

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

5

6

7 THE PEOPLE OF THE STATE OF)

8 CALIFORNIA,)

9 Plaintiff,)

10 -vs-) No. 1133603

11 MICHAEL JOE JACKSON,)

12 Defendant.)

13

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17 REPORTER'S TRANSCRIPT OF PROCEEDINGS

18

19 MONDAY, MARCH 14, 2005

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21 8:30 A.M.

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23 (PAGES 1794 THROUGH 1864)

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

28 BY: Official Court Reporter 1794

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1 I N D E X

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3 Note: Mr. Sneddon is listed as "SN" on index.
4 Mr. Zonen is listed as "Z" on index. Mr. Auchincloss is listed as "A"
on index.
5 Mr. Mesereau is listed as "M" on index. Ms. Yu is listed as "Y" on
index.
6 Mr. Sanger is listed as "SA" on index. Mr. Oxman is listed as "O" on
index.

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9 PLAINTIFF'S WITNESSES DIRECT CROSS REDIRECT RECROSS

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11 ARVIZO, Gavin-Anton 1797-M (cont'd)

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1 Santa Maria, California
2 Monday, March 14, 2005
3 8:30 a.m.
4
5 THE COURT: Good morning.
6 COUNSEL AT COUNSEL TABLE: (In unison)

7 Good morning, Your Honor.
8 THE COURT: Let's see, the witness is in his
9 place.
10 I'll remind you that you're still under
11 oath.
12 Mr. Mesereau, you may proceed.
13 MR. MESEREAU: Thank you, Your Honor.
14 Good morning.
15 THE JURY: (In unison) Good morning.
16
17 GAVIN-ANTON ARVIZO
18 Having been previously sworn, resumed the stand
19 and testified as follows:
20
21 CROSS-EXAMINATION (Continued)
22 BY MR. MESEREAU:
23 Q. Mr. Arvizo, on Thursday you testified about
24 how you learned what masturbation was. Remember
25 that.
26 A. I believe so.
27 Q. Pardon me.
28 A. I believe so. 1797

1 Q. Okay. And you testified that Mr. Jackson
2 told you what masturbation is, right.
3 A. Uh-huh.
4 Q. Is that true.
5 A. Yes.
6 Q. And you testified to the jury that Mr.
7 Jackson said that if men don't masturbate, that they
8 can get to a level where they can -- might rape a
9 girl. Remember that.
10 A. Uh-huh.
11 Q. Do you remember saying that.
12 A. Yes.
13 Q. Do you remember being interviewed by the
14 Santa Barbara Sheriff's Department on a number of
15 occasions.
16 A. Yes.
17 Q. And do you remember who interviewed you.
18 A. Most likely Steve Robel or Paul Zelis.
19 Q. Do you remember being asked, "Before we get
20 started on the next set of questions, can you
21 describe to us what your opinion is, what you think
22 masturbation is." Do you remember one of the
23 sheriffs asked you that during an interview.
24 A. I believe so.
25 Q. And you knew those interviews were being
26 recorded, right.
27 A. Yes.
28 Q. Remember you said, "My grandma explained it 1798

1 to me. She told me that -- that your -- the only
2 reason is because like if -- if men don't do it, men
3 might get to a point where they might go ahead and
4 rape a woman". Do you remember saying that to the
5 sheriffs.

6 A. I believe so.

7 Q. Why did your story change between that
8 interview and your testimony last Thursday.

9 A. Well, what do you mean "changed".

10 Q. Well, you told the police your grandmother
11 made that quote to you, and you came into court
12 under oath and told the jury Mr. Jackson made that
13 quote to you.

14 A. That didn't change. Because Michael tried
15 to explain to me first. And I -- he was more
16 pushing on me that men have to masturbate.
17 Now, later when I came back from Neverland,
18 I guess my grandmother saw that I was very confused
19 about sexuality and things like that. And my
20 grandmother explained to me a lot of things.

21 Q. So it just so happened that after Mr.
22 Jackson told you, "If a man doesn't do it, they may
23 get to a point where they rape a woman," your
24 grandmother made the almost identical quote to you.
25 Is that what you're saying.

26 A. Not really. She didn't make the same exact
27 thing that Michael said. But I'm not exactly sure
28 what my grandmother said. I know my grandmother 1799

1 explained a lot of things to me.

2 Q. Would it refresh your recollection if I show
3 you a transcript of your sheriff's interview.

4 A. Probably.

5 MR. MESEREAU: May I approach, Your Honor.

6 THE COURT: Yes.

7 MR. MESEREAU: Whoops, I'm sorry.

8 Your Honor, I spilled a little water with my
9 notebook, so --

10 THE BAILIFF: How about you put that over
11 here.

12 Q. BY MR. MESEREAU: Mr. Arvizo, have you had a
13 chance to look at that page of transcript.

14 A. Yes.

15 Q. Does it refresh your recollection about what
16 you told the sheriffs about what masturbation was.

17 THE COURT: Just a moment, Counsel.

18 THE WITNESS: It refreshes my --

19 THE COURT: Just a moment. Let's take care
20 of one thing at a time.

21 You may start again on that.

22 MR. MESEREAU: Yes, thank you, Your Honor.
23 Q. Mr. Arvizo, have you had a chance to look at
24 that page of transcript of your sheriff's interview.
25 A. Uh-huh.
26 Q. Does it refresh your recollection about what
27 you told the sheriffs your grandmother said.
28 A. It refreshes -- I can recall what my 1800

1 grandmother was telling me. She was -- she saw that
2 I was embarrassed about things like masturbation and
3 growing up, and my mother was telling me that it's
4 okay to do it. And Michael was telling me that you
5 have to do it.

6 Q. Well, Mr. Arvizo, I understand your
7 position. But when the sheriffs asked you what
8 masturbation was, you didn't say, "Mr. Jackson told
9 me if a man doesn't do it, he may rape a woman."
10 You said if -- "My grandmother told me that if a man
11 doesn't do it, he may rape a woman," correct.

12 A. I believe so. That's what you showed me.
13 But --

14 Q. And between the time of that interview --

15 MR. SNEDDON: Excuse me.

16 Your Honor, he was about to say something
17 when he got cut off by counsel.

18 MR. MESEREAU: Oh, I apologize. I had no
19 idea.

20 THE WITNESS: But --

21 MR. MESEREAU: Excuse me. Go ahead.

22 THE WITNESS: But that still doesn't mean
23 that Michael did not tell me.

24 Q. BY MR. MESEREAU: But what you're telling
25 the jury is it was sort of a coincidence that both
26 your grandmother and Michael used almost the
27 identical phrase about raping a woman.

28 A. Both my grandmother and Michael were trying 1801

1 to talk to me about the -- pretty much the birds and
2 the bees story.

3 Q. Okay. And they pretty much said the
4 identical thing, is that what you're telling me.

5 A. Not exactly.

6 Q. Not exactly.

7 A. No.

8 Q. Well, the quotes are almost identical,
9 aren't they.

10 A. You see, Michael was trying to tell me that
11 I have to masturbate. My mom -- my grandmother was
12 actually telling me -- giving me the talk. Michael
13 was just talking about masturbation.

14 Q. But your grandmother said to you, "If men
15 don't do it, men might get to a point where they
16 might go ahead and rape a woman," correct.
17 A. Michael also told me that.
18 Q. Well -- so you're saying they basically said
19 the same thing.
20 A. My grandmother said it's okay to do it,
21 because sometimes, some men, they can't control
22 themselves and might do that.
23 Q. But in that police interview, you never
24 mentioned that Michael Jackson had said that to you,
25 did you.
26 A. I'm sure in one of the other transcript I
27 mentioned about Michael.
28 Q. Not in that interview, correct. 1802

1 A. But I'm sure in another one I did.
2 Q. Okay. I'd like to ask you just about the
3 allegations in the J.C. Penney case, okay. We're
4 not going to go into the evidence, just what the
5 allegations were. Okay.
6 A. Uh-huh.
7 Q. Do you remember that case.
8 A. Uh-huh.
9 Q. And you and your mother Janet sued J.C.
10 Penney, correct.
11 A. I think we did. I'm pretty sure we did.
12 Q. Okay. And originally your family sued for
13 battery, false imprisonment and infliction of
14 emotional distress, right.
15 A. I don't know.
16 Q. Okay. Later on, your mother amended the
17 complaint to add sexual assault. Do you remember
18 that.
19 A. Not really.
20 Q. Do you remember that you were asked
21 questions about that in a sworn deposition.
22 A. I don't remember being asked about my mom
23 being -- whatever.
24 Q. Do you remember being asked questions about
25 your mother's allegations that J.C. Penney guards
26 fondled her breasts in a parking lot.
27 MR. SNEDDON: Your Honor, I'm going to
28 object; 403. 1803

1 THE COURT: Sustained.
2 Q. BY MR. MESEREAU: Do you remember that case
3 at all.
4 A. Um, a little bit. I mean, I was in the
5 middle of my chemotherapy.

6 Q. Okay. Your chemotherapy was going on at the
7 same time.

8 A. At the same time as those depositions.

9 Q. Okay. And how many -- how many appointments
10 for chemotherapy had you had at that point, if you
11 know.

12 A. They would have it once a month -- once
13 every three weeks, actually. Then I had ten rounds.
14 And I wasn't like a regular kid that had cancer that
15 would just go in for a few hours and get one bag of
16 chemotherapy. I would go there for a week, in the
17 hospital, and -- in a bed, and they would give me
18 chemotherapy.

19 Q. Okay. And approximately when did the
20 chemotherapy end.

21 A. June 2001.

22 Q. Okay. Do you remember last Thursday I asked
23 you when these alleged acts of masturbation by
24 Michael Jackson occurred. Do you remember that.

25 A. Uh-huh.

26 Q. And within an approximately 20-minute period
27 you first said a couple of days before you left with
28 Jose Salas, right. 1804

1 A. What do you mean.

2 Q. Jesus Salas, excuse me.

3 A. Couple days before I left with Jose Salas.

4 Q. Yes. You said a couple of days before you
5 left Neverland with Jose Salas the masturbation
6 occurred. Do you remember that.

7 A. No, I did not say that.

8 Q. You didn't say that.

9 A. No, I said that it happened approximately
10 the last two weeks of when we left Neverland for
11 good.

12 Q. Well, first you said a few days, and then
13 you said a week, and then you said a couple of
14 weeks, right.

15 A. Maybe you said that it was a few days.

16 Q. Did you discuss over the weekend these facts
17 with anybody.

18 A. No.

19 Q. Did you discuss the case with anybody over
20 the weekend.

21 A. I had a brief conversation with Mr. Sneddon.

22 Q. Okay. And what did you talk about.

23 A. We talked about certain things that you
24 might ask me.

25 Q. And like what.

26 A. Just things about me.

27 Q. Pardon me.

28 A. Things that you might ask about me. 1805

1 Q. Like what.
2 A. Like my history.
3 Q. Your history.
4 A. Uh-huh.
5 Q. And what do you mean, your "history".
6 A. In school maybe.
7 Q. Pardon me.
8 A. In school maybe.
9 Q. And what did Mr. Sneddon say to you about
10 that.
11 A. He just told me to answer honestly.
12 Q. And what else did he talk to you about.
13 A. That's pretty much it right there.
14 Q. How long was the discussion.
15 A. 15 minutes.
16 Q. Did he say anything to you about an
17 interview he had with a witness over the weekend.
18 A. With a witness besides me.
19 Q. Yes.
20 A. No.
21 Q. Did he ask you anything about one of your
22 teachers at school.
23 A. Um, yes. He asked me about it.
24 Q. And who was that.
25 A. My teacher.
26 Q. Yes.
27 A. It's -- he wasn't really my teacher. His
28 name is Richard Geralt. 1806

1 Q. What did Mr. Sneddon say to you about
2 Mr. Geralt.
3 MR. SNEDDON: I'm going to object. It
4 assumes facts not in evidence that I said anything.
5 MR. MESEREAU: I'll rephrase the question,
6 Your Honor.
7 THE COURT: All right.
8 Q. BY MR. MESEREAU: Did Mr. Sneddon say
9 something to you about Mr. Geralt.
10 MR. SNEDDON: Same objection.
11 THE COURT: Overruled.
12 THE WITNESS: Can you repeat the question.
13 Q. BY MR. MESEREAU: Did Mr. Sneddon say
14 anything to you over the weekend about Mr. Geralt.
15 A. He didn't have to tell me anything. I told
16 him everything. I told him the facts about Mr.
17 Geralt.
18 Q. Let me ask the question again. Did Mr.
19 Sneddon over the weekend say anything to you about a
20 Mr. Geralt.

21 A. He asked me about Mr. Geralt, so it's kind
22 of knowing, I guess.
23 Q. What did he ask you about Mr. Geralt.
24 A. He asked me what do I know of Mr. Geralt.
25 Q. And did you tell him.
26 A. Yes.
27 Q. What did you tell him.
28 A. I told him about -- that I knew Mr. Geralt. 1807

1 Q. Excuse me.
2 A. I told him that I knew of Mr. Geralt.
3 Q. Did you tell him anything else.
4 A. About Mr. Geralt.
5 Q. Yes.
6 A. I told him about school and how Mr. Geralt
7 was.
8 Q. And what did you tell him.
9 A. About Mr. Geralt.
10 Q. Yeah. What did you tell him about Mr.
11 Geralt and school.
12 A. I told him that -- about a time when he --
13 he was a detention teacher. And I had detention,
14 and I was in there.
15 Q. Pardon me.
16 A. I was in his detention.
17 Q. Okay. What else did you tell Mr. Sneddon
18 about Mr. Geralt.
19 A. I told him that one time when I was in
20 detention, I was sitting there, and he told us we
21 had to do work, our homework. I didn't have a
22 pencil. So I asked him, "Mr. Geralt, may I have a
23 pencil." And then he put me against the wall,
24 because I asked if I could have a pencil.
25 Q. Did you tell Mr. Sneddon anything else about
26 Mr. Geralt.
27 A. Uh-huh.
28 Q. What else. 1808

1 A. That sometimes in the middle of his class he
2 would go outside and smoke a cigarette.
3 Q. What else.
4 A. Um, that he always tried to handle his
5 classes as if he was a drill sergeant.
6 Q. Okay. What else.
7 A. I told him a story about -- that detention.
8 Q. Okay. What did you tell him.
9 A. I told him there was one time that I was in
10 detention, same -- and then when I was against the
11 wall, I asked Mr. Geralt, "Why is it that I'm
12 against the wall. I would like to do my work as you

13 told me to do."

14 Q. What else did you tell Mr. Sneddon.

15 A. And then Mr. Geralt asked me, he said if I
16 was on drugs. He said that if I was on -- doing
17 marijuana or doing crack or something, and he told
18 me he was going to give me a drug test.

19 Q. What else did you tell Mr. Sneddon.

20 A. I told him that I was -- "Mr. Geralt, I'm
21 not on drugs." And then Mr. Geralt said that he's
22 going to call the cops, and this and that, because
23 he was saying that I was on drugs. But he was doing
24 it in a way that he was making fun of me.

25 Q. Now, Mr. Geralt was a teacher, correct.

26 A. He was a teacher at the school.

27 Q. At what school.

28 A. John Burroughs Middle School. 1809

1 Q. Did you tell Mr. Sneddon anything else about
2 Mr. Geralt.

3 A. Yes.

4 Q. What else did you tell him.

5 A. I -- then I told Mr. Geralt that, "Why is it
6 that you're going to call a police officer here who
7 would rather be doing something more important than
8 something as my minute and dumb as this."

9 Q. And anything else you told Mr. Sneddon about
10 Mr. Geralt.

11 A. And then after I told Mr. Geralt that, he
12 realized that I was right, and he put his phone
13 away. And then he called the campus supervision.
14 And then he kept on going on that I was doing drugs
15 and this and that. He said he -- he was just saying
16 stuff like that.

17 And then he went into -- he called campus
18 supervision, and then they took me into the office.
19 And then I told the teachers what happened, and they
20 said they know how Mr. Geralt is.

21 Q. Did you tell Mr. Sneddon anything else when
22 you spoke to him over the weekend.

23 A. No. We talked about a lot -- we talked
24 about a few things. I don't remember too much.

25 Q. You don't remember too much.

26 A. Well, I do, and -- I don't remember the
27 exact things, I mean, word for word.

28 Q. Why don't you just tell us generally what 1810

1 you talked about.

2 A. My history, mostly.

3 Q. Pardon me.

4 A. My history.

5 Q. Your history.
6 A. Yes.
7 Q. Please tell the jury what you told Mr.
8 Sneddon about your history.
9 A. I just told you.
10 Q. Anything else come up in that discussion.
11 A. Yeah.
12 Q. What else.
13 A. Are you trying to specify something.
14 Q. No, I'm just simply asking you to tell the
15 jury what you told Mr. Sneddon when you spoke to him
16 over the weekend about your testimony in this case.
17 A. Please be specific.
18 Q. Well, I'm just asking you. I wasn't in the
19 conversation. What else do you remember. Please
20 tell the jury anything else that was discussed.
21 A. Talked about my father.
22 Q. Did you talk about a Mr. Alpert.
23 A. Oh, yes. Yes, we did.
24 Q. Did I just jog your memory a little bit
25 about that.
26 A. Yes.
27 Q. Did Mr. Sneddon tell you he had been in an
28 interview with a Mr. Alpert on Saturday. 1811

1 A. Yes. Well, I don't know if -- no, he said
2 if I was -- if Mr. -- the dean, Alpert, interviewed
3 me or talked to me.
4 Q. And did he ask you questions about any
5 discussions you ever had with Dean Alpert at John
6 Burroughs School.
7 A. Yeah, he asked some questions about it.
8 Q. In fact, Mr. Arvizo, he asked you whether
9 you had been interviewed by Dean Alpert and whether
10 you had confessed to him that Mr. Jackson never did
11 anything to you of a sexual nature, right.
12 A. Yeah.
13 Q. Why didn't you say that at the beginning.
14 A. I told Mr. Alpert that he didn't do anything
15 to me.
16 Q. You told Dean Alpert that twice, correct.
17 A. I don't know how many times I told him.
18 Q. Well, that was the reason Mr. Sneddon
19 telephoned you, wasn't it, as far as you knew.
20 A. What do you mean.
21 Q. Mr. Sneddon telephoned you --
22 A. Oh, telephoned.
23 Q. -- to ask you whether you had ever confessed
24 to Dean Alpert that Michael Jackson never did
25 anything to you of a sexual nature, right.
26 A. I don't remember Mr. Sneddon calling me and
27 asking me that question.

28 Q. You don't recall Mr. Sneddon asking you any 1812

1 questions like that over the weekend.

2 A. Over the weekend, if Michael had done
3 anything to me.

4 Q. No, Mr. Arvizo. Let me just -- let me just
5 try and rephrase it, if I have confused you.

6 Mr. Sneddon called you over the weekend,
7 right.

8 MR. SNEDDON: Your Honor, I'm going to
9 object. That's a misstatement of his testimony and
10 it assumes facts not in evidence that I called him.

11 THE COURT: Sustained.

12 Q. BY MR. MESEREAU: Did Mr. Sneddon telephone
13 you over the weekend.

14 A. No, he did not.

15 Q. Did you telephone Mr. Sneddon over the
16 weekend.

17 A. No, I did not.

18 Q. Did you engage in a conversation with Mr.
19 Sneddon over the weekend.

20 A. Yes, I did.

21 Q. Where did that conversation take place.

22 A. In a house.

23 Q. Okay. Did Mr. Sneddon come to see you.

24 A. No.

25 Q. Did you go to see Mr. Sneddon.

26 A. Yes.

27 Q. Where did you go to see Mr. Sneddon.

28 A. In a house. 1813

1 Q. In his house.

2 A. In a house.

3 Q. Okay. Who was with you, if anybody.

4 A. Detective Robel. Mr. -- Ron, Gordon and
5 Mr. Sneddon, and I believe Mr. Mag was there.

6 Q. Okay. Let me just get it straight. Mr.

7 Robel was there from the Santa Barbara Sheriffs,
8 right.

9 A. Yes.

10 Q. Mr. Sneddon was there, right.

11 A. The attorneys were there.

12 Q. Prosecutors. Prosecutor Zonen was there,
13 right.

14 A. All of the district -- all of the attorneys
15 were there.

16 Q. Prosecutor Auchincloss was there, right.

17 A. Auchincloss.

18 Q. Yes. The fellow seated right to my left.

19 A. Oh, Gordon, yeah.

20 Q. Anyone else there besides those four.
21 A. Mag.
22 Q. Who.
23 A. Mag. I don't know his full name.
24 Q. Okay. Is this another sheriff.
25 A. No, this is an attorney.
26 Q. Another prosecutor.
27 A. He's another attorney.
28 Q. So you met with four prosecutors and a Santa 1814

1 Barbara Sheriff over the weekend, right.
2 MR. SNEDDON: Your Honor, I'm going to
3 object again. It assumes facts not in evidence that
4 all of those people were present during the meeting.
5 MR. MESEREAU: I think that's what he just
6 said.
7 MR. SNEDDON: No, he didn't.
8 THE COURT: Sustained.
9 Q. BY MR. MESEREAU: Did you meet over the
10 weekend with three prosecutors.
11 A. No.
12 Q. Did you meet with four prosecutors.
13 A. No.
14 Q. Did you meet with any prosecutors.
15 A. Yes.
16 Q. Who were they.
17 A. One, Mr. Sneddon. And Steve Robel -- and
18 Detective Steve Robel was present.
19 Q. Okay. Was anyone else present.
20 A. They were there, but they were in another
21 room.
22 Q. Okay. Who was there but in another room.
23 A. Ron, Mr. Zonen, Gordon and Mag.
24 Q. Okay. I'm not hearing that. Is it Meg or
25 Mick.
26 A. Mag.
27 Q. Mag. Okay. And as far as you know, Mag's a
28 prosecutor, correct. 1815

1 A. Yes, I believe so.
2 Q. Okay. Now, what day did you have this
3 meeting.
4 A. I believe it was yesterday.
5 Q. And approximately what time did the meeting
6 take place.
7 A. 6:00, maybe 7:00.
8 Q. So that would be last evening, right.
9 A. Uh-huh.
10 Q. Did you learn in advance that the meeting
11 was going to take place.

12 A. A couple hours before.
13 Q. And how did you learn the meeting was going
14 to take place.
15 A. They -- they told me.
16 Q. Okay. Who's "they".
17 A. Detective Steve Robel told me.
18 Q. Okay. Did he call you on the phone.
19 A. No, he told me.
20 Q. Did he call you on the phone.
21 A. He told me.
22 Q. Okay.
23 A. No, did he not call me on the phone.
24 Q. Did you call him on the phone.
25 A. No.
26 Q. Did he show up at your house.
27 A. No. I don't live up here.
28 Q. I'm just trying to ask you how you found out 1816

1 about the meeting. That's all I'm asking.
2 A. I told you, he told me.
3 Q. Okay. Where did he tell you about the
4 meeting.
5 A. He told me at a house.
6 Q. Where you're staying, right.
7 A. Yes.
8 Q. Okay. Did he come to the house.
9 A. Yes.
10 Q. Okay. Approximately what time did Mr. Robel
11 come to the house to tell you there was going to be
12 a meeting that evening with all the prosecutors.
13 MR. SNEDDON: Your Honor, I'm going to
14 object to that question. There was no meeting with
15 all those prosecutors. Misstatement of his
16 testimony.
17 MR. MESEREAU: I'll rephrase it, Your Honor.
18 THE COURT: All right.
19 Q. BY MR. MESEREAU: Mr. Arvizo, at
20 approximately what time yesterday did you learn you
21 were going to travel to another location to meet
22 with Mr. Sneddon and others.
23 A. Um, other -- it was around maybe 5:00 or
24 something like that.
25 Q. Okay. And you obviously attended the
26 meeting, right.
27 A. Yes.
28 Q. Do you know if the conversation was 1817

1 recorded.
2 A. I don't believe it was recorded.
3 Q. Do you know if anyone was taking notes.

4 A. Um, no, I don't think anyone was taking
5 notes.
6 Q. Okay. Did anyone tell you what the purpose
7 of the meeting was.
8 A. No.
9 Q. No one explained why you were having a
10 meeting last night.
11 A. No. They told me that Tom was going to have
12 to talk to me about some things.
13 Q. Okay. And Mr. Sneddon did talk to you about
14 some things, correct.
15 A. Yes.
16 Q. And he talked to you about an interview that
17 had been conducted on Saturday, right.
18 A. No.
19 Q. Did Mr. Sneddon ever tell you he had
20 conducted an interview with a Mr. Alpert on
21 Saturday.
22 A. No, did he not tell me that he conducted an
23 interview.
24 Q. Okay. Did he ever tell you he had spoken
25 with Mr. Alpert.
26 A. Yes.
27 Q. And what did he say about that.
28 A. He asked me about Mr. Alpert. 1818

1 Q. Okay.
2 A. What I knew.
3 Q. And did he ask you if you ever had a meeting
4 with Mr. Alpert, correct.
5 A. Yes.
6 Q. And you told him you did, right.
7 A. Yes.
8 Q. You told him you met --
9 A. I told him that I'm pretty sure I did -- I
10 did. Because I didn't really remember too good.
11 Q. You didn't remember too good that you had
12 told Mr. Alpert that Mr. Jackson had never touched
13 you sexually.
14 A. Well, I believe it happened, because he was
15 a dean of the school. And so -- I'm pretty sure I
16 had a conversation with him.
17 Q. Okay. And did you tell Mr. Sneddon you were
18 pretty sure you had had a conversation with Dean
19 Alpert at John Burroughs School.
20 A. Yes.
21 Q. Did you tell Mr. Sneddon approximately when
22 you had that discussion.
23 A. No.
24 Q. Did Mr. Sneddon ever ask you when you had
25 that discussion.
26 A. No.

27 Q. Where did the discussion with Dean Alpert
28 take place. 1819

1 A. I don't remember. It was probably in his
2 office.

3 Q. Okay. And the purpose of the discussion was
4 what, if you know.

5 A. It was probably about Michael.

6 Q. Okay. You say "probably about Michael".

7 A. Uh-huh.

8 Q. But you're not sure.

9 A. I'm not sure what the whole conversation was
10 about.

11 Q. Okay. But sometime in that conversation,
12 Dean Alpert looked you in the eye and said, "Are
13 these allegations that Mr. Jackson sexually abused
14 you true," right.

15 A. Uh-huh.

16 Q. And you said they were not true, right.

17 A. Yeah. I told him that Michael didn't do
18 anything to me.

19 Q. Okay. Mr. Alpert asked you twice whether or
20 not Michael Jackson had ever done anything of a
21 sexual nature to you, correct.

22 A. I don't know if he asked me twice.

23 Q. Well, the first time he asked you, you shook
24 your head "No," right.

25 A. I don't know.

26 Q. And the second time he asked you, you said
27 to him, "No, he did not touch me in any sexually
28 inappropriate way," correct. 1820

1 A. I don't know.

2 Q. You don't know.

3 A. I'm pretty sure I told him that.

4 Q. Okay.

5 A. But, I mean, I don't know how exactly it
6 happened.

7 Q. Okay. Now, based on what you've already
8 said, you also discussed a teacher named Geralt,
9 right.

10 A. Yes.

11 Q. When I started asking you questions about
12 your discussion with Mr. Sneddon, the first person
13 you mentioned was Mr. Geralt, correct.

14 A. Yes.

15 Q. Mr. Geralt was also a teacher at the school,
16 right.

17 A. Yes.

18 Q. Okay. And in summary, you had some

19 disciplinary problems with Mr. Geralt, right.
20 A. I had a lot of disciplinary problems.
21 Q. Excuse me.
22 A. I had a lot of disciplinary problems.
23 Q. You had a lot of them.
24 A. Uh-huh.
25 Q. What disciplinary problems did you have.
26 A. I would get into fights sometimes at school.
27 Q. Pardon me.
28 A. I would get into fights sometimes at school. 1821

1 Q. Okay. You got into a lot of them, didn't
2 you.
3 A. Not a lot. I got into a few.
4 Q. Okay. And were you ever asked to leave the
5 school.
6 A. No, I don't think so.
7 Q. Were you ever asked to leave class.
8 A. Yes.
9 Q. Okay. And approximately when did that
10 happen.
11 A. Um, well, a lot of teachers at John
12 Burroughs Middle School, once anyone even talks out
13 of turn, they'll send you out of class.
14 Q. Well, you got up in class and accused
15 Teacher Geralt of having his balls in his mouth,
16 right.
17 A. His balls in his mouth.
18 Q. Yes.
19 A. No, because I was never in one of his
20 classes.
21 Q. Do you deny doing that.
22 A. I don't even remember ever doing that.
23 Q. Were you in any programs after school with
24 Teacher Geralt.
25 A. I believe he was an ROTC instructor.
26 Q. Okay. So you were in ROTC at the time,
27 right.
28 A. No. Not exactly. Because I had so much 1822

1 experience in that field of marching, and military,
2 military aspects, he -- they liked me being an
3 advisor there.
4 Q. Well, you were accused by Mr. Geralt of
5 being totally disruptive in that program, right.
6 A. In the ROTC program.
7 Q. Yes.
8 A. I don't remember that. I remember them
9 loving me there because the whole -- the whole --
10 their whole cadet corps was disciplined, and -- and

11 knew what they were doing. It was getting better at
12 marching.

13 Q. And you accused the cadet core of being
14 stupid, right.

15 A. I might have called a few cadets -- that
16 they looked stupid with their uniforms. But -- if
17 their uniforms look ugly, that they need to make
18 them look better. But I don't think I remember
19 calling the whole core stupid.

20 Q. Now, you said you were accused of being on
21 drugs, right.

22 A. Yes.

23 Q. And you say that was false, right.

24 A. Yes. I don't -- will never go on drugs.

25 Q. Okay. Who accused you of being on drugs.

26 A. Mr. Geralt.

27 Q. Okay. And did he ask you if you were on
28 drugs. 1823

1 A. He was doing it in a way that he was trying
2 to make fun of me.

3 Q. Were you escorted away from the other
4 students at one point.

5 A. During the detention.

6 Q. Yes.

7 A. Actually, all of the students in there were
8 kind of cheering me on because they all knew how
9 Mr. Geralt is, and no one's ever stood up to him
10 before.

11 Q. But you stood up to the teacher, right.

12 A. I was already standing up, so --

13 Q. Excuse me. I'm sorry, I didn't hear what
14 you said.

15 A. I guess so.

16 Q. You did stand up to Teacher Geralt, right.

17 A. Yes.

18 Q. You confronted him, right.

19 A. Yes, after he had brought himself down to my
20 level by doing those things. By not -- see, because
21 I believe teachers are higher than me because I'm
22 just a student. When a teacher does something like
23 that and makes fun of me and tries to say I'm on
24 drugs, he's no longer the level of a teacher, he's
25 come down to my level.

26 Q. And you were angry about that, right.

27 A. Um, I felt as if he was -- didn't deserve
28 respect as a teacher. 1824

1 Q. Didn't deserve respect as a teacher.

2 A. No.

3 Q. Okay. So you did not respect him because
4 you didn't think he deserved it, right.
5 A. I didn't respect him as a person.
6 Q. And you told him that, didn't you.
7 A. I didn't tell him those exact words.
8 Q. Pardon me.
9 A. I didn't tell him, "I don't respect you."
10 I didn't tell him in those exact words.
11 Q. Okay. Did Teacher Geralt do anything to
12 discipline you, that you can recall.
13 A. He gave me detention once, I think.
14 Q. Okay. And when you say "detention," what do
15 you mean.
16 A. Detention with him again.
17 Q. Excuse me.
18 A. A detention with him again.
19 Q. Okay. And what was detention. What did he
20 take you do.
21 A. He had us go in this -- the auditorium,
22 because there was a lot of kids. Well, first we'd
23 be in his classroom, and usually there would be a
24 lot of kids, so we would usually move over to the
25 auditorium because it was bigger, and then we would
26 do our homework in there. It was after school.
27 Q. Okay. Since we're on the subject of school,
28 I'd like to just ask you some questions about your 1825

1 experiences at school. Okay.
2 A. Uh-huh.
3 Q. Did you know a teacher named Murphy.
4 A. Mr. Murphy, yes.
5 Q. You were disciplined by Mr. Murphy as well,
6 correct.
7 A. I don't remember too much about Mr. Murphy.
8 Q. Well, was Mr. Murphy one of your teachers.
9 A. He was for a while, but I asked the
10 counselor -- my counselor to move me out of his
11 class.
12 Q. Why did you want to get out of Mr. Murphy's
13 class.
14 A. I didn't like how he conducted his
15 classroom.
16 Q. What didn't you like about it.
17 A. He was just hard to understand, the way he
18 was trying to teach.
19 Q. Well, he accused you of being disruptive in
20 his class, didn't he.
21 A. Uh-huh. Yes.
22 Q. Okay. Were you disruptive.
23 A. Um, now that I look back, yes. I -- I was
24 dis --
25 Q. How were you disruptive in Mr. Murphy's

26 class.
27 A. I might ask a question without raising my
28 hand. 1826

1 Q. Excuse me.

2 A. I might ask a question without raising my
3 hand.

4 Q. Okay. Your answer is, "I might ask a
5 question." Did you or did you not do that.

6 A. I'm pretty sure I did. I mean --

7 Q. Well, he accused you of being uncooperative
8 and disruptive, didn't he.

9 A. He accused me of being uncooperative because
10 I didn't sign a detention he gave me because I
11 didn't believe it was correct.

12 Q. I'm sorry, you're speaking a little fast.
13 I couldn't understand that. Could you just repeat
14 it.

15 A. He accused me of being uncooperative because
16 of a detention he had given me and I did not want to
17 sign it because I didn't believe it was a --

18 Q. What didn't you want to sign.

19 A. A detention.

20 Q. Excuse me.

21 A. A detention that he had written up.

22 Q. Did you refuse to sign it.

23 A. Yes.

24 Q. And what happened after you refused to sign
25 it.

26 A. He told me -- he gave me -- he wrote up a
27 referral, and I believe he sent me to Dean Alpert.

28 Q. Did you know a Mr. Parker at school. 1827

1 A. Yes.

2 Q. Who was Mr. Parker.

3 A. He was a new guy that came. I think he was
4 going to take Dean Alpert's spot, and Dean Alpert
5 was going to move up or something.

6 Q. At one point you apologized to Mr. Parker,
7 didn't you.

8 A. Yes.

9 Q. What did you apologize to Mr. Parker for.

10 A. Probably apologized about the way I was in
11 school and stuff.

12 Q. And what do you mean by that.

13 A. About how I disrespected teachers sometimes.

14 Q. Okay. And that was correct, wasn't it. You
15 did disrespect your teachers sometimes, correct.

16 A. Yes.

17 Q. Did you know a Mr. Collins.

18 A. I don't remember Mr. Collins.
19 Q. Do you remember anyone named Collins at the
20 school.
21 A. No.
22 BAILIFF CORTEZ: I need you to speak up a
23 little louder. Okay.
24 THE WITNESS: Okay.
25 Q. BY MR. MESEREAU: How about a Mr. or Mrs.
26 Slauch, S-l-a-u-g-h.
27 A. Probably talking about Miss Slaughter.
28 Q. Okay, Slaughter. 1828

1 A. Uh-huh.
2 Q. Do you remember a Miss Slaughter.
3 A. Yes.
4 Q. Do you remember having problems in -- with
5 Miss Slaughter.
6 A. I was -- not really. I mean --
7 Q. You don't recall arguing with that teacher.
8 A. Oh, yeah. I remember.
9 Q. What was that argument about.
10 A. It's because I asked to go to the rest room.
11 And I told her that I had to go to the rest room or
12 else I'll have problems. And then she still
13 wouldn't let me go.
14 Q. And then what happened.
15 A. I told her about how I had cancer and stuff,
16 and she still wouldn't let me go to the rest room.
17 Q. And what did you do about that.
18 A. I sat back in my seat.
19 Q. You requested to be transferred out of that
20 class, right.
21 A. Well, it's like they had all these -- I
22 didn't really request to get out of Miss Slaughter's
23 class, but I wanted to get out of Mr. Murphy's
24 class. They have different -- they have A, B, C and
25 D, I think. And then C was what I was in. And C is
26 a whole block of teachers that everyone is in, and
27 they all switch around.
28 Q. Okay. Well, you were accused of screaming 1829

1 words that the other students were jumping around
2 like retarded people, right. Do you remember that.
3 A. I don't know.
4 Q. Do you remember that.
5 A. Yes.
6 Q. And --
7 A. Well --
8 Q. Please tell the jury --
9 A. Barely.

10 Q. -- what happened.
11 A. I don't really remember what I said. It
12 probably happened, because a lot of times there
13 was -- I would stand up to the teacher. A lot of
14 the kids would kind of congratulate me, and then --
15 Q. You were kind of a hero for standing up to
16 teachers.
17 A. Sometimes.
18 Q. Okay. Do you remember a teacher named Fink.
19 A. I think you're talking about Mr.
20 Finklestein.
21 Q. Who is Mr. Finklestein.
22 A. He was my math teacher.
23 Q. You had problems in that class also, didn't
24 you.
25 A. I think everyone in his class had a problem
26 with him.
27 Q. Let me just ask about you. Did you have
28 problems in Mr. Finklestein's class. 1830

1 A. I was "everyone."
2 Q. Pardon me.
3 A. I was one of the "everyone."
4 Q. You're saying everybody had a problem.
5 A. If everyone had a problem, then I would be
6 one of them, right.
7 Q. I'm just asking about yourself. Okay. Did
8 you have problems with your conduct --
9 A. Yes.
10 Q. -- in Mr. Finklestein's class.
11 A. Yes.
12 Q. Please tell the jury what those problems
13 were.
14 A. Same problems with every other teacher.
15 Q. And what do you mean by that.
16 A. I was kind of argumentative sometimes, and I
17 shouldn't have been. I didn't like the way he
18 taught because I wasn't learning anything.
19 Q. And what did you do in his class that caused
20 a disruption.
21 A. I would argue sometimes about the way he
22 would teach, and that he wouldn't use our textbooks.
23 And I asked him why we have these textbooks, if he
24 didn't let us use them.
25 Q. And were you disciplined at all.
26 A. Yes, sometimes he would send me out of
27 class.
28 Q. And how many times were you asked by this 1831

1 teacher to leave the class.

2 A. I don't know.
3 Q. Was it more than five.
4 A. I don't know.
5 Q. Was it -- do you think it was ten.
6 A. I don't know.
7 Q. Do you have any idea at all.
8 A. I remember him -- I know I got sent more
9 than once, but, I mean, I don't remember the exact
10 number.
11 Q. Okay. But you were accused of disrupting
12 that class, right.
13 A. Yes.
14 Q. Do you remember someone named Moon. Is
15 there a teacher named Moon.
16 A. I remember the name, but I'm not sure which
17 teacher it was.
18 Q. Well, you were accused of singing in the
19 classroom and disrupting the class, right.
20 A. Can you tell me more about Mr. Moon.
21 Because I don't remember really who he is.
22 Q. Let me ask you this: Were you accused of
23 being defiant, singing in the classroom, talking,
24 disrupting testing, and they had to call your
25 parents.
26 A. Mr. Moon. Mr. Moon. Oh, he's my home room
27 teacher. I don't know.
28 Q. You don't recall any problems with that 1832

1 teacher.
2 A. No, because he was my home room teacher, and
3 I hardly do anything in that class.
4 Q. Okay. So you don't recall any problem with
5 a teacher named Moon, right.
6 A. No.
7 Q. Okay. Now, how many times did you refuse to
8 write an apology to teachers.
9 A. I don't remember being asked to write an
10 apology.
11 Q. Well, didn't you just say before you were
12 asked to apologize at one point.
13 A. No, I have -- they didn't ask me to
14 apologize. I apologized to Mr. Parker.
15 Q. But you were asked to write an apology to a
16 child who you insulted in class, correct.
17 A. I don't remember that.
18 Q. Okay. Would it refresh your recollection if
19 I just show you a note from your school records.
20 A. Yes.
21 MR. MESEREAU: May I approach, Your Honor.
22 THE COURT: Yes.
23 MR. SNEDDON: Go ahead.
24 THE WITNESS: I can't really understand that

25 writing.
26 Q. BY MR. MESEREAU: You can't read that.
27 A. I see "apology" -- it's kind of messed up
28 writing. 1833

1 THE COURT: Wait a minute. Just a moment.
2 He's just asking you to read that and see if it
3 refreshes your memory, not to comment on it.
4 Just -- no, you just read it and see if it refreshes
5 your memory.
6 THE WITNESS: I can't understand it.
7 Q. BY MR. MESEREAU: You didn't read that at
8 all.
9 A. It looks like -- kind of like scribbles.
10 Q. I'm sorry.
11 A. It's like doctor's writing.
12 Q. You can't read any of it.
13 A. I can't read that. It's unlegible.
14 Q. Okay. Do you recall an incident like that.
15 A. Writing to a student, no.
16 Q. Pardon me.
17 A. Writing an apology letter to a student, I
18 don't remember.
19 Q. Do you recall being asked to write an
20 apology to a student.
21 A. No.
22 Q. Okay. Do you recall being accused of not
23 completing your school assignments and tasks.
24 A. Yeah, I wouldn't ever do my homework or
25 anything.
26 Q. You would never do it.
27 A. Okay. I did it sometimes. Like in eighth
28 grade I did it for my science class, because I kind 1834

1 of liked it.
2 Q. Now, you testified last week that Mr.
3 Jackson didn't help you with your homework, right.
4 A. No. I said that he might have helped me for
5 that one little bit of homework that I did, but he
6 didn't really help me too much.
7 Q. Okay. But he helped you a little bit,
8 right.
9 A. Foe that one little bit of the assignment.
10 Q. Okay. Do you know a Mr. Davy.
11 A. Yeah, he was the vice principal. He was a
12 cool guy.
13 Q. Which school.
14 A. John Burroughs.
15 Q. Okay. Do you remember having discussions
16 with Mr. Davy about your disciplinary problems.

17 A. Yes.
18 Q. And please tell the jury what those
19 discussions were all about.
20 A. I don't really remember too good. Probably
21 the same thing I talked about like with dean -- or
22 Mr. Parker, that to get better.
23 Q. Well, you had discussions with Mr. Davy,
24 right.
25 A. Uh-huh.
26 Q. The subject of the discussions was your
27 being disruptive, right.
28 A. Probably, yes. 1835

1 Q. Please tell the jury what you and he
2 discussed.
3 A. I don't really remember. It was in the
4 eighth grade. Well, it was a while ago.
5 Q. Would it refresh your recollection if I just
6 show you one of your school records. And this is
7 typed up.
8 A. Oh, yes.
9 MR. MESEREAU: May I approach, Your Honor.
10 THE COURT: Yes.
11 Now, when he shows you that, he's just going
12 to ask you if that refreshes your memory. You're
13 not to say what's on the page or you're --
14 THE WITNESS: Oh, okay.
15 THE COURT: -- not to discuss it. There's
16 only one issue in front of you. Go ahead.
17 THE WITNESS: All right.
18 Oh, I remember Miss Super.
19 Q. BY MR. MESEREAU: Have you had a chance to
20 read that document.
21 A. Yes.
22 Q. Does it refresh your recollection about
23 problems you had with Mr. Davy.
24 A. Well, that wasn't a letter from Mr. Davy.
25 That was a letter from --
26 THE COURT: Just a moment. He's just asked
27 you whether or not that refreshes your recollection
28 about problems you had with Mr. Davy. That's a 1836

1 "yes" or "no" answer.
2 THE WITNESS: No, I never had problems with
3 Mr. Davy.
4 THE COURT: That's not the question.
5 Listen. Did that paper refresh your recollection
6 about any problems you have had with Mr. Davy.
7 "Yes" or "no."
8 THE WITNESS: No.

9 THE COURT: All right. Next question.
10 MR. MESEREAU: Yes, Your Honor.
11 Q. Did you ever have a discussion with Mr. Davy
12 about your disciplinary problems with other
13 teachers.
14 A. Yes.
15 Q. Please tell the jury what went on in that
16 discussion.
17 A. I don't really remember too good. I mean,
18 he would tell me to get better, or stuff like that.
19 Q. Anything else.
20 A. Pretty much that's it.
21 Q. Do you know someone named Bender.
22 A. Yes, yes. Miss Bender.
23 Q. Who is Miss Bender.
24 A. She was my history teacher.
25 Q. And she was your history of teacher in
26 November of 2002, correct.
27 A. Yeah, I think so.
28 Q. Okay. And she complained to Mr. Davy about 1837

1 you having disciplinary problems in school, right.
2 A. Probably.
3 Q. Do you remember that.
4 A. Not really. But, I mean, she probably did.
5 Q. Would it refresh your recollection if I show
6 you a memo from her to Mr. Davy.
7 A. I don't think so, because I would never
8 really see those. They would -- the teachers would
9 give them to them about me. They wouldn't, like,
10 pass it to me to give to them. They wouldn't have
11 me read it.
12 Q. To your knowledge, she did complain about
13 your behavior, true.
14 A. She probably did. Because a lot of teachers
15 did.
16 Q. In her class, right.
17 A. Yeah.
18 Q. Okay. You got complaints from almost every
19 teacher at John Burroughs School, right.
20 A. Uh-huh.
21 Q. And you were going to John Burroughs School
22 in 2002, correct.
23 A. Uh-huh.
24 Q. Were you there in 2001.
25 A. I had cancer in 2001.
26 Q. So you weren't at John Burroughs School
27 then.
28 A. I had -- that was -- I had finished my 1838

1 chemotherapy in June 2001. So I started -- I
2 believe I started in seventh grade in -- or -- I'm
3 not sure. Probably the sixth grade. I don't know.
4 All I know is what -- because when I got out of
5 cancer, I think I was in the sixth grade at LeConte
6 Middle School.

7 Q. But you entered Miss Bender's class in world
8 history and geography in 2002, right.

9 A. Uh-huh.

10 Q. Okay. And she complained that you were
11 defiant on a regular basis and disrespectful to her,
12 correct.

13 MR. SNEDDON: Your Honor, I'm going to
14 object as asked and answered. He's already answered
15 this question.

16 THE COURT: Overruled.

17 You may answer.

18 THE WITNESS: Can you repeat the question.

19 THE COURT: I'll have it read back.

20 THE WITNESS: Thank you.

21 (Record read.)

22 THE WITNESS: Yes, I believe so.

23 Q. BY MR. MESEREAU: She also said you appeared
24 to have good acting skills, right.

25 A. I don't know if she said that.

26 Q. Would it refresh your recollection if I show
27 you her memo to Mr. Davy.

28 A. Probably not, because I never saw the memo 1839

1 before.

2 Q. Well, do you recall her ever saying anything
3 to the effect, "You have good acting skills".

4 A. No.

5 Q. Okay. When you were at John Burroughs
6 School, what kind of grades did you get, generally
7 speaking. Were they good.

8 A. No.

9 Q. Were they poor.

10 A. Yeah.

11 Q. Okay. And how long were you at John
12 Burroughs School.

13 A. Seventh and eighth grade, I believe.

14 Q. Okay. So that would be two years.

15 A. Probably. I mean, because I don't think I
16 stood there the whole seventh and eighth grade.

17 Q. I'm sorry, I couldn't hear that.

18 A. I don't think, because, I mean, a few months
19 I was at Neverland, I don't think I stood there the
20 whole two years of school.

21 Q. Did you discuss these disciplinary problems
22 that you had at John Burroughs School with

23 Mr. Sneddon last night.

24 A. Yes.
25 Q. Did he ask you about all these teachers.
26 A. No.
27 Q. Well, he asked you about some teachers,
28 didn't he. 1840

1 A. Yes.
2 Q. What teachers did Mr. Sneddon ask you about
3 last night.
4 A. He asked me -- well, I don't think he asked
5 me about teachers. I think he just -- I just recall
6 Mr. Geralt. And Alpert, the dean.
7 Q. Do you recall a teacher named Martinez.
8 A. Oh, yes.
9 Q. Martinez was your drama teacher, correct.
10 A. Yes.
11 Q. And you were accused of being disruptive in
12 that class, weren't you.
13 A. Probably.
14 Q. Now, were you taking -- excuse me, let me
15 rephrase that.
16 Let's talk about the year 2002 when you were
17 having these disciplinary problems in John Burroughs
18 School, okay. Were you taking any medication then.
19 A. I was taking my 500 milligrams of
20 Amoxicillin, the antibiotics I have to take for like
21 the rest of my life, and the -- and five milligrams
22 of Lycinopril for my kidney.
23 Q. Now, at some point you entered into an
24 agreement to do independent study, right.
25 A. Yes.
26 Q. And approximately when was that.
27 A. I'm not sure. Toward the end -- probably
28 the second semester of the eighth grade. 1841

1 Q. And approximately what year would that be.
2 A. 2003, I think.
3 Q. Excuse me.
4 A. Maybe 2003.
5 Q. Okay. You attended Roosevelt High School at
6 one point, right.
7 A. No.
8 Q. Did you ever go to Roosevelt High School.
9 A. No.
10 Q. Did you ever go to City of Angels.
11 A. No.
12 Q. Ever do an independent study program with
13 City of Angels.
14 A. I don't know if it was with City of Angels,
15 but I did an independent study program.

16 Q. Okay. Again, what year was that, if you
17 know.

18 A. Probably 2003.

19 Q. Okay. And how about Bernice Carlson
20 Hospital School. Do you recall that school.

21 A. No.

22 Q. Don't recall ever being enrolled there.

23 All right. Before Burroughs, which school
24 did you go to.

25 A. I think it was LeConte Middle School.

26 Q. Excuse me.

27 A. LeConte Middle School.

28 Q. Is it LeComt. 1842

1 A. LeConte.

2 Q. LeConte. And where was that located.

3 A. North Hollywood. It was a magnet school.

4 Q. Did you ever have any disciplinary problems
5 at that school.

6 A. Yeah, probably.

7 Q. Please tell the jury what disciplinary
8 problems you had at that school.

9 A. Same stuff. I mean, I was -- I wasn't that
10 good of a kid then.

11 Q. Okay. And what did you do that was a
12 problem.

13 A. Argue with teachers, stuff like that.

14 Q. Did you get disciplined at that school.

15 A. Yeah, I'm pretty sure I did.

16 Q. Please tell the jury how you were
17 disciplined.

18 A. They would probably give me detention or
19 something like that.

20 Q. And what were you accused of doing at that
21 school.

22 A. Being argumentative and confrontational and
23 stuff like that.

24 Q. Let me get back to your conversation with
25 Mr. Sneddon last night. Did he ask you who Jeffrey
26 Alpert is.

27 A. He asked me who Dean Alpert was.

28 Q. And did you tell him who Jeffrey Alpert is. 1843

1 A. I don't know if Dean Alpert was the same
2 Jeffrey Alpert, because, I mean, I only call him
3 Dean Alpert. So I don't know if we're talking about
4 the same guy, because there's -- I think there's
5 another guy named Alpert there.

6 Q. Okay. Did you tell Mr. Sneddon you knew who
7 Dean Alpert was.

8 A. Yes.
9 Q. Did you tell him when you first met Dean
10 Alpert.
11 A. Yes. Well --
12 Q. What did you tell Mr. Sneddon.
13 A. Well, I didn't really tell him when I first
14 met him, but I told him that I knew that I met him.
15 Q. Okay. Did the conversation begin with a
16 discussion about Mr. Alpert or Mr. Geralt.
17 A. I believe it was about Mr. Geralt first.
18 Q. Okay. And you told Mr. Sneddon your history
19 with Mr. Geralt, right.
20 A. I told him about that one story that I told
21 you.
22 Q. Pardon me.
23 A. I told him about that one story that I told
24 you.
25 Q. Okay. And after you finished telling Mr.
26 Sneddon about your experiences with Mr. Geralt, did
27 you then start talking about Mr. Alpert.
28 A. No, he asked me if I remember who Mr. Alpert 1844

1 was.
2 Q. Okay. Now, you were sent to Mr. Alpert's
3 office many times for disciplinary problems,
4 correct.
5 A. Uh-huh.
6 Q. Generally fights, correct.
7 A. Um, not really. Because I didn't want to
8 fight in the seventh grade -- well, every time I
9 would get into a fight, I would be sent there. I
10 got into one fight in seventh grade with an eighth
11 grader, and I'm not -- I remember one fight, but I
12 know I got into more than one in the eighth grade.
13 Q. Okay. But you were -- you had a lot of
14 meetings with him about --
15 A. Yes.
16 Q. -- allegations, at least, that you were a
17 discipline problem, right.
18 A. No, I had meetings with him because I was a
19 disciplinary problem.
20 Q. Okay. Okay. And do you know approximately
21 when Dean Alpert called you in his office to ask you
22 if any of these allegations involving Michael
23 Jackson were true.
24 A. I believe it was after I came back from
25 Neverland.
26 Q. Pardon me.
27 A. I'm pretty sure it was after I came back
28 from Neverland, the eighth grade. 1845

1 Q. Okay. And he looked at you, and he said,
2 "Look at me, look at me, Gavin. I can't help you
3 unless you tell me the truth. Did any of this
4 happen. Did anything bad happen." Remember that.
5 A. Um, yeah, I believe so.
6 Q. And your response was, "No, nothing
7 happened," right.
8 A. Yeah.
9 Q. Okay. You used to send a lot of letters and
10 cards to Michael Jackson, correct.
11 A. Yes.
12 Q. When did you begin sending letters and cards
13 to Michael Jackson.
14 A. When I met him, I guess.
15 Q. Excuse me.
16 A. When I met him.
17 Q. Would that be the first trip to Neverland.
18 A. Yeah, I don't think I gave him a card
19 when -- the first day I met him, but, I mean, it was
20 probably around the times that I knew him.
21 Q. You also were sending cards to his assistant
22 named Evvy, right.
23 A. Yes. She was a really nice lady.
24 Q. Please tell the jury who Evvy is.
25 A. I think she's like the assistant to Michael
26 or something like that.
27 Q. You sent a card to her saying that you loved
28 her, right. 1846

1 A. Yeah -- I believe I did.
2 Q. Yeah, your whole family did, right.
3 A. I think we did.
4 Q. Said, "Evvy, sweetheart, we love you,"
5 right.
6 A. I don't know if we said that, but I mean --
7 Q. Would it refresh your recollection if I just
8 show you a copy of a card.
9 A. Sure. Yes.
10 MR. MESEREAU: May I approach, Your Honor.
11 THE COURT: Yes.
12 MR. SNEDDON: Could I see the card for just
13 a second.
14 THE WITNESS: It's --
15 THE COURT: Just a moment. He's just showing
16 you the card, remember.
17 THE WITNESS: Okay.
18 THE COURT: Now he's going to ask you if it
19 refreshes your recollection.
20 THE WITNESS: All right.
21 Q. BY MR. MESEREAU: Have you had a chance to
22 look at that card.

23 A. Yes.
24 Q. Does it refresh your recollection about
25 sending a card to Evvy.
26 A. A little bit. Because I knew we sent cards
27 to Evvy.
28 Q. Okay. You called her a sweetheart and said 1847

1 you loved her, right.
2 MR. SNEDDON: Your Honor, I'm going to
3 object to that question, because counsel's not laid
4 the foundation that he recognizes the handwriting as
5 being his.
6 THE WITNESS: That's my mom's --
7 THE COURT: Just a moment.
8 MR. SNEDDON: Lack of foundation.
9 MR. MESEREAU: I'll go into it, Your Honor.
10 THE COURT: The objection is overruled.
11 THE COURT: You may answer. I'll have the
12 question -- do you want the question read back.
13 THE WITNESS: Yes.
14 (Record read.)
15 THE WITNESS: Yes.
16 Q. BY MR. MESEREAU: And you used to write
17 cards to Michael and call him "daddy," correct.
18 A. Yes.
19 Q. And you would refer to yourself as his son,
20 right.
21 A. Well, I called him "daddy," and then he
22 would call me his son.
23 Q. Well, you yourself wrote to him and said,
24 "To Daddy Michael, from your son Gavin," correct.
25 A. That's probably after he called me "son."
26 Q. Let me just ask you the question again,
27 because you got to answer the question.
28 A. Okay. 1848

1 Q. Isn't it true that you sent a letter to
2 Michael Jackson, you addressed it to "Daddy Michael,
3 from your son Gavin".
4 A. I mean, I'm -- I don't know every letter I
5 ever sent to him, but, I mean, I probably did.
6 Q. Do you remember doing that.
7 A. Not really.
8 Q. Would it refresh your recollection if I just
9 show you that, the letter.
10 A. Yes.
11 MR. MESEREAU: May I approach, Your Honor.
12 THE COURT: Yes.
13 THE WITNESS: Yeah.
14 Q. BY MR. MESEREAU: Have you had a chance to

15 look at that document.
16 A. Yes.
17 Q. Does it refresh your recollection about
18 sending Michael Jackson a letter that said, "To
19 Daddy Michael, from your son Gavin".
20 A. Yes.
21 Q. Do you remember sending another card to
22 Michael Jackson that said, "I miss you, Daddy
23 Michael".
24 A. I don't know -- I probably did send him
25 that.
26 Q. Do you know for sure if that happened.
27 A. Not for sure, but I'm pretty sure I did.
28 Q. Would it refresh your recollection if I just 1849

1 show you the card.
2 A. Yes.
3 MR. MESEREAU: May I approach, Your Honor.
4 THE COURT: Yes.
5 THE WITNESS: Oh, yes.
6 Q. BY MR. MESEREAU: Okay. Have you had a
7 chance to look at that document.
8 A. Yes.
9 Q. Does it refresh your recollection about your
10 sending a card to Michael Jackson that said, "I miss
11 you, Daddy Michael".
12 A. Yes.
13 Q. Okay. How often would you send cards or
14 letters to Michael Jackson.
15 A. I'd probably send them maybe once a month or
16 something like that.
17 Q. And you used to ask him for his phone
18 numbers, right.
19 A. He would give me some of his phone numbers.
20 Q. Pardon me.
21 A. He would give me some of his phone numbers.
22 He gave them.
23 Q. But correct me if I'm wrong, did you tell
24 the jury last week that he gave you phone numbers
25 that ended up not working.
26 A. No, I told you he gave me phone numbers, and
27 after a while they didn't work.
28 Q. And you would then routinely ask him for 1850

1 numbers that did work, right.
2 A. Not really routinely. But, I mean, I asked
3 him.
4 Q. Okay. Do you know approximately when you
5 began sending letters or cards to Michael Jackson.
6 A. Probably when the numbers didn't work no

7 more, and all we had was Evvy to talk to.
8 Q. Do you remember sending a letter to Michael
9 Jackson that said, "I love you, Daddy Michael. And
10 tell my little brother and little sister that I love
11 and care about them. Thank you for everything,
12 Daddy Michael. Thank you for being my Daddy
13 Michael. Thank you for helping me be happy and beat
14 cancer." Do you remember sending him a letter like
15 that.
16 A. Not really, but I mean I probably did.
17 Q. Would it refresh your recollection if I just
18 show you the card, or a copy of the card.
19 A. Yes.
20 MR. MESEREAU: May I approach, Your Honor.
21 THE COURT: Yes.
22 THE WITNESS: Oh, I remember.
23 Q. BY MR. MESEREAU: Have you had a chance to
24 look at that copy of a card.
25 A. Yes.
26 Q. And does it refresh your recollection that
27 you wrote to Michael Jackson yourself and thanked
28 him for helping you beat cancer. 1851

1 A. I remember that card.
2 Q. Pardon me.
3 A. I remember that card.
4 Q. You did write to Michael Jackson yourself
5 and thanked him for helping you beat cancer,
6 correct.
7 A. I wrote that in the letter, yes.
8 Q. Okay. You used to also write letters to
9 Michael Jackson's children, right, Prince and Paris.
10 A. I might have.
11 Q. You called Michael, Prince and Paris your
12 very best friend -- friends in the world, right.
13 A. I don't know.
14 Q. Do you recall doing that.
15 A. No.
16 Q. Would it refresh your recollection if I show
17 you a copy of that card.
18 A. Yes.
19 MR. MESEREAU: May I approach, Your Honor.
20 THE COURT: Yes.
21 THE WITNESS: I don't remember writing that.
22 Q. BY MR. MESEREAU: You don't remember that.
23 A. No.
24 Q. Do you remember writing any letters that
25 were addressed to Michael, Prince and Paris.
26 A. My writing doesn't -- no.
27 Q. You don't recall ever doing that.
28 A. No. My writing doesn't look that good. 1852

1 Q. Pardon me.
2 A. My writing doesn't look that good.
3 Q. Okay. Now, you used to write Evvy, Michael
4 Jackson's personal assistant, and thank her for what
5 she had done for you, correct.
6 A. Yeah, I would thank her for, like, setting
7 up stuff and helping us.
8 Q. What nice things had Evvy done for you.
9 A. She would like -- when I would -- she helped
10 me set up the AOL account with the Internet.
11 Q. I'm sorry, I can't --
12 A. She helped me set up the Internet on the
13 computer that Michael --
14 Q. What else did she do for you.
15 A. She was just a really nice lady. I mean, we
16 would call her and she would be really nice to me.
17 Q. Do you recall ever writing to Michael
18 Jackson about his injuring his foot.
19 A. Yes.
20 Q. And tell the jury what you told Michael
21 Jackson about that.
22 A. I just told him, like, I hope he feels
23 better, or stuff like that.
24 Q. You told him that your family was praying
25 for him, true.
26 A. I think so.
27 Q. You said you felt sorry about his foot being
28 broken, right. 1853

1 A. Yes.
2 Q. And you said you couldn't wait till you
3 could play at Neverland again, right.
4 A. Yes.
5 Q. You called him "daddy" in that letter,
6 right.
7 A. Yes, I believe so.
8 Q. Is that true.
9 A. I don't know, but I'm pretty sure I did.
10 Q. Okay. You reminded him that he keeps all of
11 his promises, right.
12 A. Yeah, he would tell me he keeps every
13 promise he says.
14 Q. Okay. And you reminded him of that in your
15 letter at one time, right.
16 A. Yes.
17 Q. And you said, "I wish I could be with you in
18 New York and watch you record your music stuff."
19 Remember that.
20 A. No.
21 Q. Would it refresh your recollection if I just

22 show you a copy of this letter.
23 A. Yes.
24 MR. MESEREAU: May I approach, Your Honor.
25 THE COURT: Yes.
26 THE WITNESS: Oh, yeah, I remember that.
27 Q. BY MR. MESEREAU: Have you had a chance to
28 look at that document. 1854

1 A. Yes.
2 Q. And you wanted to go to New York and be with
3 Mr. Jackson in a recording studio, right.
4 A. I guess. I mean, yeah.
5 Q. And that didn't happen, right.
6 A. No.
7 Q. You never traveled with Mr. Jackson to New
8 York.
9 A. I never traveled with Mr. Jackson.
10 Q. You called him the nicest, most loving
11 person in the world, right.
12 A. Yes.
13 Q. You said, "I love you, Daddy Michael,"
14 right.
15 A. Yes.
16 Q. You said, "Thank you, Daddy Michael, for
17 being my best, best friend forever and ever," right.
18 A. Yes.
19 Q. Okay. You sent another card to him and it
20 said, "Here's a little something to make you feel
21 better while your leg is healing. Ha ha, ha ha.
22 Love you. Love, your son Gavin." Do you remember
23 that.
24 A. Yeah.
25 Q. Do you remember doing that.
26 A. Yes. Yes.
27 Q. Okay. Do you remember sending him a card
28 asking him to, "Please come back, I miss you, I love 1855

1 you". Do you remember that.
2 A. No.
3 Q. Would it refresh your recollection if I show
4 you a copy of that card.
5 A. Yes.
6 MR. MESEREAU: May I approach, Your Honor.
7 THE COURT: Yes.
8 Q. BY MR. MESEREAU: Have you had a chance to
9 look at that document.
10 A. Yes.
11 Q. Does it refresh your recollection.
12 A. Not really.
13 Q. Okay. You don't recall saying words to

14 Mr. Jackson, "Come back, I miss you, I love you".
15 A. I mean, because I probably did, but I don't
16 really remember sending a letter.
17 Q. Okay. Now, to your knowledge, other members
18 of your family were sending cards to Mr. Jackson as
19 well, right.
20 A. Yes.
21 Q. Okay. You sent a lot of cards that were
22 signed, "Your son, Gavin," true.
23 A. Yes.
24 Q. All right. You used to refer to Michael as
25 your best friend, right.
26 A. Yes.
27 Q. You used to refer to him as "cool," right.
28 Right. 1856

1 A. I don't know if I said "cool," but I
2 probably did.
3 Q. You said you liked being in the music studio
4 at Neverland.
5 A. Yes.
6 Q. Were you ever in his music studio at
7 Neverland.
8 A. Yes.
9 Q. Were you with Michael Jackson.
10 A. Yes.
11 Q. Who else was there.
12 A. I think David was there.
13 Q. You said who.
14 A. David.
15 Q. Your father.
16 A. No, the -- the -- the dude that would, like,
17 work with all the computers and stuff. And one time
18 when we went in there and he was doing his hair with
19 one lady.
20 Q. This is someone who works on the computers
21 at Neverland.
22 A. Well, I don't know if -- he's like a
23 computer-whiz-type guy. And then the other time was
24 with the lady that was in there doing his hair or
25 something.
26 Q. How often were you in the music studio at
27 Neverland.
28 A. Not really that often. I mean, I would go 1857

1 in there sometimes.
2 Q. Would you go in there with Michael Jackson
3 or would you go in there with someone else,
4 typically.
5 A. I would usually go in there when Michael was

6 probably already in there.
7 Q. And usually what time of day would that be.
8 A. Afternoon.
9 Q. Was there a general time you used to go in
10 there.
11 A. Not really, because it was pretty random. I
12 mean, because we would be probably bored, and then
13 we'd ask, "Where's Michael at," and then we would go
14 to his studio.
15 Q. And how long would you stay in the studio,
16 typically.
17 A. An hour or two. Like, we would be in there,
18 and it would kind of give Michael a little break
19 from working. And once he had to go back to work,
20 we would leave and go do something else.
21 Q. Were you ever in that music studio when
22 Michael Jackson was not present.
23 A. I think I might have been in there once.
24 Q. How did you get in.
25 A. Well, the door was probably open. Because
26 there's a code there, and you can't really get in
27 without the code.
28 Q. How did you get the code. 1858

1 A. I said that I didn't know the code. So the
2 door might have been open or something.
3 Q. Excuse me.
4 A. It was either someone was already probably
5 in there, or the door was open, because I didn't
6 know that code.
7 Q. But you and Star used to go into that studio
8 without Mr. Jackson, didn't you.
9 A. No, I don't remember going there randomly.
10 Q. Do you ever remember being in there with
11 your brother Star.
12 A. I probably went in there once without
13 Michael being there, but, I mean -- it was probably
14 just to look in there and look if Michael was there.
15 Q. And my question is -- you're telling the
16 jury you probably went in there. And my question
17 is, how did you get in, if you know.
18 A. I don't know, because I didn't know the
19 code. So it wouldn't be punching in the code.
20 Q. Okay. Did you ever ask anybody for the code
21 to the studio at Neverland.
22 A. No, I don't think so. I mean, because that
23 was like Michael's work area, so I wouldn't even
24 really want to be in there.
25 Q. Were you ever in the theater with your
26 brother Star when Michael Jackson was not present.
27 A. Yes.
28 Q. How did you get in. 1859

1 A. The door was usually open to the theater.
2 Q. And what did you and Star do in that theater
3 when Michael was not with you.
4 A. Watch movies.
5 Q. Did you just pick the movies yourself.
6 A. No. They -- they had this list of all the
7 movies that would be playing in the theater, at his
8 theater. They had like this chalkboard, and you
9 write them there, and say that we could go watch
10 them; that these are the movies that would be
11 playing. And we would go and talk to the guy that
12 works the projector and we asked him what movie to
13 play. And we'd get our little snacks from the booth
14 place and then we'd go sit down and watch.
15 Q. And did you feel you could just go in there
16 anytime you wanted.
17 A. Pretty much.
18 Q. Okay. And did you do that.
19 A. Yeah. Yes.
20 Q. Did you start using that theater from the
21 first time you ever visited Neverland.
22 A. I think we went in there the first time we
23 visited at Neverland.
24 Q. And correct me if I'm wrong, you would
25 simply go in there and pick whatever movie you
26 wanted, or would it just be the movie for the day.
27 A. Sometimes they would only have one movie and
28 sometimes they would have more than one movie, and 1860

1 we would go in there and we would watch it.
2 Q. When you were recovering from cancer, did
3 you used to go into that theater and watch movies.
4 A. When I had cancer, I think I went in there
5 and watched movies.
6 Q. Okay. When did you learn your cancer was in
7 remission.
8 A. June 2001.
9 Q. Okay. And after you learned your cancer was
10 in remission, when is the next time you remember
11 speaking to Michael Jackson.
12 A. When he wanted me to go up and do the Martin
13 Bashir thing.
14 Q. Was that the first time you recall speaking
15 to Michael Jackson after you learned your cancer was
16 in remission.
17 A. Yes.
18 Q. Okay. These cards that I just showed you,
19 letters and cards, you started sending them shortly
20 after you met Mr. Jackson, correct.

21 A. Well, not really, because I think we -- I
22 think I started wanting to send the cards when
23 Michael wasn't talking to me anymore.
24 Q. When he wasn't talking to you anymore.
25 A. Yeah.
26 Q. And approximately when do you think he
27 wasn't talking to you anymore.
28 A. Two months into my cancer. 1861

1 Q. Excuse me.
2 A. Two months into my chemotherapy.
3 Q. Approximately when would that be.
4 A. August or September of 2000.
5 Q. Okay. So August or September of 2000, you
6 and your family started sending nice letters and
7 cards to Michael Jackson, correct.
8 A. Yes.
9 Q. And those are the letters and cards that I
10 showed you a little while ago, right.
11 A. Yes.
12 Q. And it was your understanding your mother
13 used to send him cards and letters as well, right.
14 A. I think so.
15 Q. And she used to refer to him as "daddy,"
16 didn't she.
17 A. I don't think she referred to him as
18 "daddy."
19 Q. You never heard her say that once.
20 A. Well, toward me, me saying that. Because, I
21 mean, my dad had left. And I started calling him
22 "daddy" after my dad left because I didn't have a
23 dad.
24 Q. And your mother approved of that, correct.
25 A. Yeah.
26 Q. Okay.
27 THE COURT: All right. Let's take our
28 morning break. 1862

1 (Recess taken.)
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28 1863

1 REPORTER'S CERTIFICATE

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4 THE PEOPLE OF THE STATE OF)

5 CALIFORNIA,)

6 Plaintiff,)

7 -vs-) No. 1133603

8 MICHAEL JOE JACKSON,)

9 Defendant.)

10

11

12 I, MICHELE MATTSON McNEIL, RPR, CRR, CSR

13 #3304, Official Court Reporter, do hereby certify:

14 That the foregoing pages 1797 through 1863

15 contain a true and correct transcript of the

16 proceedings had in the within and above-entitled

17 matter as by me taken down in shorthand writing at

18 said proceedings on March 14, 2005, and thereafter

19 reduced to typewriting by computer-aided

20 transcription under my direction.

21 DATED: Santa Maria, California,

22 March 14, 2005.

23

24

25

26

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

28 OFFICIAL COURT REPORTER 1864

1 SUPERIOR COURT OF THE STATE OF CALIFORNIA

2 IN AND FOR THE COUNTY OF SANTA BARBARA

3 SANTA MARIA BRANCH; COOK STREET DIVISION

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

1 THE COURT: All right. You may proceed.
2 MR. MESEREAU: Thank you, Your Honor.
3 Q. BY MR. MESEREAU: Gavin, I just want to ask
4 you a couple of questions about your illness. Okay.
5 Looking at your medical records, clearly you
6 had a massive amount of tumor, right.
7 A. Yes.
8 Q. And you had surgery on your spleen, a
9 kidney, the tip of your pancreas, right.
10 A. I don't know about my pancreas. But they
11 took out my kidney and my spleen.
12 Q. All right. Now, how long after your surgery
13 did you learn you were in remission.
14 A. After my surgery. It wasn't -- you're not
15 in remission until you're done with your
16 chemotherapy.
17 Q. Okay. So when were you told your cancer is
18 in remission.
19 A. June 2001.
20 Q. Okay. And when was your surgery, if you
21 know.
22 A. June 2000.
23 Q. Okay. So one year after your surgery, were
24 you told the cancer had disappeared.
25 A. Yes.
26 Q. Okay.
27 A. June of 2001.
28 Q. Okay. And in 2001, you did not go to 1867

1 Neverland, correct.
2 A. No.
3 Q. In 2000 you made a number of trips to
4 Neverland, right.
5 A. Yes.
6 Q. So you started going to Neverland right
7 after you had your surgery, right.
8 A. Not right after, because I had to recuperate
9 from the surgeries.
10 Q. Okay. How many months after your surgery do
11 you think you started going to Neverland.
12 A. It was probably after the first round of --
13 because I had to recuperate from the surgery and
14 then I had to do my first round of chemotherapy.
15 Q. Okay.
16 A. And so after my first round of chemotherapy,
17 I believe I went to Neverland.
18 Q. You can play sports now, correct.

19 A. Yes.
20 Q. And what sports do you play.
21 A. I play football.
22 Q. Okay. What position.
23 A. They have me at wide receiver, but they kind
24 of realized that I was too big, and -- to play wide
25 receiver.
26 Q. Okay.
27 A. So they put me on corner now.
28 Q. Now, have you -- have you ever learned what 1868

1 kind of cancer it was.
2 A. They didn't -- no one ever knew what kind of
3 cancer it was. That's why I only believe that God
4 gave me this cancer to guide my life in a certain
5 way --
6 Q. Right.
7 A. -- because they -- no one -- they sent it
8 all over the country and no one could figure out
9 what kind of cancer it was.
10 Q. What I'm asking is this: How long after the
11 surgery did you learn there was no cancer in your
12 body at all. Was it one year.
13 A. It was -- well, it's like they had a CAT
14 scan after my fifth round of chemotherapy.
15 Q. Right.
16 A. And then they said they couldn't see the
17 cancer anymore, but they said they still had to
18 finish the rest.
19 I asked them, "Why can't I stop now then."
20 Because, I mean, I didn't like taking chemotherapy,
21 because it made me nauseous and a bunch of other
22 stuff.
23 But he said I had to finish the next five,
24 because it could be to where it's really, really
25 small, to where you can't see it under a microscope.
26 So they said I had to finish.
27 Q. Okay. Do you recall -- let me rephrase the
28 question. 1869

1 Do you remember in 1996 making a false
2 allegation that your mother abused you.
3 MR. SNEDDON: Your Honor, I'm going to
4 object to that. 403.
5 THE COURT: Sustained.
6 Q. BY MR. MESEREAU: I asked you some questions
7 about Evvy Tavasci. And she was Michael Jackson's
8 assistant, right.
9 A. Yes.
10 Q. And did you talk to her often.

11 A. Yeah.
12 Q. And --
13 A. Yes.
14 Q. -- when did you begin talking to her.
15 A. I began talking to her once I -- the first
16 time I met Michael, I mean, I would call her
17 sometimes and ask her about stuff. I would talk to
18 her, and I would ask her if she knew where Michael
19 was sometimes, or stuff like that.
20 Q. Well, how many times do you think you
21 telephoned Evvy Tavasci.
22 A. I don't know. I don't know how many times I
23 called her.
24 Q. You called her quite often, didn't you.
25 A. I believe so.
26 Q. And do you know when you began telephoning
27 Evvy.
28 A. When I first met Michael. 1870

1 Q. And did Michael give you her phone number.
2 A. I believe so.
3 Q. Did Michael tell you you could call Evvy
4 when you wanted to.
5 A. Not really. It was -- I wasn't supposed to
6 just call her for a lot of times. Or like -- for
7 just like business -- well, not really business,
8 but, I mean, stuff like if I wanted to go to
9 Neverland or something like that.
10 Q. I can't hear what you're saying.
11 A. If I wanted to go to Neverland or something
12 like that.
13 Q. Okay. Did you think she was your friend.
14 A. Yes.
15 Q. Okay. Did you think she was a friend of
16 your family.
17 A. Yes.
18 Q. And did you call her every week.
19 A. No, not really. I mean, we would call her
20 sometimes, but I don't know if it was every week.
21 Q. You mentioned that she had helped you set up
22 an AOL account on the computer that Michael Jackson
23 gave you, right.
24 A. Yes.
25 Q. And approximately when did she set up that
26 account, if you know.
27 A. After Michael had given me the computer.
28 Michael told me that he wanted to get me Internet 1871

1 for the computer, so he told me just like -- that's
2 the kind of stuff I'm talking about to call Evvy, to

3 call Evvy and she would help me set it up.
4 Q. When you called Evvy to help set up that
5 account, were you recovering from cancer.
6 A. No. I was in the middle of it -- I mean, I
7 just started.
8 Q. Excuse me, I couldn't understand that.
9 A. I just started chemotherapy.
10 Q. Okay. So you had just started chemotherapy
11 when you first began talking to Evvy.
12 A. Because the first time I went up to
13 Neverland he gave me the computer, so that's when he
14 told me that he wanted me to get Internet. So when
15 I came back, that's when I set it up, came back to
16 my house. That's when I set up the Internet.
17 Q. So you came back to your house with a
18 computer that Michael Jackson had given you, right.
19 A. Yes.
20 Q. You called Evvy to help set up an AOL
21 account, right.
22 A. Yes.
23 Q. You wanted an Internet account, correct.
24 A. I thought it would be cool if I had one.
25 Q. Okay. And Michael Jackson ended up paying
26 for that, true.
27 A. Yes.
28 Q. Okay. And you requested a screen account 1872

1 name, right.
2 A. Well, I didn't request it. Well, it's
3 because I have the computer and they were telling me
4 what to do. And I put my name in -- I put the
5 screen name I wanted in there.
6 Q. Okay. You put the screen name you wanted in
7 there.
8 A. Yeah. Like there's -- well, when you have
9 the CD and you're setting it up, like it tells you
10 to do all the things, and --
11 Q. Right.
12 A. -- there's a point where they have you put
13 in what screen name you want.
14 Q. Right.
15 A. And I put the screen name that I wanted in
16 there.
17 Q. Did you do this right after you returned
18 home with the computer Michael Jackson had given
19 you.
20 A. Probably not right after. Maybe a few days
21 after.
22 Q. Okay. And was this one of the first things
23 you did when you got home.
24 A. No. Because it was a few days after I got
25 home.

26 Q. Okay. So a few days after you returned from
27 your first trip to Neverland, you tried to set up an
28 AOL account on the computer that Mr. Jackson had 1873

1 given you, right.

2 A. Yes, I did set up an AOL account.

3 Q. Was that the first computer you'd ever
4 owned.

5 A. Yes.

6 Q. Was it the first computer you'd ever used.

7 A. No, because I -- no.

8 Q. Explain -- let me rephrase that.

9 When did you first learn to use a computer.

10 A. In the first grade.

11 Q. Okay. Did you own a computer at any time

12 before Mr. Jackson gave you the computer.

13 A. No.

14 Q. Okay. But you knew how to use one, correct.

15 A. I wasn't like a cyber guy, but I knew how to
16 generally use a computer.

17 Q. You knew what an AOL account was, right.

18 A. Not really. They told me.

19 Q. But you immediately started to set one up

20 when you got home with the computer Mr. Jackson gave
21 you, right.

22 A. Not when I got home. A few days later.

23 Q. You called up Evvy about setting up that

24 account, right.

25 A. Yeah. Because -- well, yeah. Yeah.

26 Q. And you requested a screen account name of

27 gblade2000 --

28 MR. SNEDDON: I'm going to object to that. 1874

1 THE COURT: Sustained.

2 Q. BY MR. MESEREAU: Do you remember the

3 password -- excuse me, let me rephrase that. Do you

4 remember the prosecutor asked you questions about

5 passwords.

6 A. Yes.

7 Q. And do you remember you talked about what

8 passwords you wanted.

9 A. Not -- to the prosecutor.

10 Q. Yeah. Did you say something about "hawk".

11 A. Oh, I told him that one of my screen names

12 that I had was whitehawk344.

13 Q. Please tell the jury what a screen name is.

14 A. It's on the Internet. You have like a name

15 that you go by, and that's the screen name.

16 Q. Do you remember asking Mrs. Tavasci to

17 change the password to "sexy," s-e-x-y.

18 MR. SNEDDON: Your Honor, I'm going to
19 object again. This is in violation of the Court's
20 order.
21 THE COURT: Sustained; that is a violation.
22 The jury's admonished to disregard that.
23 You're instructed not to go into that.
24 MR. MESEREAU: Yes, Your Honor.
25 Q. Let me ask you questions about the alarm
26 system.
27 Do you recall the alarm system at Neverland.
28 A. I remember an alarm system that was up at -- 1875

1 where like you would see -- where you would -- this
2 one house where they put all this stuff in, like his
3 awards and his gloves, and stuff like that.
4 Q. When did you first learn about the alarm
5 system at Neverland.
6 A. Well, he had passwords and stuff, so I'm
7 pretty sure those were alarm systems.
8 Q. And when did you first see an alarm system
9 at Neverland.
10 A. I saw the code things, but I never really
11 saw the alarm system.
12 Q. Now, what code things are you talking about.
13 A. The code that you push so the doors would
14 open.
15 Q. And how did you learn about those codes.
16 A. We'd go into the main house, Michael gave me
17 a code, I guess that's what I learned about it.
18 Q. Do you remember the number of the code he
19 gave you.
20 A. No.
21 Q. Do you remember any of the code numbers at
22 Neverland.
23 A. I remember the code to his room.
24 Q. What was the code number to his room.
25 A. I'm pretty sure it was like 1960.
26 Q. And approximately when did you learn that
27 code number.
28 A. I didn't learn that until after I came back 1876

1 from Miami.
2 Q. Had you ever been -- excuse me. Had you
3 ever learned any code number at Neverland before you
4 got back from Miami.
5 A. Yes. They -- when I was visiting the first
6 time, they told me the code to the main house.
7 Q. Who is "they".
8 A. It was either Michael or the maids.
9 Q. Did you ever ask anybody for the code at

10 Neverland.
11 A. Yeah, I would ask Michael.
12 Q. And did you ever ask anybody else.
13 A. Well, not really. I mean, I would ask the
14 maids sometimes when I would forget the code and
15 they would remind me. But when I would ask -- like
16 when I didn't know the code at all, and I would
17 first ask, I would usually ask Michael.
18 Q. Did you ever ask any security person any
19 code number.
20 A. No.
21 Q. Did you ever see your brother or sister ask
22 any security person for any code number.
23 A. No.
24 Q. Do you recall having the code to get into
25 Michael's room.
26 A. Yes.
27 Q. Do you recall having the code to get into
28 any other room at Neverland. 1877

1 A. No.
2 Q. Never did.
3 A. No. I think those are the only two.
4 Q. Do you recall ever going into any room at
5 Neverland when Michael Jackson wasn't present,
6 besides his bedroom.
7 A. I mean, there's a lot of rooms there. I
8 don't -- maybe we'd go in the arcade and play video
9 games. I don't know if that counts.
10 Q. What rooms at Neverland have you been into
11 when Michael Jackson was not present.
12 A. The theater. The main house. My unit. The
13 train house -- the train station. I guess that's
14 it.
15 Q. Are they the only rooms you ever went into
16 when Michael Jackson wasn't present.
17 A. Oh, maybe the library, too.
18 Q. Did you ever go into his children's
19 bedrooms, Prince and Paris.
20 A. Yeah. Well, when Michael wasn't -- I
21 wouldn't go in there if -- I mean, because I would
22 go in there to visit Prince and Paris, but, I mean,
23 I never went in there when they weren't there.
24 Q. Did you ever go into Prince's room when
25 Michael Jackson wasn't at Neverland.
26 A. I don't think I did.
27 Q. Are you sure.
28 A. Not really, because -- I might have walked 1878

1 through there or something, because, I mean, when

2 you walk up some stairs, there's -- like all the
3 rooms are connected between all the doors.
4 Q. Did you ever go into Paris's room at
5 Neverland when Michael Jackson was not present.
6 A. I don't think I did. I mean, because their
7 room is like -- because you could walk through the
8 doll room and just go right to the upstairs. So, I
9 mean, their room wouldn't really be a room that you
10 can really walk through. So, I mean, I don't think
11 I ever went into that when they weren't there.
12 Q. Are you sure.
13 A. I'm pretty sure.
14 Q. Okay. Is Prince's room near Paris's room.
15 A. No, I don't think so. I think they're
16 like -- both doors are like in two different corners
17 of the whole upstairs thing.
18 Q. Have you been in every room in the main
19 house.
20 A. Um, I believe so.
21 Q. And why do you believe so.
22 A. Because I was there a long time, you know,
23 when Paris was there -- or when Prince and Paris
24 were there, and, like, I was there one time when
25 they were getting ready to go to bed. I would walk
26 through the doll room, and then I would go up to
27 where the train thing was, and then they were having
28 their class one time that -- Grace was teaching 1879

1 them. And then I went up there, and I was -- I
2 think I was teaching Prince something. I was
3 helping Grace. And --
4 Q. Were you helping Grace teach --
5 A. Yes.
6 Q. -- the children.
7 A. Yes.
8 Q. Where were you helping Grace teach.
9 A. I don't know. It was probably -- I don't
10 even think I was really helping them. I think I was
11 helping them with a puzzle or something.
12 Q. With a puzzle.
13 A. Yeah.
14 Q. You said you were helping with homework or
15 something along those lines, right.
16 A. Well, I was helping with their schooling.
17 Q. With their schoolwork.
18 A. With their schooling.
19 Q. Please tell the jury what help you were
20 giving Grace as far as the children's schooling is
21 concerned.
22 A. It wasn't really, like, teaching, like you
23 wouldn't say, "This and this equals this," or
24 whatever. I was just like -- like Prince might have

25 been doing a drawing, and I was -- I was talking to
26 him about it, and I was saying, "Well, it's really
27 nice," and -- or like they might have been doing a
28 puzzle, and I would be helping them do it or 1880

1 something like that.

2 Q. Did you do that more than once.

3 A. I think I only did that once.

4 Q. Okay. And did you ask Grace if you could
5 help out before you did that.

6 A. Yes.

7 Q. And she said "yes".

8 A. Yes.

9 Q. Okay. How long was that session.

10 A. Well, I think their school is only like
11 three hours. But, I mean, I think I was only in
12 there for, like, 30 minutes to an hour.

13 Q. Okay. And was it your understanding that
14 Michael Jackson's children do their schooling at
15 Neverland.

16 A. I -- I -- I thought that wherever -- I
17 thought Grace would teach them, and then Grace would
18 go wherever they go, so I guess it would be
19 anywhere.

20 Q. And was this teaching going on in one of the
21 children's bedrooms.

22 A. No.

23 Q. Where was it going on.

24 A. It was upstairs, like in the little playroom
25 place.

26 Q. Well, there's a room upstairs which has
27 school materials, right.

28 A. Yes. 1881

1 Q. And what school materials have you seen in
2 that room.

3 A. I saw this little tiny chalkboard, and then
4 like these big floor piece puzzles, and -- I don't
5 really remember.

6 Q. But you've seen schoolbooks in there,
7 correct.

8 A. No, I don't think so.

9 Q. Well, that's where the children do their
10 schooling, as far as you know, right.

11 A. No. I said that I think whenever Grace
12 wants to teach them, that's where they do their
13 schoolwork.

14 Q. Okay. But you've seen blackboards, you've
15 seen school materials; correct.

16 A. I said I saw a little kid blackboard, but I

17 don't even think Grace was using it.
18 Q. Okay. But the room you're talking about is
19 not one of the children's bedrooms, correct.
20 A. No.
21 Q. Okay. Now, was that the first time you'd
22 been in that room.
23 A. No.
24 Q. When was the first time you went through
25 that room.
26 A. I mean, because the room wasn't really a
27 classroom. I mean, per se. They would use it as a
28 classroom. There would be stuff there. There would 1882

1 be -- to use as a classroom. There was like this
2 video game thing there. I think it was in that
3 room. And I think it might have been in the same
4 room as the big train thing.

5 Q. Was it your understanding that Michael's
6 children are tutored in the main house.

7 A. My understanding was that they are tutored,
8 but I don't know where.

9 Q. Okay. Okay. But you don't think it's in
10 that particular room you just described.

11 A. It probably was. I mean, I'm saying
12 wherever Grace wanted it, they could have it,
13 because it's not like she had a set classroom. It's
14 not like they're going to New York and they're going
15 to come back to Neverland to do their classing,
16 their schooling.

17 Q. Do you remember approximately when you
18 helped Grace tutor the children.

19 A. Probably after I came back from Miami.

20 Q. Okay. Wasn't before then.

21 A. No.

22 Q. Okay. Did you see the children tutored the
23 first time you went to Neverland.

24 A. No. That was the only time I ever saw them,
25 really.

26 Q. Now, is it true that you introduced Chris
27 Tucker to Michael Jackson.

28 A. Yes. 1883

1 Q. And approximately when was that.

2 A. Well, I think I gave -- it was either I gave
3 Chris Michael's phone number or -- well, I think I
4 gave Michael Chris's phone number, and then I called
5 Chris after a while and I asked him if Michael
6 called him yet, and then he said that he hadn't.
7 And so then I just gave him one of Michael's phone
8 numbers, or I gave him Evvy's phone number, I'm not

9 sure, just so he could do it himself; he can call
10 Michael.
11 Q. Do you recall ever being in Michael
12 Jackson's bedroom and hearing the alarm go off.
13 A. The little "dee-do, dee-do" thing.
14 Q. Yes.
15 A. Yes.
16 Q. Okay. Approximately when was that.
17 A. I don't know. After Miami. I mean, but
18 it's -- because -- I mean, when you're up in his
19 bedroom, like you can hear it, but it's not as good
20 as if you're downstairs, but you can still kind of
21 hear it.
22 Q. Okay. When you were initially interviewed
23 by the sheriffs, you were asked about what happened
24 after the Bashir documentary was on television,
25 right.
26 A. Yes.
27 Q. Now, when did you first hear about the
28 Bashir documentary that appeared on television. 1884

1 A. On the news and from Michael.
2 Q. Were you watching the news at home when you
3 first heard about it.
4 A. I didn't really know that it was the Bashir
5 documentary per se. But I knew that they were
6 talking about kids sleeping in his room or whatever.
7 Q. Well, you mentioned to the sheriffs about
8 people coming to your house and bothering you,
9 right.
10 A. Yes. I think so.
11 Q. And when did that first start.
12 A. I think after we came back from Neverland.
13 Q. Okay. You say after you came back from
14 Neverland. When was that.
15 A. I don't know. I'm not sure.
16 Q. Well, when you told the sheriffs that people
17 were coming to your house and bothering you, what
18 were you referring to.
19 A. Well, one time we caught one of Michael's
20 security guys that we thought he was standing in --
21 trying to stand behind a car, and then my stepdad
22 went out and was like -- asked him what he was
23 doing, and then we saw him run, and --
24 Q. Well, your mother had asked for security
25 because she said your family was being hassled,
26 didn't she.
27 A. I don't know if she asked him or -- who are
28 you saying that she asked. 1885

1 Q. You never heard your mother say she wanted
2 some security because your family was being hassled.

3 A. No, I knew that she didn't like it, but, I
4 mean, I don't know if she asked for security.

5 Q. Okay. Okay. We talked last week briefly
6 about all the conversations you had with Michael
7 Jackson at the hospital, right.

8 A. Yes.

9 Q. Remember that.

10 A. Yes.

11 Q. You had initially testified that there was
12 just one call, correct.

13 A. Well, it's like -- I don't -- I'm probably
14 sure I called him more than once, but, I mean, the
15 one I'm for sure of is the first time he called me
16 to go up to Neverland for the first time.

17 Q. You told the sheriffs there were times when
18 you would speak to Mr. Jackson on the phone for
19 hours, right.

20 A. Yes.

21 Q. And what did you used to talk about, if you
22 remember.

23 A. We would talk about, like, video games or
24 people I knew, and people he knew, or a CD he might
25 be trying to do or a song or something, or his life,
26 or my cancer, or Simpsons and Disney cartoons.

27 Q. And you had a lot of those discussions in
28 the hospital, right. 1886

1 A. Yes.

2 Q. And you had discussions after you got out of
3 the hospital, right.

4 A. We would have discussions, yes. Yes.

5 Q. And you would have discussions after you got
6 out of the hospital at home, right.

7 A. They were -- a majority of them, if not all
8 of them, were -- well, the majority of them were at
9 my grandmother's house.

10 Q. Okay. And would you call Mr. Jackson.

11 A. Sometimes I would call him, and he would
12 call me sometimes.

13 Q. Okay. And these conversations would last
14 sometimes a couple hours, right.

15 A. Yes.

16 Q. And you said you would talk about cancer.

17 You would talk about the Simpsons. You would talk
18 about video games, right.

19 A. Yes.

20 Q. Do you remember anything else you talked
21 about.

22 A. That's pretty much it right there.

23 Q. Do you recall your first trip to Neverland.

24 A. Yes.

25 Q. And how did you get there.

26 A. They had us pack all our bags, and then a
27 limousine came in the front of my grandmother's
28 house. And we were all surprised because we didn't 1887

1 I think we were going to go up in a limousine. Well,
2 I didn't think I was going to go up in a limousine.
3 I didn't know that we were. And I was really happy,
4 because that was the first time I'd ever been in a
5 limousine. And we threw all our bags in there and
6 then we went up to Neverland.

7 Q. Who told you you were going to be picked up to
8 go to Neverland.

9 A. Well, I believe my parents set it up. But I
10 don't know who really told me. I knew what day and
11 I knew Michael wanted me to go up, but, I mean, I
12 didn't really know, like, all the logistical stuff.

13 Q. When you were responding to Prosecutor
14 Sneddon's questions, do you remember discussing Jay
15 Leno.

16 A. Yes.

17 Q. Now, isn't it true that in none of your
18 interviews with the sheriffs and never when you
19 testified before the grand jury on two occasions did
20 you ever mention Jay Leno, correct.

21 A. Yes. Because I thought he didn't have
22 anything to do with this case.

23 Q. Did Prosecutor Sneddon tell you at some
24 point that Mr. Leno had something to do with the
25 case.

26 A. Yes. Well, he asked me about what I know
27 about Jay Leno and how I came about to have him in
28 my -- well, not really have him, but, I mean, how 1888

1 he -- I don't know how to say it. Like, he pretty
2 much just asked me what I know about Jay Leno.

3 Q. Did Prosecutor Sneddon tell you that I had
4 mentioned Jay Leno in this courtroom.

5 A. No.

6 Q. Did he tell you how the name Jay Leno had
7 come up in the case.

8 A. No.

9 Q. When did Prosecutor Sneddon first mention
10 the name Jay Leno to you.

11 A. Well, actually, it wasn't really --
12 Mr. Sneddon was there, but I believe it was -- I
13 don't remember who exactly asked me, but I remember
14 him being there, and I remember Mr. Sneddon shaking
15 his head, but I don't think it was Mr. Sneddon that

16 actually asked me.
17 Q. Do you know approximately when this meeting
18 took place.
19 A. Before I even -- maybe a day or two before I
20 first came to testify here.
21 Q. So it was after this trial had started,
22 right.
23 A. Yes.
24 Q. Okay. And did Mr. Sneddon call you on the
25 phone to discuss this.
26 A. No. I met with him.
27 Q. Okay. Did someone ask you to come meet with
28 Mr. Sneddon. 1889

1 A. Yes.
2 Q. Who was that.
3 A. I don't remember. I remember they told me
4 that I was going to, but I don't remember who
5 exactly.
6 Q. Do you remember where the meeting took
7 place.
8 A. In a house.
9 Q. Okay. Did Mr. Sneddon ask you to testify
10 that Jay Leno was your favorite comedian.
11 A. No.
12 Q. Okay. When did the idea that Jay Leno was
13 your favorite comedian come up in this case.
14 A. Well, Jay Leno was my favorite comedian, but
15 I don't really understand what --
16 Q. Do you remember calling Jay Leno on the
17 telephone.
18 A. I remember calling -- yeah, I remember
19 calling his phone.
20 Q. Do you remember speaking with Jay Leno on
21 the telephone.
22 A. No, I never spoke with Jay Leno.
23 Q. At any time.
24 A. No.
25 Q. Did you ever try to reach Jay Leno on the
26 telephone.
27 A. Yes.
28 Q. And who did you call, if you know. 1890

1 A. I called a phone number that I was given.
2 Q. Where did you get the phone number.
3 A. It was either Jamie Masada or Louise
4 Palanker.
5 Q. Did you dial the number.
6 A. Yes.
7 Q. Was your mother with you.

8 A. No.
9 Q. Was anybody in the background.
10 A. Well, when I called him, I'm pretty sure
11 that I was in the hospital, so either it could have
12 been my dad, or maybe a nurse that would come in to
13 do my vital signs or something.
14 Q. And you dialed the number, right.
15 A. Yes.
16 Q. And do you have any idea who answered the
17 phone.
18 A. Answering machine.
19 Q. And did you ever actually get Mr. Leno on
20 the phone.
21 A. No.
22 Q. So you deny you've ever spoken to him on the
23 phone, right.
24 A. I've never spoken to Jay Leno.
25 Q. Okay. You never mentioned Mr. Leno to
26 Psychologist Stanley Katz, right.
27 A. No, I don't think so.
28 Q. And you never mentioned Mr. Leno to 1891

1 Lieutenant Klapakis during any interview, correct.
2 A. No, I've never mentioned Jay Leno to
3 anybody. Except --
4 Q. I'm sorry.
5 A. Except for when they asked me what I know
6 about Jay Leno.
7 Q. To your knowledge, did anybody in your
8 family contact, or try to contact, Mr. Leno while
9 you were ill.
10 A. No. Because I was the only one with the
11 phone number.
12 Q. Did you ever give it to your mother.
13 A. No.
14 Q. Ever give it to your father.
15 A. No.
16 Q. Ever give it to Star.
17 A. No.
18 Q. Ever give it to your sister Davellin.
19 A. Her name is Davellin. But, no, I never gave
20 it to her.
21 Q. Okay. You left a message on his machine,
22 correct.
23 A. Yes.
24 Q. Did you ever get a call back from anyone
25 claiming they represented Mr. Leno.
26 A. No.
27 Q. All right. So what you're saying is if
28 anybody spoke to Mr. Leno and said they were you, it 1892

1 was certainly a false statement, right.
2 MR. SNEDDON: Object as argumentative, Your
3 Honor.
4 THE COURT: Sustained.
5 THE WITNESS: I never spoke to --
6 THE COURT: Just a moment.
7 Next question.
8 Q. BY MR. MESEREAU: Has Prosecutor Sneddon
9 ever discussed with you his conversation with Mr.
10 Leno.
11 MR. SNEDDON: Your Honor, object. Assumes
12 facts not in evidence.
13 THE COURT: Sustained. Assumes facts not in
14 evidence.
15 MR. MESEREAU: I'll rephrase it, Your Honor.
16 Q. Has Prosecutor Sneddon ever told you that he
17 had a conversation with Jay Leno about this case.
18 A. No.
19 Q. Has Prosecutor Sneddon ever told you that
20 any Santa Barbara sheriff had a conversation with
21 Jay Leno about this case.
22 A. No.
23 Q. Never told you that at all.
24 A. No.
25 Q. Okay. Did you hear the alarm in Michael
26 Jackson's bedroom more than once.
27 A. The little "dee-do" sound.
28 Q. The alarm. 1893

1 A. Yeah, like when Frank would come in or
2 something, you could hear it.
3 Q. You could hear the alarm go off.
4 A. Yeah.
5 Q. How many ringing sounds would you hear.
6 A. It would go like three times, "dee-do,
7 dee-do," like three times. And that's how many
8 ringing sounds it was.
9 Q. Have you ever discussed that alarm system
10 with your brother Star.
11 A. Probably. I don't know.
12 Q. Did you talk to your brother Star about what
13 he said about the alarm system in this courtroom.
14 A. No.
15 Q. Have you discussed with your brother Star
16 anything you said in this courtroom.
17 A. No.
18 Q. How many times do you think you entered
19 Michael Jackson's bedroom when Mr. Jackson wasn't
20 there.
21 A. I never went inside his room when he wasn't
22 there.

23 Q. To your knowledge, did your brother ever go
24 into his room when he wasn't there.
25 A. I don't think my brother went into his room
26 when he wasn't there.
27 Q. Okay. So you have no knowledge of him doing
28 that, correct. 1894

1 A. No.

2 Q. Okay. Prosecutor Sneddon asked you
3 questions about your father abusing you and your
4 mother, right.

5 A. I believe so.

6 Q. You always refer to David as your biological
7 father, correct.

8 A. Yes.

9 Q. Did someone ask you to use that term.

10 A. No.

11 Q. How did you start calling him "my biological
12 father".

13 A. Because I accepted my now father Jay Jackson
14 as my real father, because he's more of a father
15 than my real father ever was.

16 Q. Okay. You testified that Michael Jackson
17 and Frank showed you a computer and went to websites
18 with naked women, right.

19 A. Yes.

20 Q. And approximately when was that.

21 A. That was like on the first night that we
22 were inside his room that we were going to go to
23 sleep.

24 Q. And you said it was like an Apple computer;
25 is that right.

26 A. I'm not sure, because I don't remember -- I
27 think it was Frank's computer because -- it wouldn't
28 be mine, because I didn't set up the AOL account 1895

1 until, like, after I came back, so it was probably
2 Frank's computer.

3 Q. Was your computer an Apple computer.

4 A. Yes.

5 Q. Okay. You told the sheriffs that it was
6 either your computer or Frank's computer during one
7 of your interviews, right.

8 A. Yes, sir.

9 Q. Was Frank's computer an Apple computer.

10 A. I think it was probably a Sony computer.

11 Q. And you told the sheriffs that Frank started
12 looking at girls on those sites, right.

13 A. He started, like, typing up stuff, yes.

14 Q. Pardon me.

15 A. Yes.
16 Q. And did he ask you to join in.
17 A. No, well, he was -- he had it on his bed and
18 he set it up, and there were -- well, Frank was
19 typing in stuff and looking. And me, Michael and my
20 brother were there.
21 Q. Is that when you say that Michael Jackson
22 looked at a naked girl on the computer and said,
23 "Got milk."
24 A. Yes.
25 Q. Okay. Now, to your knowledge, did Michael
26 Jackson or Frank ever show you a website on a
27 computer like that at any other time.
28 A. I don't think so. 1896

1 Q. Was that the only time.
2 A. I believe so.
3 Q. Okay. And Frank's the one who initially was
4 pressing the buttons to look up the site, correct.
5 A. Yes.
6 Q. Okay. You also testified that at some point
7 Michael Jackson showed you some girlie magazines,
8 right.
9 A. Yes.
10 Q. And I believe you mentioned Hustler and
11 Playboy to the sheriffs, right.
12 A. Yes.
13 Q. Okay. You also testified that at some point
14 Michael Jackson pretended that he was having sex
15 with a female mannequin, right.
16 A. Yes.
17 Q. Okay. And you also told the jury that at
18 some point Michael Jackson mentioned the word
19 "clitoris," or "clitoris," right.
20 A. I don't think I did.
21 Q. Did you testify to that.
22 A. (Shakes head from side to side.)
23 Q. Ever tell the sheriffs that.
24 A. No.
25 Q. Okay. And your testimony to the jury is
26 that after Michael Jackson showed you women on
27 websites, after he showed you Hustler and Playboy,
28 which are girlie magazines, and after he pretended 1897

1 to have sex with a female mannequin, he then at some
2 point masturbated you; is that correct.
3 A. Yes.
4 Q. Is that what you told the sheriffs.
5 A. Yes, I told the sheriffs about that.
6 Q. Now, at some point, you went to the Hilton

7 Hotel to visit Michael Jackson, right.
8 A. Yes.
9 Q. And approximately when was that.
10 A. I was in my second round of chemotherapy.
11 Q. And you were with your father, right.
12 A. Yes.
13 Q. And you say that was around the time of your
14 second round of chemotherapy.
15 A. Yes.
16 Q. And who invited you to the Hilton Hotel.
17 A. It was either I called Michael or Michael
18 called me, and I asked him where he was. And then
19 he told me that he was in -- more like near --
20 around L.A. And then I asked him -- I think I asked
21 him -- yeah, I asked him if I could visit him.
22 Q. Okay.
23 A. And then he said it was okay. And so I went
24 up there and visited him for like two hours.
25 Q. And how long were you there.
26 A. Two hours.
27 Q. Okay. With your dad, right.
28 A. My dad was in another room. And then with 1898

1 me and Michael, we were in his bedroom with Prince
2 and Paris, and we were watching Aaron Carter's music
3 videos.
4 Q. And Prince and Paris were there the whole
5 time, right.
6 A. Yes.
7 Q. How did you get to the Hilton.
8 A. My dad drove me there.
9 Q. And he drove you in an SUV that Michael
10 Jackson had given your family, correct.
11 A. Yes.
12 Q. Do you know when Michael Jackson gave your
13 family that SUV.
14 A. I think it was like right after my second
15 round of chemotherapy, Gary came and -- I think he
16 was going to drive me up from Neverland right after
17 my second round. And then once I went in -- he
18 drove me up in the truck, and then I walked up to
19 the truck, and I was like, "Is this Michael's
20 truck." And he was like, "Yeah."
21 And I said, "Wow, my grandfather has one
22 that looks exactly like this one."
23 And Gary was like, "Well, this one's yours
24 now."
25 Q. That was Gary Hearn.
26 A. Yes.
27 Q. Okay. And just -- Gary Hearn was an
28 employee of Mr. Jackson's, correct. 1899

1 A. Yes.
2 Q. And you're telling the jury that Gary Hearn
3 told you that your family owned the SUV, right.
4 A. He told me that Michael gave it to us.
5 Q. Okay. And did he leave it at your house, to
6 your knowledge.
7 A. No, we were coming -- it was in the garage
8 of the hospital, and I went in there, and there's
9 like a little bow in the center console between the
10 two seats and stuff.
11 Q. You complained to the sheriffs that someone
12 had taken that truck back, right.
13 A. Yes. I said I believe so.
14 Q. You complained to the sheriffs that your
15 family thought it was their truck, and at some point
16 someone representing Mr. Jackson took the truck back
17 and never returned it to you, right.
18 A. Um, I think it was that we had the truck and
19 somebody crashed into it or something. And then we
20 had asked Michael if they can fix it and give it
21 back to us. And then we gave it -- we -- they had
22 it, they got the truck so that they can fix it and
23 give it back to us, and they never gave it back to
24 us.
25 Q. Who crashed the truck.
26 A. I don't think it was someone -- I think
27 someone crashed into it.
28 Q. Do you know who was driving it at the time. 1900

1 A. I think it might have been parked. I'm not
2 sure. I don't really know how it happened exactly.
3 Q. It might have been who.
4 A. It might have been parked while it went --
5 and someone, like, ran into it or something, because
6 I don't really remember how exactly --
7 Q. Yes, but somebody ran into it while your
8 family had possession of it, right.
9 A. Yes, well, we owned it.
10 Q. When you owned it, right.
11 A. Yes.
12 Q. And at some point, someone in your family
13 asked if Mr. Jackson would pay to repair it,
14 correct.
15 A. I'm pretty sure. I mean --
16 Q. Pardon me.
17 A. I'm pretty sure.
18 Q. All right. Let me just make sure I
19 understand. You're pretty sure that someone in your
20 family asked if Mr. Jackson would pay to repair the
21 SUV that you claimed he gave your family, right.

22 A. Yeah. Because, I mean, it had to have been
23 like that, because the guy came to fix it.
24 Q. And you did complain to the sheriffs that
25 the truck was never returned to your family,
26 correct.
27 A. Yes.
28 Q. Because you believed that your family owned 1901

1 the truck at that point, right.
2 A. Because Michael said he -- well, Gary said
3 that Michael said he gave it to me. And then I
4 called Michael later to thank him, and he said,
5 "Yeah, it's your truck now."
6 Q. Okay. People in your family -- well, I
7 shouldn't say that. You were personally upset about
8 that, right.
9 MR. SNEDDON: Excuse me, vague as to what
10 "that" is.
11 MR. MESEREAU: I'll rephrase it.
12 Q. You were upset that your family never got
13 that truck back, correct.
14 A. I was more sad because then we didn't have a
15 vehicle to use to go anywhere.
16 Q. Okay. Do you recall ever asking Chris
17 Tucker for a vehicle.
18 A. No.
19 Q. Do you know of any member of your family
20 ever doing that.
21 A. No.
22 Q. Okay. Never heard of anything like that.
23 A. I remember Chris gave us -- was going to
24 give us a vehicle.
25 Q. And what happened.
26 A. It never was able to -- I mean, someone lost
27 the key and something like that, and that was the
28 only key, and then -- and then I think all this 1902

1 stuff started.
2 Q. So you never got a vehicle from Chris
3 Tucker, right.
4 A. No.
5 Q. Were you upset about that.
6 A. Well, I mean, I was kind of sad, but I
7 mean -- yeah, I mean, it's like he was going to give
8 it up, that would be nice, so I don't really have
9 that much of a right to be angry.
10 Q. Okay. Now, you complained to the Santa
11 Barbara Sheriffs that, "After I was done with my
12 cancer stuff," you never saw Michael again, right.
13 A. No, not until the Martin Bashir thing.

14 Q. Okay. And you wanted to see him after you
15 were in remission, correct.
16 A. Yes.
17 Q. You wanted to visit Neverland after you were
18 in remission, right.
19 A. Yes.
20 Q. And you felt in some way that Michael had
21 cut off the friendship, right.
22 A. Yes.
23 Q. You felt he had abandoned you, right.
24 A. Yes.
25 Q. And you felt he had abandoned your family,
26 right.
27 A. Yes.
28 Q. Now, at some point you told the sheriffs 1903

1 that Michael had given your family a Bronco,
2 correct.
3 A. I believe -- I'm pretty sure that the GMC
4 was called Bronco.
5 Q. Are you sure about that.
6 A. I'm not exactly sure what kind of truck it
7 was.
8 Q. You also complained to the Santa Barbara
9 Sheriffs that your computer had gotten messed up,
10 right.
11 A. I think I did. The battery stopped working.
12 It wasn't -- the computer just wouldn't turn on. It
13 would always stay black.
14 Q. This was the computer that Michael Jackson
15 had given you, right.
16 A. Yes.
17 Q. And at some point you asked to have Michael
18 Jackson fix the computer, right.
19 A. Well, I told my mom about it. And then my
20 mom said, well, we could probably call Evvy and they
21 can help us fix it.
22 And then I called Evvy and asked her if they
23 can fix it for me. And Evvy said yes. And then so
24 we mailed it to her or dropped it off or something
25 like that, and then I never got it back.
26 Q. Well, actually, your mother asked Evvy if
27 Michael Jackson would fix the computer, right.
28 A. I don't know who exactly asked. 1904

1 Q. Well, you told the sheriffs that your mother
2 had asked, didn't you.
3 A. I don't know.
4 Q. Would it refresh your recollection if I just
5 show you a page of the transcript of your interview.

6 A. Yes.
7 MR. MESEREAU: Okay. May I approach, Your
8 Honor.
9 THE COURT: Yes.
10 Q. BY MR. MESEREAU: Have you had a chance to
11 look at that page --
12 A. Yes.
13 Q. -- of your police interview.
14 Does it refresh your recollection about what
15 you told Santa Barbara Sheriffs.
16 A. A little bit. I mean --
17 Q. You told him that your mother asked to have
18 the computer repaired, right.
19 A. Yes. But as I told you, I'm not -- as of
20 right now -- I mean, that interview took place a
21 while ago. I mean, I'm not sure who exactly called.
22 But in the transcript it says that, so that's
23 probably what happened.
24 Q. Okay. Is it your belief that your mother
25 called Evvy.
26 A. I believe so.
27 Q. Your mother used to call Evvy a fair amount,
28 didn't she. 1905

1 A. I don't know.
2 Q. Did you ever see your mother call Evvy.
3 A. Maybe once or twice.
4 Q. Not -- no --
5 A. Maybe -- I'm pretty sure I saw her call for
6 the computer, because I asked her. And I'm not sure
7 exactly how many times she called Evvy.
8 Q. And you complained to the Santa Barbara
9 Sheriffs that you never got the computer back,
10 right.
11 A. Yeah, I told them that I didn't get the
12 computer back.
13 Q. Did you used to communicate with Evvy by
14 e-mail.
15 A. I don't know. I don't think I did.
16 Q. Okay. Are you sure about that.
17 A. No.
18 Q. Okay. Did you know how to use e-mail at
19 that point.
20 A. A little bit. I mean, it was kind of hard.
21 Well, it wasn't really hard. I just didn't really
22 understand it at first, and then I got the hang of
23 it, but --
24 Q. You indicated at the Hilton you watched
25 music videos with Mr. Jackson, right.
26 A. Yes.
27 Q. And do you know why Mr. Jackson was at the
28 Hilton. 1906

1 A. I think he was doing some recording thing.
2 Well, yeah, he told me that he was going to do some
3 recording in Los Angeles, or something like that.
4 Q. And at some point you complained to the
5 sheriffs that Mr. Jackson had changed his phone
6 numbers after you visited the Hilton, right.
7 A. Well, that was the only phone number I
8 left -- or I called -- well, I'm not sure. Because
9 the only phone number that never changed was Evvy's
10 phone number. And I would call her and I would ask
11 her sometimes where Michael was or something.
12 And then -- and I had the phone number to
13 his hotel, so I think I called him at his hotel and
14 asked him if I could go visit him. I think it was
15 around -- I'm not sure when exactly.
16 Q. When did you first get upset about your
17 phone numbers for Michael Jackson not working.
18 A. Maybe around the third or fourth
19 chemotherapy round I called his numbers and it would
20 be, like, "This phone number is no longer in
21 service." Or sometimes it would just ring and it
22 wouldn't never -- no one would ever pick up or
23 something like that.
24 Q. This was after your cancer was in remission.
25 A. No, this was around the third or fourth
26 cancer -- round of chemotherapy.
27 Q. Suddenly his phone numbers didn't work,
28 right. 1907

1 A. Yes.
2 Q. And did you try to get ahold of phone
3 numbers that would work.
4 A. I don't know.
5 Q. Well, you've indicated that you were upset
6 that the phone numbers you had for Mr. Jackson at
7 some point didn't work, right.
8 A. Yes.
9 Q. And the phone numbers you had for Mr.
10 Jackson began to not work after it appeared that
11 your cancer was in remission, correct.
12 A. No, I said they stopped working after my
13 third or fourth chemotherapy round.
14 Q. Okay. Before that, could you easily call
15 him.
16 A. Yes.
17 Q. And before that, did you often call him.
18 A. Yes. And he would call me and stuff. We
19 would talk -- we talked a lot more before then.
20 Q. In fact, you called him at the Universal --

21 Hilton Universal the day you visited, right.
22 A. I believe so. I'm not too sure how it came
23 about.
24 Q. Who did you complain to about your phone
25 numbers to Mr. Jackson not working.
26 A. I didn't complain to anybody.
27 Q. Ever mention it to your mother.
28 A. I'm pretty sure I did. 1908

1 Q. Ever mention it to your brother and sister.
2 A. I'm pretty sure I did -- well, the first
3 person I told was my biological father, and then --
4 because he was usually the one always with me like
5 when we would go up to Neverland or go with me to --
6 with Chris or something.
7 Q. So you complained to your biological father
8 David that around the time of your third
9 chemotherapy treatment the phone numbers you had for
10 Michael Jackson were not working, right.
11 MR. SNEDDON: Your Honor, I'm going to
12 object to the question, the use of the first part of
13 it, because I believe that's not his testimony, so
14 it assumes facts not in evidence.
15 THE COURT: Overruled.
16 You may answer. Do you want the question
17 read back.
18 THE WITNESS: Yes.
19 (Record read.)
20 THE WITNESS: I didn't really complain.
21 I mean, I was in the hospital, and -- I was either
22 in the hospital or at my grandmother's house or
23 something. And I told my dad that -- I told my
24 biological father that they weren't working anymore.
25 Q. BY MR. MESEREAU: Well, when you first
26 started talking to Michael Jackson in the hospital,
27 you talked to him about your cancer, right.
28 A. Yes. 1909

1 Q. And he used to talk to you about ways to
2 deal with it, right.
3 A. Sometimes he would, yes.
4 Q. And he tried to encourage you to believe in
5 yourself and you could heal, correct.
6 A. Yes. He would tell me that like -- that --
7 to -- like this one time he told me to eat up cancer
8 cells like a Pac Man. Something like that.
9 Q. And what he told you was to sort of
10 visualize in your mind Pac Man eating up bad cancer
11 cells, right.
12 A. Yes.

13 Q. Did you do that.
14 A. Not really.
15 Q. Did you ever try to visualize.
16 A. Well, yeah, I think I did once, but I
17 mean --
18 Q. Now, when you had your third chemotherapy
19 treatment, you were getting encouraging signs from
20 the doctor, right, about beating cancer.
21 A. Yes.
22 Q. And you were being told that it looked like
23 you might beat this thing, right.
24 A. I didn't really get told that until my fifth
25 chemotherapy round where they had that CT scan.
26 Q. But didn't you complain to the Santa Barbara
27 Sheriffs that after your cancer was over, Michael
28 stopped communicating with you. 1910

1 A. It wasn't after my cancer. It was toward
2 the beginning of my third chemotherapy round.
3 Q. You told them, "After I was done with my
4 cancer stuff," you couldn't call Michael anymore,
5 right.
6 A. I couldn't call Michael either at that
7 period, or the period when I had cancer.
8 Q. Okay. When you were undergoing
9 chemotherapy, you visited Neverland with Chris
10 Tucker on a couple of occasions, correct.
11 A. I don't know if it was during my cancer. I
12 think it was -- I visited him after. I don't know.
13 Q. Approximately when was that, if you know.
14 A. I went up there with his birthday for
15 Dustin, so whenever his birthday is.
16 Q. I'm sorry, I can't hear you.
17 A. I went up there whenever his birthday was,
18 whenever Dustin's birthday was. But I don't know
19 what came first, either the Martin Bashir thing or
20 Dustin's birthday. I'm not sure.
21 Q. And Michael Jackson wasn't there, right.
22 A. No.
23 Q. Do you know how that trip got arranged.
24 A. Which trip.
25 Q. The trip with Chris Tucker to Neverland when
26 Michael Jackson wasn't even there.
27 A. Well, I'm not sure if Dustin -- well, if it
28 was Dustin's birthday or Chris's -- or, I mean, the 1911

1 Martin Bashir thing. So I'm not -- I don't know how
2 it got arranged that we'd go up there. I mean, I
3 don't -- like -- I don't really know whether it was
4 like a limousine or something.

5 Q. But you don't know who set that up, right.
6 A. Not exactly. Well, the -- I think the
7 Martin Bashir thing I went up there with Chris.
8 And then with the Dustin thing, I went up
9 there in Chris's bus with a bunch of other people,
10 his family and stuff.
11 Q. Are you telling the jury that when you did
12 the Martin Bashir filming, Chris Tucker was with
13 you.
14 A. Um, I'm -- I don't know whether he drove me
15 up there or not. I -- because I'm not too sure how,
16 like, all this stuff -- how I got up there. But I
17 know I went up there with Chris for Dustin's
18 birthday.
19 Q. Do you remember Chris being there when you
20 were filmed for the Bashir documentary.
21 A. I don't know, because I think I might have
22 went up there with Chris, because I remember going
23 up there with Chris one time when we were riding
24 horses, and then he was wearing like this -- this
25 thing that like only like sheiks would wear, and he
26 was joking around, and we were all riding horses and
27 stuff. And I don't know -- I think it might have
28 been around the time that I was -- that Martin -- 1912

1 that the Martin Bashir thing got filmed.
2 Q. To your knowledge, Chris Tucker wasn't in
3 the Bashir documentary, right.
4 A. No.
5 Q. Did you leave Neverland after that visit
6 with Chris.
7 A. After -- well --
8 MR. SNEDDON: Excuse me, I'm going to object
9 as vague as to "that visit." We've discussed a
10 couple of them.
11 MR. MESEREAU: I'll rephrase it.
12 THE COURT: All right.
13 Q. BY MR. MESEREAU: When you were at Neverland
14 to film what became part of the Bashir documentary,
15 at some point you went home, right.
16 A. Yes.
17 Q. And did you go home with Chris Tucker.
18 A. No. We stood there and we went swimming and
19 stuff.
20 Q. What was the state of your cancer when you
21 filmed what became part of the Bashir documentary.
22 A. The Martin Bashir interview thing.
23 Q. Yes.
24 A. I was in remission.
25 Q. And for how long had you been in remission
26 at that point.
27 A. I'm not sure when it was filmed. So I'm not

28 sure how long. 1913

1 Q. Do you know if it was a number of months.

2 A. Yeah. Definitely.

3 Q. At that point, could you reach Michael

4 Jackson by telephone if you wanted to.

5 A. No, after the Martin Bashir thing, he didn't

6 give me any phone numbers, because he left, like,

7 either the same day or the day after the Martin

8 Bashir interview, and I didn't really get any other

9 phone numbers.

10 Q. But your phone numbers for Michael Jackson

11 stopped working before the Bashir documentary,

12 didn't they.

13 A. Yes. Michael called me to go up to

14 Neverland. He said that he was trying to find me or

15 something like that to go -- for him to talk to me,

16 and then he wanted me to go up to the Martin

17 Bashir -- well, he didn't tell me that. He told me

18 he wanted me to go up to his ranch and visit him.

19 Q. You hadn't been able to call Michael Jackson

20 by phone for many, many months before you were

21 filmed in the Bashir documentary, right.

22 A. No, I was not able -- well, I didn't have a

23 phone number.

24 Q. Okay. Now, in the year 2001, you don't

25 recall ever going to Neverland, right.

26 A. No.

27 Q. You started going in the year 2000, right.

28 A. Yes. 1914

1 Q. You didn't go there in the year 2001, right.

2 A. I don't think I did.

3 Q. And at some point you heard from Michael

4 Jackson and went there for the Bashir filming,

5 right.

6 A. Yes.

7 Q. Now, you visited Neverland a number of times

8 in the year 2000 with your biological father,

9 correct.

10 A. Yes.

11 Q. And do you remember if Michael Jackson was

12 there during those visits.

13 A. I think he was there for the -- I think he

14 was there once. The first time I went there he was

15 there. And then I think the second time I went

16 there, he was there and then he had to leave.

17 Q. When your father was at Neverland with you,

18 did you ever stay in Michael Jackson's room.

19 A. No, I only stood on the first night, and

20 then the rest of the nights I just stood in, like,
21 the units and stuff.

22 Q. And when you say you stayed there the first
23 night, is that the night you described where Michael
24 Jackson and Frank slept on the floor, and you and
25 your brother slept on the bed. Is that what you're
26 talking about.

27 A. Yes, I believe so.

28 Q. And is it your testimony that that first 1915

1 visit, you had dinner in the main house with your
2 family and Michael Jackson.

3 A. Yes.

4 Q. And during that dinner, was there a
5 discussion about whether or not you and Star could
6 sleep in Michael Jackson's room.

7 A. The first day.

8 Q. Yes.

9 A. Yeah. Like, we were in Michael's office and
10 then we were talking about stuff, and then Michael
11 told me to ask if I could go sleep in his room so we
12 can watch, like, movies and stuff.

13 Q. Was there a discussion at the dinner table
14 that evening with your parents and Michael Jackson
15 about whether or not you could stay in his room.

16 A. Yes. Michael told me to ask my parents in
17 front of him and my parents.

18 Q. Did you ask your parents in front of Mr.
19 Jackson at the dinner table that evening.

20 A. Yes.

21 Q. Did your parents both approve you and your
22 brother staying in Michael Jackson's room.

23 A. Yes.

24 Q. And that's the night you say Michael and
25 Frank slept on the floor, right.

26 A. Yes.

27 Q. Did you ever ask either of your parents
28 after that whether you could stay in Michael 1916

1 Jackson's room.

2 A. I don't think so.

3 Q. You don't think you ever asked them that
4 question again.

5 A. I think it was like we only stood there that
6 one night, and then after that, we stood in our
7 units or something. Because I think that's the only
8 night I slept in his room, the first night.

9 Q. Okay. You said after that, you had stayed
10 in the guest units.

11 A. Yes.

12 Q. And are the guest units where your mother
13 was staying.
14 A. Well, there's a lot of guest units, so I
15 think me and my brother had a room. Me and my
16 brother and my sister had a room, and my mom and my
17 dad had another room.
18 Q. Okay. And you and your brother would stay
19 in those guest units, right.
20 A. Yes.
21 Q. And approximately how many of those trips to
22 Neverland do you think you and your brother stayed
23 in the guest units.
24 A. After that first night we would stay in
25 there every night we would go there, every time, or
26 sometimes we would go to the train house and sleep
27 up there.
28 Q. You'd sleep in the train house. 1917

1 A. Yeah.
2 Q. Please tell the jury where the train house
3 is.
4 A. It's on top of a -- like you come -- like
5 the guest units are right here, and you go up the
6 side of this hill, and then up there there's like
7 this train station. And then you can sleep in
8 there, because there's, like, couches, and you can
9 roll out a bed, and then there's a T.V. there and
10 stuff. It was pretty cool.
11 Q. How many times do you think you and your
12 brother stayed in the train house.
13 A. A few nights, I guess.
14 Q. When you visited Neverland with Chris
15 Tucker, did you stay in the train house.
16 A. Yeah. I think so. I think that's the time
17 that we stood in the train house.
18 Q. Do you know where Chris Tucker stayed when
19 you visited Neverland with Chris Tucker.
20 A. No.
21 Q. Did you ever go into his room.
22 A. I think we might have. I don't know. I
23 mean, I don't know where he stood right as of now.
24 I mean, I don't remember, but I don't -- I think we
25 went into his room to, like, say, "Let's go do
26 this," or something like that.
27 Q. Let me ask you this: After the first night
28 your family was at Neverland, when do you next 1918

1 remember your mother visiting Neverland.
2 A. Not until after we came back from Miami.
3 Q. So you don't think your mother ever visited

4 Neverland between your first visit in the year 2000
5 and right after the Miami trip.
6 A. Yes. I don't think she did.
7 Q. Okay. You don't recall her being there at
8 all.
9 A. No.
10 Q. Okay. And you recall your father being
11 there once or twice.
12 A. No, I recall my father being there every
13 time I went up there.
14 Q. And how many times was that.
15 A. When I had cancer, it was -- well, he went
16 up there every time that I had cancer. And he
17 was -- I'm not sure how many times I stood there.
18 That was -- because I think I stopped going out
19 there after my fourth chemotherapy round. And so it
20 was -- probably we went there, like, four or five
21 times, or something like that, yeah.
22 Q. At some point you learned about the Bashir
23 documentary by watching television, right.
24 A. Well, I didn't really know it was the Bashir
25 documentary until I -- we started talking about it
26 more with Chris, and stuff like that.
27 And I just remember watching the news and
28 they were talking about kids and Michael, but I 1919

1 didn't really know they were talking about the
2 Martin Bashir documentary.
3 Q. Well, you were watching CNN, correct.
4 A. I think I was. I don't know.
5 Q. And at some point you saw a reference to
6 yourself being in the Bashir documentary, right. Is
7 that true.
8 A. I didn't know it was the Bashir documentary,
9 but they said -- I personally thought it was some
10 guy that was saying stuff about Michael. And they
11 were talking -- I thought they mentioned my name
12 when they were talking about Michael. But I didn't
13 know it was the Martin Bashir documentary until,
14 like, we started talking to Chris and stuff.
15 Q. But you told the Santa Barbara Sheriffs your
16 name was mentioned a lot, correct.
17 A. No, I think I only told them my name was
18 mentioned maybe -- I don't think "a lot." But, I
19 mean, I did think my name was mentioned.
20 Q. You told the sheriffs, "Because on, like,
21 CNN and stuff, they started saying, like, Gavin --
22 Gavin this and Gavin that, right.
23 A. I don't remember. I mean, I guess I did,
24 because it's in the transcript.
25 Q. Were they really mentioning your name on the
26 newscasts.

27 A. Yes.

28 Q. How many times did you hear your name 1920

1 mentioned on the newscasts.

2 A. Three or four times. I don't know.

3 Q. Did you -- were you watching that with your
4 mom.

5 A. Yes. Our whole family was watching it.

6 Q. And generally speaking, would you say your
7 family was upset.

8 A. Yes.

9 Q. Okay. And do you recall your mother ever
10 calling up Michael Jackson to talk about it.

11 A. No. I remember Michael calling us.

12 Q. Do you recall your mother ever discussing
13 the fact that you had legal rights regarding that
14 show.

15 A. No. I mean -- the Martin Bashir thing.

16 Q. Yes.

17 A. No.

18 Q. Do you recall your mother ever discussing
19 her claim that she never gave permission for you to
20 be on a show.

21 A. Oh, yes. I remember that.

22 Q. Okay. And when is the first time you heard
23 your mother complain about her not giving proper
24 permission for you to be on the show.

25 A. I don't remember.

26 Q. Do you recall ever going to a lawyer with
27 your mother to discuss your legal rights in that
28 regard. 1921

1 A. Hmm, I'm not sure.

2 Q. Do you remember discussing that with
3 Attorney Bill Dickerman.

4 A. Oh, yeah, yeah. We went to The Laugh
5 Factory and we talked to Bill. My mom was talking
6 to him. I mean, I was, like, playing around or
7 something. I was -- like, with the microphone.

8 Q. And the discussion concerned, among other
9 things, the fact that you had legal rights in that
10 documentary, right.

11 A. I guess. I mean, I wasn't really paying
12 attention. I was kind of bored.

13 Q. Okay. Do you recall -- do you remember the
14 rebuttal video.

15 A. Yes.

16 Q. Do you remember you went to Hamid's home to
17 film the rebuttal video.

18 A. Yes.

19 Q. Do you remember discussions before you
20 filmed that video about whether or not your mother
21 was going to sign a release.

22 A. Not too sure.

23 Q. Do you remember anything like that.

24 A. No.

25 Q. You claim that Michael Jackson called you on
26 the phone and said there's going to be a press
27 conference in Florida, right.

28 A. Yes. 1922

1 Q. Did you want to be in a press conference.

2 A. Yeah. I wanted to, like, say that Michael
3 was a good guy and stuff.

4 Q. And you were disappointed when you got to
5 Florida and no press conference took place, right.

6 A. I guess. But, I mean, I was still kind of
7 having fun, so it wasn't that big of a deal to me.

8 Q. I couldn't hear what you said.

9 A. I was still having fun, so it wasn't really
10 that big of a deal to me.

11 Q. Well, you thought that you were going to
12 Florida to appear in a press conference with Michael
13 Jackson, correct.

14 A. Yes.

15 Q. You flew on Chris Tucker's plane to Florida,
16 right.

17 A. Yes.

18 Q. You stayed at a luxury hotel, right.

19 A. Yes.

20 Q. You came back a couple of days later, right.

21 A. We went right to Neverland after we came
22 back.

23 Q. And there never was a press conference that
24 you appeared at in Florida, right.

25 A. No.

26 Q. And that upset you, didn't it.

27 A. Um, as I said, not really. Because it
28 wasn't -- I mean, I thought we were. I mean -- and 1923

1 then he said that we're not going to. Well, he
2 didn't really say that we're not going to. I mean,
3 it never really happened, so it's like -- I was
4 like, "Okay, whatever." I mean -- and I was still
5 having fun playing around and stuff, playing video
6 games and stuff.

7 Q. When you were in Miami, you stayed with your
8 mom in a room, right.

9 A. Yes.

10 Q. That was at the Turnberry Hotel, right.

11 A. Yes.
12 Q. That was a floor below Michael Jackson's
13 suite, true.
14 A. I don't know.
15 Q. It wasn't a floor below.
16 A. I said that I don't know.
17 Q. Do you remember your mother ever complaining
18 that she wanted to be in Michael Jackson's suite.
19 A. No.
20 Q. Never heard anything like that.
21 A. No.
22 Q. And you say you never stayed overnight in
23 Mr. Jackson's room at the Turnberry in Miami, right.
24 A. No. I never stood in his room.
25 Q. Do you remember telling the Santa Barbara
26 Sheriffs that Michael Jackson first touched you
27 inappropriately during your last days at Neverland.
28 A. Yes. 1924

1 Q. Were you telling the truth.
2 A. Yes.
3 Q. This was shortly before Vinnie drove your
4 family to your grandparents', right.
5 A. Not -- well, it was like a week or --
6 probably two weeks before Vinnie drove us back.
7 Q. Well, you said to the sheriffs it was during
8 the last days at Neverland, right.
9 A. Well, days equals -- seven days equals a
10 week, so it could be days. So, I mean, it was more
11 like a week or two.
12 Q. We'll get to that.
13 Did you discuss over the weekend with
14 Prosecutor Sneddon exactly when you say this
15 inappropriate touching took place.
16 A. No. Not over this -- no.
17 Q. Did you have any discussion at all with the
18 prosecutors last night about when you say the
19 inappropriate touching took place.
20 A. No.
21 Q. Okay. Now, when you claim you were
22 masturbated, were you wearing pajamas.
23 A. Yes, I was wearing Michael's pajamas.
24 Q. Okay. Now, clearly during the last days at
25 Neverland, you and your family, from what you say,
26 wanted to leave, right.
27 A. Well, my mom always wanted to leave. I
28 wanted to stay, because I was having lots of fun, 1925

1 but my mom was always really worried.
2 Q. Well, at some point you say you escaped from

3 Neverland, right.
4 A. Yes.
5 Q. You've told the jury you escaped a couple of
6 times before the final escape, which was when you
7 left for good --
8 A. Yes.
9 Q. -- right.
10 A. Yes.
11 Q. So what you are telling this jury is that
12 after a couple of escapes, and following your return
13 from those escapes, you claim you were
14 inappropriately touched. That's what you're saying,
15 right.
16 MR. SNEDDON: Object as argumentative, Your
17 Honor.
18 THE COURT: Overruled.
19 You may answer. Do you want the question
20 read back.
21 THE WITNESS: Yes.
22 (Record read.)
23 THE WITNESS: Yes.
24 Q. BY MR. MESEREAU: Now, you told the sheriffs
25 that after Miami, you slept in Michael Jackson's
26 room every night, right.
27 A. I slept in his room every night that Michael
28 was there. 1926

1 Q. And this would include visits when your
2 mother was staying at Neverland, correct.
3 A. Yes.
4 Q. Are you telling the jury that you never
5 discussed your staying in Michael's room with your
6 mother.
7 A. Not really, because my mom was always in her
8 unit. She was never outside or with us really. I
9 mean, so we would just go into Michael's room.
10 Q. Are you telling the jury that your mother
11 never asked you, during any of those visits, "Where
12 are you spending the night."
13 A. Not really, because I think she thought we
14 were sleeping in our unit. I mean, because she was
15 always in her unit.
16 Q. Are you telling the jury your mother never
17 left her unit at any time after the Miami trip.
18 A. She probably left a few times, but, I mean,
19 mainly she was always in her unit.
20 Q. And how many nights do you think you spent
21 in Michael Jackson's room after the Miami trip.
22 A. I'm not sure because, I mean, every time
23 that Michael was there, me and my brother would be
24 in his room.
25 Q. And you never had one discussion with your

26 mom at any time after Miami about where you were
27 staying at night.
28 A. I might have. I don't think I did. I'm 1927

1 pretty sure that I didn't, because she was never
2 really involved in what we were doing at Neverland.

3 Q. And you've told the jury that you and your
4 brother were drinking every single night, right.

5 A. Every night that Michael was there.

6 Q. You were drinking alcohol every single night
7 that Michael was there; is that what you're saying.

8 A. Yes.

9 Q. Okay. How about the nights that Michael
10 wasn't there.

11 A. We wouldn't drink. I mean --

12 Q. Well, you and your brother were caught by
13 employees at Neverland drinking when Michael wasn't
14 there, weren't you.

15 A. No.

16 Q. Never happened.

17 A. No.

18 Q. No one ever walked in the wine cellar at
19 Neverland and caught you and your brother drinking
20 when Michael wasn't there.

21 A. No.

22 Q. Did you know where the key was to the wine
23 cellar.

24 A. No.

25 Q. To your knowledge, did your brother know
26 where the key was to the wine cellar.

27 A. I don't think he ever knew. He was always
28 with me everywhere we went. 1928

1 Q. Did you ever learn where the key was to the
2 wine cellar.

3 A. No.

4 Q. To this day, you don't know.

5 A. To this day, I don't know.

6 Q. Never discussed it with your brother.

7 A. No.

8 Q. Okay. Now, correct me if I'm wrong, you've
9 told the jury -- excuse me, let me rephrase that.

10 You've told the sheriffs that Michael
11 Jackson would give you and your brother Bacardi,
12 right.

13 A. That was one of the things he gave us, yes.

14 Q. That was rum, right.

15 A. Yes.

16 Q. And you also said he'd give you Skyy Vodka,
17 right.

18 A. Yes.
19 Q. Jim Beam, which was bourbon, right.
20 A. I don't know what it is, but, yes.
21 Q. And red and white wine, right.
22 A. Yes.
23 Q. Did you drink all this stuff at once.
24 A. No, it was over the whole period of time
25 that we were over there.
26 Q. Okay. But never once did you taste any of
27 this stuff when Michael wasn't there.
28 A. No. 1929

1 Q. Okay. Never took any alcohol out of the
2 refrigerator in the kitchen, right.
3 A. No.
4 Q. Never got caught taking alcohol out of the
5 refrigerator in the kitchen, right.
6 A. I never took any alcohol out of the
7 refrigerator in the kitchen.
8 Q. To your knowledge, was your brother ever
9 caught taking alcohol out of the refrigerator in the
10 kitchen.
11 A. I was always with him during the day, so no,
12 he didn't.
13 Q. Okay. Now, you told the sheriffs at some
14 point your mother was scared and wanted to leave
15 Neverland, right.
16 A. My mom was scared, like, the whole time.
17 Q. Did you discuss your mother being scared
18 with your mother at Neverland.
19 A. Yes.
20 Q. Did you have talks with her about it.
21 A. Yes.
22 Q. And at no time during any of those
23 discussions did where you and Star were sleeping at
24 night come up.
25 MR. SNEDDON: Object as asked and answered,
26 Your Honor.
27 THE COURT: Sustained.
28 Q. BY MR. MESEREAU: You talked about a black 1930

1 suitcase. Do you remember that.
2 A. Yes.
3 Q. When did you first see the black suitcase.
4 A. The same night that we came back from Miami.
5 Q. And this is right after the Miami trip.
6 A. Yes.
7 Q. The first night you're back.
8 A. Yes.
9 Q. And when did you first see it.

10 A. In Michael's, like, bathroom room, and,
11 like, he had all this stuff. Like he had, like, a
12 sink and a bathtub and a mirror and stuff.
13 Q. Before I explore that subject, you've talked
14 to the jury about Michael Jackson giving you a watch
15 that you claim he said was worth \$75,000, right.
16 A. Yes.
17 Q. And that's the watch you claim that others
18 wanted to get back from you, right.
19 A. Oh, yes. Like the -- I think Frank wanted
20 me to give it back or something like that.
21 Q. So after the Miami trip, you had the watch,
22 right.
23 A. Yes.
24 Q. You claimed that Mr. Jackson told you it was
25 worth \$75,000, right.
26 A. Yes.
27 Q. Were you wearing it.
28 A. Yes. I believe so, yes. 1931

1 Q. And did Frank or someone else notice the
2 watch, to your knowledge.
3 A. Yeah. Yes.
4 Q. Did you discuss the watch with Frank.
5 A. Not really in -- I think Chris -- I mean,
6 Frank wanted me to give it back. And then I told
7 Michael, and Michael was like, "No, no, that's your
8 watch. I gave it to you."
9 Q. And did you have a discussion with Frank
10 about whether you should return it.
11 A. Frank, I think, wanted me to return it, and
12 Michael told me not to.
13 Q. At some point, did you ever complain to
14 anyone that that watch was not worth \$75,000.
15 A. No. I always thought it was worth \$75,000.
16 Q. Did you ever learn at some point it wasn't.
17 A. No.
18 Q. To this day, is that what you think.
19 A. I'm pretty sure that's how much it's worth.
20 Q. Okay. Do you recall the Make a Wish
21 Foundation.
22 A. Yes.
23 Q. Did you have experience with them.
24 A. Yes.
25 Q. What is your experiences with Make a Wish
26 Foundation.
27 A. They called me up because I have cancer.
28 They do it for everybody that has -- every child 1932

1 that has cancer. And then they call you up and say

2 that, "You have one wish," and they tell you that,
3 "Pretend I'm the genie, and you have one wish that
4 you can have."
5 And then I asked them -- first I asked -- I
6 wanted a dog, like a little puppy, a beagle, but my,
7 like, dad -- my parents said that I can't have a
8 beagle because it can get me sick. So I ended up
9 just asking for a vacation.
10 Q. And did you obtain any benefits from that
11 foundation; do you know.
12 A. Just a vacation.
13 Q. They paid for a vacation.
14 A. Yes.
15 Q. And approximately when was that.
16 A. Well, the doctor said to not go, because I
17 would have -- because I had -- like, it was such a
18 big amount of chemotherapy, that it would wipe out
19 every single one of the blood cells that I had. So
20 I would -- it would be bad if I get a fever, because
21 I was getting lots of fevers, because my white blood
22 cells can't fight it because they're so little. And
23 I would have to go in the hospital, and then they'd
24 have to give me antibiotics.
25 And if I was over in Hawaii, and I got a
26 fever because of some bacteria or something that was
27 in me, I -- I wouldn't be able to go back, and then
28 I would get really sick. 1933

1 Q. Did Michael Jackson ever help you make
2 contact with that foundation.
3 A. No, I don't believe so. I believe the
4 hospital social worker did.
5 Q. Do you recall ever discussing with Mr.
6 Jackson the Make a Wish Foundation.
7 A. I think I asked him if he donated money to
8 the Make a Wish Foundation.
9 Q. Do you recall what he said.
10 A. He said that he did.
11 Q. Okay. Do you know when you discussed that
12 with him.
13 A. I think it was like when he was doing the
14 rebuttal thing, when he was getting ready to do the
15 rebuttal. He was writing down all the foundations
16 that he ever donated to.
17 Q. And did you have a discussion with him about
18 that.
19 A. Not really. I mean, I saw him -- I mean, we
20 were talking about it, or whatever, and then we were
21 like, "Okay, okay," and then we left and we were
22 playing some more.
23 Q. Okay. Now, you mentioned on your first day
24 of testimony that when you showed up for the Bashir

25 filming, there was some discussion about a burn
26 victim.
27 A. Yes.
28 Q. Tell the jury what that was about. 1934

1 A. Well, there was a boy there that had gotten
2 burned really bad, and then Michael said that he
3 helped him or something. And then that he was going
4 to -- that he was going to film him, too. So --
5 Q. Were you supposed to be in the same film.
6 A. Yeah. Yes.
7 Q. And did you have a discussion with Michael
8 about that subject.
9 A. About me being in there.
10 Q. Yes.
11 A. Yes.
12 Q. Okay. Did you ever meet this person who was
13 burned.
14 A. Yeah, I think Michael introduced me to him.
15 Q. And when was this.
16 A. Around the same time as the Martin Bashir
17 thing.
18 Q. Was it at Neverland.
19 A. Yes.
20 Q. Did you talk to this person.
21 A. Yes.
22 Q. Do you remember the person's name.
23 A. I think his name might have been David.
24 Q. Was it Rothenberg.
25 A. I don't know.
26 Q. Was this a young man that you learned's
27 father had poured gasoline on him and set him on
28 fire. 1935

1 A. I don't know.
2 Q. Okay.
3 A. I think that's what happened.
4 Q. And he was supposed to be in the film with
5 you, right.
6 A. Yes.
7 Q. Okay. And correct me if I'm wrong, you
8 discussed with Michael the fact that Michael had
9 helped this young boy, right.
10 A. Yes.
11 Q. Okay. Did you talk to this young boy about
12 what he had experienced.
13 A. No.
14 Q. Okay. Did you ever see him.
15 A. Yes.
16 Q. And please describe for the jury what he

17 looked like.

18 A. He looked like he was really badly burned
19 and he had like -- he was like a rocker. He was
20 wearing, like, rocker stuff. And he was burned.
21 And he had like only a few hairs on his head because
22 I guess it covered all the pores when he was burned.

23 Q. Did you and he appear in the film, if you
24 know.

25 A. Later I watched it, and then -- well, I
26 watched my part, and then I don't think he was in
27 there.

28 Q. Okay. But was he at Neverland the day you 1936

1 were filmed.

2 A. Yes.

3 Q. Okay. Did you meet him shortly after you
4 arrived.

5 A. Yes.

6 Q. Okay. Did you and he walk around Neverland.

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

8 Q. How much time did you spend with him.

9 A. Michael introduced me to him and he was
10 older than me, so I mean -- I was pretty young. I
11 mean -- I don't know. We just didn't really have
12 that much in common that much.

13 Q. Okay. Were you ever personally threatened
14 by anyone associated with Mr. Jackson.

15 A. No.

16 Q. Okay.

17 THE COURT: Let's take our morning break.

18 (Recess taken.)

19 THE COURT: All right. You may proceed.

20 MR. MESEREAU: Thank you, Your Honor.

21 Q. Mr. Arvizo, do you recall being interviewed
22 by the Santa Barbara Sheriffs about drinking in the
23 arcade.

24 THE COURT: They can't hear you in the back
25 of the room.

26 THE BAILIFF: Do you still have your
27 microphone on.

28 MR. MESEREAU: It's on. 1937

1 Q. Mr. Arvizo, do you recall discussing with
2 the Santa Barbara Sheriffs your claim that you were
3 drinking in the arcade with Michael Jackson.

4 A. Yes.

5 Q. Do you recall telling them the following:
6 "We didn't drink a lot".

7 A. No.

8 Q. Would it refresh your recollection if I show

9 you a transcript from that interview.
10 A. Yes.
11 MR. MESEREAU: May I approach, Your Honor.
12 THE COURT: Yes.
13 MR. SNEDDON: I'm sorry, Counsel, what page
14 was that.
15 MR. MESEREAU: 26.
16 Q. Mr. Arvizo, have you had a chance to look at
17 that page.
18 A. Yes.
19 Q. Does it refresh your recollection about what
20 you told the Santa Barbara Sheriffs.
21 A. Not really.
22 Q. You told them, "We didn't drink a lot,"
23 right.
24 A. I don't know. It says it on there.
25 Q. Do you recall saying that.
26 A. No.
27 Q. Pardon me.
28 A. No. 1938

1 Q. Do you deny saying that.
2 A. I don't know if I ever said that.
3 Q. Would you agree that every time you were
4 interviewed, your stories of drinking got worse and
5 worse, correct.
6 A. No.
7 Q. You initially told them you didn't drink a
8 lot.
9 A. That's true.
10 Q. Then you started telling them you drank a
11 lot, and then you started telling them, "We drank
12 every night," correct.
13 A. Well, "a lot" would be every night, so it
14 would really --
15 Q. Pardon me.
16 A. "A lot" would be every night.
17 Q. And you're saying after Miami that you
18 basically were drinking every single evening at
19 Neverland, correct.
20 A. No, I told him that every single evening
21 that Michael was there. In those transcripts,
22 probably when -- I still -- I don't know.
23 Q. Isn't it true that every time you were
24 interviewed, your stories of drinking got bigger and
25 bigger and bigger.
26 A. No.
27 Q. Are you saying your stories to the sheriffs
28 were always consistent when it came to drinking. 1939

1 A. I'm pretty sure they are. I mean, it
2 doesn't really matter whether I said that or not.
3 I'm saying the fact is that we drank every night
4 that Michael was there.
5 Q. Did you ever discuss your drinking with your
6 mother when she was at Neverland.
7 A. I think I called her up at night -- yeah, I
8 called her up at night once.
9 Q. You called her up.
10 A. Called her on Michael's phone.
11 Q. You called her from Michael's room to say
12 you were drinking.
13 A. No.
14 Q. During the nights after Miami, when your
15 mother was staying at Neverland, are you saying you
16 never discussed your drinking with her.
17 A. No. I -- there was one -- I'm talking about
18 the one night that I told Michael that -- I told
19 Michael about the test that I had to take, and I
20 called my mom up. That's what I was talking about.
21 Q. Okay. So not only did you never have a
22 discussion with your mother about where you were
23 staying at night, but you never had a discussion
24 with her about drinking alcohol; is that correct.
25 A. Yes.
26 MR. SNEDDON: Object as argumentative, Your
27 Honor.
28 THE COURT: Sustained. 1940

1 Q. BY MR. MESEREAU: When you were at the
2 Calabasas Inn, was there a phone in your room.
3 A. I'm pretty sure there was.
4 Q. Did you ever see anybody call the police.
5 A. No.
6 Q. When you were shopping near the Calabasas
7 Inn, to your knowledge, did anyone ever scream
8 "help".
9 A. No, I don't think so.
10 Q. Ever see your mother do it.
11 A. No.
12 Q. Ever see Star do it.
13 A. No.
14 Q. Ever see your sister do it.
15 A. No.
16 Q. You didn't do it either, correct.
17 A. No.
18 Q. After you escaped from Neverland the first
19 time, where did you go.
20 A. I think we went to my grandmother's house.
21 Q. To your knowledge, did anybody call the
22 police and say, "We've been" --
23 A. No, because the thing was, like I --

24 Q. Let me just finish my question.
25 A. Okay.
26 Q. After you say you escaped from Neverland the
27 first time, you went to your grandparents', correct.
28 A. Yes. 1941

1 Q. And how did you get there.
2 A. Jesus Salas drove us there.
3 Q. Do you recall anyone ever calling the police
4 and saying, "We've just been held against our will".
5 A. No. Because like I -- my mom was --
6 Q. Let me just ask you the questions. Okay.
7 Nobody did, right.
8 A. No.
9 Q. A few days later, you went back to
10 Neverland, right.
11 A. I believe -- yes.
12 Q. And then you say you escaped a second time,
13 correct.
14 A. Yes.
15 Q. And when you escaped the second time, how
16 did you get out of Neverland.
17 A. I don't know.
18 Q. Someone drove you somewhere, right.
19 A. Yeah, probably.
20 Q. Did you go to your grandparents' again.
21 A. Probably.
22 Q. Nobody called the police from your
23 grandparents' when you say you escaped the second
24 time, right.
25 A. No.
26 Q. And then you claim you returned, right.
27 A. Yes.
28 Q. And you say you finally escaped for good, 1942

1 right.
2 A. Yes.
3 Q. And when you got back after finally escaping
4 for good to your grandparents', nobody called the
5 police, correct.
6 A. No.
7 Q. Now, when you say Mr. Jackson masturbated
8 you, you've indicated that was sometime between
9 Jesus Salas driving your family to your
10 grandparents' and your final trip out of Neverland,
11 correct.
12 A. Yes.
13 Q. Okay. And that's at a time when you say
14 your mother was being threatened, correct.
15 A. My mother said that she felt -- that she was

16 being threatened, she felt. And Frank also told me
17 once that -- because he was angry about my mom
18 always wanting to leave and stuff.
19 Q. Okay.
20 A. And --
21 Q. But basically what you're saying is that the
22 inappropriate touching by Michael Jackson happened
23 after you'd escaped a few times, correct.
24 A. Yes.
25 Q. After you'd gone back a few times after your
26 escapes, right.
27 A. Yes.
28 Q. And after you claim you knew your mother was 1943

1 being threatened by Frank, correct.
2 A. Frank was angry at my mom once and he told
3 me, "Hey, Gavin, you know I could have your mother
4 killed."
5 Q. Okay. And you believed him, correct.
6 A. Yes.
7 Q. Did you believe Frank.
8 A. Yes.
9 Q. All right. And you knew about the Brazil
10 planning at this point, correct.
11 A. Yes.
12 Q. Because you'd been to an agency, a federal
13 office to get a visa, right.
14 A. Yes.
15 Q. Do you remember driving down to that federal
16 office.
17 A. Yes.
18 Q. Do you remember going into the federal
19 office.
20 A. Yes.
21 Q. And while you were in that federal office,
22 nobody screamed for help, right.
23 A. No.
24 Q. And this was after you had the interview
25 with the three social workers at Jay Jackson's home,
26 right.
27 A. Yes.
28 Q. And during the interview with the social 1944

1 workers at Jay Jackson's home, nobody screamed for
2 help; true.
3 A. No.
4 Q. And that was after you went to Hamid's home
5 for the rebuttal video, right.
6 A. I think it was. I don't know.
7 Q. Right.

8 A. I think it was.

9 Q. And what you're saying is that after your
10 interview with the social workers, where you were
11 asked questions about Michael Jackson, you're saying
12 it was after that that inappropriate touching began,
13 correct.

14 A. Yes.

15 Q. While Mr. Jackson is being investigated by
16 Los Angeles County, true.

17 A. It -- it didn't happen until the last few
18 weeks before I left. Or two weeks, somewhere around
19 there.

20 Q. Let me ask the question again.

21 A. Okay.

22 Q. The three social workers were from Los
23 Angeles County, true.

24 A. I think they were.

25 Q. And they were asking you questions about
26 whether Mr. Jackson had ever inappropriately touched
27 you, correct.

28 A. Yes. 1945

1 Q. And you said "No," right.

2 A. Yes.

3 Q. You knew they were investigating Mr.
4 Jackson, right.

5 A. No, I thought they were just going to try to
6 ask me, and that was it. I didn't know --

7 Q. But what you're telling the jury is that
8 after this investigation starts and after you and
9 your family are questioned, Mr. Jackson supposedly
10 starts touching you inappropriately, right.

11 A. Yes.

12 Q. Okay. Now, you indicated to the jury last
13 week that the first time Mr. Jackson inappropriately
14 touched you, you weren't looking at him, right.

15 A. Well, it's like I would turn over to him
16 sometimes. I glanced over at him a couple times.

17 Q. You said you weren't really looking at him,
18 right.

19 A. Not really.

20 Q. Okay. You said you weren't looking at him,
21 but you could somehow feel him moving, correct.

22 A. I could feel his leg like moving up
23 against --

24 Q. Okay. After that, did you complain to your
25 mother that you had been inappropriately touched.

26 A. No. I never discussed it with my mom. I
27 never discussed it with my mom at all.

28 Q. Did you complain to Star that you had been 1946

1 inappropriately touched.
2 A. No.
3 Q. Did you complain to your sister that you had
4 been inappropriately touched.
5 A. No.
6 Q. Did you complain to Jay Jackson that you had
7 been inappropriately touched.
8 A. No.
9 Q. Were you upset when you say you were
10 inappropriately touched.
11 A. If I was upset.
12 Q. Yes. Were you upset.
13 A. Yeah. Because, I mean, something happened
14 to where, like, it's not like I can go back and
15 change it; you know what I mean. It's like
16 something that I have, like, no control of.
17 Q. Well, at this point, in your mind, your
18 mother's been threatened and you've been
19 inappropriately touched, correct.
20 A. Yes.
21 Q. And you remained at Neverland, true.
22 A. Yes.
23 Q. And you claim you continued to stay in his
24 bedroom, right.
25 A. Well, I think he left after the second time.
26 Q. You think Michael Jackson left after the
27 second time.
28 A. Yeah, a few days after the second time. 1947

1 That's why I'm pretty sure that it happened a few --
2 two weeks before, because I know I'm pretty sure
3 that Michael left like a day after the second time.
4 Q. Well, but you told the jury last week it was
5 a couple of days before you left for good. Do you
6 remember that.
7 A. No. You kept on saying that.
8 Q. Pardon me.
9 A. No. You kept on saying that.
10 Q. Well, let's look at this.
11 You said that maybe a few days before you
12 left Neverland for good you were inappropriately
13 touched, right.
14 MR. SNEDDON: Judge, I'm going to object as
15 asked and answered. He was asked this morning.
16 THE COURT: Sustained.
17 Q. BY MR. MESEREAU: Do you remember saying
18 last week, Mr. Arvizo, when I asked you when it
19 happened, you said, "No, it was more toward the end,
20 toward when we were already about to leave, after we
21 had been drinking alcohol and all that stuff. It
22 wasn't directly after the DCSF. It was more toward

23 the end of the" -- a few days before you left
24 Neverland, right.
25 MR. SNEDDON: Same objection, Your Honor.
26 Asked and answered.
27 THE COURT: Sustained.
28 Q. BY MR. MESEREAU: You then changed it later 1948

1 on in that examination to say, "It was a week before
2 we left," right.
3 MR. SNEDDON: Your Honor, I'm going to
4 object to counsel. He's just trying to read this in
5 after the objection.
6 THE COURT: Sustained.
7 Counsel, you're -- be quiet. You're arguing
8 your case. Stop it. Start asking questions.
9 MR. MESEREAU: Yes, Your Honor.
10 Q. Do you know when you first saw Attorney
11 Larry Feldman.
12 A. Yes.
13 Q. When was that.
14 A. It was after all the stuff was done.
15 Q. And approximately when.
16 A. I don't know.
17 Q. Have you discussed your meeting with Larry
18 Feldman with any prosecutor.
19 A. I don't think so.
20 Q. At any time.
21 A. No.
22 Q. Pardon me.
23 A. No. I don't think I ever talked to anyone.
24 Q. So you've never talked to any prosecutor
25 about your meeting with Attorney Feldman. Is that
26 what you're saying.
27 A. I don't think I did.
28 Q. Okay. Did you ever discuss your meeting 1949

1 with Attorney Larry Feldman with any sheriff.
2 A. I don't think I did.
3 Q. Do you know for sure.
4 A. No.
5 Q. You eventually spoke to a psychologist named
6 Stanley Katz, correct.
7 A. Yes.
8 Q. Do you know about when that was.
9 A. No.
10 Q. You told Stanley Katz that chemotherapy had
11 messed up your head. Do you remember that.
12 A. Yeah, it -- for a while it was hard for me
13 to do schoolwork in school because of the
14 chemotherapy.

15 Q. And you told Stanley Katz that, correct.
16 A. Yes.
17 Q. Did you tell him you had memory problems.
18 A. Yeah, for a while I had memory problems.
19 Q. And that was from chemotherapy, correct.
20 A. I believe so.
21 Q. Were you taking any medications at the time
22 you returned to Neverland from Miami.
23 A. I had -- I have to take, even now, the 500
24 milligrams of Amoxicillin, and five milligrams of
25 Lycinopril for my kidney and because I don't have a
26 spleen.
27 Q. Do you remember telling Psychologist Stanley
28 Katz you thought a crazy fan of Michael Jackson will 1950

1 kill you.
2 A. Yes.
3 Q. You never told that to the sheriffs,
4 correct.
5 A. I'm pretty sure I discussed it with them.
6 Q. Well, it never appears in your interviews,
7 right.
8 A. Yeah, I guess it didn't. But, I mean, it
9 doesn't mean I didn't tell them that.
10 Q. The only time that you used the word "kill"
11 was when you told the sheriffs that Frank had
12 threatened to kill your mom, right.
13 A. Uh-huh. In an interview.
14 Q. When did you start thinking that a crazy fan
15 of Michael Jackson will kill you.
16 A. When Frank kept on telling us that people --
17 there was death threats on us.
18 Q. What were the death threats.
19 A. I don't know. Frank just told us that.
20 Q. Well, when you discussed that with Stanley
21 Katz, you didn't tell him that came from Frank. You
22 told him you personally were frightened, right.
23 A. Yeah. Be -- but I mean --
24 Q. Is that right.
25 A. Yes. Frank was the one that really made me
26 realize that that could happen.
27 Q. Okay. Now, did you ever discuss with
28 Michael Jackson your fear that a fan might hurt you. 1951

1 A. I don't know.
2 Q. Did you ever discuss with Michael Jackson
3 what Frank was telling you that you thought was
4 threatening.
5 A. I don't think I did.
6 Q. Okay. So based on your experiences, Michael

7 Jackson knew nothing about what Frank was saying to
8 you, correct.
9 MR. SNEDDON: Object. It calls for
10 speculation.
11 THE COURT: Sustained.
12 Q. BY MR. MESEREAU: When you were at the
13 Calabasas Inn, you never spoke to Michael Jackson,
14 right.
15 A. No, I don't think so.
16 Q. The night before you did the rebuttal video,
17 you never spoke to Michael Jackson, right.
18 A. I might have. I don't know.
19 Q. The day you did the rebuttal video, you
20 never spoke to Michael Jackson, right.
21 A. No. Michael was telling me that I'm going
22 to do a rebuttal for him.
23 THE REPORTER: What was the last part.
24 THE WITNESS: Michael was telling me before
25 we went that we were going to do the rebuttal for
26 him.
27 Q. BY MR. MESEREAU: Approximately when was
28 that. 1952

1 A. Maybe right before the rebuttal.
2 Q. When you spoke on that rebuttal video, were
3 you telling the truth.
4 A. No.
5 Q. Were you lying.
6 A. Dieter had us pretty much -- yeah, Dieter
7 had us lie.
8 Q. Were you lying throughout that rebuttal
9 video.
10 A. There was probably a few things that were
11 true, but, I mean, a lot of it was what Dieter told
12 us to say.
13 Q. Was it your understanding that your mother
14 was lying.
15 A. She was saying what Dieter told her to say.
16 Q. Was it your understanding she was lying.
17 A. Yes, she was lying, because Dieter told her
18 to say it.
19 Q. Was it your understanding that Star was
20 lying in that rebuttal video.
21 A. Yes.
22 Q. And was it your understanding that your
23 sister lied on that rebuttal video.
24 A. Yes.
25 Q. And you were lying about Mr. Jackson helping
26 you with cancer; is that correct.
27 A. No, because Michael did help me a little
28 bit, but, I mean, he -- for me, what I felt as a 1953

1 little kid, I mean, besides the fact of all this
2 money and who paid for this and who paid for that,
3 who -- I felt who really helped me was my other
4 friends.
5 Because Michael, at the time when he was
6 calling me and talking to me and stuff, I felt like
7 he was my best friend. But, I mean, when he -- when
8 I would call his phone numbers and a little
9 operating lady would say, "This phone is no longer
10 in service." I mean, I never called Chris and his
11 phone was never in service. I never called George
12 and his phone wasn't in service.
13 Q. Do you recall being caught at Neverland with
14 girlie magazines when you were not around Michael
15 Jackson.
16 A. No.
17 Q. Are you saying that never happened.
18 MR. SNEDDON: Your Honor, 403 hearing.
19 THE COURT: Sustained.
20 I'll -- that's sort of a -- you know what
21 he's talking about on the 403 hearing, right.
22 MR. MESEREAU: I thought I was able to get
23 into these areas on cross.
24 THE COURT: Yes. That's why I'm looking at
25 you, because I don't want to discuss it. I just
26 want to make sure we understand each other.
27 MR. MESEREAU: Yeah, I won't go further than
28 that on this one. 1954

1 There's another area, too, I think the Court
2 gave me permission.
3 THE COURT: That's correct.
4 Q. BY MR. MESEREAU: Mr. Arvizo, you were
5 caught masturbating at Neverland when Michael
6 Jackson wasn't even around, weren't you.
7 A. No.
8 Q. You were caught masturbating in a guest
9 quarters, weren't you.
10 A. No.
11 Q. No one ever saw you do that.
12 A. No.
13 Q. No one ever talked to you about that.
14 A. No one ever talked to me about it.
15 Q. Okay. Long after you did the rebuttal
16 video, you had written numerous letters and cards to
17 Michael Jackson thanking him for what he did for
18 your cancer, true.
19 A. Yes.
20 Q. Long before you did the rebuttal video, you
21 had written numerous cards and letters to Michael

22 Jackson referring to him as your father, true.
23 A. Yes. Because I missed him. I mean, I
24 wanted to know what happened, why he wasn't calling
25 anymore. And that's the only real way I had
26 connection with him was through mail, because I had
27 Evvy's -- I knew where Evvy was, so I could send it
28 to her. 1955

1 Q. And long before you did the rebuttal video,
2 you sent cards and letters to Michael Jackson
3 referring to yourself as his son, true.

4 MR. SNEDDON: Your Honor, I'm going to
5 object. This has all been asked and answered.

6 MR. MESEREAU: I don't think it has.

7 THE COURT: Well, there wasn't a time frame.
8 You have covered the cards and letters. Is there a
9 specific time frame you're concerned about.

10 MR. MESEREAU: Any time before the rebuttal
11 video, Your Honor.

12 THE COURT: I think you've covered that. The
13 objection is sustained.

14 MR. MESEREAU: Okay. Okay.

15 Q. We're going to go through the rebuttal
16 video. And I'm just going to ask you some questions
17 about what you said and how you said it. Okay.

18 A. Okay.

19 MR. MESEREAU: All right. Your Honor, at
20 this time we'd like to play the rebuttal video.

21 THE COURT: What is that. "Input 4".

22 MR. SANGER: Yes. Your Honor, for the
23 record, it's Exhibit 340.

24 THE COURT: Exhibit 340.

25 Ready.

26 I'd like one of those whistles just before I
27 make a ruling.

28 MR. SANGER: Tell me to queue it up, Your 1956

1 Honor.

2 Just for the record, I turned the sound off
3 on this so we wouldn't....

4 (Whereupon, a portion of a DVD, People's
5 Exhibit 340, Disk 1, was played for the Court and
6 jury.)

7 Q. BY MR. MESEREAU: Now, you heard what your
8 mother just said, right.

9 A. Yes.

10 Q. And is it your belief your mother is lying.

11 A. Um, right there, not really, because I had a
12 pretty good relationship with him, you know, right
13 at the beginning.

14 Q. So you don't think your mother is lying when
15 she makes that statement, correct.
16 A. Well, not really, because, I mean, he was
17 like really close to me in the beginning. I mean, I
18 guess, I thought I was close to him; you know what I
19 mean.
20 Q. Okay.
21 (Whereupon, a portion of a DVD, People's
22 Exhibit 340, Disk 1, was played for the Court and
23 jury.)
24 Q. BY MR. MESEREAU: Mr. Arvizo, when you made
25 those statements, were you lying.
26 A. Statements about the first night.
27 Q. What you just said, yes.
28 A. The sleeping arrangements. 1957

1 Q. Yes.
2 A. No, I wasn't lying about that.
3 Q. Have you told any lies so far in this
4 rebuttal tape.
5 A. I don't -- I remember I said something
6 that -- oh, yeah, because Michael told me in the
7 office, in his office, to ask my parents if I could
8 sleep in his room. So it wasn't -- he told me to
9 ask in front of my parents.
10 Q. So are you saying this is a lie you just
11 told.
12 A. I'm just saying that -- about how I asked my
13 parents.
14 Q. Yes.
15 A. That's a lie.
16 Q. That's a lie.
17 A. Yes.
18 Q. Okay. Is that the first lie you've told in
19 this rebuttal tape, as far as you can see.
20 A. Yes.
21 Q. Okay.
22 (Whereupon, a portion of a DVD, People's
23 Exhibit 340, Disk 1, was played for the Court and
24 jury.)
25 Q. BY MR. MESEREAU: Mr. Arvizo, you heard what
26 you just said. Is that a lie.
27 A. No.
28 Q. Was everything you said there truthful. 1958

1 A. Yes.
2 Q. Okay.
3 (Whereupon, a portion of a DVD, People's
4 Exhibit 340, Disk 1, was played for the Court and
5 jury.)

6 Q. BY MR. MESEREAU: Mr. Arvizo, you've heard
7 what your mother just said. Was it your belief that
8 she was lying.

9 A. There's a part in there, like, that there
10 was no way to cure me. Dieter told us to say that.

11 Q. Okay. So that was not true.

12 A. Yeah, because they did do radiation and
13 chemotherapy.

14 Q. The truth was, you had needed radiation and
15 chemo to cure you, and what your mother said was a
16 lie, correct.

17 A. About there was no way to cure me, that
18 Michael was the only person that could cure me.

19 (Whereupon, a portion of a DVD, People's
20 Exhibit 340, Disk 1, was played for the Court and
21 jury.)

22 Q. BY MR. MESEREAU: Mr. Arvizo, is what you
23 said there the truth.

24 A. Yes.

25 Q. Have you told any lies in this particular
26 segment.

27 A. No.

28 Q. Okay. 1959

1 (Whereupon, a portion of a DVD, People's
2 Exhibit 340, Disk 1, was played for the Court and
3 jury.)

4 Q. BY MR. MESEREAU: Gavin, is your mother
5 telling the truth.

6 A. Yes, because I remember -- I think Michael
7 did, like, a blood drive or something. Yeah, a lot
8 of my other friends were also helping, thank God,
9 because, I mean, it's such a rare blood that I
10 needed.

11 Q. But is your mother telling the truth in the
12 statements she makes.

13 A. Yes. About Michael, yes.

14 (Whereupon, a portion of a DVD, People's
15 Exhibit 340, Disk 1, was played for the Court and
16 jury.)

17 Q. BY MR. MESEREAU: Gavin, is your sister
18 telling the truth when she makes that statement.

19 A. Not really, because she was saying that --
20 well, she was saying that people were always turning
21 us away. And that's not true, because, I mean,
22 Jamie Masada was helping us, Louise Palanker was
23 helping us, George Lopez was helping us. I'm pretty
24 sure -- I'm not too sure, but I'm pretty sure Dieter
25 told her to say that also, that no one else was
26 helping us but Michael.

27 Q. And Chris Tucker was helping you, correct.

28 A. Yes, Chris Tucker was helping us, yes. 1960

1 Q. Okay. And this is the rebuttal video that
2 you did before the meeting with the three social
3 workers, correct.
4 A. I don't know. I'm pretty sure I did it
5 before the social workers.
6 Q. You went the next morning to interview with
7 the social workers, didn't you.
8 A. I think I did.
9 Q. Okay. Let me ask you a question: You said
10 repeatedly in this trial that Mr. Jackson did not
11 inappropriately touch you until after this video was
12 done, correct.
13 A. Yes.
14 Q. And repeatedly in this video, you make
15 statements about what a wonderful person Mr. Jackson
16 is, right.
17 A. Yes.
18 Q. Do you remember telling Mr. Sneddon and the
19 sheriffs on one occasion that you were molested
20 before the video was done.
21 A. No.
22 Q. Would it refresh your recollection if I show
23 you a transcript of that interview.
24 A. Yes. Please.
25 MR. MESEREAU: May I approach, Your Honor.
26 THE COURT: Yes.
27 Q. BY MR. MESEREAU: Have you had a chance to
28 look at that transcript. 1961

1 A. Yes.
2 Q. Does it refresh your recollection that
3 Mr. Sneddon was interviewing you about when these
4 acts of molestation allegedly occurred.
5 A. Yes. But the thing was, I don't -- even to
6 this day, I don't remember exactly when everything
7 happened exactly, so I mean --
8 Q. Well, do you remember being asked, "The acts
9 of molestation, had they already begun by the time
10 you did this video, do you know." And you said, "I
11 think so."
12 And then Mr. Sneddon said to you, "So, in
13 your mind, one of the things that you're thinking
14 is, they're doing this video that they want you guys
15 to do so that if you ever told them the truth about
16 being molested, nobody would believe you," and you
17 say, "Yeah," right.
18 A. Well, I --
19 Q. Do you remember saying that to Mr. Sneddon.
20 A. That's more of my opinion - you know what I

21 mean. - right there. That last statement you just
22 said on that transcript, it's more of my opinion
23 than a state of fact.
24 Q. Well, Mr. Sneddon asked you last week when
25 this inappropriate touching supposedly occurred, and
26 you said it was after the rebuttal video was made,
27 correct.
28 A. Yes. 1962

1 Q. But in an interview with Mr. Sneddon before
2 this trial ever began, you told him differently,
3 correct.
4 A. That's what it says right there. But it
5 happened after.
6 Q. Did someone ever say to you, "You have to
7 say it happened after, because on the rebuttal video
8 you deny he's ever done anything wrong".
9 A. No. No one's ever told me that.
10 Q. Then why does your story change.
11 A. I don't know. It happened after. I mean --
12 Q. Well, at some point did you go to Mr.
13 Sneddon and say, "I'm changing my story about when
14 this inappropriate touching happened".
15 A. No.
16 Q. At some point did you go to the sheriffs and
17 say, "I'm changing my story about when this
18 inappropriate touching happened".
19 A. No.
20 Q. You just suddenly got on the stand and
21 changed it.
22 MR. SNEDDON: Object as argumentative, Your
23 Honor.
24 THE COURT: Sustained.
25 Q. BY MR. MESEREAU: Have you ever had any
26 discussion at any time with Mr. Sneddon where you
27 used words to the effect, "I'm changing my story
28 about the time this molestation happened". 1963

1 A. No.
2 Q. Okay. When Mr. Sneddon asked you questions
3 last week about when this molestation supposedly
4 occurred, was that the first time you said to Mr.
5 Sneddon it happened after the rebuttal video.
6 A. I don't think so.
7 Q. You don't think so.
8 A. I don't think that was the first time I ever
9 told him that it happened after the rebuttal video.
10 Q. So are you saying that at different times
11 you gave Mr. Sneddon different accounts of when the
12 molestation supposedly happened.

13 MR. SNEDDON: Your Honor, I'm going to
14 object to that question. Assumes facts not in
15 evidence, and it's argumentative and speculative.
16 THE COURT: Overruled.
17 Do you want the question read back.
18 THE WITNESS: Yes.
19 (Record read.)
20 THE WITNESS: Sometimes I would talk to
21 Mr. Sneddon without having like an interview -- or,
22 like, have a recorder or something. And I would
23 talk -- like, Mr. Sneddon was being really nice to
24 me. Like he was helping me, and he was making me
25 feel better about what happened and stuff. So he's
26 been really nice to me.
27 Q. BY MR. MESEREAU: Do you remember telling
28 the Santa Barbara Grand Jury that after the Miami 1964

1 trip, your brother stayed in Michael's room with you
2 every night until the last few days.
3 A. Yeah, he stood in my room -- he stood in the
4 room with me and Michael pretty much every day.
5 Some days he wouldn't stay there.
6 Q. Do you remember telling the grand jury that
7 until the last few days, your brother Star stayed
8 with you in Michael's room all the time.
9 A. He stood with us -- well, he -- the last --
10 the last week or two, or a few days, or something
11 like that, he didn't. Well, because my brother
12 wasn't there when it happened, so I'm pretty sure it
13 wasn't -- he stopped staying there the last few
14 weeks.
15 Q. Do you remember telling the Santa Barbara
16 Grand Jury:
17 "Q. Was your brother staying in the room
18 with you during that time.
19 "A. Well, the last few times he didn't, but
20 he was, like, when Michael was there -- when
21 Michael was there --
22 "Q. Uh-huh.
23 "A. -- he stood with me for all the time
24 when Michael was there. But, like, toward the
25 end, toward the last few days, he wasn't staying
26 with me no more."
27 Do you remember that.
28 A. Uh-huh. 1965

1 Q. And you've also told this jury that the two
2 times you claim Michael Jackson inappropriately
3 touched you Star wasn't there, correct.
4 A. Yes.

5 MR. MESEREAU: We can continue.
6 MR. SANGER: Are you ready. Your Honor, we
7 need the....
8 (Whereupon, a portion of a DVD, People's
9 Exhibit 340, Disk 1, was played for the Court and
10 jury.)
11 Q. BY MR. MESEREAU: Do you think your sister
12 is lying when she made those statements.
13 A. No. Because, I mean, people on the news
14 media were -- might have been saying something,
15 probably. I don't know.
16 Q. So you think she's telling the truth when
17 she says what she just said.
18 A. Probably. I mean, I looked at her, and
19 she's crying and stuff, so....
20 MR. MESEREAU: Okay. Go ahead.
21 (Whereupon, a portion of a DVD, People's
22 Exhibit 340, Disk 1, was played for the Court and
23 jury.)
24 Q. BY MR. MESEREAU: Is what your mother just
25 said correct.
26 A. No. Because we could have at any time stood
27 at my grandmother's house. I mean, it's not like --
28 Q. In your opinion, was your mother lying when 1966

1 she made that statement.
2 A. I remember hearing Dieter talk to her, so
3 I'm pretty sure Dieter told her to say that.
4 Q. Well, that --
5 A. We can stay at my grandmother's house. We
6 could stay at one of our family members' house; you
7 know what I mean. It's not like we were spit on and
8 all this other stuff; you know what I mean.
9 Q. My question to you is, did your mother just
10 lie, in your opinion.
11 A. She's saying what Dieter told her to say.
12 Q. Did she lie. Yes or no.
13 A. She -- well, only because --
14 MR. SNEDDON: Argumentative, Your Honor.
15 THE COURT: Overruled.
16 You may answer.
17 THE WITNESS: Yes.
18 MR. MESEREAU: Okay. Go ahead.
19 (Whereupon, a portion of a DVD, People's
20 Exhibit 340, Disk 1, was played for the Court and
21 jury.)
22 Q. BY MR. MESEREAU: You just heard your
23 sister's statement; is that true.
24 A. A little bit of it is true.
25 Q. Did she lie in part of that.
26 A. I mean, because we would talk about girls at
27 times, and -- like all my friends that were females

28 and stuff like that. But I mean -- 1967

1 Q. You would talk with Michael Jackson about
2 your female friends.
3 A. Yeah. He would talk to me about girls and
4 how to, like, handle them; you know what I mean.
5 Like how to talk to a girl or something like that.
6 Q. So that statement's true.
7 A. Yes.
8 Q. And anything else you just heard that's not
9 true.
10 A. No, not really. No.
11 Q. Okay.
12 (Whereupon, a portion of a DVD, People's
13 Exhibit 340, Disk 1, was played for the Court and
14 jury.)
15 Q. BY MR. MESEREAU: Was the statement you just
16 made true.
17 A. No. Because I didn't really have a phone
18 number to call him.
19 Q. So were you lying.
20 A. Yes.
21 Q. Okay. Was your mother lying also.
22 A. No, not really.
23 Q. Was she telling the truth.
24 A. Pretty much, yeah.
25 Q. After the Miami trip, were you able to call
26 Michael Jackson.
27 A. Michael would -- I was at Neverland.
28 Q. Were you able to call him after the Miami 1968

1 trip.
2 A. I would talk to him when he was at
3 Neverland. I mean, I didn't really call him.
4 Q. Did you ever call him at Neverland on any
5 phone.
6 A. I don't know. I don't think I did.
7 Q. You don't remember.
8 A. I don't remember.
9 Q. Well, there were phones you could use to try
10 to call Michael Jackson when you were at Neverland,
11 correct.
12 A. Yes.
13 Q. Where were the phones.
14 A. All over the house and stuff.
15 Q. You tried to call him often, didn't you.
16 A. Well, why would I try to call him if I could
17 just go and talk to him at Neverland.
18 Q. Well, it's a large ranch, correct.
19 A. Yes.

20 Q. You used to spend time in the theater,
21 correct.
22 A. Yes.
23 Q. Did you ever try and call Michael Jackson
24 from the phone in the theater.
25 A. No. Because I would just go over in my
26 little cart to see Michael.
27 Q. Did you ever try to call Michael Jackson
28 from the guest quarters. 1969

1 A. No, because I had the code to his room and I
2 would go up there when he -- when he was there.
3 Q. Ever try calling him from the amusement
4 area.
5 A. No. There's not really any phones out
6 there.
7 Q. Ever try calling him from the zoo area.
8 A. No.
9 Q. When you made this rebuttal video, you could
10 get in contact with him almost any time, couldn't
11 you.
12 A. I could drive over to where he was in my
13 cart at Neverland, but never had a phone number if
14 he left or something.
15 MR. MESEREAU: Okay.
16 (Whereupon, a portion of a DVD, People's
17 Exhibit 340, Disk 1, was played for the Court and
18 jury.)
19 Q. BY MR. MESEREAU: Is what your brother Star
20 just said true.
21 A. Yeah, Michael let us call him --
22 Q. Pardon me.
23 A. Yes, Michael let us call him "Daddy
24 Michael."
25 Q. So what he said was correct.
26 A. Yes.
27 MR. MESEREAU: Okay.
28 (Whereupon, a portion of a DVD, People's 1970

1 Exhibit 340, Disk 1, was played for the Court and
2 jury.)
3 Q. BY MR. MESEREAU: Was the statement you just
4 made the truth.
5 A. Yeah. Yes.
6 Q. Is what your mother just said the truth.
7 A. I guess. I mean, I don't know if Michael
8 was trying to teach us that or --
9 A VOICE FROM THE AUDIENCE: We can't hear.
10 THE WITNESS: I don't know if Michael was
11 trying to teach us that or something.

12 Q. BY MR. MESEREAU: Well, did your mother tell
13 the truth, in your opinion.
14 A. Yes.
15 Q. Did you tell the truth, in your opinion.
16 A. Yeah, we'd go on rides and watch movies.
17 Q. How about the other things you said, are
18 they true.
19 A. Yes.
20 (Whereupon, a portion of a DVD, People's
21 Exhibit 340, Disk 1, was played for the Court and
22 jury.)
23 Q. BY MR. MESEREAU: Is what your mother just
24 said the truth.
25 A. I kind of stopped paying attention for a
26 while.
27 Q. Excuse me. Huh.
28 A. I started looking at the roof and stuff. I 1971

1 wasn't really paying attention.
2 MR. MESEREAU: Can we replay that, Your
3 Honor.
4 MR. SNEDDON: Well, Judge, it would call for
5 speculation on his part anyhow.
6 MR. MESEREAU: I'm asking for his opinion.
7 THE COURT: I guess you'll have to.
8 MR. MESEREAU: Okay.
9 THE COURT: Can you do it without --
10 MR. MESEREAU: This may take a while, Your
11 Honor.
12 I think we'll just go forward, Your Honor.
13 THE COURT: Do you want to just go forward.
14 (Whereupon, a portion of a DVD, People's
15 Exhibit 340, Disk 1, was played for the Court and
16 jury.)
17 Q. BY MR. MESEREAU: In your opinion, is your
18 mother telling the truth.
19 A. Yes, we felt as if he was closest to us as a
20 father and family.
21 (Whereupon, a portion of a DVD, People's
22 Exhibit 340, Disk 1, was played for the Court and
23 jury.)
24 Q. BY MR. MESEREAU: Were you telling the truth
25 when you made that statement.
26 A. What I just said right now.
27 Q. Yes.
28 A. Well, I didn't pray to meet Michael Jackson 1972

1 when I was little.
2 Q. Did you pray to meet Michael Jackson at any
3 time.

4 A. No.
5 Q. You made a statement about Michael Jackson's
6 charitable acts. Did you hear that.
7 A. Yeah. I knew he donated to charities. I
8 knew about that.
9 Q. Was the statement you made true.
10 A. Yes.
11 Q. You just heard your mother make some
12 comments.
13 A. Um --
14 Q. In your opinion, were they true comments.
15 A. I don't really remember what she just said.
16 I'm sorry. I just --
17 Q. Well, your mother praises Michael Jackson
18 throughout this video, true.
19 A. Yes.
20 Q. Is she telling the truth.
21 A. Some parts she is; some parts she isn't.
22 Depends on what she's praising him about.
23 Q. Did you and your mother discuss that you
24 were going to lie before you did this video.
25 A. No. Dieter discussed it with us.
26 Q. Did you discuss that you were going to tell
27 lies with your mother at any time before this video.
28 A. No. Dieter discussed it with us. 1973

1 Q. Did you discuss with your brother or sister
2 at any time that you were going to lie in this
3 video.
4 A. No.
5 (Whereupon, a portion of a DVD, People's
6 Exhibit 340, Disk 1, was played for the Court and
7 jury.)
8 Q. BY MR. MESEREAU: In your opinion, did
9 Michael ever claim you and your brother and sister
10 as his kids.
11 A. Well, he would call me "son" if -- depends
12 what she was trying to say, but -- I don't know.
13 Q. In your opinion, did Michael Jackson ever
14 claim that you, your brother and sister were his
15 kids.
16 A. What do you mean by "claim". Like claim on
17 T.V., or claim on his taxes, or --
18 Q. You don't know what I'm asking you.
19 A. Well, he said -- as I said, he called us --
20 he said that, like, if he would call me "son"
21 sometimes - you know what I mean. - if that's what
22 she's trying to say.
23 Q. Did you ever think you were part of Michael
24 Jackson's family.
25 A. I felt as if I was his family.
26 Q. In your opinion, did your mother think she

27 was part of Michael Jackson's family at one point.
28 A. What did my mom believe. 1974

1 Q. No, in your opinion, did your mother think
2 she was part of Michael Jackson's family at one
3 point.

4 A. Um, I don't know. That's what she believes.

5 Q. Do you know whether she felt that way or
6 not.

7 A. No. I don't know whether she --

8 Q. In your opinion, did either your brother or
9 your sister ever think they were part of Michael
10 Jackson's family.

11 A. I know my brother did, because my brother
12 was sad by my biological father leaving, as I was.
13 And he felt that, as I did, about Michael being
14 close to us as if he was a father because we didn't
15 have one.

16 Q. You were looking for a family, correct.

17 A. I wasn't really, like, going out and
18 looking; you know what I mean. I was just -- came
19 across as Michael being the only older male that was
20 close to me in my life; you know what I mean.

21 Q. And you wanted to be part of the Jackson
22 family, correct.

23 A. Not really Jackson family. But just Michael
24 was there and he was like a father figure to me; you
25 know what I mean.

26 Q. You think of Paris and Prince as your
27 brother and sister.

28 A. Yeah, we would talk about it and stuff. I 1975

1 would always play with them, and I would teach them
2 stuff, and we would go look at stuff together and
3 stuff like that.

4 Q. And in your opinion, did Star and your
5 sister think of Paris and Prince as their brother
6 and sister.

7 A. I don't know.

8 Q. But you did, right.

9 A. Yes.

10 Q. Okay.

11 (Whereupon, a portion of a DVD, People's
12 Exhibit 340, Disk 1, was played for the Court and
13 jury.)

14 Q. BY MR. MESEREAU: Is what you just said the
15 truth.

16 A. What I had said.

17 Q. Yes.

18 A. Yes.

19 Q. Is what your mom just said the truth.
20 A. Which -- I can't -- she said what she said.
21 Q. Did you think of Michael Jackson, when you
22 made this video, as honest.
23 A. Not really, because he said that I can call
24 him at any time, and I didn't really have the phone
25 numbers before that.
26 Q. So because of that, you thought he was
27 dishonest.
28 A. Yes. 1976

1 Q. Did you think of Michael Jackson as loving
2 when you made this video.
3 A. Yes.
4 Q. Okay.
5 (Whereupon, a portion of a DVD, People's
6 Exhibit 340, Disk 1, was played for the Court and
7 jury.)
8 Q. BY MR. MESEREAU: In your opinion, is what
9 your mother just said the truth.
10 A. Yes. He seemed very loving and we trusted
11 him a lot.
12 Q. So in your opinion, your mother meant what
13 she just said.
14 A. Yes.
15 Q. Okay.
16 (Whereupon, a portion of a DVD, People's
17 Exhibit 340, Disk 1, was played for the Court and
18 jury.)
19 Q. BY MR. MESEREAU: Is what you just said the
20 truth.
21 A. Yeah, Michael invited me to Neverland.
22 Q. That's not what I asked you. Is what you
23 just said the truth.
24 A. Yes. Well -- well, it would be the truth,
25 because in the beginning of my cancer he would
26 invite me to Neverland after, to come after my
27 chemotherapy round.
28 Q. When you made these statements, was Michael 1977

1 the kind of person you were describing, as far as
2 you were concerned.
3 A. Yes, he was very nice to me and stuff.
4 Q. And he was nice to your family.
5 A. Yes. It was what was in my eyes.
6 Q. Excuse me.
7 A. What I saw, in my eyes.
8 (Whereupon, a portion of a DVD, People's
9 Exhibit 340, Disk 1, was played for the Court and
10 jury.)

11 Q. BY MR. MESEREAU: Was what you have just
12 said the truth.
13 A. Yes. Pac Man; Michael did tell me to say
14 that.
15 Q. What about everything else you said.
16 A. About me going to chemotherapy.
17 Q. Yes.
18 A. No. I wouldn't think about it every time I
19 went to a chemotherapy round.
20 Q. So were you lying at that point.
21 A. Yeah, Dieter actually told me to say that,
22 because he knew about the Pac Man.
23 Q. When I say whether you lied, I'm not asking
24 what Dieter said. I'm just asking what you, Gavin
25 Arvizo, said, all right. Did you just lie on that
26 tape.
27 MR. SNEDDON: Your Honor, I'm going to
28 object. He doesn't even let him answer the 1978

1 question.
2 THE COURT: Yes, but it's not necessary to
3 give a pre-statement to your question.
4 MR. MESEREAU: Yes, Your Honor.
5 THE COURT: Go ahead and rephrase it.
6 Q. BY MR. MESEREAU: When you just made the
7 statement that everybody heard in this courtroom,
8 did you lie.
9 A. About the Pac Man thing, me going in every
10 single time in chemotherapy.
11 Q. Yes.
12 A. Yes.
13 Q. Okay.
14 (Whereupon, a portion of a DVD, People's
15 Exhibit 340, Disk 1, was played for the Court and
16 jury.)
17 Q. BY MR. MESEREAU: Is what your mother just
18 said about you wanting to be in movies true.
19 A. Yes. Michael was saying that he was going
20 do some movie, or something, about some orphanage.
21 Q. What about you wanting to be in movies.
22 A. Oh, yes, I wanted to be an actor for a
23 while. But now I want to -- hopefully I can -- I
24 want -- well, I don't really want to say, but I want
25 to do something else.
26 Q. Let me ask you what you just said. Did you
27 say you want to be in movies.
28 A. I wanted to. But now that I'm in high 1979

1 school and I'm seeing all the other careers, I want
2 to do -- I want to be in law enforcement, or

3 whatever.

4 Q. At the time you were going to Neverland, did
5 you want to be in movies.

6 A. Yes.

7 Q. Did you tell Michael Jackson you wanted to
8 be in movies.

9 A. Yes.

10 Q. To your knowledge, did your brother Star say
11 he wanted to be in movies.

12 A. I'm pretty sure he wanted to.

13 Q. Is there anything you just heard your mother
14 say that you think is not true.

15 A. No. I don't think -- I think everything she
16 said was true.

17 Q. Okay.

18 MR. SANGER: Putting in Disk 2, Your Honor.

19 (Whereupon, a portion of a DVD, People's
20 Exhibit 340, Disk 2, was played for the Court and
21 jury.)

22 Q. BY MR. MESEREAU: Is everything you just
23 said correct.

24 A. I don't -- I don't think I said anything
25 right there.

26 Q. Well, you said -- you've seen the first disk
27 of this rebuttal video, correct.

28 A. Yes. 1980

1 Q. How many lies do you think you told.

2 A. Um, I think maybe about four.

3 Q. Four lies.

4 A. Yeah.

5 Q. How many lies do you think your mother told.

6 A. Four or five. I'm not -- I mean --

7 Q. Four or five lies.

8 A. I wasn't counting or anything.

9 Q. I'm just asking what your opinion is. How
10 many lies do you think your sister told.

11 A. One or two.

12 Q. And how many lies do you think Star told.

13 A. Oh, he wasn't really talking, so I don't
14 think he really said anything.

15 (Whereupon, a portion of a DVD, People's
16 Exhibit 340, Disk 2, was played for the Court and
17 jury.)

18 Q. BY MR. MESEREAU: Now, you heard what your
19 mother just said, right.

20 A. Yes.

21 Q. You saw the way she expressed herself,
22 correct. Do you think she's just doing what Dieter
23 wants.

24 A. No, not right there.

25 Q. Do you think she's doing what she wants.

26 A. Yes.
27 (Whereupon, a portion of a DVD, People's
28 Exhibit 340, Disk 2, was played for the Court and 1981

1 jury.)

2 Q. BY MR. MESEREAU: You just said you didn't
3 like Martin Bashir, was that true.

4 A. Uh-huh. Yeah, because when it came out on
5 the CNN and stuff, then I saw it, I saw parts of it.
6 I mean, what part I know Bashir was saying, that at
7 the time I didn't feel was true.

8 Q. You didn't like him personally.

9 A. Not really. I mean --

10 Q. When did you decide you didn't like Martin
11 Bashir.

12 A. After I found out that he -- that it was an
13 actual documentary and what he was saying about
14 Michael.

15 Q. Okay.

16 (Whereupon, a portion of a DVD, People's
17 Exhibit 340, Disk 2, was played for the Court and
18 jury.)

19 Q. BY MR. MESEREAU: Now, your mother mentions
20 gang signs. Do you know what she's talking about.

21 A. She was probably joking about something.

22 Q. Do you know what she was joking about.

23 A. Not really.

24 Q. She talks about friends on the west side.

25 Do you know what that's all about.

26 A. It was just a joke, about like -- because
27 you know how gangs say "east side" or "west side" or
28 something. 1982

1 Q. But you're really not sure what she was
2 talking about, right.

3 A. Are you trying to say my mom's in a gang or
4 something.

5 Q. No, I'm asking you a question. Do you know
6 what she was referring to.

7 A. She was making a joke.

8 Q. Okay. And what was the joke about, in your
9 opinion.

10 A. About gangs. Pretty much making fun of
11 gangs.

12 Q. Okay. And were you joining with her in
13 making fun of gangs.

14 A. I was laughing, I guess, right there.

15 Q. Okay. Did you do a gang sign.

16 A. No. She probably -- I was probably pointing
17 or something, and then -- I don't know. I'm not a

18 part of a gang. I'm not a part of a crew or
19 something.
20 Q. I'm asking you if you made a gang sign in
21 this video.
22 A. No.
23 Q. Do you know what your mother was referring
24 to.
25 A. No. She was probably just joking about
26 something that they were talking about off camera.
27 Q. Okay. But you don't know for sure, right.
28 A. No. 1983

1 Q. Okay.
2 (Whereupon, a portion of a DVD, People's
3 Exhibit 340, Disk 2, was played for the Court and
4 jury.)
5 Q. BY MR. MESEREAU: Is your mother telling the
6 truth.
7 A. Dieter told her to talk about the hands
8 thing.
9 Q. I'm asking if your mother is telling the
10 truth. I'm not asking about Dieter.
11 A. She talked about her opinions, so I don't
12 know if that's her -- if she was really telling the
13 truth or not.
14 Q. Did someone tell you whenever I ask a
15 question like this, to refer to Dieter.
16 A. No. I'm referring to Dieter because
17 Dieter's the one that told us to say all these
18 things.
19 Q. Did your mother just tell the truth, in your
20 opinion.
21 A. Um, I don't know, because that's her
22 opinion.
23 Q. In your opinion, Gavin Arvizo, did your
24 mother just tell the truth.
25 A. I do not know, because that's -- you can
26 call my mother and ask her that, because I don't
27 know.
28 THE COURT: All right. Let's take our break. 1984

1 (Recess taken.)
2 THE COURT: Go ahead.
3 MR. MESEREAU: With your permission, Your
4 Honor, we'll just continue the tape.
5 THE COURT: All right.
6 (Whereupon, a portion of a DVD, People's
7 Exhibit 340, Disk 2, was played for the Court and
8 jury.)
9 Q. BY MR. MESEREAU: Gavin, is your mother, in

10 your opinion, telling the truth.
11 A. I think so, I guess.
12 Q. Excuse me.
13 A. I believe so, I guess.
14 Q. I couldn't hear what you said.
15 A. I believe so, I guess.
16 Q. Okay. Have you heard her say anything at
17 this point that's not true.
18 A. I mean, Michael was nice to me and stuff,
19 and I felt as if he was like a father to me, so --
20 Q. Okay.
21 (Whereupon, a portion of a DVD, People's
22 Exhibit 340, Disk 2, was played for the Court and
23 jury.)
24 Q. BY MR. MESEREAU: At some point you and your
25 mother and your brother and your sister concluded
26 that Michael Jackson didn't want you all to be part
27 of his family, right.
28 A. Yes. 1985

1 Q. And you were upset about that, correct.
2 A. We concluded because --
3 Q. Just answer my question, if you would,
4 please. Okay.
5 A. Okay.
6 Q. At some point you, your mother, your sister
7 and your brother realized that you were not going to
8 spend the rest of your lives as part of Michael
9 Jackson's family, correct.
10 A. Well --
11 Q. Is that true or not.
12 A. It's like we didn't really conclude all
13 together, "Hey, everybody." I mean, I guess we all
14 realized on our own that, like -- that he isn't as
15 nice of a man as we thought he was.
16 Q. Because he wasn't going to let you be part
17 of the Michael Jackson family, correct.
18 A. We never wanted to be part of the Michael
19 Jackson family. The only part of it was, he was
20 just like a father to me.
21 Q. Yes.
22 A. That's the only part in connection to a
23 family there would be. We weren't expecting a --
24 to live with him forever. We were expecting --
25 well, we just thought of him -- I thought of him as
26 a father figure.
27 Q. You expected Michael Jackson to support you,
28 your mother, your brother and your sister 1986

1 indefinitely, correct.

2 A. No.

3 Q. You wanted to be part of his family, and
4 when you found out you weren't going to be, you got
5 angry, true.

6 A. No.

7 Q. You found out --

8 A. I -- I didn't -- I never thought we were
9 going to be, "Okay, he's going to be our dad. We're
10 going to live in the house together," and blah,
11 blah, blah. No.

12 He -- I saw him as like someone who could
13 guide me as a father would; someone who can talk to
14 me and stuff like that. I mean, it would be stupid
15 if you wanted to live with a man like that for the
16 rest of your life. He's not really my father.

17 Q. Would you agree that your mother got very
18 angry in front of you when she realized Michael
19 Jackson was fading out of your lives.

20 A. No.

21 Q. Would you agree that you got very angry
22 when, at some point, you realized Michael Jackson
23 was fading out of your family's life, right.

24 A. I didn't really get angry. I mean, it's --
25 I mean, I didn't think he was going to live with us
26 forever. I just -- like, you know the Big Brother
27 program thing for, like, kids that don't have dads.
28 That's kind of what I thought of Michael as. 1987

1 Q. You expected Michael Jackson to keep helping
2 you, your mother, your brother and your sister,
3 right.

4 A. I didn't expect it from him, no.

5 Q. And that's why you got very angry when you
6 realized certain people wanted you to leave the
7 country, right.

8 A. Michael told me that he was going to come
9 over later after we were there, so -- after we even
10 got there.

11 Q. And were you looking forward to meeting
12 Michael in Brazil.

13 A. Yes. I guess.

14 Q. And at some time did you realize that
15 Michael wasn't going to Brazil.

16 A. No, to my understanding was that he was
17 always going to come a week later after we got
18 there.

19 Q. But at some point you realized even you
20 weren't going to Brazil, right.

21 A. No, I thought the whole time they were
22 trying to get us to go to Brazil.

23 Q. And when you wanted to go to your
24 grandparents', you all got into a car and Vinnie

25 drove you to your grandparents', right.
26 A. After -- yeah. Vinnie drove us there, yes.
27 Q. And at that point you realized you're never
28 going to be in Michael Jackson's family, right. 1988

1 A. Well -- I never wanted to be in his family.
2 I was never looking for that.
3 MR. MESEREAU: Let's keep going.
4 (Whereupon, a portion of a DVD, People's
5 Exhibit 340, Disk 2, was played for the Court and
6 jury.)
7 Q. BY MR. MESEREAU: Now, your brother Star had
8 just said that going to Neverland Ranch was
9 something you always looked forward to, right.
10 A. Yes.
11 Q. And at one point you realized you probably
12 weren't going to be returning to Neverland Ranch,
13 right.
14 A. After it was all over, I didn't want to go
15 back.
16 Q. At some point you realized you weren't going
17 to be in Michael Jackson's family, you weren't going
18 to Neverland Ranch, and it wasn't until then that
19 you ever came up with these allegations of
20 molestation, right.
21 A. I didn't want to go back after I came back.
22 Q. Please answer my question.
23 It wasn't until you realized that you and
24 your mother and your brother and your sister were
25 not going to be part of Michael Jackson's family
26 that you ever told anybody about any molestation,
27 right.
28 A. It wasn't as if we got together and realized 1989

1 it. It wasn't -- so your question isn't really
2 working.
3 MR. MESEREAU: Your Honor, could I request
4 that the witness be instructed to answer the
5 question.
6 THE WITNESS: I don't really understand the
7 question.
8 THE COURT: All right. Go ahead. Rephrase
9 your question.
10 Q. BY MR. MESEREAU: Okay. It wasn't until you
11 realized you were not going to be part of Michael
12 Jackson's family, you were not going to meet Michael
13 Jackson in Brazil, you were not going to be going to
14 Neverland, that you ever came up with these
15 allegations of molestation, right.
16 A. I didn't come and talk to the -- to the --

17 my mom always wanted to leave. She was the one that
18 was able to realize and get us out of there. I
19 liked being there.
20 MR. MESEREAU: Excuse me.
21 Your Honor, can I ask the witness be
22 instructed to just answer the question.
23 THE COURT: No.
24 THE WITNESS: I don't understand --
25 THE COURT: Just a minute.
26 No. Your question is compound and it's
27 argumentative. Break your question down.
28 MR. MESEREAU: Okay. I will, Your Honor. 1990

1 Q. Until you realized you were not going to be
2 part of Michael Jackson's family, you never made any
3 allegation of child molestation, correct.
4 A. I didn't want to be part of his family. I
5 just saw him as a father figure.
6 Q. Until you realized Michael Jackson was not
7 going to meet you in Brazil, you never made any
8 allegation of child molestation, right.
9 A. I didn't even really want to go to Brazil.
10 Q. Until you left Neverland for the last time,
11 you never made any allegation of child molestation,
12 correct.
13 A. I didn't tell anyone until I left for the
14 last time, correct.
15 Q. And never called the police until after
16 you'd seen two lawyers, right.
17 MR. SNEDDON: Object as argumentative, Your
18 Honor.
19 THE COURT: Overruled.
20 THE WITNESS: Yes, it wasn't until I saw two
21 lawyers until I told the police what really
22 happened.
23 MR. MESEREAU: Okay. We can keep going.
24 (Whereupon, a portion of a DVD, People's
25 Exhibit 340, Disk 2, was played for the Court and
26 jury.)
27 Q. BY MR. MESEREAU: Did you, your mother, your
28 brother, your sister actually have to share cereal 1991

1 when you were too poor to get other food.
2 A. I know we had problems with trying to get
3 food and stuff, but I don't know if we shared a box
4 of cereal.
5 Q. Okay.
6 A. And --
7 (Whereupon, a portion of a DVD, People's
8 Exhibit 340, Disk 2, was played for the Court and

9 jury.)
10 Q. BY MR. MESEREAU: At this point in time, did
11 you agree with what your mother just said. Did you
12 think Michael was there for you.
13 A. Yeah, I believe -- I thought that Michael
14 was there for us. But he -- he helped us.
15 (Whereupon, a portion of a DVD, People's
16 Exhibit 340, Disk 2, was played for the Court and
17 jury.)
18 Q. BY MR. MESEREAU: Now, you and your family
19 did pray with Michael, correct.
20 A. Yes. I believe we asked him if we can pray
21 at the dinner tables.
22 Q. You also one time were in the theater; you,
23 your mother, your brother and your sister and
24 Michael. Remember that.
25 A. We were in the theater a lot together.
26 Q. Do you remember your mother wanted everyone
27 to hold hands and pray with Daddy Michael.
28 A. No. 1992

1 Q. You don't remember that at all.
2 A. No.
3 Q. Okay. Did you typically pray at the dinner
4 table with Michael.
5 A. We would ask him sometimes.
6 Q. You asked him and he said, "Okay".
7 A. Yes.
8 Q. And what prayers did you say.
9 A. "Thank God for the food we were going to
10 eat," and stuff like that.
11 Q. Okay.
12 (Whereupon, a portion of a DVD, People's
13 Exhibit 340, Disk 2, was played for the Court and
14 jury.)
15 Q. BY MR. MESEREAU: In your opinion, is your
16 mother telling the truth about that statement.
17 A. About the relationship between me and
18 Michael.
19 Q. About what you just heard.
20 A. Yeah, I was pretty close to Michael, as I've
21 said many times.
22 Q. So do you have any -- excuse me, let me
23 rephrase that.
24 What your mother just says is true, as far
25 as you're concerned.
26 A. Yeah. Up to that point, yes.
27 Q. Are you saying "yes".
28 A. Yes. 1993

1 (Whereupon, a portion of a DVD, People's
2 Exhibit 340, Disk 2, was played for the Court and
3 jury.)

4 Q. BY MR. MESEREAU: When these statements were
5 made, you did not want your relationship with Mr.
6 Jackson to end, correct.

7 A. No, I still wanted to be able to call him
8 and stuff like that.

9 Q. And among all the celebrities that you had
10 met, no celebrity had included you in their family
11 the way Michael Jackson had, right.

12 A. He didn't really include me in his family.
13 I just -- as I said before, I looked to him as a
14 father figure, and he looked at me as a son, because
15 he was the only father figure I had.

16 Q. And your letters to him reflected that,
17 correct.

18 A. Yes.

19 Q. Your calls to him reflected that, correct.

20 A. Yes.

21 Q. When you went to the ranch, you felt you
22 were part of a family, correct.

23 A. As I just told you, I felt as if he was my
24 guider, my -- a teacher to me in life. A father
25 figure to me.

26 Q. And when you left Neverland for the last
27 time, you felt your father had rejected you,
28 correct. 1994

1 A. Not really, because I found a new father.

2 I found my now father.

3 Q. When you left Neverland, did you feel that
4 the father figure Michael Jackson had rejected you;
5 yes or no.

6 A. I didn't need him. I didn't want him.

7 Q. When you left Neverland for the last time,
8 did you feel that the father figure Michael Jackson
9 had rejected you; yes or no.

10 A. As I said, I didn't feel that. I didn't
11 feel that I was rejected, because I had my now,
12 which I consider my real father.

13 Q. You knew Jay Jackson long before these
14 statements were made, correct.

15 A. Yes.

16 Q. You knew Jay Jackson long before you were
17 referring to Michael Jackson as a father figure,
18 correct.

19 A. Not long before, but, I mean, he was my
20 mom's boyfriend. I didn't know him. I wasn't close
21 to him.

22 But when I came back, I saw his concern.

23 I saw the way he felt about my family and how he

24 would hug me, and actually feel like he's a man; you
25 know what I mean. And he's my father.
26 Q. At the time you and your mother and your
27 brother and your sister made the statements on this
28 video, your mother had been in a relationship with 1995

1 Jay Jackson for many months, true.

2 A. Yes.

3 Q. At the time your mother makes these
4 statements that Michael Jackson is a father figure,
5 she's in a relationship with Jay Jackson, right.

6 A. Yes.

7 Q. Jay Jackson wasn't present when this video
8 was done, correct.

9 A. No.

10 Q. Now, at some point did you learn that the
11 actual rebuttal show went on television.

12 A. This.

13 Q. Yes.

14 A. I never knew it went on television.

15 Q. Did you ever know any rebuttal show was ever
16 made to rebut what was said in Bashir.

17 A. No.

18 Q. Did you ever hear anything about that.

19 A. Oh, yes. Um, I remember something happened
20 where -- Michael had me sign some papers or
21 something like that. I think something came on.

22 Q. And at some point you learned there was a
23 Maury Povich show that was done as a rebuttal to the
24 Bashir documentary, correct.

25 A. Yes. I remember them coming and filming,
26 but --

27 Q. And you learned at some point that none of
28 this footage in which you and your family are 1996

1 interviewed ever appeared on that Maury Povich
2 television show, right.

3 A. I didn't watch it.

4 Q. As you sit here today, do you know whether
5 or not any of this footage was ever used in the
6 Maury Povich rebuttal show.

7 A. No, I don't know.

8 Q. You've never discussed that with anybody.

9 A. No.

10 Q. Okay. At this particular point in time, you
11 thought Michael Jackson was going to give your
12 family a home in the Hollywood Hills, correct.

13 A. No.

14 Q. Ever hear anybody discuss that.

15 A. No.

16 (Whereupon, a portion of a DVD, People's
17 Exhibit 340, Disk 2, was played for the Court and
18 jury.)
19 Q. BY MR. MESEREAU: While your mother was
20 dating Jay Jackson, you considered Michael Jackson a
21 father figure, right.
22 A. Yes. Well, if -- she was dating her -- him
23 right now, so in this time period I did see Michael
24 as a father figure.
25 Q. Approximately when did you first meet Jay
26 Jackson.
27 A. I don't know. I don't remember the first
28 time. But -- I mean, I didn't get close to him 1997

1 until I came back from Neverland.
2 Q. It was many months before this, correct.
3 A. Yes, I believe so.
4 Q. In fact, after this rebuttal was filmed, you
5 went to Jay Jackson's apartment for the interview
6 with the three social workers, right.
7 A. Yes.
8 Q. Were you living at his apartment at that
9 point.
10 A. Yes.
11 Q. How long had you been living at Jay
12 Jackson's apartment at that point.
13 A. A few months. But he was just my mom's
14 boyfriend. He wasn't my stepfather yet.
15 Q. Okay.
16 A. He was just a guy. He was not my stepfather
17 yet.
18 Q. So you had lived at Jay Jackson's apartment
19 for a couple of months before this rebuttal video
20 was filmed, right.
21 A. I believe so, yes.
22 Q. But during those months you considered
23 Michael Jackson to be your father figure, right.
24 A. No, in those months I had no father figure.
25 That's why when I came to Neverland and Michael was
26 like this, I considered Michael as my father figure.
27 MR. MESEREAU: Let's keep going.
28 (Whereupon, a portion of a DVD, People's 1998

1 Exhibit 340, Disk 2, was played for the Court and
2 jury.)
3 Q. BY MR. MESEREAU: Did you discuss with Jay
4 Jackson what your mother was going to say in this
5 video.
6 A. No. I don't even know -- I didn't even know
7 that Jay Jackson even knew about this.

8 Q. Do you recall any discussion at any time
9 with Jay Jackson about you and your family being
10 videotaped.

11 A. No, I do not.

12 Q. You recall going to Jay Jackson's apartment
13 after this was filmed, right.

14 A. Not really.

15 Q. Did you ever discuss with Jay Jackson this
16 videotape after it was filmed.

17 A. No, I don't think I did.

18 Q. Have you ever discussed with Jay Jackson at
19 any time the fact that you made this videotape.

20 A. No, I don't think so.

21 Q. Have you ever heard your mother discuss it
22 with Jay Jackson.

23 A. No.

24 Q. Now, your mother has a curl coming down her
25 face. Do you see that.

26 A. Yes.

27 Q. Did she normally wear her hair that way.

28 A. Yeah, when she had her hair permed, she 1999

1 always wore it like that.

2 Q. Always like that.

3 A. Uh-huh.

4 Q. Was she ever trying to look like Janet
5 Jackson.

6 A. No.

7 Q. Okay.

8 (Whereupon, a portion of a DVD, People's
9 Exhibit 340, Disk 2, was played for the Court and
10 jury.)

11 Q. BY MR. MESEREAU: Was what your mother just
12 said true.

13 A. He's a nice man. He's -- he's approached
14 and he's kind of friendly.

15 Q. Was what your mother just said true.

16 A. Yes.

17 Q. Did you believe she was telling the truth
18 when she talked about Michael Jackson's honesty.

19 A. The way I felt about it was kind of awkward,
20 but, I mean, he was pretty honest. But, I mean, the
21 things that he did was kind of dishonest; you know
22 what I mean.

23 Q. Let me ask you what you're talking about.

24 Did you think when your mother said Michael Jackson
25 was honest and told the truth, that she was being
26 truthful.

27 A. Yes. He's a nice man.

28 Q. Did you think your mother was being truthful 2000

1 when she made that statement we just heard.
2 A. I don't know. You can ask her.
3 Q. What did you think at the time.
4 A. I don't remember what I thought at the time.
5 Q. What do you think now. Do you think she was
6 being honest.
7 A. As I just said, yes, Michael was a nice man.
8 (Whereupon, a portion of a DVD, People's
9 Exhibit 340, Disk 2, was played for the Court and
10 jury.)
11 Q. BY MR. MESEREAU: Now, you've told the jury
12 a number of times that Dieter was telling you what
13 to say on this, is that correct.
14 A. Dieter told us a lot of things to say.
15 Q. Dieter told you general things to say.
16 A. Yes. He told us what to say pretty much,
17 yeah.
18 Q. And I believe when Prosecutor Sneddon was
19 asking you questions, he talked about some type of a
20 sheet of questions. Do you remember that.
21 A. Uh-huh.
22 Q. Did somebody show you a sheet with some
23 questions on it before you did this interview.
24 A. Yes, actually, and kind of waving it in
25 front of the camera right here.
26 Q. And how many sheets are you talking about.
27 A. I'm not sure how many sheets it was.
28 Q. It was just a certain number of questions 2001

1 they told you they were going to ask you, correct.
2 A. Yes. And Dieter went over it with us and
3 told us the answer, what to say.
4 Q. At the time when Dieter went over those
5 questions with you, did you think Michael Jackson
6 had abandoned you as a father figure.
7 A. No. Not then.
8 Q. Okay.
9 (Whereupon, a portion of a DVD, People's
10 Exhibit 340, Disk 2, was played for the Court and
11 jury.)
12 Q. BY MR. MESEREAU: Gavin, you and your mother
13 are living with Major Jay Jackson when she makes
14 this statement about Michael Jackson being a parent,
15 right.
16 A. Yes.
17 Q. Did you think of Michael Jackson as a third
18 parent.
19 A. No. I saw him, as I've said many times
20 today, as a guider, as a father figure. Not my
21 actual father, as I consider Major Jay Jackson
22 today, as he is my stepfather.

23 Q. He has since married your mother, correct.
24 A. Yes.
25 Q. Now, if you know, were -- were Major Jay
26 Jackson and your mother engaged when this video was
27 made.
28 A. I don't know. 2002

1 Q. Did you expect this video to be on national
2 television at some point when you made it.
3 A. I didn't even think about it.
4 Q. Did you ever discuss that with your mom.
5 A. No.
6 Q. Okay. Do you remember any discussion
7 involving your mother before this was filmed about
8 whether or not she should sign any documents.
9 A. No.
10 Q. Don't recall that at all.
11 A. Not really, no.
12 Q. Okay.
13 (Whereupon, a portion of a DVD, People's
14 Exhibit 340, Disk 2, was played for the Court and
15 jury.)
16 Q. BY MR. MESEREAU: Now, when you used to
17 visit Neverland and Michael Jackson was present, you
18 used to see his children, correct.
19 A. Yes.
20 Q. When you flew to Miami and saw Michael
21 Jackson, he was with his children, correct.
22 A. Yes. I'm sure his children were there.
23 Q. When you came back from Miami and started
24 visiting Neverland, when Michael Jackson was there,
25 his children were always there, correct.
26 A. Um, no. Because there was one time that he
27 wasn't at Neverland and he flew somewhere on a
28 commercial plane or something and he came back. 2003

1 Q. Let me rephrase the question.
2 When you were at Neverland and Michael was
3 there, you saw his children, true.
4 A. Yes.
5 MR. MESEREAU: Okay.
6 (Whereupon, a portion of a DVD, People's
7 Exhibit 340, Disk 2, was played for the Court and
8 jury.)
9 Q. BY MR. MESEREAU: When your mother made that
10 statement, in your opinion, was she telling the
11 truth.
12 A. Yes, because sometimes we'd accidentally
13 crash a cart or something, and -- otherwise,
14 probably other people would yell at us or something.

15 And Michael would just say, "It's okay. They can
16 fix it."
17 Q. Did you ever get in any trouble at Neverland
18 other than crashing carts.
19 A. Not that I can think of. I think that's the
20 only real bad thing that we did. I mean,
21 accidentally crashing a cart, that's about it.
22 MR. MESEREAU: Okay.
23 (Whereupon, a portion of a DVD, People's
24 Exhibit 340, Disk 2, was played for the Court and
25 jury.)
26 MR. MESEREAU: I believe that's the end,
27 Your Honor.
28 Q. You remember returning from Miami to 2004

1 Neverland, correct.
2 A. Yes.
3 Q. Do you remember the next day seeing Ed
4 Bradley from 60 Minutes at Neverland.
5 A. No.
6 Q. Do you remember seeing entertainment company
7 executives at Neverland the next day.
8 A. No.
9 Q. Were you there the next day.
10 A. Yes, but I was probably out playing on the
11 rides or something.
12 Q. Do you recall the day that Jesus Salas drove
13 your family away from Neverland.
14 A. Yes.
15 Q. Do you recall your mother getting a full
16 body wax that day in Los Olivos.
17 A. No.
18 Q. Did you know anything about that.
19 A. No.
20 Q. Do you recall your mother telling you she
21 was going to leave Neverland to go to a salon.
22 A. No.
23 Q. Did you ever discuss that with your mother.
24 A. No.
25 Q. Do you know someone named Brett Ratner.
26 A. Yes.
27 Q. How do you know him.
28 A. He was Chris Tucker's director for the movie 2005

1 Rush Hour.
2 Q. Do you recall asking Mr. Ratner if he would
3 arrange for you to fly to Florida to meet Michael
4 Jackson.
5 A. No, I don't remember that.
6 Q. You never did that.

7 A. I don't remember ever doing that.
8 Q. Okay. Do you remember Michael Jackson
9 flying to Florida with Brett Ratner.
10 A. No.
11 Q. Never heard about that.
12 A. No.
13 Q. Okay. Do you recall your mother ever
14 signing an agreement regarding distribution of any
15 of this footage on television.
16 A. No.
17 Q. Well, you said something before -- or you
18 began to say something about Michael Jackson asking
19 you to sign an agreement, correct.
20 A. Yes, there's a little document he had me
21 sign so that I can sign for the rebuttal or
22 something. I don't know.
23 Q. Do you remember signing that document.
24 A. Yes.
25 Q. Michael never asked you to sign that, did
26 he.
27 A. Yeah, he did. And he was with Brett Ratner,
28 and Brett Ratner signed as a witness. 2006

1 Q. Do you recall your mother signing it also.
2 A. No. I was the only one that signed it.
3 Q. Do you recall your mother signing any
4 agreement regarding this video.
5 A. No.
6 Q. Okay. Do you recall your mother making any
7 trips outside of Neverland into the city to do
8 errands.
9 A. No.
10 Q. Do you recall your mother going shopping
11 with Vinnie Amen.
12 A. No.
13 MR. SNEDDON: Excuse me, I'm going to object
14 to vagueness as to what period of time we're talking
15 about here.
16 MR. MESEREAU: Sure.
17 Q. We're talking about February 21st, which
18 would be the same day you met Attorney William
19 Dickerman and Jamie Masada at The Laugh Factory.
20 Do you remember that.
21 A. I remember meeting him.
22 Q. Do you remember your mother going shopping
23 with Vinnie.
24 A. No.
25 Q. Do you remember your mother getting her hair
26 done with Vinnie.
27 A. No.
28 Q. Do you remember shopping at Robinson's-May. 2007

1 A. No.
2 Q. Do you remember shopping -- excuse me.
3 Do you remember eating at an Outback Steakhouse.
4 A. No.
5 Q. Do you remember your mother going to any
6 salon that day.
7 A. I think I remember my mom go to a salon and
8 meet my stepfather.
9 Q. Do you know when that was, approximately.
10 A. No.
11 Q. Do you remember going on a shopping spree
12 around February 26th with your mother.
13 A. I don't know. I remember they took us to
14 Anchor Blue once because we told them that we didn't
15 have a lot of clothes at Neverland, and they didn't
16 want us to go to our house.
17 Q. Do you remember going to Pacific Sunwear.
18 A. No.
19 Q. How about Banana Republic.
20 A. Yes. I bought some boxers, I think.
21 Q. How about Gap Outlet.
22 A. No.
23 Q. How about Levi Outlet.
24 A. No.
25 Q. How about Abercrombie & Fitch.
26 A. No.
27 Q. Wilson's Luggage, did you ever go there with
28 your mother. 2008

1 A. Yeah, they bought us luggage because they
2 were saying they were going to take us to Brazil,
3 and we didn't have luggage.
4 Q. Now, two days later -- excuse me, one day
5 later, do you recall going shopping to
6 Robinson's-May.
7 A. No.
8 Q. Do you recall going shopping to Adidas.
9 A. No.
10 Q. How about Old Navy.
11 A. No.
12 Q. Anchor Blue.
13 A. Yes.
14 Q. Robinson's-May.
15 A. No.
16 Q. Okay. Do you remember on February 28th
17 going to Hsong's Barber Shop for a haircut.
18 A. I got my hair cut there, but I don't know if
19 we went on February 28th.
20 Q. Do you remember going there with your
21 mother.

22 A. I remember going there in the past with my
23 mother.
24 Q. When you were there, did anyone scream for
25 help.
26 A. I don't know if we went on February 28th to
27 Hsong's Barber Shop.
28 Q. When you went to Hsong's Barber Shop, did 2009

1 anyone scream for help, as far as you know.
2 A. As I said, I don't remember whether we went
3 there during the time that we were down in Los
4 Angeles area.
5 Q. Do you remember anyone screaming for help at
6 any of the stores that you recall going to during
7 this period of time.
8 A. No.
9 Q. Do you remember going to the Brazilian
10 consulate.
11 A. Yes.
12 Q. You went in there with your mother, right.
13 A. Yes, I'm pretty sure.
14 Q. Do you remember anybody screaming for help
15 in the Brazilian consulate.
16 A. No.
17 Q. You were with your entire family, right.
18 A. Yes.
19 Q. Okay. Do you remember seeing a movie called
20 Old School around March 1st, 2003.
21 A. A little bit.
22 Q. Your mother, your brother, your sister and
23 you went to that movie theater, right.
24 A. I don't really remember.
25 Q. You also went to Anchor Blue that day,
26 right.
27 A. I believe so. I guess.
28 Q. When you went to see that movie, do you 2010

1 remember anybody screaming for help.
2 A. No.
3 Q. Do you remember eating at Johnny Rocket's
4 Burgers that day.
5 A. Oh, yeah. I remember that place. It was
6 pretty good.
7 Q. And that was after you saw the movie, right.
8 A. I don't know.
9 Q. You went for burgers and ice cream, right.
10 A. Yes.
11 Q. Do you remember anybody screaming for help
12 when you were at Johnny Rocket's.
13 A. No.

14 Q. Okay. Do you know someone named Brad Buxer.
15 A. No.
16 Q. Did you ever meet any of Michael Jackson's
17 movie producers at Neverland.
18 A. No.
19 Q. Do you know someone named Rio.
20 A. I think he was a little kid that was there
21 for a while.
22 Q. When did you first meet Rio.
23 A. I don't remember.
24 Q. But do you remember seeing Rio at Neverland.
25 A. Yeah, he stood there for like a week or --
26 Q. Did you stay in a guesthouse with Rio.
27 A. No.
28 Q. Never did. 2011

1 A. No. Well, I might have hung out with him
2 for a while. No, I hung out with his sister, you
3 know. And she was telling me about some girls that
4 thought I was cute from the Martin Bashir thing, and
5 then that was it.
6 Q. This is Rio's sister.
7 A. Yes.
8 Q. Was there a television in the guest room at
9 Neverland.
10 A. There's a television in every guest room.
11 Q. Did you ever use that television.
12 A. We were always playing. We never watched
13 T.V.
14 Q. Was Rio ever in a room with you at the
15 guesthouse.
16 MR. SNEDDON: Your Honor, I'm going to
17 object to this line of questioning under the 403
18 ruling the Court made.
19 THE COURT: Sustained.
20 Well, just a minute. I will change that
21 ruling. You may ask.
22 MR. MESEREAU: Thank you, Your Honor.
23 Q. Was Rio ever in a guest room with you when
24 you were watching T.V. at Neverland.
25 A. Um, no. I don't remember really -- I mean,
26 I might have hung out with him in a guest room for a
27 minute, but, I mean, I don't remember watching T.V.
28 with him. 2012

1 Q. You don't.
2 A. No.
3 Q. Are you saying you don't remember or are you
4 saying it just didn't happen.
5 A. I don't think it happened.

6 Q. Okay. Do you recall ever telling Rio you
7 wanted to look at adult movies on television at
8 Neverland.
9 MR. SNEDDON: I'm going to object.
10 THE COURT: Overruled.
11 THE WITNESS: No, I don't remember that.
12 Q. BY MR. MESEREAU: Ever remember stealing
13 alcohol from Michael Jackson's bedroom when Rio was
14 present.
15 A. No.
16 Q. Do you recall stealing a \$1,000 laminated
17 bill from Michael's room.
18 A. A thousand dollar bill.
19 Q. That was laminated.
20 A. Do they make thousand-dollar bills.
21 Q. Did you ever steal one.
22 A. No.
23 Q. Ever recall masturbating in front of Rio.
24 A. No.
25 Q. Now, earlier in your testimony, you said
26 that the only time you'd ever tasted wine was in
27 church. Do you remember that.
28 A. Yes. 2013

1 Q. Are you telling the jury the only time you
2 tasted wine before you went to Neverland was in a
3 church.
4 A. Yes.
5 Q. Did you ever tell Rio or anyone else at
6 Neverland that you knew what wine tasted like.
7 A. No. I don't remember telling him that.
8 Q. Do you remember calling Chris Tucker and
9 telling him that you wanted to go to Miami to be
10 with Michael Jackson.
11 A. No.
12 Q. That never happened.
13 A. I don't know if it did.
14 Q. You don't know if it did.
15 A. No.
16 Q. Did your mother ever ask you to call Chris
17 Tucker so that your family could go to Miami to be
18 with Michael Jackson.
19 A. No.
20 Q. Has your mother ever coached you on what to
21 say in this case.
22 A. No.
23 Q. Has your mother coached you on what to say
24 in your legal disputes with your father.
25 A. No.
26 Q. Has your mother ever coached you on what to
27 say in the J.C. Penney case.
28 A. No. 2014

1 Q. Has your mother asked you to write out what
2 you were going to say before you went to court.
3 A. No.
4 Q. Have you ever done that.
5 A. Done --
6 Q. Written out what you plan to say before you
7 went to court.
8 A. No.
9 THE COURT: Is this a good place to stop.
10 MR. MESEREAU: Okay.
11 THE COURT: All right. We'll recess until
12 tomorrow morning at 8:30. Remember the admonitions.
13 See you then.
14 (The proceedings adjourned at 2:30 p.m.)
15 --o0o--
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28 2015

1 REPORTER'S CERTIFICATE

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3

4 THE PEOPLE OF THE STATE OF)
5 CALIFORNIA,)
6 Plaintiff,)
7 -vs-) No. 1133603
8 MICHAEL JOE JACKSON,)
9 Defendant.)

10
11

12 I, MICHELE MATTSON McNEIL, RPR, CRR, CSR
13 #3304, Official Court Reporter, do hereby certify:
14 That the foregoing pages 1867 through 2015
15 contain a true and correct transcript of the
16 proceedings had in the within and above-entitled
17 matter as by me taken down in shorthand writing at
18 said proceedings on March 14, 2005, and thereafter
19 reduced to typewriting by computer-aided
20 transcription under my direction.

21 DATED: Santa Maria, California,
22 March 14, 2005.

23

24

25

26

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

28 OFFICIAL COURT REPORTER 2016