Michael.

Q Okay. Because you had gotten to know Michael

during the time that you were working on the Thriller album?

A The Bad album.

Q The Bad album which was after the Thriller album, right?

A Right.

Q Alrighty. And what did he say when he asked you to work for him?

MS. MacISAAC: Lacks foundation, calls for speculation.

BY MR. FINALDI:

Q How did he say it? How did he make the proposal?

A I don't really remember.

Q So you were working on the Bad album, correct? And who were you employed by when you were working on the Bad album?

A I was technically an independent contractor at that point.

Q Okay. And who was paying your salary?

A An independent contractor working in that position on a record is paid by the record company. It's a recording cost.

Q All right. And who was the record company at the time?

A Michael's record company. Sony.

Q Okay. During the Thriller album -- during the recording of that, do you remember Mr. Jackson ever bringing kids to the studio?

MS. MacISAAC: Objection; Thriller album. I thought we were talking about the Bad album.

MR. FINALDI: Ma'am --

MS. MacISAAC: It misstates the testimony.

MR. FINALDI: Conduct yourself ethically.

Okay. All right.

MS. MacISAAC: Vince, I am perfectly --

MR. FINALDI: Conduct yourself ethically.

Okay.

MS. MacISAAC: -- comfortable with how I conduct myself.

MR. FINALDI: Yeah.

MS. MacISAAC: I think you and Mr. Manly should take -- take your own advice.

MR. FINALDI: Please reread the question back.

(The record was read as follows:

"Question: During the Thriller album -- during the recording of that, do you remember Mr. Jackson ever bringing kids to the studio?")

THE WITNESS: I was only peripherally involved

in the Thriller album, so I don't -- I don't remember if he brought -- who he brought to the studio.

BY MR. FINALDI:

Q Okay. How about during the Bad album recording. Do you remember Mr. Jackson bringing kids with him to any of the meetings or recordings or anything like that?

A No.

Q Okay. You don't remember him ever bringing a single child with him on any of the Bad recording stuff, correct?

MS. MacISAAC: Asked and answered.

THE WITNESS: He didn't bring children with him but I brought my son in.

BY MR. FINALDI:

Q Your son Yoshi, right?

A Right.

Q Is he your only son?

A Yes.

Q Alrighty. When you were working for MJJ Productions, you said you were the liaison between Michael Jackson and his business manager.

Who was his business manager at the time?

A Oh. Frank DeLio.

Q Did they have any managers at the time that you

liaised with?

A Not that I know of.

Q Do you know who Frank DeLio worked for, what company?

A No.

Q And you said that while you worked for MJJ, sometimes you would go shopping for Michael buying clothes or things for the house?

A Yes.

MS. MacISAAC: If you're not sure if you testified to something, you can look in the exhibit that's --

THE WITNESS: Oh, okay.

BY MR. FINALDI:

Q Did you ever --

A Yeah. Tell me what page we're on so I know.

Q Did you ever buy gifts for kids for Michael?

A Are we on a certain page here?

Q No. It's just a question.

A Oh, okay. Gifts for kids. Sometimes, I think, but I'm not 100 percent sure.

Q Okay. What kind of gifts do you think you bought for kids for Michael?

A Toys.

MS. MacISAAC: Objection --

BY MR. FINALDI:

Q Toys?

A I think but I'm not sure.

Q Okay. Do you remember a child named Jimmy Safechuck?

A Yes.

Q And what do you remember about him?

MS. MacISAAC: Objection; vague and ambiguous.

You can answer.

THE WITNESS: He was a little boy.

BY MR. FINALDI:

Q And he was one of Michael Jackson's friends, correct?

A Yes.

Q You remember seeing him at the Hayvenhurst home?

A Yes.

Q And he actually went with on the Bad Tour, correct?

A Yes.

Q Do you remember ever seeing him at the ranch at Neverland?

A I can't remember.

Q Okay. Did you ever work at Neverland?

A Yes.

Q Okay. Do you remember another child being Michael Jackson's friend by the name of Jonathan Spence?

A I don't remember.

Q In your deposition on page 16, towards the bottom.

A 16.

Q Lower right-hand corner.

MS. MacISAAC: Page 16.

THE WITNESS: Oh, okay.

BY MR. FINALDI:

Q So it starts on line 17. Okay.

"Other children other than Jimmy Safechuck?

"Yes.

"Do you remember any of their names?

"Answer: Jonathan Spence."

Does that refresh your recollection as to whether Michael Jackson had another boy who would spend time with him named Jonathan Spence?

A You know, I'm old. I have lupus and this was over 30 years ago. I don't remember.

Q Okay.

MS. MacISAAC: That's perfectly fine.

BY MR. FINALDI:

Q And moving down it says,

"Who else?"

And you said, "I don't recall -- really recall any others.

"Question: Macaulay Culkin?"

You don't remember him being around? No?

A No.

Q How about Emmanuel Lewis?

A I remember meeting Emmanuel Lewis but -- what page are we on? Are we on a page?

Q Well, on page 17, you admitted that you met Emmanuel Lewis, if that's what you're looking for.

A Yeah. I met Emmanuel Lewis. He's so cute.

Q Where did you meet him?

A You know, that's what I'm trying to think of. I think at a show or something at one of the concerts but I don't really remember.

Q Okay.

A You know, this is -- you know, think about it. This is over 30 years ago.

Q Yep.

A And I'm old.

Q Mr. Jackson -- Michael Jackson. Did he ever buy or give gifts to your son?

A Yes.

Q What kind of gifts?

A Toys.

Q Do you remember what kinds of toys?

A No.

Q Do you know how often he would give toys to your son?

A Very infrequently. Not -- it wasn't very often.

Q Did Mr. Jackson ever go and pick up your son and take him places in his car?

A Yes.

Q Did you always know about that when it was happening?

A Of course.

Q And you gave permission?

A Yes.

Q How would that come about?

MS. MacISAAC: Objection; vague and ambiguous. If there was a general practice, you can --

THE WITNESS: Yeah. I don't -- I don't remember.

BY MR. FINALDI:

Q Would Mr. Jackson come to you and say I'd like to pick up your son and take him somewhere or would you ask Mr. Jackson or something else?

A To be honest I don't remember but it would

never occur without my permission.

Q Okay. What kinds of places did Mr. Jackson take your son?

A Shopping. What else did they do? I don't remember. It was so many years ago.

Q Did he ever take him on any overnight outings anywhere?

A Yes.

Q To where?

A They stayed at the ranch or at Hayvenhurst.

Q And on those occasions you were not there, right, at either the ranch or Hayvenhurst?

A I think I stayed at -- you know, I can't remember if he stayed at the ranch with or without me. I can't remember, but I know he did stay at Hayvenhurst.

Q Yoshi stayed at Hayvenhurst. When Yoshi stayed at Hayvenhurst, were you there at night?

A No. You know, I lived, like, ten minutes away.

Q Yeah. Where -- how many times did Yoshi spend the night at Hayvenhurst?

A I can't remember.

Q What's your best estimate?

A I couldn't even estimate that. It wasn't very -- you know, it wasn't a huge amount. I have no idea. I can't estimate that.

Q More than once, though, right?

A Yes.

Q And when he would spend the night, where would he sleep?

MS. MacISAAC: Calls for speculation. If you know.

THE WITNESS: I have no idea.

BY MR. FINALDI:

Q Why did you let your son sleep at Michael Jackson's home with him?

A They were friends.

Q And you trusted Mr. Jackson?

A Yes.

Q Did there become a point where you stopped letting Yoshi spend the night with him?

A I didn't disallow my son to spend the night there. It just -- you know, we went on tour. And, you know, there -- it just, you know, stopped happening because of that.

Q And it's my understanding that after the tour, you were fired by MJJ Productions; is that correct?

A Yes.

Q And they never really gave you a reason for the firing, correct?

A Correct.

Q Yoshi was born in what year?

A 1977.

Q And it's my understanding he was about 13 when you were fired; is that about right?

A You know, I can't remember. I mean, we could do the math but I need my calculator.

Q Do you remember the year you were fired?

A No.

Q Okay.

A I mean, it -- let's see. When did the tour end?

Q Well, we can find that out on a break. So --

A Yeah. What time is it?

MS. MacISAAC: Do you want to take a break?
It's five after 11.

THE WITNESS: Yeah.

MR. FINALDI: Let me ask one last question.

MS. MacISAAC: Well, I mean, the question is not pending and the witness has asked for a break so --
BY MR. FINALDI:

Q It says here that you began to work for Michael Jackson in 1987. Does that sound right?

A After the recording of the Bad album that I went to work for Michael --

Q Yes.

A -- right? Okay. 19- when?

Q '87?

A '87. Okay. That sounds about right.

MR. FINALDI: Okay. All right. We can take a break.

THE WITNESS: Take a little break.

THE VIDEOGRAPHER: Off the record. 11:04 a.m.

Don't forget to take your mics off, please.

(Off the record.)

THE VIDEOGRAPHER: Returning to the record at 11:31 a.m.

BY MR. FINALDI:

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

A Yes.

Q Okay. Here's a check for \$35.80. This is your statutory witness fee you're entitled to.

A For real?

Q Yes.

MS. MacISAAC: Third party witnesses get that.

MR. FINALDI: The second thing is --

THE WITNESS: Oh, wow.

MR. FINALDI: -- we're going to serve you with a subpoena for a deposition.

THE WITNESS: I thought that's what this was.

MR. FINALDI: Yeah. This is in a separate case. This is the Jane AA Doe case and that's for June 7th. If you need a new date, that's fine, but we'll go ahead and serve you with the subpoena.

MS. MacISAAC: We'll deal with that later.

MR. FINALDI: And then here's another subpoena.

THE WITNESS: Wait. What's this for?

MR. FINALDI: Your counsel can explain it to you.

BY MR. FINALDI:

Q I'm also going to serve with you a deposition subpoena for June 6 and that's in the James Safechuck case.

MS. MacISAAC: Okay. We can meet and confer about --

MR. FINALDI: And your attorney can talk to you about that and, if they want, maybe we can combine them into one or something.

THE WITNESS: That would be better.

MR. FINALDI: Alrighty.

THE WITNESS: And will they be, like, close like this so I don't --

MR. FINALDI: We can -- we can do that as well.

THE WITNESS: Okay. That is really helpful because --

MR. FINALDI: No problem.

THE WITNESS: -- I can't make a long car drive.

MR. FINALDI: No problem.

THE WITNESS: And I would probably get lost
anyway.

MR. FINALDI: No problem. Now --

THE WITNESS: I got lost coming here.

MR. FINALDI: Okay.

BY MR. FINALDI:

Q I'm going to show you something we'll mark as
Exhibit A for the record.

A Okay.

Q I'll let your counsel take a look at it first.

A Okay.

Q It's your notice of deposition for today.

A Oh, okay.

Q And I'll ask you if had you a chance to see
that before today. You got served with that, correct?

A Yes, I did.

Q Alrighty.

A Well, like, a kind of funky, weird version of
it but then I did get, yes.

Q Okay. And it asks for you to bring certain
documents with you today, correct?

A Yes, I read that.

Q Did you bring anything?

A I don't have anything to bring.

Q Can see that, please?

A This? Yes, sir.

Q So some of the things we asked for is any documentation regarding MJJ Productions that you still possess.

Do you have anything at all from your time at MJJ?

A Unfortunately, no.

Q Nothing at all? No cards, photos, autographed photos, anything?

MS. MacISAAC: Vague and ambiguous.

THE WITNESS: No.

BY MR. FINALDI:

Q What happened to it all?

A You know, it -- well, I was really sick. And when I got sick, my life kind of blew up in my face. I lost everything. Went bankrupt. I had to sell a lot of things and kind of lost everything and I had to move several times.

Q Okay. Did you sell your Michael Jackson memorabilia that you had?

A Unfortunately, yes.

Q Did you, like, auction -- put it in auctions or

something?

A No. I just, you know, sold it through Craigslist.

Q What types of items?

A My tour jacket, my gold -- my platinum records. Not just Michael's, all the ones I had from other -- many other artists and, you know, some signed photographs. Posters, you know. I didn't have that much to begin with. You know, I wasn't a super collector.

Q Okay. Now, when you worked for MJJ Productions, do you remember Michael Jackson ever calling your home to speak with Yoshi?

A Yes.

Q How often would he call and speak with him on the phone?

A I can't recall.

Q How long would their conversations be?

A I don't know.

Q After you were fired by MJJ Productions, did Michael Jackson stay in contact with Yoshi?

A For a short period of time. Oops.

Q How did they remain in contact?

MS. MacISAAC: Calls for speculation. If you know.

THE WITNESS: Yeah, I don't know.

BY MR. FINALDI:

Q Well, you said they stayed in contact for a short time?

A I know they spoke on the phone a few times but other than that, I don't really know.

Q Wasn't Yoshi upset when you were fired from MJJ Productions?

A I don't know. I think he was. I mean, you would have to ask Yoshi that.

Q Getting to your deposition and you can follow along, if you'd like.

A Oh, yeah.

Q On page 18 --

A 18.

Q -- line 15 --

A Line 15.

Q -- you were asked if you prepared cards for gifts that Michael Jackson was giving to somebody. Gift cards. And on line 22 you said, "Yes."

Do you remember doing that?

A Gift cards, you mean, like the kind, you know, you buy and they're -- you know, like a --

Q Credit card? No.

A Right, no.

Q This is in 1993. We're talking about cards,

you know --

A Oh, like --

Q Greeting-type cards you give with gifts.

A Yeah, like a --

Q Do you remember doing that?

A I -- I -- you know, I don't really remember but probably. I mean, I --

Q It says here, you were asked:

"Would you sign his name to them or not?"

And you said, "Sometimes."

So sometimes you would sign Michael Jackson's name?

A Yeah.

Q And it says on the next page, which is the lower left, goes down to 19 and it says,

"And on the gifts to children,

Did he sometimes use names other

than their true names on the cards?"

And you said, "Yes."

And you said one of the names he used was Rubba.

Do you remember that?

A Yes.

Q Okay. On the lower right-hand side, page 20, line 17, you were asked:

"How frequently would you purchase gifts from Michael Jackson?"

And you said, "Maybe once a month I'm guessing."

Do you remember giving that testimony?

A Yeah.

Q All right. You remember buying gifts for kids for Michael Jackson from Michael Jackson?

A Yes.

Q Okay. And would you go to, like, toy stores and things?

MS. MacISAAC: Would he go?

BY MR. FINALDI:

Q No. Would you?

A Would I?

Q Would you get them from toy stores or -- I would assume you bought toys for the kids, electronics?

MS. MacISAAC: If you recall.

THE WITNESS: Sorry. I'm just, like, reading this to see if it jogs my memory because I'm sort of having a lupus fog here. Okay. I'm sorry. I got -- I'm kind of confused there for a second. So what's the question again?

BY MR. FINALDI:

Q The question is: Do you remember what types of

things you bought for the kids? Did you, like, go to toy stores, electronics stores, buy them those types of things?

A I don't really remember.

Q Okay. It says here that you used -- sometimes you used your credit card and sometimes you used Michael's credit card; is that true?

A When purchasing things, yes.

Q Okay. And when you say Michael's, was that an MJJ Productions credit card or was it a Michael Jackson credit card?

A I don't remember.

Q Okay. You don't know.

Do you remember the bank that the card was with?

A I have no idea.

Q Okay. It says here that -- so your office at Hayvenhurst was in a building that was next to the main house and there was a spiral staircase that you could use to go up to Michael Jackson's bedroom; is that correct?

A Yes.

Q And that's how you would go to his room sometimes?

A Sometimes.

Q Okay.

A What page are we on?

Q I'm not really on a page.

A Oh, okay.

Q When you were fired by MJJ Productions, you were not given a reason, correct?

A Correct.

Q And you had no other job lined up at the time, correct?

A Correct.

Q And you were unemployed for, like, a couple months, correct?

A Yes.

Q And then you got a job with some ad company or something, music ads or something?

A Oh, yeah. A jingle house.

Q And is it true that no one from MJJ Productions helped you to get that job?

A No. Of course, no.

Q And it's true that when you were fired from MJJ Productions, you didn't try and lobby to keep your job, right?

A Right.

Q Who fired you?

A Bill Bray.

Q And he didn't tell you anything, he just said

you're fired?

A Right.

Q Did you ever have any idea in your mind as to why you were let go?

A No.

Q Never?

A No.

Q Okay. You never asked anyone?

A Well, there's really nobody to ask. I mean --

Q Well, you didn't ask Bill Bray?

A He just said your services are no longer required. Good-bye. Something like that.

Q You didn't ask why or who's going to replace me or you know --

MS. MacISAAC: If you recall.

THE WITNESS: I --

MR. FINALDI: It's always if you recall. All right. That's just coaching. There's no reason to say that over and over.

MS. MacISAAC: I'm not coaching at all.

THE WITNESS: No, I didn't.

MR. FINALDI: Okay.

THE WITNESS: I kind of figured I -- I knew that the job was -- had a built-in obsolescence, so it wasn't exactly like I was surprised.

BY MR. FINALDI:

Q Do you know who replaced you?

A No. I -- I assumed it was Norma Staikos.

Q Did you ever talk to Michael after you were fired?

A Yes.

Q How did that come about?

A I think he called.

Q And what did he say?

A He apologized or something like that and I don't really recall any more than that.

Q Do you know how long after you were fired this was that he called you?

A No.

Q He apologized for what?

A For me being fired.

Q All right. And you never asked him for your job back or anything, right?

A No.

Q Did -- as of the time that you were fired, did you like your job?

A Yes. It was a lot of work, though.

Q Was there anything that you didn't like about your job?

A The fact that it was 24/7.

Q You were always on call?

A Always.

Q And so if he called and needed something, you would have to respond regardless of what time of the day it was, right?

A Correct.

Q And did you respond -- did you report directly to Michael or did you report to Bill Bray or sometimes both or someone else?

A Directly to Michael and to Bill Bray.

Q Okay. Did you get along with Bill Bray?

A I seemed to.

Q Okay. In your deposition on page 26, at the top, you testified that Bill Bray told you that you were moving the office to Westwood.

Do you remember that occurring?

A Right.

Q And at the bottom it says -- you were asked:
"Were you instructed not to tell anyone that you were moving the office?"

And you said, "Yes."

Do you remember being instructed not to tell anyone that the office was moving to Westwood?

A I don't recall.

Q Page 27 at the top it says -- well, you said,
"Yes."

"Question: Was that Mr. Bray?"

And you said, "Yes."

"Question: And that's what he told
you when he told you you were moving,
right?"

"Yes."

"Question: So he told you we're
moving to Westwood. Don't tell
anybody. And then he told you why
not to tell anybody, didn't he?"

And "Answer: I don't remember."

Does that refresh your recollection?

A Not really.

Q Okay. During the time you were working at
Hayvenhurst, isn't it true that Michael Jackson didn't
really want his family knowing what he was doing and
knowing about his business?

A Well, the family seemed to be doing their own
thing and Michael seemed to be doing his own thing.

Q But when you were hired, isn't it true that you
were told by Mr. Bray not to tell the family and other
people about Michael Jackson's business?

A I don't recall that.

Q Did Michael ever tell you that?

A I don't recall that.

Q Did you sign a confidentiality agreement?

A At the very end.

Q What do you mean, "the very end"?

A Right before they let me go. Up until that time, they had -- I had not signed a confidentiality agreement.

Q Are you talking about the day of or a couple days before?

A A couple days before.

Q Who had you sign it?

A Bill Bray.

Q When you were let go from --

A I think it was Bill Bray anyway.

Q Okay. When you were fired from MJJ Productions, were you given any kind of a severance?

A I don't remember.

Q Okay. Do you know if you signed any kind of an employment agreement, you know, saying I'll agree to keep things confidential and you got paid a certain amount? Did that happen?

MS. MacISAAC: Objection; vague and ambiguous. It misstates the witness's testimony.

THE WITNESS: I don't understand.

BY MR. FINALDI:

Q Sure. The confidentiality agreement you signed, was that in conjunction with your firing?

A I'm sorry. I still don't -- I don't understand.

Q Yeah. You said you signed a confidentiality agreement right before you were fired. Was that done as part of the firing process? For example, here you go, sign this and then we'll give you this severance or something like that?

A No. I think my assistant found another job and gave her notice and then they realized -- this is my understanding any way. This is just my personal opinion. When my assistant found another job and gave her notice, they realized they had no confidentiality agreement on file for her. So then they had her sign one and realized they didn't have one on me so then they made me sign one.

Q Okay. And that was Miss Gilbert?

A Yes.

Q Do you know why she left?

A She just was -- she just wanted to do another job. She just wanted to do something else.

Q Did she have any kids?

A No.

Q Okay. Bottom of page 28 on line 16. It

says -- starting at 14, Bill Bray:

"Question: What did he tell you?

"Answer: To respect Michael's privacy in regards to the family.

"Question: And he told you that you should not talk to other members of the family about what Michael is doing?

"Answer: Correct."

Does that refresh your recollection as to whether Bill Bray told you not to talk with the other family members about what Michael was doing?

A I'm sorry. No, it doesn't. I don't know.

Q But that was truthful when you gave it, right?

A Of course it was truthful when I gave it.

Q Okay. Next page. So sometimes you stayed overnight at the ranch in the guest cottages --

A Yes.

Q -- is that correct?

A Yes.

Q Okay. How many times did you spend the night at the ranch; do you know?

A Oh, I couldn't say. I don't remember.

Q When you did stay at the ranch, were there kids there?

A I can't remember.

Q All right. Page 30, line 17. It asks:

"Now, your employment with Michael Jackson ended in 1989?

"Answer: '88 or '89.

"Okay. And how long did you work for him total?

"Answer: I think about two years."

Does that refresh your recollection as to when you were let go by MJJ Productions?

A Not really. I mean, I don't know. I'm not really good with -- I mean, when did the concerts end? After the --

Q Well, here --

A -- tour ended and then I still worked for him for a while and --

Q So here on Google it says the Bad Tour was September 12th, 1987 to January 27th, 1989.

Does that sound about right?

A That sounds about right.

Q Okay.

A And then I continued to work for him for a while after the tour ended. And then -- then was let go.

Q So about 1989 you were let go?

A I guess, somewhere around there.

Q Okay.

A I don't know.

Q That would be your best estimate, right?

A I guess.

Q Okay. Well, do you have a better estimate than that?

A No. I don't think so.

Q Okay. So at that time in 1989, Yoshi would have been about, what, 12 years old since he was born in '77?

A I guess. I'm sorry. Not good with math.

Q Yeah.

A Yeah. But if that -- if that adds up right, then, okay.

Q So if he was born in '77. 1987, he would have been 10, right?

A Okay.

Q In two more years he would have been about 12 years old, correct?

A Sounds about right.

Q All right.

A Sorry. Medicine.

Q After you were fired by MJJ Productions, did you ever go back to Hayvenhurst?

A No.

Q Did you ever go back to the ranch?

A No.

Q Did you ever go back to the Westwood office?

MS. MacISAAC: Why don't we just go off the record for a second and let the witness take her medicine and then we'll --

THE WITNESS: Yes. I need to take my medicine. I'm just kind of really hurting.

MR. FINALDI: Well, there's no reason to go off the record. We were just off the record.

THE WITNESS: I'm okay. Okay. All right.

BY MR. FINALDI:

Q Okay. And you never went back to the Westwood office after you were fired? No?

A No.

Q Okay. Had you ever gone to either of Michael Jackson's hideouts, his apartments?

A Yes.

Q Which one or which ones?

A There was one in -- on Wilshire.

Q Was that in a high-rise?

A Yes.

Q Okay.

A Yeah.

Q And did he have furniture in there?

A Yes.

Q A lot of furniture or very little?

A Very little.

Q Okay. Do you know if Yoshi ever went there?

A I do not know.

Q Did you ever see any kids there?

A No.

Q Did you ever go to any of his other hideouts?

A No.

Q Okay. And for what reason would you go to the
Hideout?

A I don't remember.

Q Like, to bring him documents or things he
needed?

A Probably something like that, I would assume.

Q Okay. Page 37.

A Oops. Okay.

Q You were asked: "When you worked
for Michael Jackson, did he have
children visit him from time to time?"

And you said, "Yes."

You were asked: "Who were the children
that visited him from time to time when
you worked for him?"

And you said, "Jimmy Safechuck."

Do you remember Jimmy Safechuck coming to visit

Michael Jackson at Hayvenhurst?

A Yes.

Q Do you remember him staying the night at Hayvenhurst?

A I don't recall.

Q Do you remember him going into the house with Michael at Hayvenhurst?

A Yes.

Q Do you recall Jimmy Safechuck going to the ranch?

A I don't recall.

Q Did you ever meet Wade Robson?

A I have no idea. And I never met him. I don't even know who he is.

Q Okay. How about a young girl named ^{Jane AA Doe?} [REDACTED]

[REDACTED]?

A I have no idea who she is.

Q Okay. You don't remember meeting her?

A No.

Q Do you remember any little girls visiting Michael at Westwood -- I mean, at Hayvenhurst?

A You know, there were different kids but I don't -- I don't remember anyone in particular.

Q Okay. You do remember different kids being at Hayvenhurst to see Michael, correct?

A Yes.

Q And we're not talking about outside of the gates. We're talking about with Michael, right?

A I think so. Yeah.

Q Okay. Because on the outside of the gates, there was always lots of kids and --

A There was a ton of people.

Q Okay. All right. You testified that Jimmy Safechuck was on the tour about 90 percent of the time on page 40.

Does that sound about right? Line 10.

A Okay. I don't know -- I mean --

Q You have no reason to dispute that number, right?

A Well, he was -- I don't recall if he was in the American leg, but the European leg, yeah. And I don't recall if he was on the Asian leg. But on the European leg, he was there.

Q Okay. And on page 11 you were asked:

"And when he was on the Bad Tour where did he sleep?"

And you said, "In Michael's room."

Is that correct?

A On page 11?

Q No. Page 40.

A Page 40. Oh, sorry.

Q Line 11.

A On line 11. Okay.

Q It says, "And when he was on the
Bad Tour, where did he sleep?
And you said, "In Michael's room."
Is that correct?

A Well, I -- I think so.

Q Okay. Who arranged the rooms during that tour?

A I don't know. I -- I would assume the tour
manager.

Q And who was that at the time?

A I don't remember his name.

Q Okay. And were Jimmy Safechuck's parents on
the tour?

A Yes.

Q Were they on the tour the entire time that
Jimmy was?

A I believe so.

Q And where did they sleep?

A They had a room.

Q Why did Jimmy have a different -- stay in a
different room than his parents?

MS. MacISAAC: Calls for speculation.

THE WITNESS: Yeah. I don't -- that's not -- I

have no idea.

BY MR. FINALDI:

Q Did you ask?

A No. It's none of my business.

Q Oh, okay. But you knew that Jimmy was a minor, right?

A It's obvious.

Q Okay. Did you think it was weird or odd that he was sleeping in Michael's room?

A I didn't know that he was always sleeping in Michael's room or if he was or was not.

Q But the fact that he was staying in Michael's room, did you find that odd or weird?

A No.

Q Did you ever know Michael Jackson to have a girlfriend?

A No.

Q Did you ever know him during the time you worked for him to go on any type of romantic date with any woman?

A No. But I saw that he had interest in girls.

Q Oh, yeah?

A Yes.

Q Tell me about that.

A He was -- would ask me about Tatiana. You

know, the girl in the video, "The Way You Make Me Feel."

I think that's the song.

Q What would he ask you?

A He would just ask me questions about her and if she asked about him. You know, like any guy would, you know, if she was interested in him and --

Q Did he ask you for her phone number?

A I can't remember.

Q Did he ever call her or ask her out on a date that you know of?

A I don't know.

Q All right. Anything else besides the Tatiana question?

A No. Nothing -- not that I can remember.

Q All right.

A She was very pretty.

Q So page 41. Isn't it true when Michael was on tour you would go into his bedroom from time to time?

A Yes.

Q To, like, give him things, right?

A Yes.

Q Would he work, like, right from his bed, like, reviewing materials and stuff like that sometimes?

A Yeah. From his room.

Q Okay. And did he do that at the ranch as well?

A I don't know.

Q Did you ever go into his room at the ranch?

A Sometimes.

Q Because Michael was in there, right?

A Yes.

Q And he was, what, working? Did he give you instructions what he wanted to do or were you there for personal reasons?

A Oh, no. Just for work.

Q You were in his room for work because he was working from there, right?

A Sometimes, yes.

Q Okay. Page 41, on line 15, it's talking more about the tour.

It says, "And when you went in and the bed or beds were unmade, how many beds were unmade?

And you said, "One."

"Question: And you saw Jimmy Safechuck in bed with Michael Jackson from time to time; isn't that correct?

"Answer: Yes."

Were those answers true?

A I guess they were since I said that.

Q Okay. And you have no reason to dispute that

that's true, correct?

A Correct.

Q How many times did you see Jimmy Safechuck in bed with Michael Jackson?

A I don't know.

Q More than once?

A I don't know.

Q What were they doing in bed?

A I think just sitting there, you know.

Q Do you know what they were wearing?

A Just their clothes.

Q Okay. Was it nighttime? I mean, were they in pajamas? Was it daytime, regular clothes? Do you remember?

A I don't remember.

Q Okay. Did you ever see your son Yoshi in bed with Michael?

A I can't remember.

Q Is that something that you would have allowed?

A Yes.

Q Okay. Why would you have let Yoshi go into a bed with Michael Jackson when he was a grown man?

MS. MacISAAC: When Michael was --

THE WITNESS: I'm sorry.

MS. MacISAAC: Vague and ambiguous.

BY MR. FINALDI:

Q Why would you have allowed your son Yoshi to go into Michael Jackson's bed with him when Michael's a grown man?

MS. MacISAAC: Vague and ambiguous.

THE WITNESS: I didn't really -- I didn't see anything wrong with it.

BY MR. FINALDI:

Q Okay. Page -- actually, at the time you were working for MJJ Productions, were you ever trained by them on anything related to childhood sexual abuse?

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

Q Do you understand what childhood sexual abuse is?

A Of course.

Q Okay. Were you ever trained on that issue by anyone at MJJ Productions during the entire time you worked for them?

A What do you mean by, "trained"?

Q Trained. Trained about what childhood sexual abuse is, how to spot it, how to prevent it, how to report it, things of that nature?

A No.

Q Okay. You weren't taught about any of that stuff with MJJ Productions, correct?

A Correct. But I think I know what child abuse is.

Q Okay. Do you remember child sexual abuse coming up as a topic at any time you worked for MJJ Productions?

A No.

Q Alrighty. Now, it's my understanding when Jimmy Safechuck was on the Bad Tour, he would dance with Michael during their performances, correct?

A Yes.

Q And he had an outfit that he wore, correct?

A I think -- I can't remember if he did or not.

Q Okay. You don't recall if he had an outfit that was very similar to Michael's that he would wear?

A I can't remember for sure but it sounds vaguely familiar.

Q Okay. During this time period -- do you know if Jimmy Safechuck was paid for these performances?

A I -- I have no idea.

Q Do you know if he was an employee of MJJ Productions?

A I don't know.

Q Okay. Do you know whose responsibility it would have been to know that, the answers to those questions at the time?

A Whose responsibility it would have been to know if he was being paid as an employee --

Q An employee, yes.

A -- of MJJ Productions?

Q Yeah.

A I guess the accountants.

Q And the accountants at the time were? Was it Breslauer?

A Gelfand, Rennert and Feldman. But there was also TTC Touring Company, so I don't really know.

Q Okay. During the time that you worked for MJJ Productions, was Gelfand -- the Gelfand Company the only accountant or was the Breslauer Company involved as well?

A I'm sorry. I don't know that.

Q You don't recall?

A I just don't know that.

Q Okay. So page 42 on line 4 you said:

"I can't name an amount of times

but I saw them sitting in bed, yes.

I mean, I don't know how many times."

Do you see that?

A I'm sorry. Line --

Q Line 4.

A Okay.

Q You said, "I can't name an amount of

times but I saw them sitting in bed,

Yes."

A Yes.

Q "I mean, I don't know how many times."

That's true, right?

A Right.

Q Okay. Next down it says, "But it was not an unusual occurrence; am I right?"

And you said, "Correct"?

A Right.

Q It was not unusual to see him sitting on his bed, right?

A Right.

Q And it says, "And when they were in bed together were they dressed or undressed -- undressed?"

"Answer: Dressed.

"Question: And what were they wearing?"

"Answer: Pajamas."

So do you remember seeing them in bed in pajamas together?

A I guess I did because I, you know, gave this deposition. But, you know, this is a long time ago --

Q Yeah.

A -- and I'm sick. I don't -- I don't remember now.

Q Okay. But you have no reason to dispute that that was truthful at the time, right?

A Correct.

Q Okay. And isn't it true that oftentimes when Michael Jackson wasn't working and he was in his bedroom, he would wear silk-type pajamas, black pajamas?

A Kind of any kind of pajamas.

Q Yeah.

A When I'm not working and I'm at home I stay in my pajamas all day.

Q Okay. Did you at the time?

A Pardon?

Q Did you work in pajamas when you were working for Mr. Jackson?

MS. MacISAAC: She said when I'm home and I'm not working.

MR. FINALDI: I understand that.

THE WITNESS: No. I dressed like this.

BY MR. FINALDI:

Q Okay. But Michael would often wear pajamas around the house even when he was working, correct?

A No. He was usually dressed, you know. And especially when we were on tour, it was my job to set out

his clothes for the day.

Q I'm talking about at Hayvenhurst and at the ranch, isn't it true that oftentime he would walk around and he would be wearing pajamas?

A No. He was usually wearing his usual Michael Jackson get-up, you know.

Q Which would be what?

A Black pants, corduroy shirt, white socks.

Q Did you ever see Jimmy Safechuck and Michael rehearsing together during the Bad Tour?

A No. I think I saw him, you know, kind of playing around, you know, with some moves and stuff but I never watched them rehearse.

Q Where would they -- where did you see this, where they were playing around and moves?

A Just goofing around, you know.

Q At the hotel?

A Yeah. At the hotel or in their room just, you know, whatever.

Q Doing dance moves?

A Yeah.

Q Where would they go to rehearse if you wouldn't watch it?

MS. MacISAAC: Calls for speculation.

THE WITNESS: Yeah. I don't know.

BY MR. FINALDI:

Q Did he rehearse before his performances?

A My --

MS. MacISAAC: Vague and ambiguous as to him. Michael or Safechuck.

BY MR. FINALDI:

Q Isn't it true that Michael used to rehearse quite a bit before his performances?

A I -- my understanding, although, I never saw it, was that we carried a wooden floor, you know, that collapsed and that Michael rehearsed ever Sunday.

Q Okay.

A But I never saw it and I never saw him rehearse.

Q You never watched him rehearse?

A Yeah. People don't watch him rehearse. This is just something I was told but I never saw it.

Q Alrighty. And was it your understanding people weren't allowed to watch him rehearse?

A I don't know that.

Q Moving on to page 43, line 5,
It says, "When you went into the
bedroom, did you ever see dirty
clothes lying around the bed?"
And you answered, "Yes."

Do you recall that?

A Yes. Because I -- on tour, my room was always next to Michael Jackson's room, if possible. And I was the person who packed his suitcases and all his belongings up before we left.

Q All right. And would you also pack up Jimmy's belongings?

A Yeah. Everything that was in the room I packed up.

Q So you would put -- where would you put Jimmy's clothes? Into Michael's suitcase or into his own?

A I think his parents must have, you know, helped with that. But I just would pack up everything that there was in there and pack it into the suitcases and boxes so that it would be ready to be picked up.

Q And what kind of clothes do you remember of Jimmy's being there?

A I don't --

MS. MacISAAC: Lacks foundation.

THE WITNESS: I don't remember.

BY MR. FINALDI:

Q Just general kind of clothes that people had?

A I don't remember Jimmy's clothes being there.

Q Okay. Did you ever ask him exactly where he slept in the room?

A No.

MS. MacISAAC: Objection; vague and ambiguous as to who he was.

BY MR. FINALDI:

Q Jimmy. You never asked Jimmy where he slept in the room?

A No.

Q Did you ask Michael where Jimmy was sleeping in the room?

A No.

Q Did you have any assumptions as to where he was sleeping?

A No.

Q Okay. Bottom of page 43, line 24, You're asked, "While Michael Jackson was on the tour, would he give gifts to Jimmy Safechuck?"

Page 44 you said, "Yes."

"Question: What sorts of gifts did he give to Jimmy Safechuck when he was on tour?

"Answer: Toys.

"Question: Did they go, like, on shopping sprees?

"Answer: Yes."

And then later on you said he would buy a large quantity of toys. Do you remember that occurring?

A Vaguely, yeah.

Q And it says at the bottom.

"Did you accompany them on any of these shopping sprees?"

And you said, "Occasionally. A couple times a month."

Is that true?

A Yeah. To the best of my recollection, yes.

Q Okay. It's my understanding that at one point during the Bad Tour -- so Yoshi didn't come initially on the Bad Tour, correct?

A Correct.

Q But at one point in time he came, right?

A Yeah. He came out for a little while.

Q And where did he sleep?

A In my room.

Q Did he ever sleep with Michael during the Bad Tour?

A No.

Q Okay. Did he ever ask to sleep with Michael?

A No.

Q Did Michael ever ask him to sleep in his bedroom --

A I don't know.

Q -- during the Bad Tour?

A I don't know.

MS. MacISAAC: Calls for speculation.

BY MR. FINALDI:

Q Okay. Page 45, line 12.

"Question: Now Jimmy Safechuck's mother was on the tour part of the time?"

Is that correct?

A Correct.

Q And then you answered, "Most all of the time"?

A Right.

Q But you didn't say she was with the tour the entire time.

Do you know if she was with the tour the entire time or was she gone for part of it?

A To the best of my recollection, she was there most all the time.

Q Okay.

A And her husband a great portion of the time.

Q Okay.

A They were there most all the time.

Q Were there times where Jimmy's parents were in some other location on the tour and Jimmy would be with

Michael in a different location?

MS. MacISAAC: Vague and ambiguous.

BY MR. FINALDI:

Q Or were they always together; Jimmy's parents, Michael and Jimmy?

A Sometimes the Safechuck family and Michael would do things together and sometimes I would do stuff with the Safechuck mother and -- Jim and Stephanie were their names. And Michael and Jimmy would do stuff together.

Q Okay. And when that would happen, how would that come about? Would Michael ask you to go take the parents and do something or would you offer or would they ask? How did that come about?

MS. MacISAAC: I'm going to object as vague, ambiguous as if there was, like, a general practice. If there was a general practice --

MR. FINALDI: That's a speaking objection. It's improper.

MS. MacISAAC: It's vague and --

MR. FINALDI: Then say vague and ambiguous.

MS. MacISAAC: Then go through every time that she can recall.

MR. FINALDI: Say vague and ambiguous.

MS. MacISAAC: I said vague and ambiguous.

MR. FINALDI: All right. That's all you need to say.

MS. MacISAAC: That is not -- I get to object.

MR. FINALDI: Ma'am, you're raising --

MS. MacISAAC: Okay. You know what, why don't you ask every time she can recall then, if that's how you want to do it.

MR. FINALDI: Now you're yelling again.

MS. MacISAAC: I'm not yelling.

MR. FINALDI: We've talked about this.

MS. MacISAAC: No, we have not. Oh, my God.

MR. FINALDI: Try not to do that. All right.

MS. MacISAAC: You know what, Vince, why don't you start with every instance she can remember or you can ask if there's a general practice.

MR. FINALDI: No. I'm going to ask the questions that I deem appropriate and these are proper questions.

BY MR. FINALDI:

Q So on these times that you would go and take Jimmy's parents somewhere, how would that come about?

A I don't really remember.

Q Okay. You don't remember if it was your idea, their idea, Michael's idea?

A Yeah. I don't really remember.

Q Okay. And who would pay for those things?

A I had an expense account so it would be either that or the Safechuck's would pay.

Q Was the expense account with MJJ Productions?

A Yes.

Q And that's the same account sometimes that you used to buy toys or gifts for kids, right?

A Yes.

Q And when Michael would go with Jimmy, where would they go when the parents weren't there, when you were with the parents?

MS. MacISAAC: Calls for speculation. Calls for speculation. It could be innumerable times. If there was a general practice, you can answer. Vague and ambiguous.

MR. FINALDI: Speaking objection again. You're coaching the witness.

MS. MacISAAC: No, I'm not.

MR. FINALDI: It's improper.

MS. MacISAAC: It's not improper. It's an improper question.

MR. FINALDI: Play by the rules.

MS. MacISAAC: Play by your rules.

MR. FINALDI: Just play by the rules, please.

All right.

MS. MacISAAC: Why don't you go through each question?

MR. FINALDI: Be fair. Be fair. All right.

MS. MacISAAC: You're asking --

MR. FINALDI: Be fair.

MS. MacISAAC: -- when they would have these times they would go off together, where would they go?

MR. FINALDI: Ma'am, the rules would --

MS. MacISAAC: It lacks foundation. It calls for speculation. It's vague and ambiguous. It's compound.

MR. FINALDI: You're being obstreperous on purpose. Okay. You are.

MS. MacISAAC: I'm happy to talk to the judge about that question.

MR. FINALDI: You are. Well, you're probably going to have to.

MS. MacISAAC: Okay.

BY MR. FINALDI:

Q So --

A I'm sorry. What was the question again?

Q Yeah. Now, at these times when you said you would be with the Safechucks and then Jimmy would be with Michael and they'd go off somewhere else, what are some of the places they would go to?

A I don't remember.

MS. MacISAAC: Same objections.

BY MR. FINALDI:

Q Do you know any of the places that they went to?

MS. MacISAAC: Same objections.

THE WITNESS: I -- I don't really remember.

BY MR. FINALDI:

Q Did they ever just stay at the hotel while you and Jimmy's parents went off to dinner or other places?

MS. MacISAAC: Asked and answered. Same objections. Calls for speculation.

THE WITNESS: I don't really remember. Oh, I think sometimes there was maybe, like, an arcade or something, you know, noisy and that kind of thing.

BY MR. FINALDI:

Q Gotcha. Now, when you would go into Michael's room and he was on tour, was there a certain knock that you had to do or were you allowed to go straight into his room?

A Oh, I could go straight in.

Q Any time of the day?

A Well, no. I mean, that would be rude.

Q So what would you do? Would you knock first?

A Yeah, I would knock. I'd, you know, say, hey,

Mike, it's me.

THE VIDEOGRAPHER: Two minutes.

BY MR. FINALDI:

Q And if it was, like nighttime, for example, you'd knock and you'd wait for permission before entering, opening the door and entering the room, right?

A Yes.

MR. FINALDI: You need to change the tape?

THE VIDEOGRAPHER: Yes.

MR. FINALDI: All right. Let's go off the record real quick so she can change the tape.

THE VIDEOGRAPHER: Off the record at 12:15 p.m. This will conclude tape 1.

(Off the record.)

THE VIDEOGRAPHER: On the record, 12:22 p.m. This begins tape 2.

BY MR. FINALDI:

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

A Yes.

Q Alrighty. Did you ever e-mail with Miss MacIsaac? Have you ever exchanged e-mails with her?

A Yes.

Q How many e-mails?

A Two, maybe.

Q All right. What's your e-mail address?

A It's K-A-L-E-A-O-B-A-C-H-A-N@gmail.com. I couldn't come up with a shorter one.

Q Yeah. And was anyone else cc'd on those e-mails?

A No.

Q And I'm sure this is going to draw an objection but I'm going to ask the question anyways.

What did you speak with Miss MacIsaac about?

MS. MacISAAC: I'm going to object and instruct the witness not to answer on attorney-client privilege grounds.

BY MR. FINALDI:

Q And what did you e-mail with Miss MacIsaac Isaac about?

MS. MacISAAC: Same objection. Same instruction.

BY MR. FINALDI:

Q Were you provided any documents to review before your deposition today?

A Just, you know, what I was given -- you know, the --

Q The subpoena?

A Yeah.

Q Okay. Were you given any kind of -- any police

statements and any of your prior testimony, depositions, anything like that to read?

A No.

Q Alrighty. Was Miss Gilbert on the tour, on the Bad Tour as well?

A She mostly stayed in the office but she went to one or two U.S. cities --

Q Okay.

A -- I think. What page are we on?

Q Have you ever heard the term -- with respect to a person the term, "chicken hawk"?

A Yes. I would really like to talk about this.

Q Okay. Go ahead.

A Okay.

Q Have you ever used the term --

A What page are we on?

Q Have you ever used the term, "chicken hawk," with respect to Michael Jackson?

A No. I want to clear this up.

Q What's your understanding of what a chicken hawk is?

A Okay. A pedophile.

Q And where did you learn that?

A Okay. I want to clear this up. The police lied to me.

Q Hang on. That's not my question. My question is --

MS. MacISAAC: Just follow the question.

BY MR. FINALDI:

Q -- where did you learn the term, "chicken hawk"?

A My stepfather is a retired police officer.

Q What's his name?

A Tom Finn.

Q Is he still alive?

A Yes.

Q F-I-N-N?

A Yes.

Q And did he teach you the word pedophile -- the word chicken hawk?

A Yes.

Q And what year do you think it was that he taught you this word?

A Oh, I don't know. Sometime in the '80s, probably.

Q And how did that come about?

A Just through jokes and stories he would tell us.

Q He was joking about pedophiles?

A He wasn't joking about pedophiles. It would

just be different stories he would tell us.

Q Such as?

A Just things that would happen on the job.

Q What -- so he was a police officer?

A Yes.

Q Or was he a sheriff?

A Sergeant.

Q Sergeant with which department?

A Hollywood division.

Q So he was LAPD?

A Yes.

Q And what's your understanding of what a pedophile is?

A What's my understanding of what a pedophile is?

Q Yeah.

A A person who preys on children.

Q Sexually, an adult who has a sexual interest in --

A Right.

Q -- prepubescent children, correct?

A Correct.

Q Okay. And so in your deposition testimony --

A On which page are we on?

Q -- you testified that you told the police that you had said that Michael was a chicken hawk before,

correct?

A What page are we on?

Q You're on page number 50 and 51.

MS. MacISAAC: You want to direct the witness to lines --

MR. FINALDI: Yeah.

MS. MacISAAC: -- or read them over --

THE WITNESS: Okay. Which lines are we on?

BY MR. FINALDI:

Q So we're on page 50 on line 13.

A 50.

Q 50, on line 13. I'll just read it. I'll read it into the record. Actually, I'll start at line 9.

"Have you ever used the phrase,

'chicken hawk'?

"Answer: Yes."

MS. MacISAAC: Where are you? That's not 50, 13, is it?

BY MR. FINALDI:

Q Page 50, line 9.

"Have you ever used the phrase

'chicken hawk'?

"Answer: Yes.

"What do you mean by that?

"It's a slang word for pedophile.

"And you told Mr. Levine that you thought Michael Jackson was a chicken hawk?

"I don't know remember if I said that to him or not."

Do you remember giving that testimony?

A Yes. But this is all -- they twisted this all around.

Q Okay.

A I'd like to clarify this.

Q Let me just ask my questions and your counsel can ask questions later, if she'd like. Okay.

So next it says, "But you've said it to other people."

You said, "Yes."

"Question: And when you told people that, you believed it to be true; isn't that correct?

"Answer: No.

"Question: Why did you tell people that if you didn't believe it to be true?"

And then you weren't allowed to answer that question. And then the question was:

"Who did you tell it to?"

"It" being that Michael Jackson was a chicken hawk.

And you said, "The detective, the police that arrived at my house."

Do you remember telling the police that?

A Do you want to hear my answer?

Q Yes. And that's the question, do you remember telling the LAPD that Michael was a chicken hawk?

A No.

Q Yes or no?

A I did not tell the police that Michael was a chicken hawk.

Q Did you use the word, "chicken hawk," in your conversations with the police?

A Yes.

Q Okay. So what's your explanation now for it?

A The police asked me -- they came to my home, interviewed my minor son without my consent. And then they came back to my house at 11:30 at night on a school night and they lied and told me they had a naked picture of my son from Michael Jackson's house.

And then they said, Do you think Michael Jackson is a pedophile? And I said, Do you mean, do I think he's a chicken hawk? And they lied and twisted that all around and said -- and the next day it was in

the Times that I said -- Jolie Levine, Michael's Jackson assistant, pet name for Michael Jackson is chicken hawk. And so that is not true. I never called him a chicken hawk. And they just latched onto it because that was the slang term known very well to police. And so I never said he was a chicken hawk.

Q Okay.

A I never said he was a pedophile.

Q Did you ever release a public statement correcting that?

A No. To call more attention to it?

Q Did you ever go to the police station to correct it?

A No.

Q Okay. Did you ever go to the court or the judge to correct it?

A Why? So I could bring more attention to it?

Q Yes or no, did you?

A No.

Q Did you file a lawsuit to try and correct it?

A No.

Q Alrighty. And when you were interviewed by the police, this was after you were fired?

A Yes. They were a bunch of liars any way.

Q Okay.

A There was no naked picture of my son. They lied to me. They lied to the newspapers.

Q How do you know there was no naked photo?

A They never produced it. There was no naked photo.

Q Do you -- well, do you know there was testimony from a security guard that there was a naked photo --

A Produce it.

Q -- of an Asian boy?

A My son? Produce it.

Q Of a young Asian boy and Michael Jackson called him and had him destroy it, rip it up into pieces and throw it over the wall?

MS. MacISAAC: The question is, do you know that there was testimony to that effect?

THE WITNESS: I don't know that.

BY MR. FINALDI:

Q Okay. So this is the first time you're hearing that, right?

A Yes.

Q Okay.

A Does anybody have proof of this picture?

Q Did you ever ask Yoshi if Michael Jackson had taken pictures of him?

A Yes.

Q And what did he say?

A He said there is no picture like that.

Q Did he ever say Michael Jackson took photos of him?

A Naked photos of him?

Q Any photos.

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

Q So he may have?

A He says there's no naked photos of him.

Q Did MJJ Productions have a Polaroid camera at the time?

MS. MacISAAC: If you know. Calls for speculation.

THE WITNESS: I don't know.

MR. FINALDI: See, you're coaching her again.

MS. MacISAAC: Oh, God.

MR. FINALDI: Everything is if you know.

MS. MacISAAC: Calls for speculation.

MR. FINALDI: Everything is if you know.

MS. MacISAAC: You said -- well, you said -- you said the wrong way. You can ask a question to say, do you know if Michael Jackson had a Polaroid? You asked a witness, Does he have a Polaroid? It calls for speculation.

MR. FINALDI: Watch the anger.

MS. MacISAAC: There's no anger.

MR. FINALDI: You're pointing your finger.

MS. MacISAAC: The anger here is that you don't like the testimony.

MR. FINALDI: You're raising your voice.

MS. MacISAAC: Okay.

MR. FINALDI: You're talking over me.

MS. MacISAAC: That's the anger.

MR. FINALDI: You're talking over me.

MS. MacISAAC: That's the anger here.

MR. FINALDI: You're talking over me.

MS. MacISAAC: That's the frustration. That's the hostility.

MR. FINALDI: Okay. Okay. All right. Now it's completely improper. Now, please stop coaching the witness. All right.

MS. MacISAAC: Please stop harassing me --

MR. FINALDI: Otherwise --

MS. MacISAAC: -- and harassing the witness.

MR. FINALDI: Otherwise, I'm going to get a discovery referee --

MS. MacISAAC: Okay.

MR. FINALDI: -- and I'm going to make you pay for it.

MS. MacISAAC: We're not going to pay for it,
Vince.

MR. FINALDI: That's what's going to happen.

MS. MacISAAC: If anyone, I will be so happy.

MR. FINALDI: That's going to happen.

MS. MacISAAC: And you know what, Wince, I'd
like to meet and confer about that because I think --

MR. FINALDI: All right.

MS. MacISAAC: -- we need a discovery referee.

MR. FINALDI: Perfect. Perfect.

MS. MacISAAC: And you absolutely should pay
for it and so should John Manly.

MR. FINALDI: And second of all, my name is not
"Wince." If you want to talk about it, then --

MS. MacISAAC: Your name's not Vince?

MR. FINALDI: -- we can talk about it another
time. It's Vince, not Wince.

MS. MacISAAC: I said Vince.

MR. FINALDI: All right. You're all out of
sorts. You don't even know what's coming out of your
mouth.

BY MR. FINALDI:

Q Now, Leroy Thomas --

MS. MacISAAC: You're so rude --

BY MR. FINALDI:

Q Do you remember him?

MS. MacISAAC: -- and unprofessional.

THE WITNESS: Who?

BY MR. FINALDI:

Q Do you remember Leroy Thomas, a security guard?

A I don't remember all their names.

Q Okay. Well, he was of Jamaican descent and he was a security guard who was interviewed by the police.

Do you want to hear what he said about the photo?

A Yes.

Q It says, "Thomas was directed to a downstairs bathroom where he was to remove a photograph from the mirror and destroy it. The photograph was a Polaroid photograph of a naked Asian boy standing sideways, his genitals not visible. Thomas estimated the boy was around 9 to 10 years old. Thomas then ripped the photograph up and disposed of it by throwing the pieces over the fence by the trash cans.

"A few days after this incident, Jackson asked Thomas to show him where he had disposed of the photograph. Thomas showed Jackson what he did with the photograph. Thomas felt after this incident Jackson was friendlier towards him."

Did you ever know about that?

A No. I don't even know who that person is.

Q Leroy Thomas?

A Yeah.

Q Okay.

MS. MacISAAC: I'm going to object to the extent that you represent it to the record that Mr. Thomas had testified to anything. You're reading from an unsigned police report that's not under oath and that was written by a police officer. That does not appear to be written by Mr. Thomas.

MR. FINALDI: I'm reading from MES028273.

BY MR. FINALDI:

Q And he says he recalled another incident that it was unusual. In 1986 or '87, approximately, 9:00 p.m., he found a boy waiting in the security house with a security guard Orlando King.

Do you remember Orlando King?

A No.

Q It said, "King told Thomas that Jackson had asked him to keep the boy there until Jackson's parents retired. Approximately one hour later, Jackson called and asked that the boy be brought to his room. Thomas took the boy and left him by Jackson's bedroom door. Thomas stated this boy had Asian features but he was unsure if it was the same boy in the photograph he

destroyed."

Did you ever know about that?

A I have no idea about that.

Q Did Yoshi ever go to Hayvenhurst at night?

A Yes.

Q Without you?

A Yes. But I wouldn't have just dropped him off there.

Q Would you have taken him into the house?

A Yes.

Q Or would you leave him at the security?

A No. I would have taken him into the house.

Q Okay. But you don't know if Michael Jackson ever had him brought to the house, right?

MS. MacISAAC: Objection as to who you're talking about him.

BY MR. FINALDI:

Q You don't know if Michael Jackson ever had Yoshi brought to the house?

A Yes. I would have known. I mean, you know, your son, you don't just let your son just --

Q So did Michael --

A -- roam free.

Q So did Michael Jackson --

MS. MacISAAC: Please let the witness finish answering the question before you start asking another question.

BY MR. FINALDI:

Q So did Michael Jackson ever send a car to pick up Yoshi and bring him to the house?

A Not that I can remember.

Q Okay. We've got a transcript of Leroy Thomas on the record.

A I don't even know who he is.

Q Did you know the names of all the security guards at Hayvenhurst?

A No. 'Cause there were a few of them but I didn't know their names.

Q Okay.

A Is that his -- a deposition of his?

Q It's a transcript from an interview with the police.

A Oh. With the police.

Q Yes. And --

A Who lie.

Q The what?

A Who lie.

Q So all the police lied in this case?

A Well, I found it's been my experience in this

situation that they've been liars.

Q So you said the police were liars because they said there was a photograph of your son naked, right?

A Which they never produced. And they lied about what I said regarding the word, "chicken hawk." And they lied to the newspapers, the L.A. Times, supposedly, a reputable newspaper. And, you know, printed things I said -- had them print things I said in the newspaper. So I'm really not -- don't really have a high opinion of the police in regards to this particular matter.

Q Did you ever call the L.A. Times and try and correct the statements that were written about you?

A I wasn't going to make a bigger -- you know, just continue it. I just wanted it to go away.

Q So he said that Michael Jackson called him on the phone and it says, "He asked me to look under the bottom of a fridge, which was an outside small fridge, and there was a key."

Do you remember Michael Jackson having a key under the fridge to get into his house at Hayvenhurst?

A What fridge?

Q A fridge outside.

A Where -- where was the fridge supposedly located?

Q Outside at the Hayvenhurst property.

Do you remember a small fridge being there?

A No.

Q It says, "I was using a cordless phone and he told me to pick up the phone and walk to the house. And he asked me if I was there. And I told him yes. And he told me to look under the bottom of the fridge. There was a key under there. And I picked up the key and he asked me to open the door. And I opened the door and he told me to go inside.

"Which door did he tell you to open?

"It's the one in the back by upstairs to his room. I went inside and he told me to look on the wall inside the bathroom.

"Question: This was his personal bedroom?

"Answer: Yes, it was.

"Question: And then there was -- and then you walked into a bathroom?

"Answer: No. Well, I didn't go to the bedroom. The bathroom was on the right side going -- I didn't go towards the bedroom at all. Just towards the bathroom. And he told me to look on the mirror. The bathroom is glass all around and he told me to take a picture down."

Had you ever been in the bathroom in Michael Jackson's bedroom in Hayvenhurst?

A Not that I recall.

Q Okay. "And I took the picture down. And he asked me if I had it. I told him yes. And he asked me to remove it from the wall and tear the picture up. It was a Polaroid.

"Question: Uh-huh. And what was the picture?

"Answer: It was a of a kid, a young man. And he was standing not forward but, like, sideways. The features was like Chinese or the features of a Chinese kid.

"Question: So he had features of an Asian?

"Answer: Asian, yes."

Did anyone ever tell you about any of this testimony?

A No.

Q Okay.

MS. MacISAAC: I'm just going to object for the record that you just read that into the record and we weren't given copies. I have no idea whether you read it accurately.

MR. FINALDI: You guys produced it.

MS. MacISAAC: Just objecting for the record, Vince.

BY MR. FINALDI:

Q So do you remember you spoke with the police on

October 4th, 1993 at 8:00 p.m.?

A I don't remember -- or I did speak with the police but I don't remember the date or time. I mean, this is --

Q Okay. So when did you speak with Yoshi about whether there was a photo or not?

A The night they -- the day they came to the -- my house and interviewed my minor child without my consent or knowledge.

Q You were upset that the police interviewed him?

A He was a minor without my consent or knowledge. They interviewed him and told him they had a naked picture of him. Wouldn't that upset you?

Q You understand that the police are allowed to -- they're well within their rights, it's perfectly legal for them to interview a minor without the parents' permission.

Do you know that?

A They told me that but I didn't know that at the time.

Q Okay.

A Do you have children?

Q I do.

A Wouldn't it upset you?

Q The whole thing would upset me if my child were

involved with Michael Jackson allegations.

MS. MacISAAC: That wasn't the question, Vince.

BY MR. FINALDI:

Q Did you ever hear anyone during the time you were working for Michael Jackson saying things like keep your son away from him?

A Never.

Q Did you ever hear any allegations that he was interested in children?

A Never.

Q You never heard that he was sexually attracted to children?

A Never.

Q Did you hear people joking about it?

A No.

Q Did you ever wonder why he didn't have girlfriends or never spent time with girls, he was always with young boys?

A No.

Q Never wondered about it?

A No.

Q How about now? Thinking back on it, doesn't it seem a little weird?

A No.

Q Where were you born?

A California.

Q Where? Where in California?

A Merced.

MR. FINALDI: Alrighty. Let's go ahead and take a break. We can do a lunch break right now.

THE WITNESS: Okay.

THE VIDEOGRAPHER: Off the record, 12:42 p.m.

(Off the record.)

THE VIDEOGRAPHER: Returning to record,
1:55 p.m.

BY MR. FINALDI:

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

A Yes.

Q Okay. Did you ever handle any flight arrangements for Michael or his friends or his associates?

MS. MacISAAC: Objection; compound.

THE WITNESS: I handled -- I recall handling one flight arrangement.

BY MR. FINALDI:

Q For whom?

A For Elizabeth Taylor.

Q Did you ever make flight arrangements for the Safchucks?

A No.

Q Did you ever do anything related to flight arrangements for the Safchucks?

A No.

Q Did you know that MJJ Productions would buy tickets for the Safchucks under the name Andrews?

A No.

Q When the Safchucks were booked into rooms, what name was used --

A I have --

MS. MacISAAC: Calls for speculation.

BY MR. FINALDI:

Q -- during these tours and things?

A I don't know.

Q Did you ever book any types of travel or events for the Safchucks and Mr. Jackson together?

A I don't understand.

Q Did you ever book any events for Mr. Jackson and the Safchucks together?

MS. MacISAAC: Objection; vague and ambiguous as to what you mean by events.

MR. FINALDI: Anything. A movie, a dinner.

THE WITNESS: Wait. I'm sorry. I'm having a lupus fog, a little fog thing. Could you explain again?

BY MR. FINALDI:

Q Uh-huh. Did you ever book any events for the Safechucks and Mr. Jackson to attend together such as movies, theaters, anything like that?

A I don't think I booked it. I can't remember.

Q Who booked it?

MS. MacISAAC: Objection; lacks foundation as to anyone booking it. Vague and ambiguous --

BY MR. FINALDI:

Q You said you don't think you did.

MS. MacISAAC: -- as to time or events?

BY MR. FINALDI:

Q Did someone that you know book these types of events and things for Mr. Jackson?

MS. MacISAAC: Calls for speculation.

THE WITNESS: I don't -- I don't know -- I'm sorry. I'm having a lupus fog and getting a little confused.

BY MR. FINALDI:

Q Okay. What are you getting confused over?

MS. MacISAAC: I'm confused.

THE WITNESS: Yeah.

MR. FINALDI: No doubt.

MS. MacISAAC: Book events for Michael Jackson. Who booked events for Michael Jackson?

MR. FINALDI: I'm not asking you. All right.

MS. MacISAAC: Can we have the last question read back?

THE WITNESS: Yeah. I'm sorry.

MS. MacISAAC: We're going to have the question read back by the court reporter, the last question. And give me time to object. Thank you.

(The record was read as follows:

"Question: Did someone you know book these types of events and things for Mr. Jackson?")

MS. MacISAAC: Objection; vague and ambiguous as to time, calls for speculation, vague and ambiguous about what events would be booked with the Safechucks or not.

BY MR. FINALDI:

Q So do you understand the question?

A Yes. Sort of.

Q Okay.

A I remember going to see Starlight Express but I don't remember if the Safechucks were there and I don't know who booked it.

Q Okay. Mr. Safechuck is being -- so Jimmy Safechuck says that he and his family were once invited to dinner at Mr. Jackson's house in Hayvenhurst and that you are the one who called them to make the invitation.

Do you recall doing that?

A No, I don't recall.

Q Are you saying it didn't happen or are you saying that you just don't know if it happened?

A No. I'm saying I don't recall --

Q Okay.

A -- calling them.

Q Are those -- is that type of a thing something that you did from time to time as Michael Jackson's assistant, call people and invite them to dinners on his behalf?

A Yes, it would be.

Q Here's something else that Jimmy Safechuck is alleging. He's saying on March 11, 1988, Plaintiff and his mother accompanied Michael Jackson and his guests to attend a performance of the Phantom of the Opera on Broadway and both before and after the performance, they all spent time together with Liza Minnelli.

After the show, they all went backstage to meet the stars of the show including Michael Crawford. Jolie Levine, again, made all the arrangements through MJJ Productions for them to fly to New York. And Michael Jackson and/or MJJ Productions paid for all the expenses for the trip.

Do you recall that event?

A I recall seeing Phantom of the Opera but I don't recall flying to New York and if I made the arrangements or not.

Q Do you recall who made the arrangements?

A No.

Q Okay. It says, "Plaintiff and his mother stayed at the Trump Tower for the weekend."

Do you remember staying at Trump Tower?

A Was that the Helmsley Palace back then?

Q It says Trump Tower here.

A Oh.

Q Do you remember staying in the Trump Tower or Mr. Jackson staying in the Trump Tower when you were his employee?

A Was that during the tour?

Q The question is not specific to the tour. The question is, do you remember Mr. Jackson ever staying in the Trump Tower during the entire time you were employed by him?

A Well, I'm asking you that because I'm trying to remember and piece it together. So -- and I know that hotel changed names and I remember staying in the Helmsley Palace, which, I think, is now the Trump Tower but I'm not sure.

Q You stayed in the Helmsley Palace with Mr.

Jackson?

A I think that's what it was called at the time.

Q Okay. Mr. -- so James Safechuck says that you assisted in paying -- in arranging the hotel and other accommodations and travel arrangements for him and his mother during the Bad Tour.

Do you recall doing that?

A No. I don't recall doing that.

Q Okay. Do you remember arranging payment for food, entertainment or shopping sprees for him -- him, being James Safechuck -- during that tour?

A I don't recall.

Q Okay. During the Bad Tour, who was the person that one would need to contact if they wanted to get a hold of Mr. Jackson? Were you the liaison between Mr. Jackson and anyone else in the public?

A Usually, yes.

Q Okay. Your attorney, your former attorney in the Jordan Chandler case was Eve Triffo, right?

A Right.

Q Or Triffo, right?

A Right.

Q How did you find her?

A Through Michael's people.

Q Do you remember which people?

A No, I don't.

Q Was it Norma?

A No.

Q No. Alrighty. And did you pay Eve for that work?

A I don't remember.

Q Well, did she send you a bill or did Michael take care of it?

MS. MacISAAC: Asked and answered. The witness just said she doesn't remember.

THE WITNESS: I don't remember.

BY MR. FINALDI:

Q You don't recall ever paying her, correct?

MS. MacISAAC: Asked and answered. The witness says she doesn't recall.

BY MR. FINALDI:

Q Correct? You don't remember ever giving her payment in a check or cash or anything, correct?

A I don't remember.

Q Yeah. And now, when the Jackson companies offered to represent you during deposition here today, did you think that was a little bit weird given the fact that they had fired you before?

A No.

Q When they offered to find you an attorney back

in 1993, did you find that was a little weird given the fact that they had fired you?

A No.

Q Do you remember a security guard named Dan Starks?

A At Hayvenhurst, you mean?

Q Yes.

A No.

Q No.

A I didn't know their names usually.

Q You just saw --

A Yeah. They weren't very involved in anything. And usually I just -- you know, you drove past them, parked your car and I went into the office.

Q What did most of the security guards look like?

MS. MacISAAC: Objection; vague and ambiguous, lacks foundation that they looked the -- I mean, I think you can ask the witness what individual guards looked like.

MR. FINALDI: No. I asked the witness a question.

MS. MacISAAC: Most people --

MR. FINALDI: Stop being obstreperous.

MS. MacISAAC: Okay. It is completely vague and ambiguous. It suggests that they all look alike.

MR. FINALDI: Fine. Your objection's made for the record.

MS. MacISAAC: Okay.

MR. FINALDI: You made your objection for the record.

MS. MacISAAC: It is an absurd question. Literally ridiculous.

MR. FINALDI: All right. You're going to get yourself in trouble if you keep that up.

MS. MacISAAC: Oh, please.

BY MR. FINALDI:

Q Now, what did the security guards generally look like; do you remember?

MS. MacISAAC: Same objections. Did they generally look in one way?

MR. FINALDI: Ma'am, that's coaching.

MS. MacISAAC: Coaching?

MR. FINALDI: You're not entitled to do it. Okay.

MS. MacISAAC: Vince --

MR. FINALDI: You can say your objection.

MS. MacISAAC: Vince -- lacks foundation.

MR. FINALDI: You can say your objection.

MS. MacISAAC: Lacks foundation that they look the same.

MR. FINALDI: There you go. Thank you.

MS. MacISAAC: Lacks foundation.

MR. FINALDI: Thank you. That's all you need to do. Okay. Play by the rules.

MS. MacISAAC: Okay. Vince --

MR. FINALDI: Play fair just --

MS. MacISAAC: Vince, Vince --

MR. FINALDI: -- like everyone else.

MS. MacISAAC: You know what --

MR. FINALDI: And lower your voice and stop pointing at me.

MS. MacISAAC: I am not raising my voice.

MR. FINALDI: Play by the rules.

MS. MacISAAC: You're doing your best --

MR. FINALDI: All right.

MS. MacISAAC: -- to try to harass the witness today --

MR. FINALDI: No. No, I'm not.

MS. MacISAAC: -- and myself.

MR. FINALDI: That's absurd.

MS. MacISAAC: You are just making totally inappropriate --

MR. FINALDI: Now, you're just lying. Now you're just flat-out outlying.

MS. MacISAAC: Let the record reflect --

MR. FINALDI: The record reflects itself and you're just lying.

MS. MacISAAC: I am not lying, Vince. I have no reason to lie.

MR. FINALDI: So you're going above and beyond just being -- you know, bending the rules. You're being completely unethical by accusing me of something that's not true.

MS. MacISAAC: You know what, you were harassing me --

MR. FINALDI: Just stop. Just stop.

MS. MacISAAC: And frankly --

MR. FINALDI: Stop.

MS. MacISAAC: Just saying that right now is harassing and it's so unprofessional.

MR. FINALDI: Stop.

MS. MacISAAC: And unfortunately, it's typical.

MR. FINALDI: Yeah. Stop.

MS. MacISAAC: And the record will speak for itself. And I think your idea of having a discovery referee is excellent.

MR. FINALDI: Go for it. File a motion and let's see.

MS. MacISAAC: Okay.

MR. FINALDI: All right.

MS. MacISAAC: Well, you know what, let's meet and confer on that when we're off the record --

MR. FINALDI: Go ahead. File a motion.

MS. MacISAAC: -- because I'm happy to do that because I am so sick --

MR. FINALDI: Consider the meet and confer --

MS. MacISAAC: -- of the sexist, outrageous things that Mr. John Manly has said to me in your presence.

MR. FINALDI: Sure.

MS. MacISAAC: And what you're saying to me today.

MR. FINALDI: What's the sexist thing I said?

MS. MacISAAC: I didn't say that you said anything sexist. John Manly has said sexist things.

MR. FINALDI: What did he say that's sexist?

MS. MacISAAC: Have I ever tried a case even though I've practiced law for 20 years?

MR. FINALDI: And that's sexist?

MS. MacISAAC: And I'm red, that I'm getting upset, that I was emotional.

MR. FINALDI: You were emotional.

MS. MacISAAC: That I shouldn't be emotional about things.

MR. FINALDI: You were getting red just like

you are now.

MS. MacISAAC: I found it -- I found it sexist and offensive.

MR. FINALDI: You were upset and you're angry

--

MS. MacISAAC: I'm not --

MR. FINALDI: -- just like you are today.

MS. MacISAAC: I'm not.

MR. FINALDI: That's your pattern.

MS. MacISAAC: Why do you keep calling -- are you angry?

MR. FINALDI: That's your pattern.

MS. MacISAAC: How am I angrier than you today?

MR. FINALDI: That's your pattern.

MS. MacISAAC: How am I angrier than you today?

MR. FINALDI: Because you're yelling. You're pointing --

MS. MacISAAC: I'm not --

MR. FINALDI: -- your finger at me and it's completely unnecessary.

MS. MacISAAC: I'm pointing my finger? My fingers are not pointed. Talk about a liar.

MR. FINALDI: Yeah. That's just --

MS. MacISAAC: Talk about a liar.

MR. FINALDI: -- simply untrue. That's simply

untrue.

BY MR. FINALDI:

Q Now, Miss Levine, generally, were the security guards at Hayvenhurst African American?

A Yes.

Q Okay. And most of them were rather large, correct?

A Not necessarily.

Q Some of them were?

A Maybe one or two.

Q Okay. Do you remember one that wore a top hat, black top hat?

A Oh, he wasn't a security guard at Hayvenhurst.

Q He was a body guard though on some of the events?

A On the tour, yeah.

Q And what was his name?

A Chuckie.

Q Chuckie. Do you remember his real name, his legal name?

A He was such a nice guy. Chuckie. I can't remember his last name.

Q Have you spoken with him lately?

A No.

Q Do you know what became of him?

MS. MacISAAC: Objection; vague and ambiguous.

THE WITNESS: No.

BY MR. FINALDI:

Q You never heard whether he continued working for Michael, whether he didn't, whether he passed away?

A No.

Q Nothing?

A Don't know what happened to him.

Q But you only have good memories of Chuckie?

A Yeah.

Q So Dan Starks was interviewed by the police department on October 1st, 1993. He was actually interviewed at the District Attorney's office.

Did you know this?

A No.

Q No? Okay.

MS. MacISAAC: Lacks foundation as to whether that's even true.

BY MR. FINALDI:

Q Okay. And this is page MES028266. And it says

--

A Is that a police report?

Q No. This is a District Attorney report.

A A District Attorney --

Q He met with the District Attorney. And here it says, "Starks recalls seeing Jolie Levine's son visit Jackson's room at night on at least two occasions and spending many hours there. Miss Levine was a Jackson employee."

So you've already testified that it's true that your son did go to Mr. Jackson's room at night and stayed the night. So that would be true, right?

A Yes.

Q Okay. Do you remember a Fred Hammond security guard?

A No. I mean, the name sounds familiar but I can't say that I remember who that is.

Q It says -- so he was interviewed -- this is MES028175 and the date is October 1st, 1993. "Fred Hammond stated that he worked for Michael Jackson as a security guard from February 1987 through February 1st, 1993. At the time that he was hired, Ramadan Habeebalah was the head of security."

Did you know that individual? Mr. Habeebalah?

A No.

Q He said, and I quote, "Hammond observed Jackson drive the Safechucks' Mercedes Benz several times with the boy, Jimmy Safechuck. He recalled the license being a personalized plate Safechuck."

Did you ever see that vehicle?

A Not that I remember.

Q Okay. It says, "Hammond observed Jolie Levine's son Yoshi go with Jackson to Jackson's room late at night. Jackson took other boys there but he didn't know who they were."

Did you ever see Mr. Jackson taking other boys besides your son to his room at Hayvenhurst?

A No.

Q Okay. So your son is the only one -- well, actually, you already said you remember him taking Jimmy Safechuck there, right?

A Right.

Q So just the two of them, no one else that you recall?

A Not that I recall.

Q Okay. We've got your statement here to the police. Here is a copy for you.

MS. MacISAAC: I'm going to object to the extent that the witness did not -- this is not a signed statement and I object to the representation that it is a statement.

BY MR. FINALDI:

Q So we're going to mark this as Exhibit B for the record. Give a copy to you and your counsel. And if

I could see that deposition transcript.

MS. MacISAAC: When you are given this, read the entire thing. Take your time and read the whole thing over before you --

THE WITNESS: Okay.

MS. MacISAAC: -- answer questions about it.

THE WITNESS: Okay.

MR. FINALDI: So I'm going to mark the deposition transcript of Jolie Levine as Exhibit C for the record.

BY MR. FINALDI:

Q You do recall speaking to the police, correct?

A Yes.

MS. MacISAAC: Asked and answered already. What exhibit is this? MES028211, did you mark it?

MR. FINALDI: It says it right on it.

MS. MacISAAC: Did you mark it as an exhibit to today's depo?

MR. FINALDI: You can read it. It's right on it.

MS. MacISAAC: So that's your kind of professionalism and lack of anger today?

MR. FINALDI: You know, if you've --

MS. MacISAAC: Will you not tell me --

MR. FINALDI: -- got an objection, make it.

MS. MacISAAC: Will you not tell me --

MR. FINALDI: If not, just don't talk to me.

MS. MacISAAC: I'm going to ask you this.

MR. FINALDI: Okay. Okay.

MS. MacISAAC: Vince, will you tell me what --

MR. FINALDI: If you've got an objection, make it.

MS. MacISAAC: -- exhibit it is?

MR. FINALDI: If you have an objection, make it. If not, I don't want to hear from you. Thank you.

MS. MacISAAC: Court reporter, could you tell me what exhibit it is?

THE COURT REPORTER: B.

MS. MacISAAC: Okay.

BY MR. FINALDI:

Q Have you had a chance to read it?

A Yeah. This is weird and wrong.

Q Okay. So at the top it says, "Date and time: October 4th, 1993 at 8:00 p.m."

MS. MacISAAC: It doesn't say -- objection. Objection. The document does not say 8:00 p.m.

MR. FINALDI: Ma'am, let me finish my question and stop interrupting.

MS. MacISAAC: I'm just objecting to your misrepresentation of the document.

MR. FINALDI: Well, you're not allowed to object while I'm talking. Okay. It's rude. It's disrespectful and there's no reason for it. It's below you.

BY MR. FINALDI:

Q Now, is that around the time that you remember them coming to interview you?

A Seems like they came later than that. Like, it was late at night.

Q Okay. 5055 Coldwater Canyon, Number 214, was that your address at the time?

MS. MacISAAC: Objection. It says, "Number 217."

THE WITNESS: Yeah.

BY MR. FINALDI:

Q Is that where you lived?

A I think, yeah. I mean, I think that's the address. It was just a long time ago.

Q Okay. And Officers Sicard and Ferrufino. Were there two officers that interviewed you?

A There were two officers.

Q Okay. It says, "On the above date and time, investigating officers interviewed Miss Jolie Lin Levine at her residence."

Was that your name at the time?

A Well, part of it, yeah. Yeah. I just really go by Jolie Levine.

Q It says, "Miss Levine stated that from 1986 through 1987, she worked as assistant to Michael Jackson during the production of the Bad album."

Did you tell them that?

A That sounds about right. I mean --

Q And that statement is true, correct?

MS. MacISAAC: I'm going to object. You absolutely have to let the witness complete her answer before you start asking another question. Was there something else that you wanted to say?

THE WITNESS: Yeah. I said I'm not -- I'm not 100 percent sure about the dates, but, yeah, I worked on the Bad album.

BY MR. FINALDI:

Q And so there's nothing in that statement that's false, correct?

A Well, I'm not sure about the dates but I did work on the Bad album.

Q Okay. It says, "After the album was completed, Michael Jackson requested Miss Levine to work for him as his executive secretary;" is that true?

A Yes.

Q Did you tell them that?

A I guess. I think I did.

Q It says, "Miss Levine was reluctant at first, but Jackson through her son Yoshi, age 9 or 10, was able to convince her."

Did you tell them that?

A I don't recall if I told them that or not.

Q Is that true?

A What?

Q That you were reluctant at first?

A Yes, I was reluctant at first.

Q And is it true that your son encouraged you to take the job?

A Yes.

Q So your son knew Michael Jackson before you began working for MJJ Productions?

A Yes. Because I brought him to the studio with me.

Q Okay. And he met Michael Jackson at the studio while he was recording the Bad album?

A Yes.

Q So did Yoshi ever go to Michael Jackson's home before you worked for MJJ Productions?

A I think so, yes. Yeah, he did.

Q Okay. So it started before then.

It says, "Yoshi and Jackson became very good

friends during the production of the Bad album."

Did you tell the police that?

A I don't recall if I told the police that but they did become friends during the production of the album.

Q Okay. And during that time you were a -- essentially, a single mother, correct?

A Yes.

Q Okay. Yoshi didn't have a father figure in the home, correct?

A Correct.

Q Okay. It says, "Miss Levine stated that during her initial part of her employment, Jackson, 'romanced' Yoshi by buying him gifts, taking him shopping and to the Encino residence."

Did you tell the police that?

A No.

Q Did you tell him -- the police anything that's in that statement? Did you tell them that Mr. Jackson bought gifts for Yoshi?

A I don't recall if I told them that or not.

Q Did he buy gifts for Yoshi?

A He bought some -- some gifts for him.

Q Did he take him shopping?

A They went shopping.

Q And did you tell the police that?

A I can't remember if I told them that or not.

Q All right. And Mr. Jackson did take Yoshi to his Encino residence, correct?

A Yes.

Q Did you tell the police that?

A I can't remember if I did or not.

Q Okay. So the part you object to is saying that he romanced Yoshi, right?

A Right.

Q You never said that?

A No.

Q Have you ever told anyone that?

A No.

Q Next paragraph says, "Miss Levine and Yoshi accompanied Michael Jackson on the Bad Tour through Japan and Europe."

You told the police that, right?

A No, I did not because that did not happen.

Q What did not happen in that sentence?

A Yoshi did not go to Japan and Europe.

Q He went on part of the Bad Tour, correct?

A He only went to a couple of cities throughout Europe but he did not go to Japan.

Q Okay. So Yoshi went to a couple cities in

Europe and no cities in Japan, correct?

A Correct.

Q Okay. It says, "During the tour, Jackson spent time with Yoshi;" is that true?

A Very little time with Yoshi during the tour.

Q Did you tell the police that Jackson spent time with Yoshi during the tour?

A No.

Q Okay. It says that during the tour, Jackson bought Miss Levine expensive presents which she did not accept because she thought it was inappropriate because of the employer/employee relationship.

Did you tell the police that?

A No. Because he didn't buy me any expensive presents which I did not accept.

Q Okay. It says, "She did not elaborate on the types of presents she received from Jackson."

Next paragraph. "When she was working for Jackson, she kept a telephone book for him with names such as Jonathan Spence, Jimmy Safechuck, Emmanuel Lewis, Brett Barnes and others. Special friends that she could not remember."

Did you tell the police that?

A No. I don't recall telling them that.

Q Is what's contained in that sentence true?

A When I worked for Michael, I had a -- you know, a Rolodex with everything in it. You know, it was just like any assistant would.

Q Okay. Did it include contact information for Jonathan Spence?

A I -- to be honest, I don't remember because I don't remember Jonathan Spence.

Q Did it contain contact information for Jimmy Safechuck?

A Yes.

Q Did it contain contact information for Emmanuel Lewis?

A Yes.

Q Did it contain contact information for Brett Barnes?

A That I don't remember because I don't remember who Brett Barnes is.

Q And then it says, "special friends."

Did you ever hear Michael Jackson refer to these children as his special friends?

A No, I don't recall that.

Q Did you ever hear anyone at MJJ Productions referring to them as special friends?

A No, I don't recall that.

Q It says, "Miss Levine stated that she believed

she may have the Rolodex with the names of the children."

Did you tell the police that?

A I don't recall that.

Q When you left MJJ Productions, did you keep your Rolodex?

A No. It wasn't my property to keep.

Q So you didn't maintain any of these contact information?

A No.

Q It says, "If she locates the Rolodex, Miss Levine will notify investigating officers."

Did you tell the police that?

A I don't recall.

Q Well, if you didn't have the Rolodex, if you left it at MJJ, you wouldn't have a reason to tell them that if you locate the Rolodex, you'll notify the officers, right?

MS. MacISAAC: Objection; vague and ambiguous, calls for speculation. We're talking about something that happened 30 years ago. If you recall.

THE WITNESS: I -- I don't remember.

BY MR. FINALDI:

Q Huh. So you think the police are just making that part up as well?

A I wouldn't be surprised.

Q Okay. And moving down --

MS. MacISAAC: I'm going to object to the commentary as --

MR. FINALDI: No.

MS. MacISAAC: -- argumentative and abusive.

The hum.

MR. FINALDI: No.

MS. MacISAAC: No? That's --

MR. FINALDI: No.

BY MR. FINALDI:

Q She said she believes that the police were lying and they made up certain things.

That's your testimony, correct?

A Correct.

Q Okay. And what I'm trying to do is find out the exact parts that you think they're lying about in this statement? Does that make sense?

MS. MacISAAC: Okay. That makes sense. Let's keep going.

BY MR. FINALDI:

Q Does that --

A Okay.

Q -- make sense? Okay.

Moving on it says, "Jackson instructed Miss Levine to purchase gifts for Brett Barnes and other kids

and have the gifts mailed to wherever the kids were. For instance, she on several occasions mailed gifts to Brett Barnes in Australia."

Did you tell the police that?

A To be honest, I don't remember.

Q Do you remember doing that, buying gifts for Brett Barnes and sending them to him in Australia?

A I don't remember because I don't remember Brett Barnes.

Q Okay.

A Remember, this is 30 years ago.

Q Yeah. That's been stated many times.

MS. MacISAAC: Well --

MR. FINALDI: We do understand that --

MS. MacISAAC: -- and it remains to be the case.

MR. FINALDI: Yep.

BY MR. FINALDI:

Q And it says, "Miss Levine stated that she remembers that Jimmy Safechuck was very attached to Michael Jackson."

Did you tell the police that?

A I don't recall if I told the police that or not.

Q You remember feeling that Jimmy was really

attached to Michael Jackson?

A Yes.

Q And describe what you mean by that.

A I'm sorry?

Q Describe what you mean by he was really attached to him.

A Oh, all the kids loved Michael.

Q Uh-huh.

A Oh, I'm sorry.

Q All which kids? Which kids are you talking about?

A I mean any kids. You know, the -- you know --

Q The kids out at the gate?

A The kids out at the gate, yeah. You know, the fans. You know.

Q So are you saying that the kids out at the gate were attached to Michael as well?

A Oh, yeah. They would just -- they would be there every day.

Q Okay. So when you say attached to Michael Jackson, is what you're meaning that they just were fond of him?

A Yes.

Q Okay. And you didn't mean anything else -- did it include -- when you told the police that Jimmy

Safechuck was very attached to Michael Jackson, did that include that he was -- he would spend a lot of time with him?

MS. MacISAAC: Objection; the witness already testified she doesn't recall telling the police that. So misstates the witness's testimony, assumes facts not in evidence, calls for speculation.

MR. FINALDI: You can answer.

MS. MacISAAC: If you understand the question.

BY MR. FINALDI:

Q Do you recall Jimmy Safechuck spending a lot of time with Michael Jackson?

A Yes.

Q Do you remember him ever sitting on Michael Jackson's lap or hugging him?

MS. MacISAAC: Objection; compound.

THE WITNESS: No.

BY MR. FINALDI:

Q Did you remember ever seeing Mr. Jackson hug Jimmy Safechuck?

A No.

Q Did you ever see him kiss Jimmy Safechuck?

A No.

Q Okay. Well, you give a weird face when you say the, "no." Is there a reason for that?

A It's just -- just -- I don't know. It's just weird.

Q Did you ever see Mr. Jackson kiss any child on the cheek?

A Not that I can remember.

Q How about on the forehead?

A Yeah. Like, the Make a Wish kids. We had Make a Wish kids after the shows.

Q Alrighty. Did you ever see him hug any kids?

A The Make a Wish kids, yeah.

Q Okay. Just the Make a Wish kids?

A Yeah.

Q All right. Did you ever see him hug Yoshi?

A Yeah.

Q Was he a Make a Wish kid?

A No. Obviously, he's still alive.

Q Okay. So Yoshi and the Make a Wish kids you saw Mr. Jackson hug. Who else, if any other kids, did you see Mr. Jackson hug?

A None that I can think of.

Q Okay. It says here, "Jimmy was Jackson's traveling companion and they slept together in the same suite, but she never saw Jackson or Jimmy involved in any sexual activity."

Do you remember telling the police that?

A I don't remember telling the police that.

Q Okay. Is what's contained in that sentence true; that Jimmy was Jackson's traveling companion and they slept together in the same suite, but you never saw Jackson or Jimmy involved in any sexual activity?

A True.

Q Okay. Now, during the Bad Tour when Jimmy Safechuck was with Michael, did any other kids ever come?

MS. MacISAAC: Objection; calls for speculation.

BY MR. FINALDI:

Q Do you understand the question?

MS. MacISAAC: Vague and ambiguous.

THE WITNESS: I'm sorry. No. Explain, please.

BY MR. FINALDI:

Q So when Mr. Jackson was on the Bad Tour, right, out on tour and Jimmy Safechuck was with him sleeping in the room, did he fly any other kids out to see him to spend the night in the room with him?

A I don't recall.

Q You can't think of a single other kid that he flew out during that time period, correct?

A I can't remember that far back.

Q Okay. It says here, "Miss Levine noticed that Jackson began to develop a pattern with the children he

catered to. She stated that the reason why Michael would get rid of the kids was because they got too old."

Did you tell the police that?

A No. I don't think I told the police that.

Q Did you notice a pattern that Mr. Jackson had with the children he'd catered to?

A No.

Q Did you notice that he would spend time with children until they turn about 13 and then he would cut ties with them?

A No.

Q Did he do that with your son?

A No.

Q So after your son became 13 years old, Mr. Jackson continued a relationship with your son?

A No.

Q So he did cut off ties with your son?

A No. I think it was the other way around.

Q You think Yoshi cut off ties with him?

A Yes.

Q Okay. So moving down it says, "When Miss Levine's son Yoshi was about almost 13 years of age, she was fired for no apparent reason and Miss Norma Staikos took over her job."

Did you tell the police that?

A I don't remember.

Q Is that true, the statement?

A The statement?

Q Yes.

A I don't know but I believe Norma Staikos took over my job.

Q Okay. And it says it was right after the Bad Tour. You told the police that?

A I don't know if I told the police that.

Q Is it a true statement?

A I believe that Norma Staikos took over my job.

Q No. The question was, you said this was right after the Bad Tour?

A Oh. This was shortly after the Bad Tour.

Q Okay. The next page it says, "Miss Levine stated that during the course of her employment with Michael Jackson, she only kept one expense account."

Was that true?

A Yeah.

Q And do you recall the recollection -- do you have a recollection now as to which bank that was with?

A I have no idea.

Q Do you know who handled from MJJ Productions the accounting for that account?

A I'm assuming it was Gelfand, Rennert and

Feldman, the accountants.

Q All right. It says, "Other employees kept other accounts and there were times when she did not know how much money was being spent."

Did you tell the police that?

A I'm sorry. I don't really understand what -- what the question -- or the statement.

Q It says, "Other employees kept other accounts."

Did you know whether other MJJ employees kept other expense accounts?

A Well, I assume Miko Brando kept some kind of, you know, expense account.

Q Did you have interaction with Miko Brando while you worked for MJJ?

A Yes.

Q Did you ever see Miko Brando signing photographs with Michael's name --

A Yeah.

Q -- for fans?

A Yes.

Q Did you ever do that for Michael as well?

A No, I was -- I tried. I was terrible at it. Miko was the best at it.

Q Okay. Alrighty. I'm all finished with that one. Give that to the court reporter. Thank you.

I've got another one. Have you ever read the statement of your son?

MS. MacISAAC: I'm going to object that there's a statement. It's not a signed statement. It's not something that was drafted by her son.

MR. FINALDI: I can see that. I'm going to mark it real quick. Make it as Exhibit D for the record.

MS. MacISAAC: Take your time and read this over.

THE WITNESS: Okay. So this is when the police came to my home while I was at work and interviewed my son without my knowledge?

MR. FINALDI: Yes.

THE WITNESS: Okay. Actually, I think this is wrong. I think I was working for Quincy Jones at the time.

MS. MacISAAC: Just read the whole thing over.

THE WITNESS: Okay.

MS. MacISAAC: Jolie. No, no. That's fine. Just take your time and read it over.

THE WITNESS: Okay.

BY MR. FINALDI:

Q Now, it says that Yoshi was interviewed on the same date as you were but at 5:45.

Now, is it your understanding that Yoshi was

interviewed on the same date that you were, just a little bit before you?

A Yes.

Q And how did you find that out? When you came home, did Yoshi tell you he was interviewed?

A He called me at work and said the police had come and interviewed him and I was livid.

Q Okay. Did he say what the police interviewed him about?

A Yeah. They told him they had a naked picture of him from Michael Jackson's house.

Q Okay. And did you tell Michael about this?

A I called Michael's people and told them.

Q Who did you call?

A I don't remember.

Q Well, what phone number did you call?

A That -- I really don't remember that.

Q Did you have a person's phone number? Did you have his office's phone number?

A I think it was his attorneys.

Q Ah. Howard Weitzman?

A I'm not sure. It was probably Branca's office or somebody like that.

Q Mr. Branca?

A Yeah.

Q And you knew him --

MS. MacISAAC: We don't want you to guess. We don't want you to guess.

THE WITNESS: Okay. I don't remember who I called exactly.

BY MR. FINALDI:

Q You knew Mr. Branca from the tours, correct?

A Uh-huh.

Q He had been on several legs of the tour?

A Yes.

Q Okay. And do you know if Mr. Branca ever saw Jimmy Safechuck during the tour?

A I don't know what Mr. Branca saw.

Q Did Mr. Branca stay in the same hotel as you guys when you guys would be on the tour?

A Mr. Branca didn't travel with us all the time. He only came out on rare occasion.

Q Yep.

A And -- he did stay -- I recall him once staying in the same hotel as us but he didn't -- it wasn't like a -- he didn't come out -- he didn't tour with us, you know.

Q Okay. When he stayed at the same hotel as you, which city were you in?

A I really can't remember that.

Q It says, "On the above date and time, detectives interviewed Yoshi Whaley, age 16, at his residence."

Was he about 16 years old at that point in time?

A Sounds about right.

Q It says, "Yoshi stated that he met Michael Jackson during a recording of the album Bad;" is that true?

A Yeah.

Q It says, "At the time Yoshi's mother Jolie Levine was working for Michael Jackson as the music contractor for the album;" is that true?

A You know, I -- I don't -- I'm not sure. I think -- I think I was working for Quincy Jones then.

Q Okay.

A I can't remember --

Q Okay.

A -- to be honest.

Q It says, "Levine was later hired as Jackson's executive secretary." That's true, right?

A Right.

Q It says underneath the next paragraph, "Yoshi stated that he 'used to hang around the studio,' and one day his mother introduced him to Michael Jackson."

Is that true?

A Yes.

Q It says, "Yoshi is not quite sure but he thinks Michael Jackson asked him for his telephone number and Jackson called him for the first time from his, Jackson's, Encino residence;" is that true?

MS. MacISAAC: Calls for speculation.

THE WITNESS: Yeah. I don't know. You would have to ask Yoshi that.

BY MR. FINALDI:

Q Do you remember Mr. Jackson calling your home?

A Yes. I spoke to him at my home.

Q Do you recall him calling to talk to your son while you were still working for Quincy Jones?

A You know, I can't remember if I was -- what -- where I was -- who I was working for at the time. I must have -- I must have been working on the Bad album during this time. So --

Q Do you remember Michael Jackson calling your home to speak with Yoshi before you were employed by MJJ Productions?

A I don't remember.

Q Okay. It says, "Thereafter, Michael Jackson used to come by every so often to his residence and pick him up. Miko Brando, Marlon Brando's son, was the

limousine driver."

Did that happen?

A Yeah. Michael would come by and pick Yoshi up sometimes.

Q Do you know -- so where would you be when Michael Jackson would come by the house to pick up Yoshi and take him somewhere?

MS. MacISAAC: Objection; vague and ambiguous, assumes facts not into evidence, assumes that the mother was always in the same place every time this happened.

MR. FINALDI: Speaking objection. Completely improper. Violation of the rules.

MS. MacISAAC: If there was a general practice, you can answer.

BY MR. FINALDI:

Q So do you remember where you were when Michael Jackson would come up in the limo with Miko Brando to pick up your son?

MS. MacISAAC: Same objection.

BY MR. FINALDI:

Q Would you be at the house?

A I think I would be at the house sometimes, yeah.

Q Other times would you be at work or somewhere else?

A I might be at work. But usually -- usually, I would be home, I think.

Q Now, when you were at work would Yoshi sometimes be home alone?

A Sometimes, yeah.

Q He didn't have a babysitter when he was 15, 16?

A Not at that age, no.

Q Okay. And there was no -- was there anyone else that resided with you and Yoshi in the Coldwater Canyon home?

A No.

Q Okay. And during the time when he was 15, 16, he was a student; is that correct?

A Yes.

Q Where did he go to school?

A Oh, I can't remember. I had him in a couple different schools. I can't remember.

Q Private or --

A Private.

Q Alrighty. You don't remember the names of any of the private --

A Well, there were a couple.

Q Okay.

A So --

Q And do you remember the names of any of the

private schools, high schools that you sent Yoshi to?

A Well, the one he graduated from was called Coutin.

Q How do you spell that?

A C-O-U-T-I-N.

Q Okay. And do you recall the names of any of the others?

A No.

Q Okay. It says that he would take him shopping, to the movies and to the Encino residence to play video games.

Do you know that to be true?

A Yeah.

Q Okay.

A Yeah.

Q It says, "Sometimes there would be other kids and sometimes it was just Yoshi and Michael Jackson;" is that true?

A That you'd have to ask Yoshi. I wouldn't even know.

Q Okay. Do you remember a maid that Michael Jackson had by the name of Blanca Francia?

A Yes.

Q And how do you remember her? Where do you remember her from?

MS. MacISAAC: Objection; vague and ambiguous.

THE WITNESS: I remember her as being the maid there.

BY MR. FINALDI:

Q Where? At which residence?

A Hayvenhurst.

Q Okay. Did you get along with her?

A Well, she was the maid. I mean, she seemed nice enough. I didn't have a lot of interaction with her.

Q Okay. Do you know if she had a son named Jason?

A I know she had a child. I didn't really know much about it.

Q Did you ever see her child Jason at the Hayvenhurst home or at the ranch?

A Maybe I saw her child at the Hayvenhurst home once or twice, maybe.

Q And her child was a male, correct?

A I didn't know if it was male or female to be honest.

Q Okay. Next paragraph says, "According to Yoshi, he used to sleep over at Michael Jackson's Encino residence."

That's true, correct?

A Yes.

Q It says, "Yoshi stated that he would sleep in Michael's room but he slept in a Murphy bed located downstairs."

Did Yoshi ever tell you that?

A I don't recall.

Q Did you ever see a Murphy bed located downstairs at Michael Jackson's Hayvenhurst bedroom?

A The house was really big. I didn't really -- when I was in the house, I -- my duties were setting the table, lighting fireplaces, getting everything ready for guests and dinners and things like that. So I didn't really --

Q At Hayvenhurst?

A -- pay attention -- yeah -- to that -- you know, to the bedrooms. But --

Q Now --

A -- I didn't know there -- you know, I don't know. I don't remember really.

Q Okay. Did you ever go into Michael's bedroom at the Hayvenhurst home?

A Yes.

Q And was that a one-story or a two-story bedroom?

A I don't remember.

Q Okay. Where was Michael Jackson's bed in the bedroom?

A You mean, like, north, east, south?

Q Yeah. Anywhere.

A I don't know.

Q Any description you can give.

A It was kind of, like, against a wall and it had a cool thing at the end of the bed where the TV would come up.

Q And did the bed itself fold into the wall, if you know?

MS. MacISAAC: Calls for speculation.

THE WITNESS: No. I don't know.

BY MR. FINALDI:

Q Now, was there more than one bed in Michael Jackson's bedroom?

A I don't know.

Q Okay. Moving on. "Yoshi described Michael's room as a story bedroom with Michael's bed located upstairs and a spiral staircase connecting the upstairs to the downstairs;" is that true?

A Yes.

Q It says, "There's a bathroom downstairs to be used by Michael and/or his guests;" is that true?

A Yes.

Q It says, "Michael's bedroom had two doors, one connected to the main house and the second connected to the backyard of the residence. Access can be made to the room through both doors;" is that true?

A I'm not sure. I don't remember.

Q It says, "Detectives asked Yoshi if he had ever been sexually molested by Michael Jackson and he emphatically responded nothing ever happened. We used to play around like kids. He never laid a hand on me. Maybe a hug or two or a handshake. That was it. I never slept in Michael Jackson's bed and never slept naked in his bedroom."

Did Yoshi tell you that he told the police that?

A I don't remember.

Q Now, earlier you stated that when Yoshi called you and told you that the police had been there and interviewed him, you called Michael Jackson's people, you believe his lawyers, right?

A Uh-huh.

Q What did you tell them?

A That the police came and interviewed my minor son without my knowledge or consent and told them that they had a naked picture of him from the ranch or from Michael's.

Q And did you tell them that the police were asking if he was sexually abused by Michael?

A Yes. I think -- I think so. I'm not sure.

Q Okay. Next it says, "Yoshi remembers that Michael Jackson had a video arcade at the Encino residence where both of them played before going to sleep."

Is that true that he had a video arcade at that residence?

A Yes. It was very fun.

Q Did Yoshi ever tell you that he played video games with Mr. Jackson there before going to sleep?

A Yes. I played video games there, too.

Q Okay. It says, "Yoshi stated that he and Michael would sometimes play Hide and Go Seek around the house or they would go swimming before going to sleep."

Did you know they were doing that?

A No.

Q Did you know that Yoshi was swimming at Mr. Jackson's house?

A I assumed they did. I mean, there was a nice swimming pool there.

Q And Yoshi knew how to swim at the time?

A Yes.

Q Did he -- well, when he went to Mr. Jackson's

house to spend the night, did he bring his bathing suit ever?

A I assume he did, yeah.

Q Do you know for a fact he did or are you guessing?

A Well, also, I stocked the house with different sizes of swimming suits for children and adults, male and female. So there were swimsuits there for everybody.

Q Who asked you to do that?

A Michael.

Q How many boys' swimsuits did you stock it with?

A I don't know. There were from babies to adults in all different sizes and colors and shapes.

Q All right.

A And, you know, male and female.

Q How about diapers?

A No diapers.

Q No swim diaper or anything --

A No swim diapers.

Q Gotcha. Did you ever see Michael Jackson play Hide and Go Seek with Yoshi or any other kids?

A No.

Q It says, "Yoshi stated that Michael Jackson is a very big kid inside. He grew up when he was young and never had a childhood. Now he plays like a little kid."

Did Yoshi ever tell you anything of that nature?

A I don't recall.

Q Did Michael Jackson ever tell you that; that he's a big kid because he never had a childhood?

A Michael never told me that but that's what I believed because, you know, we used to -- I used to play games with him and practical jokes with him. And we would play practical jokes on each other.

Q What kind of practical jokes?

A Just goofy little things. Leaving silly notes on his plate at a very, you know -- you know, formal dinner or, you know, flying paper airplanes out the window, shooting each other with water pistols. Just silly things, you know.

Q It says, "Yoshi believes that he visited Michael Jackson's Encino residence at least three dozen times and each time it was just he and Michael Jackson."

Did you know that?

MS. MacISAAC: That Yoshi said it? Objection; vague and ambiguous, whether it occurred or whether he said that.

BY MR. FINALDI:

Q Did you know that Yoshi stayed at Michael Jackson's home with him about three dozen times, 36

times?

MS. MacISAAC: Objection; misstates the document. It says, "Visited." It doesn't say stayed.

BY MR. FINALDI:

Q Did you know that?

A I don't know how many times Yoshi visited Michael.

Q Earlier in your deposition you said you think that Yoshi spent time with Michael alone at the residence only maybe three or four times.

Do you remember saying that?

A I don't remember saying that.

Q Okay.

MS. MacISAAC: Objection; misstates earlier testimony.

BY MR. FINALDI:

Q If he did go to -- if Yoshi did go to the Encino home about three dozen times with Michael Jackson alone, were you aware of each of those times or did you only give him permission and were asked just like on a handful of occasions? Do you understand the question?

MS. MacISAAC: Vague and ambiguous.

THE WITNESS: No, I'm not.

BY MR. FINALDI:

Q Okay. You stated that sometimes Mr. Jackson

would ask for permission and you would let him take Yoshi to his home, correct?

A Correct.

Q How many times did that occur? Do you think that happened 36 times --

A Oh.

Q -- you giving permission like that?

A Very possibly.

Q Do you think you gave him permission every time he went there or do you think there is possibly some times that Michael Jackson took Yoshi to his home that you were not aware of?

MS. MacISAAC: Calls for speculation.

THE WITNESS: I don't know.

BY MR. FINALDI:

Q When Yoshi was 12, 13, 14, did he have friends?

A Yeah.

Q Did he ever spend the night at friends' homes?

A Yes.

Q And when he wanted to spend the night at a friend's house, would he just call you and say I'm at "blank's" house. Can I stay the night?

MS. MacISAAC: Objection; vague and ambiguous as to time, as to instances. If you recall a general practice.

BY MR. FINALDI:

Q Do you understand the question?

A No. I'm sorry.

Q So you said that --

A Sorry. Repeat again.

Q -- Yoshi would spend the night at friend's house sometimes. And I'm saying, would he sometimes call you and say, hey, I'm at "blank's" house. Could I spend the night?

A Yeah. And I would be, like, okay, give me his mom.

Q Weren't you concerned with Yoshi staying the night with Michael Jackson all these times?

MS. MacISAAC: Objection; asked and answered. And all these times, the document -- misstates the witness's testimony as to how times he spent the night. The document talks about visits.

MR. FINALDI: No, it doesn't.

MS. MacISAAC: It's deliberately conflating it.

MR. FINALDI: No, it doesn't.

MS. MacISAAC: The document does -- it says visits. It's, "Yoshi believes that he visited Michael Jackson's Encino residence at least three dozen times." "Visited."

MR. FINALDI: Yeah. I can read. I can read.

MS. MacISAAC: So you just denied it intentionally.

BY MR. FINALDI:

Q So --

A Also, you know, you have to remember this is the thing the police -- this is a scared 16-year-old boy that, you know, the police are banging on his door and, you know, his mom's not home. This is a scared 16-year-old boy you're talking about. So --

Q So you're saying that, what, he didn't tell the truth because he was scared? Is that what you're saying?

A I'm just saying that, you know, this is a scared 16-year-old boy. So --

Q Did he tell you he was scared?

A He didn't have to tell me he was scared. He was just freaked out that the -- how would you feel if you were 16 and the police banging on your door? And, you know, this is -- he's never really had encounters with the police before so what was he to think.

Q Did Yoshi tell you that he was scared?

A Yeah. I think -- I think he did. I'm not 100 percent sure but I think he did.

Q Now, did Yoshi call Mr. Jackson and tell him that the police had come to talk to him?

MS. MacISAAC: Calls for speculation.

THE WITNESS: I don't know.

BY MR. FINALDI:

Q Did you ask him?

A I don't recall.

Q Did Michael Jackson ever call you to talk to you about it?

A No. I don't recall.

Q You don't know if you talked to Mr. Jackson about it directly, about you or Yoshi being interviewed?

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

Q Did -- after you talked to Michael Jackson's lawyers about it, did they call you back and have another conversation?

A Yes, I think so.

Q When did that occur?

A I don't remember. Shortly thereafter. Shortly after I had contacted them.

Q And do you remember which lawyer called you?

A No.

Q It would have been either Mr. Weitzman or Mr. Branca, right?

MS. MacISAAC: Objection; calls for speculation. The witness has just said she doesn't recall who it was.

THE WITNESS: Yeah. I don't know.

BY MR. FINALDI:

Q But earlier you stated it was either Mr. Weitzman or it was Mr. Branca, right? Is there any other lawyers it could have been?

MS. MacISAAC: Calls for speculation.

THE WITNESS: I don't know.

BY MR. FINALDI:

Q Okay. Those are the only two names that come to mind, correct?

A I don't know.

Q Okay. So during that second phone call, what was discussed?

A I don't really remember. This was a very long time ago.

Q Uh-huh. You don't remember anything about it?

A No, not really.

Q Were there several conversations that you had with his lawyers?

A I think there were a few, yeah.

Q Were there any in-person meetings that you had with his lawyers?

A One.

Q Where was that?

A I don't remember.

Q And the in-person meeting was after the police

had come to interview you, correct?

A Yes.

Q Do you know if Mr. Anthony Pellicano was there?

A No, he was not.

Q Okay. Who was there in the meeting that you were at in person?

A Eve Triffo.

Q Was that the first time you met her?

A Yes.

Q And was that meeting somewhere, like, in Westwood area?

A I don't remember where it was.

Q Okay. It was at someone's office, right?

MS. MacISAAC: Objection; calls for speculation. The witness has said three times she doesn't remember where it was.

THE WITNESS: I don't remember.

BY MR. FINALDI:

Q Was it at an office, a home, in a park, at a restaurant, coffee shop. Do you recall?

MS. MacISAAC: Objection; calls for speculation, asked and answered.

THE WITNESS: Yeah. I don't remember.

BY MR. FINALDI:

Q Okay. It says on the next page, "Detectives

informed Yoshi that there was a picture of him posing nude which was found in Jackson's bathroom at the Encino residence. See interview of Leroy Thomas dated October 1st, 1993."

So you remember the interview of Leroy Thomas that I talked about?

A Right. Yeah.

Q It says here the detectives didn't tell them that they had the photo. It says there was a photo that was found.

A They told him that they had the photo. They told me that they had a photo.

Q So it's your understanding that the police told you they had the photo?

A They said they have a photo of your -- naked of your son.

Q Okay. Next down it says, "Yoshi became very nervous and agitated and denying having anyone -- any picture of him taken in the nude by Michael Jackson or anyone else. At this time Yoshi reiterated Michael Jackson never sexually molested me."

Did Yoshi tell you that that happened during his interview?

A Yes.

Q Okay. Next it says, "Yoshi stated when Michael

Jackson went on the Bad Tour around the world, his mother Jolie went with Michael Jackson, leaving him behind in Los Angeles;" is that true?

A Yes.

Q When you left Yoshi behind in Los Angeles, who was watching him?

A Oh. I had a nanny, a live-in nanny.

Q And who was the live-in nanny?

A Her name was Debbie. And I can't remember her last name.

Q What ethnicity was she?

A She was -- I don't know. White, Polish, something or other. I don't know.

Q How long was she his nanny?

A Throughout most of the tour.

Q And where did you find her?

A From a nanny agency.

Q Do you remember the name of that agency?

A I have no idea. I can't remember that.

Q It says, "Later when Michael Jackson was in Nice, France, Yoshi joined them and remained with them throughout the tour;" is that true?

A He didn't remain throughout the tour but he did come to Nice.

Q Next it says, "Yoshi stated that also traveling

with Michael Jackson on the tour was Jimmy Safechuck and his parents;" that's true, correct?

A Yes.

Q "Yoshi further stated, I didn't sleep with Michael in the same room. Jimmy Safechuck stayed in Michael Jackson's room." That's true as well, right?

A As far as I know.

MS. MacISAAC: "This is true." Objection as to true whether he said it or true whether it happened.

BY MR. FINALDI:

Q Next it says, "Jimmy was with Michael all the time. It was like he was attached to him but I never saw anything going on between Michael and Jimmy."

Do you agree with that statement that on the Bad Tour Jimmy was with Michael all the time and it seemed like he was attached to him?

A Jimmy was with Michael a lot. But, you know, that's just my observation.

Q Okay. It says, "Yoshi stated that he saw Michael Jackson a few times during the tour. One of those times was in Switzerland;" is that true?

A I believe so, yeah.

Q So Yoshi came out to Switzerland and to Nice?

A Right. I can't remember other cities, if there -- which cities were between or if there were any.

Q It says, "Yoshi stated that after the completion of the Bad Tour, Yoshi's mother was fired from her job without any specific reason after three years of? Employment." Is that statement true?

A Yeah. I think, yeah.

Q It says, "Yoshi was approximately 13 or 14 years of age;" is that true?

A I think so. It sounds about right.

Q It says, "Yoshi recalls that Michael Jackson called him at home after his mother was fired from her job." Did that happen?

A Yeah.

MS. MacISAAC: Calls for --

BY MR. FINALDI:

Q It says, "Yoshi stated he was very upset at Michael and told him not to call again."

Do you recall that happening?

A Yeah.

Q Yoshi was upset at Michael, correct?

A Yeah. He was very upset.

Q Okay. It says, "Yoshi stated that Michael Jackson began to cry on the telephone and, thereafter, Michael never called him again;" is that true?

A That's between Yoshi and Michael. I don't really know what happened.

Q Do you recall Michael Jackson ever calling the home again?

A No. I didn't have any more communication with him.

Q Okay. It says, "After his relationship with Michael Jackson was terminated, Yoshi was admitted into a psychiatric hospital due to suicidal tendencies;" is that true?

A It wasn't right after. It was sometime during his teenage years. Around -- oh, I don't know. 15, 16, something like that.

Q And how did that come about?

MS. MacISAAC: I'm going to object and instruct the witness not to answer based on Yoshi's private and confidential and psychiatric history. I will, just to avoid any kind of motion practice, allow you to ask questions that are specific to Michael Jackson as long as you will agree that it's not a larger waiver. I mean, Yoshi's not even here, so it can't be waived. But do you see what I'm saying, Vince? You can ask specific questions --

MR. FINALDI: I'm just asking my questions and you can instruct her or not.

MS. MacISAAC: Okay.

MR. FINALDI: Because I don't understand what

you're saying.

MS. MacISAAC: Well, I'm happy to meet and confer with you. I'm happy to meet and confer with you and I'd like to.

MR. FINALDI: Yeah. Right.

MS. MacISAAC: What I'm saying is if you want to ask specific questions, did it have anything to do with Michael Jackson? Did you discuss Michael Jackson? Was Michael Jackson a part of it, I'll allow, as long as it's not a greater waiver into his medical records.

MR. FINALDI: I'm going to ask all the questions I want that I deem are relevant and if you want to instruct her not to answer, then go ahead.

MS. MacISAAC: Okay.

BY MR. FINALDI:

Q Which hospital was he admitted to?

A I don't remember. I think there was a hospital. I think there was a 72-hour hold at I think it was at Cedars-Sinai but I'm not sure.

Q Which location?

A Cedars-Sinai.

Q Which one?

A Isn't there only one Cedars-Sinai?

Q Well, there's satellite, you know, facilities as well.

A There are?

Q Which one are you talking about?

A Oh, the main one.

Q Where?

MS. MacISAAC: Third Street or whatever that is

--

THE WITNESS: Yeah. Third Street and whatever

--

MS. MacISAAC: La Cienega, Robertson, like

in --

THE WITNESS: Yeah, that one.

MS. MacISAAC: -- that area?

THE WITNESS: I didn't know. There's satellite
Cedars-Sinai?

MR. FINALDI: Yes.

THE WITNESS: Really? Are they called
Cedars-Sinai?

BY MR. FINALDI:

Q So was he there for 72 hours?

A Yeah.

Q Did you bring him there?

A Yes.

Q Did he try to kill himself?

MS. MacISAAC: I'm going to object. You know,
this is -- if you are comfortable answering that then

I'll let you answer it. But if you're not, I think it invades his privacy.

THE WITNESS: I think -- I think it invades his privacy, too, because it has nothing to do with Michael Jackson.

BY MR. FINALDI:

Q Okay. And was this the only time in his life this ever happened, this suicidal-type of a --

A I think that --

MS. MacISAAC: Again, I'm going --

MR. FINALDI: Okay.

MS. MacISAAC: -- to object. I instruct you not to answer the question based on the confidentiality, medical and mental history of a third party witness that has nothing to do -- the witness has already --

THE WITNESS: Yes.

MS. MacISAAC: -- clarified it had nothing to do with Michael Jackson.

BY MR. FINALDI:

Q Now is this -- was this the first time Yoshi was suicidal?

MS. MacISAAC: Same objection. Same instructions.

THE WITNESS: Yeah. None of this has anything to do with Michael Jackson.

BY MR. FINALDI:

Q Okay. So has Yoshi been suicidal after that?

MS. MacISAAC: I'm going to object and instruct the witness not to answer in the same confidentiality, invades the medical and psychiatric privilege and confidentiality of this witness's son who is not even here. And she said several times now that it had nothing to do with Michael Jackson.

BY MR. FINALDI:

Q Now, Mr. Jackson -- actually so has Yoshi ever been married?

A He's married.

Q He's married presently?

A Yes.

Q And what's his wife's name?

A Kristen.

Q How do you spell it?

A K-R-I-S-T-E-N.

Q Last name?

A Whaley.

Q W-H-A-L-E-Y?

A Yes.

Q What does she do for a living?

A She's a full-time mom.

Q And she lives with you guys as well?

A Yes.

Q Yoshi has how many kids?

A One of his own and his wife has two kids from a previous -- that she already had.

Q And the one child he has is with Miss Whaley?

A Yes.

Q It says, "Yoshi stated that the reason he was admitted into the hospital was not a result of the termination of their relationship but was because his natural father had passed away and he never had the opportunity to meet him in person."

Did Yoshi tell you that he told the police that?

A He didn't tell me that he told the police that. But this is a personal issue that he had struggled with.

Q Okay. So how long before 1993 had his father passed away?

A His father passed away when he was maybe four or something but it's something that he struggled with his whole life.

Q Okay. So his father passed away around 1981 time frame?

A Yeah.

Q And was there any kind of a trigger that led to this incident that you know of --

MS. MacISAAC: I'm going to object --

BY MR. FINALDI:

Q -- the psychiatric incident?

MS. MacISAAC: I'm going to object and I'm going to instruct the witness not to answer as invading the medical and psychiatric privileges of Yoshi Whaley. I will allow you to answer if you believe or you have any knowledge it has anything to do with Michael Jackson or the termination of the relationship.

THE WITNESS: This has nothing to do with Michael Jackson.

BY MR. FINALDI:

Q It says, "Yoshi stated during the same time period, his mother divorced his stepfather and that compounded the problem because his stepfather was like a real father to him."

Did Yoshi ever tell you that?

A Yes.

Q So Mr. Levine --

A Levine.

Q Martin Levine was like a real father to him?

A Yes.

Q But after the divorce, he lost contact with him?

A No. They kept in contact.

Q Okay. It says, "At the conclusion of the interview, Yoshi stated no crime occurred with Michael Jackson."

Did he tell you that he told the police that?

A Yep.

Q Okay. I can take that one from you.

THE VIDEOGRAPHER: One minute.

MR. FINALDI: Sure. Let's go ahead and take a quick break because we have to change tapes.

THE VIDEOGRAPHER: Off record, 3:06 p.m.

(Off the record.)

THE VIDEOGRAPHER: Returning to record, 3:16 p.m. This begins tape 3.

BY MR. FINALDI:

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

A Yes.

Q Okay. Going on to page 50 of your deposition.

A Yes, sir.

Q Actually, 52. Bottom right-hand corner.

A Okay.

Q So on line 11 you're asked:

"Well, what did you tell the police at the time that you

told them that he was a chicken

hawk?"

And you answered, "I think they asked me what I thought of the whole situation. And I said, Do you mean do I think he's a chicken hawk? And I said I didn't know."

Did you give that testimony?

A Apparently. This is in my former deposition but --

Q And that was truthful at the time you gave it, correct?

A Yeah. But --

MS. MacISAAC: You can finish answering the question.

THE WITNESS: I don't think I -- I never did and I still do not think Michael is a pedophile --

MR. FINALDI: Okay.

THE WITNESS: -- was a pedophile.

BY MR. FINALDI:

Q Okay. Next page. Why do you think he was spending so much time with kids then --

A Because I think --

Q -- or boys?

MS. MacISAAC: Calls for speculation. If you

have an idea you can --

THE WITNESS: I think he didn't have a childhood and I think that with kids, he got to -- you know, with adults they don't get over the fact that you're Michael Jackson.

MR. FINALDI: Yeah.

THE WITNESS: But with kids, you know, after 20 minutes, wow, you're Michael Jackson. Then it's like I'm going to beat you at video games.

MR. FINALDI: Yeah.

THE WITNESS: And they get over it right away.

BY MR. FINALDI:

Q Now, the other members of the Jackson 5, Randy, and Marlon and you know --

A Does Marlon really exist? I never met him.

Q He exists. It's a nickname.

But, you know, did you see any of them spending that much time with kids?

MS. MacISAAC: Calls for speculation if he spent time with them.

BY MR. FINALDI:

Q I mean, they didn't have childhoods either.

MS. MacISAAC: Calls for speculation.

BY MR. FINALDI:

Q So did you see them spending that much time

with kids?

A I didn't see --

MS. MacISAAC: Lacks foundation.

THE WITNESS: I didn't -- I didn't see them regularly. And I saw Jermaine and Jackie occasionally and Tito. And Tito had the three kids; Huey, Duey and Luey.

BY MR. FINALDI:

Q His kids, right?

A Yeah, his kids and his wife and they were great.

Q Yeah.

A And --

Q Did you --

MS. MacISAAC: Can you let the witness answer the question?

MR. FINALDI: Well, she's not answering the question.

BY MR. FINALDI:

Q Did you see them spending time with kids other than, obviously, their own kids?

MS. MacISAAC: She just said that she didn't spend --

MR. FINALDI: Ma'am --

MS. MacISAAC: -- time with them.

MR. FINALDI: Ma'am --

MS. MacISAAC: Asked and answered.

MR. FINALDI: Ma'am --

MS. MacISAAC: Calls for speculation. The witness has just testified that she didn't spend time with them.

MR. FINALDI: Ma'am, just make your objection.

THE WITNESS: So, yeah, I didn't spend time with them.

MR. FINALDI: Yeah.

THE WITNESS: So I don't really -- I didn't spend time with them.

BY MR. FINALDI:

Q Well, you knew that some of them lived at Hayvenhurst, right?

A Well, yeah. But they just kind of -- they were fleeting, you know. They were in and out of there. And you know --

Q Did Jermaine live there for part of the time you were employed?

A You know, I'm not sure because him and Jackie were in and out of the little studio a lot. So I don't know.

Q Okay. But you didn't see them hanging around with kids other than their own kids, correct?

MS. MacISAAC: Objection; asked and answered.

BY MR. FINALDI:

Q Right?

A I don't know.

Q Well, did you?

A Well, they were fleeting. I hardly ever saw them.

Q Okay. When they were fleeting, did you ever see them with little kids that weren't their kids?

MS. MacISAAC: If you recall.

BY MR. FINALDI:

Q Jackie? Any of the other ones that you talked about? Tito? Jermaine?

A No. I mean --

Q Next page, page 56.

A 53, 56. Okay.

Q Did you have a friend named Karen Krause?

A Oh, she was my secretary.

Q Are you still in contact with her?

A She was my secretary when I worked for Quincy Jones and, no, I am not in contact with her.

Q Do you know if she's still alive?

A I don't. I have no idea.

Q Okay. It says on line 21 you told -- you said in the deposition that her roommate worked for Bert

Fields.

Do you remember giving that testimony?

A Wait. Where are we at?

MS. MacISAAC: Page 56. Why don't you read the entirety of page 56 over --

THE WITNESS: Oh, yeah. Okay. Wait.

MS. MacISAAC: -- so you can review what you said.

THE WITNESS: Okay. -- abused of -- but also -- well, I don't -- I'm sorry. What's the question now?

BY MR. FINALDI:

Q Did you know that Bert Fields was Mr. Jackson's lawyer at one point in time?

A I guess maybe then but I don't really recall this now.

Q Did Karen Krause help you to get a hold of Michael Jackson's lawyers?

A I don't remember.

Q Okay. Next page. Actually page 58.

A 58.

Q Line 10.

A Line --

Q "Question: Okay. Now at the time did you know who Bert Fields was?

"Answer: Yes.

"Question: And who did you understand him to be?

"Answer: Michael Jackson's attorney."

Does that refresh your recollection as to whether you knew Bert Fields was Michael Jackson's attorney?

A Well, obviously, at the time I must have.

Q Okay. And then moving on to page 59.

A 59.

Q Actually, at the end of page 58 it starts:

"Any conversations with anybody in his office other than Karen Krause's roommate?

"Answer: No.

"Question: Prior to that time had you had any conversations with Anthony Pellicano?

"Answer: No.

"Question: Prior to that conversation, had you had any recent conversations with Bill Bray?

"Answer: No.

"Question: So the plan was the roommate was going to call Bert Fields?

"Answer: Yes.

"Question: And then what was going to happen?

"Answer: He was going to call me because I was upset about the police about their handling of my son's interview.

"Question: Were you really upset about the nude photo, right?

"Answer: Yes.

"Question: Okay. So then what happened next in this whole saga?

"Answer: Anthony Pellicano called me.

"Question: And how long did you talk to Mr. Pellicano?

"Answer: Not very long.

"Question: Approximately?

"Answer: Ten minutes."

Does that refresh your recollection as to how you got a hold of Mr. Jackson's attorneys?

A Kind of, yeah.

Q Okay. And so it was Mr. Fields who was the attorney and then Mr. Pellicano called you, right?

A Okay. So it kind of makes sense a little

refreshing my memory.

Q And you have no reason to dispute that this is accurate, correct?

A No. Because I mean, at the time, it was probably fresher in my memory than it is now. So, yeah, I mean --

Q And the next page it says,
"And was anyone on the telephone
that you were aware of other than
you and Mr. Pellicano?"

And you answered, "No."

Does that seem to comport with your
recollection as well?

A Yeah, I guess.

Q Okay. Moving down to line 15 -- actually, line
13.

It says, "Okay. What did you say
to Mr. Pellicano and what did he
say to you?"

"Answer: I explained that I was
upset because the police showed up
at my home without my knowing about
it and interviewed my son and told
him they had a naked picture of him."
Did you tell Mr. Pellicano that?

A If it says so in here I must have.

Q You generally told them about what the police did?

A Right.

Q Because you were upset with the police, correct?

A Yeah. I was upset about the whole thing.

Q "Question: And what did he say?

"Answer: I don't really remember.

"And I didn't speak to him for very long when the police returned.

"When he" --

The next page here, 61, line 13. It says, "I said that there wasn't a naked picture of my son."

Did you tell them that? Mr. Pellicano?

A Oh, did I tell Mr. Pellicano that --

Q Yes.

A -- there wasn't a naked -- yeah. Because my son said there wasn't a naked picture and I believed him.

Q Okay. Next it says,

"Okay. And then what did he say?

"Answer: Didn't he get mad at you in this conversation?

"He got a little irritated with

me, I think.

"Question: Yes, yes. And what did he say when he was irritated with you?

"Answer: I don't really remember.

"Question: Well, in this conversation, didn't you tell him that at one point in at least in this ten minutes that you didn't know whether there was or wasn't such a naked photo of your son?

"Answer: Well, we didn't think there was.

"Question: I understand that. But didn't you tell him in the conversation at some point that you didn't know whether or not there was such a naked photo of your son?

"Answer: I don't remember."

Do you remember ever telling Mr. Pellicano that you weren't sure if there was or wasn't a naked photo of your son?

A I don't remember.

Q It says, "Well, didn't he at some point say, what kind of mother

are you or words to that effect?

"Answer: Yes."

Do you remember Mr. Pellicano saying that to you?

A I don't remember but, you know, if it says it in here, I guess, that's what happened.

Q All right. Do you remember him saying anything to you on that phone call that made you upset?

A You know, I don't really remember all this.

Q Okay.

"Question: And wasn't that comment of Mr. Pellicano's in response to your statement to him that you really didn't know whether or not they did have a naked photo of your son?"

And you answered, "Something like that."

And the question was, "And that's because when this telephone conversation occurred, in your own mind you certainly considered it a possibility that Michael Jackson could have had such a photograph; isn't that correct?"

And you answered, "Possibly."

Did you give that testimony?

A I guess if it's in here. This is my deposition.

Q Okay. So when the police talked to you about a naked photo of your son, you considered it a possibility that Michael Jackson, in fact, did have such photograph, correct?

A Well, if somebody -- you know, the police come and they tell you that, you -- it gives you pause but after I had a conversation about it with my son, I knew that there was no such photograph.

Q Page 75. At the top, line 1.

A Oh, okay.

Q Question by Mr. Turner:

"Have you ever thought that Michael Jackson was a chicken hawk?

"Answer: I don't know."

Did you give that testimony?

A If this is my deposition, apparently, I --
f that's what happened.

Q And you were telling the truth when you gave the entire deposition, correct?

A Yes.

Q Okay. Page 83, please. Page 83, line 18:

"Question by Mr. Turner: Did you think there was anything inappropriate about Michael Jackson sleeping in the same bed with Jimmy Safechuck

"Answer: I think it's a little strange."

Did you give that testimony?

A Like I said, I guess if it's in here that's what I said at the time.

Q Okay. And it was truthful at the time, correct?

A Yes.

Q So what was a little strange to you about Michael Jackson sleeping in the same bed with Jimmy Safechuck?

A I can't stand sleeping with the kids. They drive me crazy. They helicopter around and hog the bed and the pillows and it's just very uncomfortable to me.

Q Okay. Did you also find it strange that Michael Jackson would sleep in the same bed with Yoshi?

A I always thought of it as kind of a sleepover kind of thing so I never thought it was perverted or weird like that.

Q Did you think it was strange?

MS. MacISAAC: Vague and ambiguous as to what you mean by strange.

THE WITNESS: Yeah. I don't -- yeah.

BY MR. FINALDI:

Q So as far as strange, I mean exactly what you meant when you testified on page 83, line 21, that you think it's a little strange that he was sleeping with Jimmy Safechuck?

MS. MacISAAC: So the helicopter in the bed.

BY MR. FINALDI:

Q So did you think it was a little strange that he was sleeping in the same bed with Yoshi?

A Like I said, I can't stand when the kids want to sleep with me because they're just all over the bed and it drives me crazy. So I don't --

Q Page 90, line 4, you testified that there were times when Michael Jackson gave your son money?

MS. MacISAAC: Can you let the witness get there and read it.

THE WITNESS: Sorry. Okay. Here it is. It's kind of blocked out so --

BY MR. FINALDI:

Q Do you recall Mr. Jackson giving your son money?

A Yeah. Okay.

Q You recall Michael Jackson giving your son money?

A Yes.

Q How many occasions?

A I don't really remember.

Q Okay. You can set that deposition aside. I'll take that from you. Thank you. Exhibit C.

Do you know whether Blanca Francia saw your son Yoshi at Hayvenhurst ever?

A She probably saw -- I'm sure she saw him, yeah.

Q Okay. Exhibit -- we'll mark as Exhibit E for the record. Ask you to take a look at it.

A Okay.

Q Tell me if you think it looks familiar. I'll give counsel a copy. Do you want a copy?

MS. MacISAAC: Yes, please.

THE WITNESS: Such a great logo. Oh, I'm sorry. I don't remember what this is. And anybody could have typed this up.

BY MR. FINALDI:

Q Okay.

A Trout?

MS. MacISAAC: You can wait for the question. Jolie, just read it over.

THE WITNESS: Oh, okay.

BY MR. FINALDI:

Q So the logo that you talked about, is that logo familiar to you?

A Yeah. Oh, yeah.

Q And that's the MJJ Productions logo, correct?

A Yeah.

Q And you had access to their letterhead when you worked there?

A Well, of course.

Q And you wrote letters on their letterhead, correct?

A Correct.

Q Did you use a typewriter or word processor or computer?

A Oh, I don't think they had computers in those days. I think I used a typewriter.

Q And did you ever write notes by hand on MJJ Productions letterhead?

A Sometime, yeah.

Q Okay. So it says December 16, 1987. Were you working for MJJ Productions at that time?

A It appears I was.

Q Right. It says, "Trout. This is for you from Michael. He said please don't wear it to school. He's

worried that the kids will tease you. Jolie Levine MJ's new secretary."

Do you remember sending letters such as this to children?

A You know what, I don't.

Q So you're saying you never did?

A I'm not saying I never did. I'm saying I don't remember sending this.

Q Okay. I'll represent to you that this is a letter we received from our client ^{Jane A Doe} [REDACTED] and she said that she received this letter from you.

Do you dispute that?

A I can't say because I didn't sign it. And I -- I don't remember it. I mean --

Q Okay.

A Why wouldn't I have signed it?

Q Is your name spelled correctly?

A Yeah.

Q Okay. And in '87 were you MJ's new secretary?

A I believe so.

Q Now, is this written out in the format that you would sometimes write notes; date and then the name and then a paragraph?

MS. MacISAAC: Objection; vague and ambiguous.

BY MR. FINALDI:

Q Or did you use a different format?

A It depends what it was typed on. I mean, if it was a -- the letterhead, I wouldn't have typed it that way because it wouldn't be the right format but --

Q What if it was a card?

A If it was a card, yeah, I might type it that way. But it doesn't -- it looks off still.

Q Okay. Got another one here.

A Why wouldn't I have signed it, though?

MS. MacISAAC: If you can't confirm whether it was you, I mean, anyone could have typed it so --

THE WITNESS: Exactly. Yeah. So I don't --

MS. MacISAAC: -- just be clear?

MR. FINALDI: Good luck with that.

BY MR. FINALDI:

Q So Exhibit F --

MS. MacISAAC: Vince, honestly, who cares?

MR. FINALDI: "Anyone can sign it." Please. "Anyone can sign it." Please. You're making -- you're just making things up.

MS. MacISAAC: You're abusive and hostile over absolutely --

MR. FINALDI: Sure.

MS. MacISAAC: -- irrelevant documents.

MR. FINALDI: Sure.

MS. MacISAAC: Good luck making a big deal out of Exhibit E.

MR. FINALDI: Yeah. Okay. You'll see.

MS. MacISAAC: Oh, God. I mean, all your threats.

BY MR. FINALDI:

Q Exhibit F here.

MR. FINALDI: No, it's not a threat. You're going to see.

MS. MacISAAC: You keep saying we'll see, we'll see because now Michael Jackson is molesting teenage girls. Okay.

MR. FINALDI: Absolutely. And paying them off. We have absolute proof of that.

MS. MacISAAC: Vince, you don't care for one second whether Michael Jackson molested anybody. That is very clear.

MR. FINALDI: Ma'am --

MS. MacISAAC: Okay. And I'm not suggesting --

MR. FINALDI: Ma'am --

MS. MacISAAC: -- that you should. But for you to represent --

MR. FINALDI: Ma'am --

MS. MacISAAC: -- on the record in front of a third party that you have such clear evidence that

Michael Jackson --

MR. FINALDI: Yeah, we do. We do.

MS. MacISAAC: Okay. I highly doubt that.

Okay.

MR. FINALDI: He molested numerous --

MS. MacISAAC: Okay. Right.

MR. FINALDI: -- and you know it.

MS. MacISAAC: Just like Wade Robson who said
under oath as an adult many times --

MR. FINALDI: Yes.

MS. MacISAAC: -- who wanted to go to the
funeral, wanted to be part of --

MR. FINALDI: Sure --

MS. MacISAAC: -- the ONE show, you're right.

Okay.

MR. FINALDI: Sure. Sure. You'll find out.

MS. MacISAAC: Okay. Well, you will, too.

BY MR. FINALDI:

Q So Exhibit F for the record, does that logo
look familiar to you?

A Of course. Everybody knows that's Michael's
logo. But you know what, I don't understand if I did
these why I wouldn't have signed them because that's
like -- I was taught like a proper way to do things and
this is not -- I would have signed them if it was from

me.

Q Okay. So who taught you the proper way of doing things?

A I learned how to do the proper -- I mean, from working for Quincy Jones. I mean, if you didn't do things properly, boy, you were in trouble.

Q Okay. It says, "Trout. Michael says hi and he loves you and misses you and he hopes to see you soon. He is in Florida rehearsing for the tour. Jolie Levine."

A There's no date on this one, huh?

Q Does this refresh your recollection as to whether you sent this note?

A No. And I don't remember who Trout is. And --

Q Do you remember Mr. Jackson ever being in Florida rehearsing for a tour?

A No.

Q Okay.

A Yeah. Because when I started it was, like, okay, you're going to -- you know, New York tomorrow. You're going to Tokyo tomorrow.

Q Exhibit G for the record.

A Okay.

Q Another one. It says, "Trout, MJ says hi and hopes to see you soon."

Do you remember sending this?

A No, I don't.

Q And you're saying you -- did you ever send notes like this to kids or are you saying you don't remember if you did?

A I don't remember if I did but I don't think I sent these. Why wouldn't I have signed them? And --

MS. MacISAAC: Exhibit G --

THE WITNESS: You notice they're all different, too.

MR. FINALDI: I did.

THE WITNESS: Yeah.

BY MR. FINALDI:

Q Yep. Exhibit H, for the record, is a photo and I'll ask you if you recognize any of individuals in that photo?

A Is that Frank DiLeo?

Q That's who we believe it is. And who's the girl --

MS. MacISAAC: If you recognize.

BY MR. FINALDI:

Q -- on the left?

MS. MacISAAC: If you recognize.

MR. FINALDI: Oh, please.

BY MR. FINALDI:

Q And who's the girl on the left?

A I have no idea.

MS. MacISAAC: Is that a girl that looks like a boy? It doesn't even look like a girl to me.

BY MR. FINALDI:

Q It does look like a boy, doesn't it?

A It looks sort of like a boy.

Q Kind of like a boy, huh? That's an important fact.

MS. MacISAAC: Really?

MR. FINALDI: Yep.

THE WITNESS: He had a little daughter, though.

BY MR. FINALDI:

Q Yeah. Did -- have you ever seen that photo before?

A No. I don't recall seeing this photo before but --

Q Okay.

A -- it looks sort of like Frank DiLeo but hard to tell, you know.

Q All right. Exhibit I for the record, another photo. Have you ever seen that one before?

A I don't remember if I've seen this or not. I don't know who that is.

Q She doesn't look familiar to you?

A Not really. Mike's nose doesn't look very good

there.

Q So -- and you're absolutely certain you don't remember a girl named ^{Jane A A Doe} [REDACTED] who was one of Michael's friends; is that true?

A I don't remember.

MS. MacISAAC: Looks very much like a girl in Exhibit I.

MR. FINALDI: Excuse me. I didn't catch that.

MS. MacISAAC: I said she looks -- this Exhibit I looks very much like a girl.

BY MR. FINALDI:

Q Alrighty. Exhibit J here is another photo. Do you recognize the people in that photo?

A Oh. Does this girl look like this girl?

MS. MacISAAC: Do you recognize them? Do you know them?

THE WITNESS: Oh, sorry.

MS. MacISAAC: Not from the various photos. Appears to be the same person in the photos, I think.

THE WITNESS: I -- I don't recognize these people.

BY MR. FINALDI:

Q Okay. And on there, there's a signature. It says, "To ^{Jane A A Doe} [REDACTED]. All my love." And there's a signature.

Does that signature look familiar to you?

A Sort of.

Q Whose signature does it look like?

A It could be Michael's or it could be Miko's.

Q Did Miko ever sign pictures of Michael Jackson with Miko's own name?

A No. He signed Michael's name.

Q Okay. It could have been Miko's signature of Michael, you mean?

A Yeah.

Q Exhibit K. Does that photo look familiar to you?

A That looks like the same little girl that --

Q How about the background or anything else look familiar about that photo?

A No, not really.

Q Okay. Was there an area in Michael's Hayvenhurst home where he had gold records?

A Yeah.

Q Okay. And are you able to depict --

A Yeah, it's hard --

Q -- the gold records in the background there?

A Yeah. I see a platinum one right there but I can't tell what it's -- and a gold record one right there.

MS. MacISAAC: The photo -- let me just object.

The photos speak for themselves. The witness has never seen it. She's confirmed that she doesn't know where it was taken.

BY MR. FINALDI:

Q Alrighty. Next photo here is actually a set of two photos that I'll give you. These two.

A Oh, this one --

Q So it's the front and the backside.

A Oh. The front and the backside.

MS. MacISAAC: I was given a different photo than everybody else.

MR. FINALDI: Let me see that. Actually, yeah. Sorry about that.

THE WITNESS: So I guess it goes like --

MR. FINALDI: Here's the backside?

THE WITNESS: -- this and this.

BY MR. FINALDI:

Q Do you have the backside?

A Yeah.

MS. MacISAAC: Can I have a copy of the photo? This is J.

BY MR. FINALDI:

Q Okay. So we'll do J.1, which would be the photograph with Michael Jackson and Jimmy Safechuck and we'll put J.2 as the backside which says, "All rights

reserved, MJJ Productions. Not for publication, duplication or commercial usage."

MS. MacISAAC: I'll just represent for the record that these have not previously been produced and we have no idea if that's printed on the backside of the document.

BY MR. FINALDI:

Q So the photograph, do you recognize the child in that photograph?

A Yeah. That's Jimmy.

MS. MacISAAC: Has this document been produced?

BY MR. FINALDI:

Q And the signature here, do you recognize the signature?

A It could be Michael or Miko.

Q Okay. Do you remember photo sessions occurring with Michael and Jimmy of this nature?

A No. I think this was just before I came onboard.

Q Okay. The backside here, there's a stamp that says, "All rights reserved. MJJ Productions. Not for publication, duplication or commercial usage."

Did you have a stamp like that?

A No.

Q Okay. Did you from time to time have

photographs of Michael Jackson that would have that stamp on the back of it?

A Not that I remember.

Q Okay. So you don't recall ever seeing that stamp before today?

MS. MacISAAC: Objection; asked and answered.

THE WITNESS: Yeah. I don't remember seeing that.

MR. FINALDI: Let me take that and with the exhibit numbers on it.

BY MR. FINALDI:

Q Alrighty. This photograph here we'll mark as Exhibit K. Have you ever seen that before today?

A I don't know if I've seen this particular picture but I do know some of the people.

Q Okay. Who are the people in the photograph from left to right?

A James Safechuck, Stephanie Safechuck. I'm guessing that's -- it doesn't look like him but I'm guessing that's Jimmy, after he got older, and Michael.

Q Okay. So you're going to right to left?

A Oh, I'm sorry.

Q Okay.

A Left to right.

Q So James Safechuck on the right?

A Yeah.

Q Who's Jimmy's father.

A Stephanie his wife.

Q Okay.

A And I'm guessing that's Jimmy but I don't -- he looks very different and Michael.

Q And Michael. And do you recognize where they are here from the background?

A I have no idea.

Q Okay. You can set that one down on there --

A Okay. I haven't seen them in so long.

Q Exhibit L for the record, I'll let you take a look at. Have you ever seen this photo before?

A Okay. Not that I remember. But I'm guessing this is during a show.

MS. MacISAAC: We don't want you to guess.

THE WITNESS: Okay.

MS. MacISAAC: If you know the photo, you know the photo. If you don't --

THE WITNESS: I don't think I've seen this photo before.

BY MR. FINALDI:

Q Did you ever send photos like this to any kids?

A I sent photos like this. They were taken before the show and I sent photos like this to, like, say

Harrison Ford or whoever was in the photo.

Q How about to the kids that Michael Jackson would bring with him, did you ever send them --

A Yeah.

Q -- send them photos?

A Yeah. It was, like, to whoever was in them that wanted them that I could figure out who they were and send them.

Q And you notice Jimmy Safechuck and Michael Jackson in this photo, correct?

A Yeah.

Q And James's mother as well, correct?

A Yes.

Q Okay. Exhibit M, as in Michael, for the record. The envelope I'll ask you to take a look at.

Does this envelope handwriting look familiar to you?

A Yes. I obviously wrote this.

Q And that's your name in the upper left-hand corner, correct?

A Yes.

Q And what's that address, 10960 Wilshire?

A That was the MJJ Productions office on -- in Westwood.

Q Okay. And it's addressed to the Safechuck

family?

A Oh, my God. I didn't put the zip on there.
Huh.

Q Via Messenger Express. Did you ever send things via Messenger Express?

A Yeah. We used to use messengers all the time.

Q So you did send, you know, envelopes like this to the Safechuck family before, correct?

A Sent -- yeah -- envelopes like that all over the place.

Q Would Michael ask you to do that?

A Yeah. Or -- just, you know, in the course of doing business, you had to messenger things.

Q Okay. Exhibit M -- N as in Nancy. Another document for you. And do you recognize that photo?

A Yeah.

Q Who's in that photo?

A Stephanie Safechuck, Jim Safechuck and me.
What do you know.

Q Do you remember being at the Eiffel Tower with them?

A Well, I obviously was there. I don't really remember it but I remember being in Paris with them.

Q Is this -- was this one of those occasions where you went with the Safechuck parents and Michael

Jackson was with Jimmy alone?

MS. MacISAAC: If you -- objection; calls for speculation. The witness didn't even remember being at the Eiffel Tower. If you recall whether Jimmy and Michael were with you or not, you can go ahead and answer.

THE WITNESS: Yeah. I can't remember if they were with us or not. I mean, somebody was taking the picture. So I don't know but --

MR. FINALDI: Alrighty.

THE WITNESS: I love Paris.

BY MR. FINALDI:

Q Exhibit O for the record. Another photograph.

A Oh.

Q Do you recognize that photograph?

A That's -- yeah, I do.

Q Okay.

A That's Stephanie and me and her husband is just behind her.

Q Okay.

A That was at something somewhere. I can't remember what city or where we were but --

Q Did you like Stephanie?

A I loved her. We were very, very close friends.

Q And you got along with her well?

A Very well. I didn't know her at first but we became very close friends and I adored her.

Q And you trusted her?

A Yes, I did.

Q How about her husband, did you like him?

A Oh, I liked him. I thought he was a very nice man.

Q And you trusted him as well?

A I did.

Q Next photograph here. Exhibit P for the record.

A How did you get those? I used to have a copy of this.

MS. MacISAAC: He gets to ask you questions. You don't get to ask him.

THE WITNESS: You don't get to answer if I ask you a question?

MR. FINALDI: Sure. These are from my client.

THE WITNESS: From your client? Oh.

BY MR. FINALDI:

Q You sent them to James Safechuck. Does that refresh your recollection?

A Oh, okay. Yeah. 'Cuz -- yeah.

Q So Exhibit P for the record?

A I had this one, too.

Q Another photograph of you all around a table, correct?

A Yes.

Q And could you tell me who the individuals are in this photo?

A Okay. There is -- starting from the left. That's the left, right?

Q Yeah.

A There's me and this gentleman I don't know but he must have been someone important. James Safechuck, Stephanie Safechuck. This woman also on the right, I don't know who she was but she must have been someone important.

Q And at dinners like this, would Jimmy Safechuck ever sit with Michael Jackson?

A Yeah.

Q Okay.

A Sometimes I sit next to Michael or somebody else, but, yeah.

Q Okay.

A Wow.

Q You can put that one aside.

A This brings back memories.

Q Exhibit Q for the record. Another photo.

A Oh, that's a nice one.

Q And that's you and --

A The Safechucks. Mr. and Mrs. Safechuck.

Q You recall that one as well?

A Oh, this was a fun dinner. I remember because there was a knight in actual armor standing there. There was actually a man in there. That's when we played a joke on Michael.

Q And the next one is a series of four and I'll explain it to you in a second. We'll mark this as R1, R2, R3 and R4.

A Okay.

Q And let me know if you recognize those. The first pages is, "Joe's Basement, Urgent Delivery. Client's name, Jolie Levine. Mayfair Hotel. Reference: M. Jackson."

Do you remember being at a hotel?

A In London?

Q In London.

A Yeah.

Q The Mayfair Hotel?

A I remember being in London several times but I don't remember the hotel.

Q Okay. Next page here.

A Okay.

Q "Puerto Jose Banez." Does that ring a bell at

all?

A Not at all.

Q Okay. The next page is a drawing and the last page is a photograph. Do you recognize that photo?

A Oh, yeah.

Q You're in the photo, correct, on the right?

A Yes.

Q And James's parents are in the photo at the top, correct?

A Yes.

Q Who are the two individuals in the left, the male and the female?

A At the left the male in the purple shirt is Damien Punasami (phonetic). He was Michael's chef. And the woman I don't know. And I think that was a personal dinner party that the Safechucks gave but I'm not sure or it was just we were out eating. I'm not sure because it looks very casual.

MS. MacISAAC: We don't want you to guess.

THE WITNESS: Yeah. I don't know. I'm not sure.

MR. FINALDI: Okay.

THE WITNESS: God. That was some bad hair day, huh.

MR. FINALDI: We'll go ahead and take a quick

break.

THE VIDEOGRAPHER: Off record, 3:56 p.m.

MS. MacISAAC: Are you almost done?

MR. FINALDI: I think so.

(Off the record.)

THE VIDEOGRAPHER: Returning to record,

4:02 p.m.

MR. FINALDI: All right. Apparently, I marked two Ks and so we're going to change the exhibit which is the picture of Jimmy Safechuck, his parents and Michael and this is the one that you referenced that you said Jimmy looked a little older and you didn't know if it was him but you were guessing. Remember that?

THE WITNESS: Yeah, I was assuming.

MR. FINALDI: We're going to change that to S, which is the next exhibit in line.

BY MR. FINALDI:

Q Did Michael Jackson ever have you order things for him like books?

A Sometimes.

Q What kind of books?

A Different books. He liked that artist. What was his name?

Q Just different art style books?

A There's, yeah, certain art style books and

different -- yeah, you know, things like that. You know -- and -- or -- you know.

Q All right. Do you remember Michael Jackson having a monkey at Hayvenhurst?

A You mean a chimpanzee --

Q Uh-huh.

A -- Bubbles? Yes. I wasn't exactly a big fan of Bubbles.

Q Why not?

A Because I had to -- Bubbles came with us on part of the American tour and I had to pack Michael's room all the time and Michael would sit there and everything I would pack, Bubbles would unpack. So -- and they're very, very, very strong. And I was kind of afraid.

Q Did he ever bite you or try to bite you?

A Yeah. Not hurt me. He didn't ever hurt me but --

Q And do you know if Bubbles slept in Michael's room at Hayvenhurst?

A I don't think he -- no. I think he had his own area.

Q And where was his area?

A I'm not sure.

Q But you did see Bubbles at Hayvenhurst?

A Yes.

Q Okay. When is the last time you spoke with Norma Staikos?

A Oh. Well, before I got fired.

Q Never communicated with her since?

A No.

MR. FINALDI: Do you have questions?

MS. MacISAAC: Yes.

MR. FINALDI: Do you want to sit here?

MS. MacISAAC: Yeah. It might make it a little easier.

THE VIDEOGRAPHER: Off record, 4:05.

(Off the record.)

THE VIDEOGRAPHER: Returning to record, 4:06

p.m.

EXAMINATION

BY MS. MacISAAC:

Q Good afternoon, Miss Levine.

When you worked for MJJ Productions, did you have an understanding of who owned the company?

A Yes.

Q And who was that?

A Michael.

Q When you worked for MJJ Productions, did you have an understanding of who had the ultimate power and control over the company?

MR. FINALDI: Calls for a legal conclusion, calls for speculation, vague and ambiguous, compound.

THE WITNESS: Yes. Michael Jackson owned the company.

BY MS. MacISAAC:

Q And it was your understanding that he controlled the company?

A Oh, definitely.

MR. FINALDI: Same objections.

BY MS. MacISAAC:

Q As far as you were aware, did Michael Jackson ever have a boss at MJJ Productions?

A No. Michael was the boss.

MR. FINALDI: Same objections.

BY MS. MacISAAC:

Q As far as you knew was there anyone at Michael Jackson -- at MJJ Productions while you were there that in any way supervised Michael Jackson or had the power or authority to tell him what to do?

A No. Michael was the boss. He was -- he had the -- he was the power.

Q I think you testified earlier that you don't

believe Michael Jackson's a pedophile?

A No, I don't. I never believed that he was a pedophile and I still do not believe that Michael was -- is a -- was a pedophile.

Q Did you ever see Michael Jackson touch a child in a way that you thought was inappropriate?

A Never.

Q Did you ever see Michael Jackson touch a child in a way that you thought was sexual?

A Never.

Q Did you ever see any interaction between Michael Jackson and a child that made you uncomfortable?

A Never.

Q I think you said that when you were on the Bad Tour, you packed and unpacked Michael's room several times?

A I always packed Michael's room whenever we moved to each different city so I saw everything.

Q In those -- can you estimate, you know, was it over 50 times that you packed and unpacked his room?

A At least, yeah.

Q During any of those times, did you ever see any pornography?

A Never.

Q Did you ever see any nude photos of children?

A Never.

Q Did you ever see any photos of children that were partially undressed?

A Never.

MS. MacISAAC: I have no further questions.

MR. FINALDI: Alrighty. I have no further questions. I'd like to offer a stip that the court reporter be relieved of her duties under the code.

Do you want the transcript sent to you --

MS. MacISAAC: Yes.

MR. FINALDI: -- to get it to her?

MS. MacISAAC: That's fine.

MR. FINALDI: The transcript will be sent to Mr. Weitzman's office and they will see to it that Miss Levine receives it, review it, sign it under penalty of perjury.

You can make any corrections you deem necessary. If you change something of substance, we can comment upon it at the time of trial and in motion practice and it may be seen as negatively affecting your credibility.

Does that makes sense? Yes?

THE WITNESS: Yes. Sorry.

MR. FINALDI: Is 30 days enough time for you to review it?

THE WITNESS: 30 days?

MR. FINALDI: Yes.

THE WITNESS: Yeah. That should be enough time. Yes.

MS. MacISAAC: If we need more, we'll let you know.

MR. FINALDI: And after it's reviewed, signed under penalty of perjury and returned with any corrections, it will be sent back to my office and we will maintain custody of the original. We'll lodge it with the court for trial and upon reasonable request. And if the original is lost, misplaced, stolen, otherwise unavailable, a certified copy can be used in lieu thereof for any and all purposes, including trial.

MS. MacISAAC: So stipulated.

THE VIDEOGRAPHER: Video deposition of Jolie Levine is being adjourned at 4:09 p.m. This concludes tape 3 of 3. Thank you.

(Deposition concluded at 4:09 p.m.)

(Exhibits A through S were marked by the Certified Shorthand Reporter.)

(Deposition to be signed under penalty of perjury.)

* * *