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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. )

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17 REPORTER'S TRANSCRIPT OF PROCEEDINGS

18

19 MONDAY, APRIL 4, 2005

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21 8:30 A.M.

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23 (PAGES 4645 THROUGH 4698)

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

28 BY: Official Court Reporter 4645

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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. Nicola is listed as "N" on index. Mr. Mesereau is listed as "M" on  
index.

6 Ms. Yu is listed as "Y" on index. Mr. Sanger is listed as "SA" on  
index.

7 Mr. Oxman is listed as "O" on index.

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9 PLAINTIFF'S

10 WITNESSES DIRECT CROSS REDIRECT RECROSS

11 SALAS, Jesus 4649-A

12 (Cont'd)

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1 E X H I B I T S

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3 PLAINTIFF'S NO. DESCRIPTION I.D. EVID.

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1 Santa Maria, California

2 Monday, April 4, 2005

3 8:30 a.m.

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5 THE COURT: Good morning.

6 THE JURY: (In unison) Good morning.

7 COUNSEL AT COUNSEL TABLE: (In unison)

8 Good morning, Your Honor.

9 THE COURT: Are you all feeling like I am?

10 A JUROR: Probably.

11 THE COURT: That damn time change.

12 (Laughter.)

13 THE COURT: All right. Counsel, call your

14 next witness.

15 MR. AUCHINCLOSS: Thank you, Your Honor.

16 We still have Jesus Salas on the stand.

17

18 JESUS SALAS

19 Having been previously sworn, resumed the

20 stand and testified further as follows:

21

22 THE COURT: Please be seated. You're still

23 under oath.

24

25 DIRECT EXAMINATION (Continued)

26 BY MR. AUCHINCLOSS:

27 Q. Good morning, Mr. Salas.

28 A. Good morning. 4649

1 Q. I'm not sure exactly where I left off, but  
2 I'd like to begin by going back to generalities  
3 about Neverland.

4 As far as your relationship with Mr. Jackson  
5 concerning your employment as house manager, can you  
6 characterize the level of control that Mr. Jackson  
7 maintained over Neverland and over the main house?

8 A. I would say pretty high.

9 Q. And as far as in terms of how demanding he  
10 could be, could you characterize that as well?

11 MR. MESEREAU: Objection. Vague;  
12 foundation.

13 THE COURT: Sustained.

14 MR. AUCHINCLOSS: I can be more specific.

15 Q. How demanding he was about the level of his  
16 service that was provided to him by his employers.

17 MR. MESEREAU: Objection. Vague;  
18 foundation.

19 THE COURT: Sustained.

20 Q. BY MR. AUCHINCLOSS: Who was it that  
21 determined what -- which guests -- well, let me back  
22 up.

23 How was it determined, if you know, whether  
24 a guest would be coming to Neverland or not?

25 A. I did not know that.

26 Q. Okay. And would guests of Neverland be  
27 allowed to bring their own guests to Neverland; do

28 you know? 4650

1 MR. MESEREAU: Objection. Calls for  
2 speculation; foundation.

3 MR. AUCHINCLOSS: If you know.

4 THE COURT: The objection is overruled.

5 You may answer.

6 THE WITNESS: I do not know that either.

7 Q. BY MR. AUCHINCLOSS: Okay. The guests of  
8 Neverland would be whose guests?

9 MR. MESEREAU: Objection. Foundation; calls  
10 for speculation.

11 THE COURT: Foundation is sustained.

12 Q. BY MR. AUCHINCLOSS: Do you know if people  
13 were allowed on Neverland without Mr. Jackson's  
14 permission?

15 A. I believe that if they weren't allowed by  
16 Mr. Jackson, I don't think they would come in.

17 Q. Okay. And do you know who would determine  
18 how long a guest was allowed to stay at Neverland?

19 MR. MESEREAU: Objection. Foundation; calls  
20 for speculation.

21 MR. AUCHINCLOSS: It's a foundational  
22 question.

23 THE COURT: You may answer that "yes" or  
24 "no."

25 THE WITNESS: I believe they didn't have no  
26 time --

27 THE COURT: Just a moment. He's just asking

28 if you have the knowledge. He's not asking you what 4651

1 the knowledge is. Do you know who determined how  
2 long a guest could stay? Yes or no.

3 THE WITNESS: No, I didn't.

4 Q. BY MR. AUCHINCLOSS: How were children  
5 treated at Neverland?

6 MR. MESEREAU: Objection. Vague;  
7 foundation.

8 THE COURT: Sustained.

9 Q. BY MR. AUCHINCLOSS: Can you -- when you  
10 were at Neverland, Mr. Salas, when you were house  
11 manager, did you observe at any time Mr. Jackson  
12 with child guests?

13 A. Yes, I did.

14 Q. And did Mr. Jackson ever inform you of the  
15 level of the service he expected of his child  
16 guests?

17 MR. MESEREAU: Objection. Leading;  
18 foundation.

19 THE COURT: Overruled.

20 You may answer.

21 THE WITNESS: He was -- he always expected  
22 the best, to be treated the best.

23 Q. BY MR AUCHINCLOSS: If a child wanted  
24 something at Neverland, had a request, or let's say  
25 food, a movie, any special request of that nature,  
26 would that request be fulfilled by the employees?

27 MR. MESEREAU: Objection. Vague;

28 foundation; calls for speculation. 4652



1 THE COURT: Overruled.

2 THE WITNESS: Yes.

3 Q. BY MR. AUCHINCLOSS: Do you know if that's  
4 the way Mr. Jackson wanted it?

5 A. That is correct.

6 Q. How do you know that?

7 A. Because of what he told me, that -- whatever  
8 the guests needed, we needed to provide that for  
9 them.

10 Q. And did you notice whether or not this level  
11 of service or treatment as far as the children went,  
12 did you notice if it affected those kids' behavior  
13 in any way?

14 MR. MESEREAU: Objection. Vague;  
15 foundation.

16 THE COURT: Sustained.

17 Q. BY MR. AUCHINCLOSS: Did you ever have a  
18 chance to observe the children -- well, let me ask  
19 you this: Were the children basically given  
20 whatever they wanted?

21 MR. MESEREAU: Objection; leading.

22 THE COURT: Sustained.

23 Q. BY MR. AUCHINCLOSS: Mr. Salas, please  
24 characterize for me, if you would, in general, the  
25 level of service and -- well, I think you've said  
26 before that the children were allowed the best  
27 treatment, the best service, true?

28 A. That is correct. 4653

1 Q. Give me an example. What are you talking  
2 about when you say that?

3 A. Well, the best service I'm talking about, if  
4 they wanted to see a movie and have their meal at  
5 the theater or any of that kind of stuff, I mean,  
6 they -- I would make sure that they would get it  
7 that way. Or if they wanted to eat like anywhere  
8 else, if they wanted to eat. If guests called me,  
9 or the kids called me, they wanted to eat in the  
10 train depot, I would make sure that that's where  
11 they get their meal, or whatever they asked for.

12 Q. If they wanted candy, were they given candy?

13 A. Absolutely.

14 Q. If they wanted to play at the amusement  
15 park, could they do it?

16 A. Absolutely.

17 Q. Were there any rules about that?

18 A. No.

19 Q. As far as when and how they would play?

20 A. Well, there was some rules, you know, for  
21 their safety, you know.

22 Q. Yes.

23 A. Yes. But other than that, there wasn't any  
24 other rules.

25 Q. Did you have golf carts at Neverland?

26 A. Yes.

27 Q. Were the children allowed to use them?

28 A. There was some kids that they were allowed 4654

1 to use them.

2 Q. Who decided who got to use the golf carts?

3 MR. MESEREAU: Objection; foundation.

4 THE COURT: Sustained.

5 Q. BY MR. AUCHINCLOSS: Are you aware who

6 allowed the children these privileges of using the

7 golf carts?

8 A. I had some control on that. We had security

9 or we'd have security there. Many times kids, they

10 were told they weren't allowed to drive certain

11 cars, but they were some kids that they were allowed

12 to drive them.

13 Q. If Mr. Jackson said, "Let this kid drive a

14 golf cart," would that kid be allowed to drive the

15 golf cart?

16 A. I would say yes.

17 Q. Tell me about the theater at Neverland.

18 Could you describe it for me?

19 A. Well, it's a full-sized theater with a candy

20 bar, ice cream. It's got pretty much anything that

21 a kid can enjoy.

22 Q. Are there any unusual features as far as

23 where you can watch the movie?

24 MR. MESEREAU: Objection.

25 THE WITNESS: Yes, there's an upstairs --

26 THE COURT: Just a moment.

27 MR. MESEREAU: Vague and foundation.

28 THE COURT: Overruled. 4655

1 You may answer.

2 Q. BY MR. AUCHINCLOSS: Go ahead.

3 A. There's an upstairs room where people can  
4 sit up there and watch the movie if they want to.

5 Q. Are there any beds in the theater?

6 A. Yes, there's two rooms downstairs with two  
7 facilities for kids that they can sit in there or  
8 lay in bed and watch a movie, if that's what they  
9 want.

10 Q. Is the theater ever closed? I mean, does it  
11 have hours, I guess is my question? Is it --

12 A. Pretty much when Mr. Jackson is on the  
13 property, we always kept the place open.

14 Q. When he had some what?

15 A. When Mr. Jackson is on property.

16 Q. I see.

17 A. We pretty much keep the place open for --  
18 you know, for guests or himself.

19 Q. All night long?

20 A. All night long.

21 Q. Was there one person who made all the main  
22 decisions about what happened at Neverland?

23 A. Well, there is the ranch manager there.

24 Q. Yes. And was there one person in charge of  
25 the ranch manager?

26 A. Yes.

27 Q. And did that person make all the main

28 decisions at Neverland? 4656



1 A. Yes, I believe so.

2 Q. And who was that?

3 A. That would be Mr. Jackson.

4 Q. Now, you spoke a little bit last week about  
5 Mr. Jackson's room. Was there -- I believe you  
6 testified there was a combination to get in that  
7 room?

8 A. Yes, I did.

9 Q. Was that combination ever changed?

10 A. Not too often, but yes, it did.

11 Q. How often would that combination change?

12 A. I believe the time that I was there, I think  
13 it was about two times that we changed it.

14 Q. Okay. Now, when you say you were there, are  
15 you referring to the time -- the full 20 years you  
16 were there, or just the year or so that you were  
17 house manager?

18 A. Just when I was the house manager.

19 Q. And was there a combination to get into the  
20 main house?

21 A. Yes, there was.

22 Q. And would that ever change?

23 A. That one got changed more often.

24 Q. How often, if you could tell us?

25 A. I would say that we changed that about every  
26 two months, somewhere -- somewhere along that.

27 Q. Were -- do you know if certain people were

28 given the combinations -- the combination to Mr. 4657

1 Jackson's bedroom?

2 A. Not to my knowledge.

3 Q. Do you know if certain people were given the  
4 combination to the Jackson house, the main entry  
5 into the home?

6 A. Yes. Pretty much all his guests have access  
7 to the house so they had to have the combination.

8 Q. And who would give them that combination?

9 A. Myself personal.

10 MR. AUCHINCLOSS: Okay. All right. Could  
11 we have the "Input 4," Your Honor?

12 Q. All right. Mr. Salas, I show you People's  
13 Exhibit No. 20. We've shown this to you before.  
14 You've identified it as Frank Tyson.

15 You mentioned that at some point during your  
16 employment, Mr. Tyson -- you mentioned something  
17 about a problem with Mr. Jackson that Mr. Tyson had.  
18 Do you recall that testimony?

19 A. Yes, I did.

20 Q. How do you know about that problem?

21 A. I believe about Mr. Jackson's frustrations.

22 Q. Okay. You were present when Mr. Jackson  
23 expressed some from frustrations?

24 MR. MESEREAU: Objection; leading.

25 THE COURT: Overruled.

26 You may answer.

27 THE WITNESS: Yes, I did.

28 Q. BY MR. AUCHINCLOSS: And what was -- can you 4658

1 tell us what he was frustrated about?

2 MR. MESEREAU: Objection; foundation.

3 MR. AUCHINCLOSS: I'll withdraw and reask.

4 THE COURT: Okay.

5 Q. BY MR. AUCHINCLOSS: Did Mr. Jackson tell

6 you what he was frustrated about? That's yes or no.

7 A. Yes.

8 Q. What -- did Mr. Jackson tell you what was

9 frustrating him?

10 A. He did not know about Frank bringing people

11 at Neverland Valley without his permission.

12 Q. Okay. Bringing guests without Mr. Jackson's

13 permission?

14 A. Yes.

15 Q. Who was it that informed Mr. Jackson of this

16 issue?

17 A. I don't know.

18 Q. Okay. And you have previously identified

19 People's Exhibit 35 as the Arvizo family; is that

20 right?

21 A. That is correct.

22 Q. You recall the time when the Arvizo family

23 visited Mr. Jackson in the year 2003?

24 A. Yes.

25 Q. Was this frustration that Mr. Jackson

26 expressed with Mr. Tyson before, or after, or during

27 the time that the Arvizo family was present at

28 Neverland in 2003? 4659

1 A. That was after the family was there.

2 Q. After the family left?

3 A. Yes.

4 Q. All right. I show you People's Exhibit No.

5 17. You've previously identified this individual as  
6 Dieter.

7 Tell me, when was the first time you met

8 Mr. -- Dieter, do you know his last name? Maybe

9 I'll ask you that question first.

10 A. No, I don't remember his last name.

11 Q. We'll just refer to him as "Dieter." When  
12 was the first time you met Dieter?

13 A. I believe it was early or mid 2002.

14 Q. Okay. And where did you meet him?

15 A. I met him at Neverland Valley.

16 Q. Can you tell me about the circumstances?

17 How is it that you met him, under what  
18 circumstances?

19 A. Well, he came to the ranch as a guest, and  
20 stayed there for a while. That's how I met him.

21 Q. Okay. So, we're in mid 2002. Dieter comes  
22 and visits. Do you know how long he visited for?

23 A. Not exactly sure, but I believe he stayed  
24 there for a couple of weeks the first time he came.

25 Q. Was Mr. Jackson there at the time?

26 A. Yes, he was.

27 Q. Was Mr. Jackson there before Dieter came on

28 the property, if you recall? 4660



1 A. I don't remember.

2 Q. When Dieter left the property, do you know  
3 if Mr. Jackson left with him?

4 A. I'm not exactly sure if they did. But there  
5 was a few times that they left together.

6 Q. Okay. So Dieter visited the property again  
7 after that first time?

8 A. Yes.

9 Q. How many times, if you can estimate?

10 A. Not exactly sure, but he came, I don't know,  
11 maybe about three or four times after that.

12 Something like that.

13 Q. All right. And you said that -- some of  
14 those times. Do you know how many times Mr. Jackson  
15 left with him, when Dieter left?

16 A. I don't.

17 Q. Do you know how many times Dieter arrived on  
18 the property with Mr. Jackson, if at all?

19 A. I would say about a couple times.

20 Q. Show you People's Exhibit 18, which you've  
21 identified as Ronald. Do you know Ronald's last  
22 name?

23 A. I believe his last name is Konister.

24 Q. Konister?

25 A. Something like that.

26 Q. Okay. We'll refer to him as "Ronald."

27 How -- when was the first time you met Ronald?

28 A. It was at the same time I met Dieter. 4661

1 Q. Did Dieter come on the property with Ronald  
2 in that period, the first visit he came?

3 A. They both came together.

4 Q. Did they leave together?

5 A. Yes.

6 Q. And when -- did Ronald ever come back to the  
7 property after that?

8 A. Yes, he did.

9 Q. How many times?

10 A. He came back about -- I believe about  
11 another couple times.

12 Q. And during the times that he visited the  
13 ranch, did Ronald ever come to the ranch with Mr.  
14 Jackson?

15 A. I believe he came once, if I can recall.

16 Q. Did he ever leave the ranch with Mr.  
17 Jackson?

18 A. I -- I'm going to say no on that one.

19 Q. Okay. And while Mr. -- while Ronald was on  
20 the property, was -- I think you said the first time  
21 Ronald came with Dieter, and they were there the  
22 entire time together; is that right?

23 A. That is correct.

24 Q. During those subsequent visits of Ronald,  
25 was Dieter on the property?

26 A. Yes, he was.

27 Q. Did you ever see these two men together?

28 A. Yes. 4662

1 Q. How often?

2 A. Daily basis.

3 Q. Daily basis?

4 A. Uh-huh.

5 Q. Did you ever see these two men with Mr.

6 Jackson?

7 A. Yes, I did.

8 Q. How often?

9 A. Oh, I'm going to say at least they try to

10 have a meeting once a day.

11 Q. Do you know what Ronald's -- well, let me

12 back up.

13 Do you know what Dieter's relationship was

14 to Mr. Jackson?

15 A. No, I don't.

16 Q. Do you know if it was -- dealt with

17 friendship, business, or a combination?

18 A. I would say it was more business.

19 Q. Why do you say that?

20 A. Because of what they were discussing about

21 business in Europe.

22 Q. You heard them talking about business?

23 A. Yes.

24 Q. What about Ronald, how would you

25 characterize Ronald's relationship on the same

26 continuum?

27 A. Same category.

28 Q. Mostly business? 4663

1 A. Mostly business.

2 Q. During the time that the Arvizo family was  
3 on the property, was at Neverland in 2003, did you  
4 ever observe Ronald on the property at the same  
5 time?

6 A. Yes.

7 Q. How about Dieter?

8 A. The same.

9 Q. And how long were they on the property when  
10 the Arvizos were there, if you know, or can  
11 estimate?

12 A. I'd say about two weeks.

13 Q. Is that two weeks total, one continuous  
14 time, or two weeks total different times?

15 A. It was one continuous time.

16 Q. What about Frank, was he on the property  
17 during the period of time in 2003 when the Arvizo  
18 family was on the property?

19 A. Yes, he was.

20 Q. And about how much -- same question, about  
21 how much time was he on the property when the  
22 Arvizos were there?

23 A. Well, he was living there. He was all the  
24 time there.

25 Q. Okay. So whenever the Arvizos were on the  
26 ranch, Frank was there?

27 A. Yes.

28 Q. Have you ever heard of an individual by the 4664



1 name of Malnik? Malnik?

2 A. Yes, I did.

3 Q. Was he a visitor? Was that a man?

4 A. Yes, it's a man.

5 Q. Did you meet him?

6 A. Yes.

7 Q. Was he ever a visitor at the ranch?

8 A. At the time that I was there he only came  
9 once, I believe.

10 Q. For how long?

11 A. I don't know. A couple weeks.

12 Q. Was that time that Mr. Malnik visited the  
13 ranch, did that coincide with any time that the  
14 Arvizos were there?

15 A. Yes.

16 Q. I'm showing you People's Exhibit 3. You  
17 didn't know this individual's name last week. But  
18 you did recognize him. Was this individual on the  
19 ranch at any time during the period that the Arvizos  
20 were at Neverland?

21 A. I don't believe he was there around that  
22 time.

23 Q. Okay. Do you remember if he was there --  
24 you did testify that he had been at Neverland  
25 before?

26 A. Right.

27 Q. Was he there before or after the Arvizos

28 were there, if you recall? 4665

1 A. I don't recall. He was there before.

2 Q. All right. Do you know an individual by the  
3 name of Zia?

4 A. Yes.

5 Q. Who is Zia?

6 A. My understanding, he is a lawyer.

7 Q. Have you met him?

8 A. Yes, I did.

9 Q. Where did you meet him?

10 A. At the ranch.

11 Q. Do you know who he works for?

12 A. Not exactly. My understanding, he was  
13 working for Mr. Jackson.

14 Q. Was Zia -- well, let me back up. How many  
15 times did Zia visit Neverland where you saw him  
16 there?

17 A. I saw him there a couple of times.

18 Q. Did -- any of the time that Zia was on  
19 Neverland, did that coincide with any of the time  
20 that the Arvizos were there in 2003?

21 A. Yes.

22 Q. Did you ever see Zia during that period of  
23 time when he was visiting the ranch in 2003 talking  
24 with Mr. Jackson?

25 A. I believe, yes, they did have a meeting one  
26 time.

27 Q. Okay. Let's talk a little bit about the

28 Arvizos, okay? In 2003, what members of the Arvizo 4666

1 family were visiting Neverland?

2 A. It was just the kids and the mother.

3 Q. Okay. So the three children, Davellin,

4 Star, Gavin, and the mother?

5 A. And the mother.

6 Q. Do you know her name?

7 A. Janet.

8 Q. Okay. Did you participate in bringing them

9 to Neverland in any fashion on that visit, first

10 visit, in 2003 I'm talking about?

11 A. Yes, I picked them up at Santa Barbara

12 Airport.

13 Q. Okay. And was Mr. Jackson with them at that

14 time?

15 A. Yes.

16 Q. And you drove to Neverland Ranch?

17 A. That is correct.

18 Q. Now, you testified that you would stay very

19 late pursuant to your employment at Neverland.

20 A. Yes.

21 Q. And you'd arrive pretty early, around 7:00,

22 I think you said?

23 A. That is correct.

24 Q. Were you in a position to see who spent the

25 night in Mr. Jackson's room?

26 A. Yes, I was aware of who was sleeping there.

27 Q. Okay. And during the time that the Arvizo

28 boys, or let's say the Arvizo children, were at 4667

1 Neverland Ranch, can you tell me where the two boys  
2 would sleep?

3 MR. MESEREAU: Objection; vague as to time.

4 MR. AUCHINCLOSS: I'm talking about the  
5 period in 2003. The visit in 2003.

6 MR. MESEREAU: I repeat the objection. It's  
7 vague.

8 THE COURT: Sustained.

9 Q. BY MR. AUCHINCLOSS: In 2003, you said that  
10 you brought the Arvizo family to Neverland. How  
11 long did they stay on that -- on that particular  
12 visit?

13 A. Not exactly sure how long they stayed. But  
14 I would say they stayed a week or two, something  
15 like that.

16 Q. And did they -- they then left the ranch for  
17 a period of time?

18 A. Yes.

19 Q. How long did they leave the ranch for,  
20 about, before they came back?

21 A. I would say about another two weeks.

22 Q. Okay.

23 A. Something like that.

24 Q. And then when they came back to the ranch,  
25 how long did they stay?

26 A. That time, I believe they stayed about  
27 another, I would say, two weeks, three weeks.

28 Somewhere around there. 4668



1 Q. All right. When they left that time, did  
2 they return to the ranch?

3 A. Yes, they came once again.

4 Q. Okay. And how long did they stay the third  
5 time?

6 A. About another week.

7 Q. Okay. When they left the third time, how  
8 long -- did they ever return to the ranch?

9 A. That was the last time I saw them.

10 Q. Okay. Now, this period of these visits that  
11 you've just described, of visiting the ranch,  
12 leaving, visiting, leaving, visiting, and visiting  
13 one third time, over what period of time did all of  
14 these visits take, if you can estimate in terms of  
15 weeks, months? How many weeks or months did it take  
16 for all of these visits to take place?

17 A. I would say about five weeks, something like  
18 that.

19 Q. All right. Now, tell me how detailed your  
20 recollections are about exact dates and exact  
21 periods of time concerning this, the visits by the  
22 Arvizos.

23 A. I -- I don't remember the dates, okay.

24 Q. Okay.

25 A. It's just --

26 Q. Are you giving us your best estimates?

27 A. That is the best.

28 Q. Are you -- but are you exactly sure about 4669

1 the time periods and the amount of time?

2 A. I'm pretty sure about the time of them being  
3 there. But not exact --

4 Q. When you say "the time," do you mean the  
5 dates, or the amount of time?

6 A. The amount of time.

7 Q. Okay. So during this period of time that --  
8 these three visits that you talked about that the  
9 Arvizos visited Neverland, was Mr. Jackson there  
10 during that period of time?

11 A. Yes, he was.

12 Q. Do you know if he was there the entire time  
13 or if he had periods where he was gone?

14 A. I would say that he was there most of the  
15 time. Pretty much all the time.

16 Q. Okay. Are you sure whether or not he -- do  
17 you have a specific recollection of whether he left  
18 or not and came back; do you know?

19 A. I don't.

20 Q. During the time -- these three visits --  
21 during that period of time in which Mr. Jackson was  
22 on the property, on Neverland - okay? - can you tell  
23 me where the Arvizo boys slept?

24 MR. MESEREAU: Again, vague as to time.

25 Vague as to what visit. Vague as to what portion of  
26 the visit.

27 THE COURT: Sustained.

28 MR. AUCHINCLOSS: I can tighten that up. 4670

1 Q. Let's do them one at a time, okay? We'll do  
2 the first one. During the first visit in 2003 of  
3 the Arvizo family, during the period of time that  
4 Mr. Jackson was on the property, can you tell me  
5 where the Arvizo boys slept?

6 A. There was times that they slept in the  
7 guesthouse. Okay. There were times that they sleep  
8 with -- with Mr. Jackson.

9 Q. Okay. And during the time that -- during  
10 this second visit when they left and came back, can  
11 you tell me, during that second visit, where did the  
12 Arvizo boys sleep?

13 A. That would be about the same. They sleep  
14 with Mr. Jackson. Most of the time I believe that  
15 they were trying to sleep with Mr. Jackson.

16 Q. And same question for the third visit.

17 A. And that's going to be the same answer.

18 Q. Okay. Now, you said that they had a guest  
19 room.

20 A. That is correct.

21 Q. Did -- let me ask you, first of all, while  
22 you were manager, house manager, did you notice if  
23 any other children slept in Mr. Jackson's room,  
24 other than the Arvizos?

25 A. There was some other kids.

26 Q. Was it unusual for a kid who was sleeping in  
27 Mr. Jackson's room to also have a guest room?

28 A. No, not really. 4671

1 Q. Did you see Mr. Jackson interact with these  
2 children who spent the night in his room?

3 MR. MESEREAU: Objection; vague.

4 MR. AUCHINCLOSS: Foundational question.

5 THE COURT: Overruled.

6 You may answer.

7 THE WITNESS: He would spend time, because he  
8 would play with them.

9 Q. BY MR. AUCHINCLOSS: And while -- and I'm  
10 just talking about the year that you were house  
11 manager. While you were house manager, how often  
12 would he play with these children?

13 A. I would say anytime that he had some spare  
14 time he would play with the kids.

15 Q. Okay. Would it be -- you tell me. Would it  
16 be daily?

17 A. He would try to be with them daily.

18 Q. As far as the children visiting the ranch,  
19 did you notice whether or not Mr. Jackson formed --  
20 appeared to form any special bonds with certain  
21 children?

22 MR. MESEREAU: Objection. Vague;  
23 foundation.

24 THE COURT: Sustained.

25 Q. BY MR. AUCHINCLOSS: Over the period of  
26 time, and I'm talking just about the time that you  
27 were manager of the ranch, you mentioned that you

28 would see the children play with Mr. Jackson, true? 4672



1 A. That is correct.

2 Q. Where would you see them play?

3 A. Well, they would go to the park. They would  
4 go for a walk. They would go bike riding. Or they  
5 have quads, and they would ride the quads  
6 everywhere.

7 Q. Quads, what -- what are quads?

8 A. The four-wheelers.

9 Q. Those are motorized vehicles?

10 A. Right.

11 Q. Did you see them in the house?

12 A. Yes.

13 Q. Did you see them having meals together?

14 A. Yes, I did.

15 Q. Would you see this on a daily basis?

16 A. Pretty much.

17 Q. So over that period of time, did you notice  
18 whether or not he formed any special bonds with  
19 certain children?

20 MR. MESEREAU: Objection. Vague and  
21 foundation.

22 THE COURT: Sustained.

23 Q. BY MR. AUCHINCLOSS: These children who  
24 spent the night in Mr. Jackson's room, did they  
25 share any common characteristics?

26 MR. MESEREAU: Objection. Vague;  
27 foundation.

28 THE COURT: Overruled. 4673

1 You may answer.

2 THE WITNESS: Go ahead and ask me the

3 question again.

4 Q. BY MR. AUCHINCLOSS: Okay. The question is,

5 the children that spent the night in Mr. Jackson's

6 room that you've talked about, did they share

7 anything in common, any common characteristics?

8 MR. MESEREAU: Vague; foundation.

9 Objection.

10 Q. BY MR. AUCHINCLOSS: Did they have anything

11 in common?

12 Sorry.

13 THE COURT: All right. Objection sustained.

14 Q. BY MR. AUCHINCLOSS: Do you know if these

15 children, whether or not -- did you notice the age

16 of these children?

17 A. They were around 10, 11. Around that age.

18 Q. Did you notice what gender they were?

19 A. No, I don't.

20 Q. Did you notice whether they were boys or

21 girls?

22 A. Well, yes, they were mostly boys.

23 Q. Did you ever see anyone else sleep in Mr.

24 Jackson's room other than these children?

25 A. Pretty much it was just the boys. That's

26 about it.

27 Q. You previously testified that there was

28 alcohol on Neverland, true? 4674

1 A. That is correct.

2 Q. And I think you said you were somewhat  
3 responsible for stocking the alcohol at Neverland as  
4 house manager?

5 A. That is correct.

6 Q. Did Mr. Jackson drink?

7 A. Yes, he did.

8 Q. Are you aware of what his drinks of choice  
9 were, what he liked to drink, in terms of alcohol?

10 A. Well, he drink wine and vodka also.

11 Q. Okay. Where was the wine stored on the  
12 property?

13 A. Most of the wine, it was in the wine cellar.

14 We also have wine in the house.

15 Q. Where in the house?

16 A. In the refrigerators.

17 Q. In the kitchen area?

18 A. Right.

19 Q. And the vodka, where was that kept?

20 A. In the kitchen.

21 Q. Okay. Was there any -- was it any secret at  
22 Neverland that Mr. Jackson drank alcoholic  
23 beverages?

24 MR. MESEREAU: Objection. Vague; calls for  
25 speculation; foundation.

26 THE COURT: Sustained.

27 Q. BY MR. AUCHINCLOSS: Mr. Salas, were you

28 ever told by anybody that Mr. Jackson's drinking was 4675

1 to be concealed from anybody?

2 MR. MESEREAU: Objection. Hearsay;

3 foundation.

4 THE COURT: Sustained.

5 MR. AUCHINCLOSS: On which basis, Your

6 Honor?

7 THE COURT: Hearsay.

8 Q. BY MR. AUCHINCLOSS: Did you see Mr. Jackson

9 drinking at Neverland?

10 A. I never saw him drinking.

11 Q. Have you ever seen him exhibiting the

12 effects of drinking?

13 A. Yes.

14 Q. On how many occasions?

15 A. Well, lately it was on a pretty much regular

16 basis.

17 Q. A regular basis?

18 A. Right.

19 Q. Did you ever see Mr. Jackson where he

20 appeared to have been drinking a great deal, that he

21 appeared to be drunk?

22 A. Yes.

23 Q. Did you ever see him appear to be drunk --

24 well, let me ask you this: Was there ever any

25 effort that you saw to conceal this fact that Mr.

26 Jackson had been drinking, that he was drunk, to

27 conceal that fact from his children?

28 MR. MESEREAU: Objection. Vague; leading; 4676



1 foundation.

2 THE COURT: Foundation; sustained.

3 Q. BY MR. AUCHINCLOSS: Mr. Salas, when you saw  
4 Mr. Jackson when he was drunk, did you ever see him  
5 in the presence -- in that condition, in the  
6 presence of his children?

7 A. Yes, I did.

8 Q. On more than one occasion?

9 A. Yes.

10 Q. Can you tell me how many or approximate?

11 A. Well, I couldn't tell you exactly how many  
12 times, but it was quite a few times.

13 Q. During that period of time -- and tell me --  
14 let's get time specific here. What time frame are  
15 we talking about? Is this when you were house  
16 manager?

17 A. That is correct.

18 Q. During that period of time did you ever see  
19 Mr. Jackson make any effort to conceal his condition  
20 from his children?

21 MR. MESEREAU: Objection. Vague;  
22 foundation; calls for speculation.

23 THE COURT: I'm going to allow an answer to  
24 that question, but again, it's a foundational  
25 question.

26 So it can only be answered "yes" or "no."

27 I'll have the court reporter read it back to you.

28 We're asking do you have this knowledge. 4677

1 (Record read.)

2 THE WITNESS: Can you ask me the question a  
3 different way?

4 MR. AUCHINCLOSS: Sure.

5 Q. My question is, during the period of time  
6 when you saw Mr. Jackson when he was drunk in the  
7 presence of his children, did Mr. Jackson do  
8 anything to hide the fact that he had been drinking  
9 or that he was drunk when that occurred, when you  
10 saw that?

11 MR. MESEREAU: Same objection.

12 THE COURT: Overruled.

13 You may answer.

14 THE WITNESS: Not to my knowledge.

15 Q. BY MR. AUCHINCLOSS: You said that wine is  
16 stored in the wine cellar. Is there any hard liquor  
17 that's ever kept in the wine cellar?

18 A. Yes.

19 Q. What kind of hard liquor?

20 A. There's some whiskey, I believe. Some  
21 tequila. Pretty much that's it.

22 Q. And was there whiskey and tequila in the  
23 wine cellar during the time that the Arvizo children  
24 were there in 2003?

25 A. Yes.

26 Q. Did you ever see kids go into the wine  
27 cellar, any kids, during your period of time as

28 house manager? 4678

1 A. Yes.

2 Q. And did you ever see the Arvizo kids go into  
3 the wine cellar?

4 A. I never saw them down in the wine cellar.

5 Q. Did you ever see them come out of the wine  
6 cellar?

7 A. No.

8 Q. Okay. Did you ever have any reports, as  
9 house manager, that the Arvizo children were in the  
10 wine cellar?

11 MR. MESEREAU: Objection; hearsay.

12 THE COURT: Overruled.

13 You may answer.

14 THE WITNESS: Not specifically the Arvizo  
15 kids.

16 Q. BY MR. AUCHINCLOSS: Okay. Have you ever  
17 served wine or any alcoholic beverage to Mr. Jackson  
18 when he was in the presence of children?

19 A. Yes, I did.

20 Q. On more than one occasion?

21 A. I would say that was a couple times.

22 Q. Do you remember any of the children that  
23 were with him when you served him alcoholic  
24 beverages, or wine, let's say?

25 A. I'm not exactly what kids were in there, but  
26 I know the Arvizos were there, the kids, and some  
27 other kids that were there as well.

28 Q. Okay. Now, tell me, was there a time when 4679

1 you brought him some wine and four glasses?

2 MR. MESEREAU: Objection; leading.

3 THE COURT: Sustained.

4 Q. BY MR. AUCHINCLOSS: Okay. Tell me -- you

5 said there was a couple of times that you brought

6 Mr. Jackson wine in the presence of children. Tell

7 me about the first one you remember. When was it?

8 A. It was at nighttime.

9 Q. Do you remember when it was in terms of the

10 year that you served as house manager,

11 approximately?

12 A. Well, it was -- I would say it was January

13 somewhere. January, somewhere around there.

14 Q. Of 2002, 2003?

15 A. 2003.

16 Q. And about what time of night?

17 A. It was about -- I would say it was about

18 nine o'clock.

19 Q. And where did you go, what room?

20 A. I went to Mr. Jackson's bedroom, upstairs.

21 Q. And what did you bring to Mr. Jackson's

22 bedroom?

23 A. I brought some glasses, and some wine.

24 Q. What type of wine; do you remember?

25 A. I don't remember the type of wine.

26 Q. Do you remember whether it was red or white?

27 A. I want to say that it was a white wine.

28 Q. What type of glasses did you bring? 4680



1 A. Glass -- it was just glass wines.

2 Q. I'm sorry?

3 A. Glass wines.

4 Q. Wine glass?

5 A. No, let me back up. It was just glasses,

6 normal glasses.

7 Q. Normal glasses?

8 A. Yes.

9 Q. Were they tall glasses or short glasses?

10 A. Short glasses.

11 Q. Can you describe them?

12 A. Short glasses.

13 Q. And who ordered this wine?

14 A. Mr. Jackson.

15 Q. Did you talk to him personally?

16 A. Yes.

17 Q. What did he tell you?

18 A. He called me and asked me to bring some

19 glasses to his room and some wine.

20 Q. Did he tell you how many glasses?

21 A. Yes.

22 Q. How many?

23 A. Four of them.

24 Q. All right. So you brought the -- and did

25 you do as he ordered you to do?

26 A. Yes, I did.

27 Q. And when you delivered this wine, did you

28 deliver it to his bedroom? 4681

1 A. Yes, I did.

2 Q. Did you deliver it to the lower portion of  
3 his bedroom or the upstairs portion?

4 A. Just to the lower portion.

5 Q. Was Mr. Jackson or any of the children  
6 present when you delivered this wine?

7 A. Yes, there were.

8 Q. Who was present?

9 A. The kids that were there. Gavin, and I  
10 believe it was also Frank's brothers, the ones that  
11 were there. But let me tell you something else. He  
12 also ordered some sodas with that.

13 Q. Okay. So what do you mean, "some sodas"?

14 A. He also asked me to bring some sodas with  
15 that order.

16 Q. Tell me what you mean by "sodas."

17 A. Yes, just the normal soda cans.

18 Q. Soda drinks?

19 A. Yes.

20 Q. Now, you have previously talked to the  
21 sheriffs about this incident, haven't you?

22 A. Right. Right.

23 Q. And described for them that you brought a  
24 bottle of wine and glasses?

25 A. Uh-huh.

26 Q. Let me back up. Let me back up.

27 So you brought some wine and glasses, and

28 some sodas? 4682

1 A. Uh-huh.

2 Q. Let's move on to the second incident first,

3 okay?

4 Tell me about the second incident. When did

5 that occur?

6 A. That was -- it was also -- it was also

7 nighttime.

8 Q. Nighttime?

9 A. Right.

10 Q. About what time?

11 A. That time it was about around eleven

12 o'clock. Somewhere around 11:00.

13 Q. And was this before or after the incident

14 that you just described?

15 A. That was after.

16 Q. And who placed the order on this occasion?

17 A. Mr. Jackson.

18 Q. And what did he order?

19 A. Some more wine.

20 Q. Okay. Did he also ask for glasses?

21 A. Yes.

22 Q. How many glasses?

23 A. This time I believe it was just one glass.

24 It was just for him.

25 Q. Okay. And who was present when that -- when

26 you delivered that wine?

27 A. I'm not exactly sure who was there, but I

28 believe this time it was himself at night. 4683

1 Q. But I'm talking about -- you said there were  
2 two times that children were present when you served  
3 him. I'm talking about the second time that  
4 children were present.

5 A. Yeah, that time I'm not exactly who was  
6 there, how many of the kids were there.

7 Q. You're not sure?

8 A. No, I'm not sure.

9 Q. All right. Now, let's go back to this  
10 time -- this first incident where you said that you  
11 served wine and soda. You have been interviewed  
12 about this by the sheriff's department, right?

13 A. That is correct.

14 Q. And you were interviewed back in, I believe  
15 it was, 2003; is that right?

16 A. That's correct.

17 Q. And when you talked to the sheriff's  
18 department about this, you never mentioned anything  
19 about any soda?

20 A. No, I didn't.

21 Q. And why is that?

22 A. I don't know. It just -- it just flip out  
23 right now to my mind.

24 Q. You just remembered it just this second?

25 A. Right.

26 Q. And you said that you came back and the  
27 bottle of wine was empty?

28 A. That is correct. 4684



1 Q. Was there any other liquor you brought?

2 A. No, that was the second time --

3 Q. I'm talking about the first time.

4 A. No, that was it.

5 Q. And when you came back, was the bottle  
6 empty?

7 A. Yes, it was.

8 Q. Okay. The wine cellar. You said you didn't  
9 ever have any complaints of -- hear of any  
10 complaints regarding the Arvizos. Did you ever have  
11 any other complaints of any other children in the  
12 wine cellar?

13 A. Yes.

14 Q. And do you know which children they were?

15 A. When I was given those complaints, it was  
16 about the kids from Los Olivos.

17 MR. AUCHINCLOSS: Okay. If I could have the  
18 Elmo again, Your Honor, please.

19 Q. Showing you People's Exhibit 45. Is that  
20 one of the kids you're talking about?

21 A. Yes.

22 Q. 46?

23 A. Yes.

24 Q. That's one of the kids?

25 A. That's correct.

26 Q. And 47.

27 A. That is correct.

28 Q. Okay. Are there any other kids that you're 4685

1 referring to, or is that everybody that we're  
2 talking about?

3 A. No, I did get some other complaints about  
4 some other kids which wasn't these kids.

5 Q. Okay. Now, these three kids that -- I think  
6 you've identified them as being from Los Olivos  
7 previously, correct?

8 A. That's correct.

9 Q. We'll call them "the Los Olivos boys," okay?

10 A. Okay.

11 Q. Now, the Los Olivos boys, you said you had a  
12 complaint, complaints regarding them in the wine  
13 cellar. What was the nature of the complaint?

14 MR. MESEREAU: Objection; hearsay.

15 MR. AUCHINCLOSS: It's offered to explain  
16 conduct.

17 THE COURT: Whose conduct?

18 MR. AUCHINCLOSS: Mr. Salas's. And I can  
19 tell you at sidebar where I'm going, if you like.

20 THE COURT: The objection is sustained.

21 Q. BY MR. AUCHINCLOSS: Did you personally ever  
22 see the Los Olivos boys in the wine cellar?

23 A. Not in the wine cellar, but I saw them come  
24 out.

25 Q. You saw them coming out of the wine cellar.

26 And when you saw them coming out of the wine cellar,  
27 what time of day are we talking about?

28 A. Early in the morning, around eight o'clock 4686

1 in the morning.

2 Q. And during that previous -- let's say the  
3 ten hours -- well, let's see, let me back up.

4 Do you know if Mr. Jackson was in the wine  
5 cellar with them?

6 A. That early morning, or late night, early  
7 morning, Mr. Jackson was with the kids.

8 Q. And when you saw these kids come out of the  
9 within cellar, did you notice whether or not they  
10 exhibited any signs of being intoxicated?

11 MR. MESEREAU: Objection; leading.

12 THE COURT: Overruled.

13 You may answer.

14 THE WITNESS: Yes, I did.

15 Q. BY MR. AUCHINCLOSS: Tell me what you saw.

16 A. When I saw the boys coming out of the  
17 arcade, which is where the wine cellar is, the kids  
18 weren't acting normal. So I approached one of them,  
19 and I said, "Are you okay?" That's when I noticed  
20 that the kids were drunk.

21 Q. How drunk were they, if you could  
22 characterize it?

23 A. I would say that they were -- what would you  
24 call it? I mean, you can tell that they were drunk.  
25 I mean, I could see that they had been drinking.

26 Q. What were they doing that made you believe  
27 they'd been drinking?

28 A. The way they were acting. I mean, they 4687

1 weren't just normal. Something was wrong with the  
2 kids.

3 Q. Did you notice any other times when these  
4 three boys had been drinking, and it was apparent to  
5 you that they had been drinking?

6 MR. MESEREAU: Objection. Leading;  
7 relevance; foundation.

8 THE COURT: Overruled.

9 You have may answer.

10 THE WITNESS: Your question was what date?

11 Q. BY MR. AUCHINCLOSS: No, my question --  
12 you've told us about one incident where you noticed  
13 the three Los Olivos boys had been drinking. I want  
14 to know if you ever observed a second time that  
15 these same boys had been drinking.

16 A. Yes, there was a second time.

17 Q. And when was that?

18 A. I want to say it was -- it was after that  
19 one. Not exactly sure, you know, how many weeks  
20 after that. But I would say it was two, three weeks  
21 after that one.

22 Q. And when was the first time, approximately?

23 A. I want to say it was in October when I saw  
24 those kids the first time.

25 Q. 2002? 2003? You tell me.

26 A. It was 2002, I believe.

27 Q. Okay. And where did you see these boys the

28 second time when they appeared to have been 4688



1 drinking?

2 A. At the house.

3 Q. Inside the house?

4 A. Yes. Well, they were everywhere, but, yes,  
5 they were in the house.

6 Q. Was Mr. Jackson on the property at that  
7 time?

8 A. Yes, he was.

9 Q. Had these boys been spending any time with  
10 Mr. Jackson that day?

11 MR. MESEREAU: Objection; foundation.

12 THE COURT: Sustained.

13 Q. BY MR. AUCHINCLOSS: Had you observed  
14 whether or not Mr. Jackson had spent any time with  
15 these boys earlier that day?

16 A. I don't believe that day he spent time with  
17 them. They were alone.

18 Q. Okay. Did you see the boys all -- during  
19 the entire time they were on the property?

20 A. Yes.

21 Q. You were with them the entire time?

22 A. No.

23 Q. So do you know whether or not they spent  
24 time with Mr. Jackson for certain?

25 MR. MESEREAU: Objection. Leading;  
26 foundation.

27 THE COURT: Argumentative; sustained.

28 Q. BY MR. AUCHINCLOSS: Okay. So what portion 4689

1 of that day did you spend actually observing the  
2 boys? Let me back up. Let me back up. How long  
3 were these boys on the property that particular day?

4 A. They were there till twelve o'clock, one  
5 o'clock.

6 Q. At night?

7 A. Uh-huh.

8 Q. Or one o'clock in the morning, I guess?

9 A. One o'clock in the morning, yes.

10 Q. And when did they arrive?

11 A. They arrived around noontime.

12 Q. And how much of that time -- so that's about  
13 12 hours, right?

14 A. Right.

15 Q. How many of those hours were they in a place  
16 that you could see them, where you were actually  
17 seeing them?

18 A. Well, they were back and forth, and they  
19 were everywhere, so I really didn't have a control  
20 of watching them or any of that stuff.

21 Q. Okay.

22 A. But they were back and forth in the house,  
23 back at the park, different places.

24 Q. Do you know where they got their alcohol?

25 A. No, I don't.

26 Q. Were you responsible for cleaning the wine  
27 cellar?

28 A. Yes. 4690

1 Q. Did you observe any other incidents where  
2 Mr. Jackson was in the wine cellar with children? I  
3 mean, did that happen on other occasions? And I'm  
4 confining this just to the time you were house  
5 manager.

6 A. No, I don't.

7 Q. Do you know? You don't recall any other  
8 times?

9 A. Not that I can remember.

10 Q. Okay. Now, during the time that you were  
11 house manager, did you ever observe any adult  
12 magazines in Mr. Jackson's private quarters?

13 A. Yes, I did.

14 Q. Did these magazines feature nudity?

15 A. Yes.

16 Q. And where were these -- which room were  
17 these magazines in?

18 A. They were on the first floor on the left  
19 side in one of the bathrooms.

20 Q. Were those magazines there in that bathroom  
21 during the time that the Arvizos were at Neverland?

22 A. Yes.

23 MR. AUCHINCLOSS: Madam Clerk, may I  
24 double-check with you? I have three items I'm  
25 marking. I want to double-check and make sure these  
26 numbers haven't been used. 777, 778, and 779.

27 THE CLERK: No, they haven't.

28 MR. AUCHINCLOSS: All right. Thank you. 4691

1 May I approach, Your Honor?

2 THE COURT: Yes.

3 Q. Mr. Salas, I show you People's Exhibit 777.

4 Can you identify that for me, please?

5 A. Yes. These are some statues that were in

6 Mr. Jackson's office.

7 Q. I show you People's Exhibit 778. Would you

8 please identify that for me?

9 A. Yes, they were also in his office.

10 Q. And People's Exhibit 779?

11 A. Yes. That is correct. They were in his

12 office.

13 Q. Okay. Thank you. Can you tell me where

14 these statues were located?

15 A. They were located in Mr. Jackson's office.

16 They were placed on different stands.

17 Q. Were they on display?

18 A. Yes.

19 Q. Over what period of time are we talking

20 about?

21 A. Well, they have been there a long time.

22 Q. Were they there the entire time you were

23 house manager?

24 A. Yes.

25 Q. Were they there during the time that the

26 Arvizos were present on the property?

27 A. Yes.

28 Q. Were they there -- did Mr. Jackson's 4692



1 children ever visit that office?

2 A. Yes.

3 MR. AUCHINCLOSS: Your Honor, I'd like to  
4 offer into evidence People's Exhibit 777, 778 and  
5 779 at this time.

6 MR. MESEREAU: No objection.

7 THE COURT: It's admitted. All three.

8 MR. AUCHINCLOSS: All right. If I may  
9 publish these, Your Honor.

10 THE COURT: All right.

11 Q. BY MR. AUCHINCLOSS: All right. Showing you  
12 People's Exhibit 777, is that an accurate depiction  
13 of one of the dolls that you saw in Mr. Jackson's  
14 office?

15 A. That is correct.

16 Q. Or statues. Whatever they are.  
17 778, there are two photographs there. Do  
18 those photographs accurately depict the dolls that  
19 were present during the period of time that you were  
20 house manager in Mr. Jackson's office?

21 A. Yes.

22 Q. And 779; same questions. Were those -- are  
23 those accurate depictions of what you observed in  
24 Mr. Jackson's office during the time that you were  
25 house manager?

26 A. That is correct.

27 Q. All right. Going back to the period of time

28 when the Arvizos were on the property, was there -- 4693

1 and I want to talk about the first visit, the first  
2 visit in 2003, after you picked up the Arvizos from  
3 the airport.

4 You previously testified that they were at  
5 Neverland for a period of approximately two weeks.  
6 Mr. Salas, during that period of time did you  
7 observe the Arvizo family to be restricted in any  
8 way?

9 A. That is correct.

10 Q. In what way were they restricted?

11 A. I believe they weren't allowed to leave  
12 Neverland Valley Ranch.

13 Q. And why do you say that?

14 A. Because I had a talk to the mother and she's  
15 the one that told me.

16 MR. MESEREAU: Objection, that's hearsay.

17 Move to strike.

18 MR. AUCHINCLOSS: Goes to state of mind.

19 Also offered to explain this witness's conduct  
20 later.

21 THE COURT: I will admit it for the limited  
22 purpose of explaining the conduct of Jesus. It's  
23 not to be used for the truth of the matter asserted  
24 by Janet.

25 MR. AUCHINCLOSS: All right.

26 Q. So at some point, did you personally help  
27 the Arvizo family to get out of Neverland?

28 A. Yes, I did. 4694

1 Q. How did you do that?

2 A. I took them down to L.A.

3 Q. You drove them personally?

4 A. Yes, I did.

5 Q. Did you take -- use -- I take it you used

6 one of Mr. Jackson's cars?

7 A. That is correct. I got a phone call from

8 her, and she wanted to talk to me about something.

9 MR. MESEREAU: Objection; hearsay.

10 MR. AUCHINCLOSS: It's offered for the same

11 purpose.

12 THE COURT: It's nonresponsive. Sustained.

13 MR. AUCHINCLOSS: Okay.

14 Q. So tell me what precipitated your conduct of

15 helping the Arvizos by taking them off the property.

16 What happened? What was it that made you do that?

17 A. Like I said, she called me at my office and

18 wanted to talk to me. So I came over, and I thought

19 it was something that I needed to take care of, you

20 know, in the room. And she asked me to --

21 MR. MESEREAU: Objection, hearsay, Your

22 Honor.

23 THE COURT: I'll admit it for the limited

24 purpose again to explain what he's doing, not for

25 the truth of the matter that she asserted.

26 THE WITNESS: So she asked me -- she told me

27 if I can drive them down to L.A., that she wanted to

28 leave the property. 4695

1 So I ask her, you know, "What's the reason?

2 Why do you want to leave the property?" She was

3 very --

4 MR. MESEREAU: Same objection.

5 THE COURT: Sustained after he started on

6 another subject.

7 MR. AUCHINCLOSS: Okay.

8 Q. Can you tell me what her emotional state was

9 at the time?

10 A. She was very upset.

11 Q. How was she demonstrating that she was

12 upset?

13 A. Crying.

14 Q. What time of -- what time of the day or

15 evening are we talking about here when this

16 happened?

17 A. We're talking about nighttime.

18 Q. Nighttime?

19 A. Yes.

20 Q. Did she express any -- did she express any

21 fear while you were talking to her?

22 MR. MESEREAU: Objection; leading.

23 THE COURT: Sustained.

24 Q. BY MR. AUCHINCLOSS: When you were talking

25 to her, did she appear to be fearful of something?

26 MR. MESEREAU: Objection; leading.

27 THE COURT: Sustained.

28 Q. BY MR. AUCHINCLOSS: Tell me about any other 4696



1 emotional -- expressions of emotion that she had, if  
2 you noticed any.

3 A. Well, she looks very preoccupied. She was  
4 just -- she wasn't comfortable there. She just  
5 wanted to leave the property.

6 THE COURT: All right. Let's take our break.

7 (Recess taken.)

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1 REPORTER'S CERTIFICATE

2

3

4 THE PEOPLE OF THE STATE )

5 OF CALIFORNIA, )

6 Plaintiff, )

7 -vs- ) No. 1133603

8 MICHAEL JOE JACKSON, )

9 Defendant. )

10

11

12 I, MICHELE MATTSON McNEIL, RPR, CRR,

13 CSR #3304, Official Court Reporter, do hereby

14 certify:

15 That the foregoing pages 4649 through 4697

16 contain a true and correct transcript of the

17 proceedings had in the within and above-entitled

18 matter as by me taken down in shorthand writing at

19 said proceedings on April 4, 2005, and thereafter

20 reduced to typewriting by computer-aided

21 transcription under my direction.

22 DATED: Santa Maria, California,

23 April 4, 2005.

24

25

26

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



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

14

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16

17 REPORTER'S TRANSCRIPT OF PROCEEDINGS

18

19 MONDAY, APRIL 4, 2005

20

21 8:30 A.M.

22

23 (PAGES 4699 THROUGH 4898)

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26

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

28 BY: Official Court Reporter 4699

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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. Nicola is listed as "N" on index. Mr. Mesereau is listed as "M" on  
index.

6 Ms. Yu is listed as "Y" on index. Mr. Sanger is listed as "SA" on  
index.

7 Mr. Oxman is listed as "O" on index.

8

9 PLAINTIFF'S

10 WITNESSES DIRECT CROSS REDIRECT RECROSS

11 SALAS, Jesus 4711-M 4781-A 4800-M

12 FRANCIA, Jason 4806-Z 4846-M

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1 THE COURT: Go ahead, Counsel.

2 MR. AUCHINCLOSS: Thank you, Your Honor.

3 Q. Before I continue where I left off with the  
4 Arvizos, Mr. Salas, I wanted to ask you a couple of  
5 questions about -- one involving the wine cellar.

6 At some time during your occupation as the  
7 house manager, was there a safe that was put in to  
8 keep some of the keys to various places, including  
9 the wine cellar?

10 A. Yes, there was.

11 Q. And where was that safe put in?

12 A. It was in the -- inside the house in what we  
13 call the maids' room.

14 Q. When was that safe put in?

15 A. It was during the time that we noticed the  
16 kids were having access to alcohol.

17 Q. The Los Olivos boys?

18 A. That is correct.

19 Q. And can you help me out with the time frame  
20 in terms of what we're -- 2002 or 2003?

21 A. 2003.

22 Q. 2003?

23 A. Yes.

24 Q. You said that it was October of 2002 when  
25 the problem occurred with the Los Olivos boys.

26 A. Yes, but we didn't took action until after  
27 that. It took us a while to put the key away.

28 Q. Have you previously told detectives that it 4702

1 was in the -- it was around December of 2002 that  
2 the safe was put in?

3 A. I must have said that. I mean, I could be  
4 wrong.

5 Q. Do you have a clear recollection of exactly  
6 when the safe went in?

7 A. I don't know.

8 Q. Do you recall that the safe was there when  
9 the Arvizos were there?

10 A. Yes, it was in, the safe.

11 Q. All right. And the wine cellar key, was it  
12 kept in that safe?

13 A. That is correct.

14 Q. All right. So when you took the Arvizos  
15 from Neverland, what car did you use?

16 A. I used the Rolls Royce.

17 Q. And who was it that decided to use that  
18 particular car? Whose decision was that?

19 A. It was my decision.

20 Q. Had you previously done some driving for  
21 Mr. Jackson? I know you previously testified you  
22 did the limo drive to Neverland. But other than  
23 that, had you previously done some driving for  
24 Mr. Jackson?

25 A. Yes, I did.

26 Q. And did you previously use that car on  
27 occasion?

28 A. Yes. 4703

1 Q. Did you tell anybody that you were taking  
2 the Jacksons -- or did you tell anybody that you  
3 were taking the Arvizos off property?

4 A. Yes, I did.

5 Q. Who did you tell?

6 A. I told Mr. Jackson's bodyguard, Chris  
7 Carter.

8 Q. And why did you tell Chris?

9 A. Because it was not my decision to make to  
10 take the family off the property without telling  
11 somebody.

12 Q. Okay. Was Dieter on the property at the  
13 time?

14 A. Yes, he was.

15 Q. Was Ronald on the property at the time?

16 A. No, he wasn't.

17 Q. Was Frank on the property at the time?

18 A. Yes, he was.

19 Q. Was there a reason you didn't tell Dieter or  
20 Frank that you were taking them off the property?

21 A. It was late, and the reason I didn't told  
22 them, it was because I didn't know who to tell, so I  
23 told Chris about the situation.

24 Q. Okay.

25 A. And so --

26 Q. Did Miss Arvizo express to you, during that  
27 period of time, that she was fearful of anything?

28 MR. MESEREAU: Objection; leading. 4704



1 THE COURT: Sustained.

2 Q. BY MR. AUCHINCLOSS: Did Miss Arvizo express  
3 concern to you over any particular individuals at  
4 Neverland?

5 MR. MESEREAU: Objection; leading.

6 THE COURT: Overruled.

7 THE WITNESS: Yes, she did.

8 Q. BY MR. AUCHINCLOSS: Who was she concerned  
9 about?

10 A. It was Dieter and Ronald.

11 Q. Was she concerned about Frank at all?

12 A. She didn't really say too much about Frank.

13 Q. So you drive her off the property. Where  
14 did you take her and her children?

15 A. Down south, L.A.

16 Q. Did you take her to a residence?

17 A. Yes.

18 Q. Was it a house or an apartment?

19 A. It was a house.

20 Q. And was it the place -- did she direct you  
21 to the location where she wanted to go?

22 A. Yes.

23 Q. Did you get in any trouble for taking the  
24 Arvizos off the property?

25 A. Yes, I did.

26 Q. Tell me about that.

27 A. Well, the next day, I was told that they

28 weren't supposed to leave the property. 4705

1 MR. MESEREAU: Objection; hearsay.

2 MR. AUCHINCLOSS: I can ask a couple of  
3 other questions that will tighten it up, Your Honor.

4 THE COURT: All right. I'll strike the  
5 answer.

6 MR. AUCHINCLOSS: And this answer will be  
7 offered in furtherance.

8 Q. Who told you you were in trouble?

9 A. The first person that told me, it was Frank.

10 Q. Frank Tyson?

11 A. Uh-huh.

12 Q. And what did Frank tell you?

13 A. He told me not -- that they weren't supposed  
14 to leave the property. They were supposed to be  
15 notified first.

16 Q. Who was supposed to be notified first?

17 A. Him.

18 Q. Did he tell you how to handle yourself in  
19 the future?

20 A. Yes, he did.

21 MR. MESEREAU: Objection; leading.

22 MR. AUCHINCLOSS: I'll rephrase.

23 THE COURT: Sustained.

24 Q. BY MR. AUCHINCLOSS: Did he make any remarks  
25 to you concerning the future?

26 A. Yes, he did.

27 Q. What did he say?

28 A. Not to make -- I mean, if it was a second 4706

1 time, not to do that anymore.

2 Q. Not to let the Arvizos off the property if  
3 they come back?

4 MR. MESEREAU: Objection; leading.

5 THE COURT: Sustained.

6 MR. MESEREAU: Move to strike.

7 THE COURT: Stricken.

8 Q. BY MR. AUCHINCLOSS: Did anybody else tell  
9 you that you did the wrong thing?

10 A. Yes.

11 Q. Who was that?

12 A. Dieter.

13 Q. What did Dieter tell you?

14 A. Same thing.

15 MR. MESEREAU: Objection; hearsay.

16 MR. AUCHINCLOSS: Same purpose.

17 THE COURT: Overruled. It's admitted for the  
18 limited purpose under the conspiracy instruction  
19 that I talked to you about earlier. Go ahead.

20 Q. BY MR. AUCHINCLOSS: Tell us what Dieter  
21 told you.

22 A. He told me the same thing; that next time I  
23 should tell them about the situation first.

24 Q. Did the Arvizos -- well, let me back up.

25 When Miss Arvizo was talking to you about her desire  
26 to leave the ranch, did you speak English with her?

27 A. Yes, I did.

28 Q. Did you ever speak with her in a different 4707

1 language?

2 A. No.

3 Q. Okay. Are you fluent in Spanish?

4 A. Yes, I am.

5 Q. Do you know if she is?

6 A. No, I don't.

7 Q. Around -- well, let's talk about when they  
8 returned to the property. You said a short time  
9 after the first -- they first left Neverland, the  
10 Arvizos returned.

11 A. That's correct.

12 Q. Were you there when that happened?

13 A. Yes.

14 Q. And when they returned to the property, did  
15 Mrs. Arvizo ever ask you to transport her off the  
16 property on that occasion, on the second visit?

17 A. Yes, she --

18 MR. MESEREAU: Objection. Leading; hearsay.

19 MR. AUCHINCLOSS: Also offered to explain  
20 conduct.

21 THE COURT: The objection is overruled. And  
22 I'll admit it for the limited purpose of explaining  
23 his behavior. Go ahead.

24 Q. BY MR. AUCHINCLOSS: What was your answer?

25 A. Yes. Yes, I was.

26 Q. And when did she make that request of you,  
27 in relationship to the time that she arrived?

28 A. I would say it was -- it was about a week 4708



1 when she asked me again.

2 Q. And did you take her off the property that  
3 time?

4 A. No, I didn't.

5 Q. Why not?

6 A. Because I was told not to do that anymore.

7 Q. Now, at some point the Arvizos left

8 Neverland --

9 A. Yes, they did.

10 Q. -- for the final time.

11 Have you ever seen them since that time?

12 A. That was the last time I saw them.

13 Q. Do you recall when you were first

14 interviewed about the general facts that you've just  
15 described for us by law enforcement?

16 A. Yes.

17 Q. And was there anything special about that  
18 particular day when you first spoke to law  
19 enforcement?

20 MR. MESEREAU: Objection. Vague; leading.

21 THE COURT: Overruled.

22 You may answer.

23 THE WITNESS: When you said about special,  
24 what do you mean?

25 Q. BY MR. AUCHINCLOSS: Was there anything  
26 unusual that happened on that date --

27 A. Yes.

28 Q. -- that you're aware of? 4709

1 A. Yes, it was.

2 Q. What was it?

3 A. That was when the police came over to Mr.

4 Jackson's house.

5 Q. The day of the search warrant?

6 A. The day of the search, yes.

7 Q. Do you remember what month that was?

8 A. It was November.

9 Q. Okay. So you told the police about this,  
10 helping the Arvizos, on the same day as the search  
11 warrant was issued, or executed, I should say; is  
12 that accurate?

13 A. That is correct.

14 MR. AUCHINCLOSS: Thank you, Mr. Salas. I  
15 have no further questions.

16 THE COURT: Okay. Cross-examine?

17 MR. MESEREAU: Yes, please, Your Honor.

18

19 CROSS-EXAMINATION

20 BY MR. MESEREAU:

21 Q. Good morning.

22 A. Good morning.

23 Q. Is it Mr. Salas or Salazar?

24 A. Salas.

25 Q. Salas, okay. My name is Tom Mesereau and I  
26 speak for Michael Jackson, okay?

27 We haven't spoken before, right?

28 A. I believe we have. Didn't you call me one 4710

1 time or something like that?

2 Q. I didn't. That was an investigator.

3 A. It wasn't you.

4 Q. Okay. You spoke to one of our investigators  
5 named Jesus Castillo, correct?

6 A. That is correct.

7 Q. And you spoke to him around January 9th,  
8 2005, right?

9 A. Must have been, yes.

10 Q. Okay. Okay. And do you know -- where did  
11 that interview take place; do you know?

12 A. Yes. Was it the Holiday Inn, Santa Maria?

13 Q. Okay. And approximately how long do you  
14 remember speaking with our investigator, Jesus  
15 Castillo?

16 A. It took, I would say, about half an hour.

17 Q. Okay. And do you remember you told Mr.  
18 Castillo that when you told the police that you  
19 remembered Gavin and Star sleeping in Mr. Jackson's  
20 room, you meant the lower portion of the two-level  
21 suite, correct?

22 A. That is correct.

23 Q. You told Mr. Castillo that Mr. Jackson's  
24 room has an upstairs portion and a downstairs,  
25 correct?

26 A. That is correct.

27 Q. And you told him that you never saw Gavin or

28 Star sleeping in Mr. Jackson's bed located upstairs, 4711

1 right?

2 MR. AUCHINCLOSS: I'll object; foundation.

3 THE COURT: Overruled.

4 You may answer.

5 THE WITNESS: That is correct. I never saw

6 them sleeping in the bed. I saw them out of bed,

7 not sleeping.

8 Q. BY MR. MESEREAU: Right. The only place you

9 ever saw Gavin or Star sleeping was in the

10 downstairs portion of Mr. Jackson's room, right?

11 MR. AUCHINCLOSS: Objection; foundation.

12 THE COURT: Overruled.

13 You may answer.

14 THE WITNESS: That is correct.

15 Q. BY MR. MESEREAU: Okay. And you remember

16 many guests of Mr. Jackson sleeping in his room,

17 sometimes upstairs and sometimes downstairs, right?

18 A. That is correct, if you're talking about the

19 boys, yes.

20 Q. Yeah. He had guests come and sleep from

21 time to time --

22 A. That is correct.

23 Q. -- in that suite, correct?

24 A. That is correct.

25 Q. Sometimes you'd see them upstairs, sometimes

26 you'd see them downstairs, right?

27 A. That is correct.

28 Q. Okay. Now, one time you suspected that 4712



1 Gavin might have been drinking at a dinner table,  
2 right?

3 A. That is correct.

4 Q. But you never saw Gavin drinking, right?

5 A. That is correct.

6 Q. And his family used to have dinner at the  
7 dinner table, right?

8 A. That is correct.

9 Q. His mother used to have dinner at the dinner  
10 table, correct?

11 A. Yes.

12 Q. Now, the prosecutor asked you questions  
13 about whether or not children have a lot of freedom  
14 at Neverland, right?

15 A. Right.

16 Q. And your answer was basically they do,  
17 right?

18 A. That is correct.

19 Q. And so do their parents have freedom at  
20 Neverland, correct?

21 A. That is correct.

22 Q. The prosecutor asked you about something  
23 along the lines of first-class service. Do you  
24 remember that?

25 A. Yes.

26 Q. And you said that Mr. Jackson liked to have  
27 his guests get high-quality service, right?

28 A. That is correct. 4713

1 Q. But when you said that, you were also  
2 including adult guests, correct?

3 A. Right.

4 Q. And when you were there and you saw Janet  
5 Arvizo there, she was getting first-class service,  
6 true?

7 A. Yes, she was.

8 Q. Do you remember a period of time when Janet  
9 Arvizo was there with her former husband, David  
10 Arvizo? Do you remember that?

11 A. One time, yes.

12 Q. And they both were entitled to first-class  
13 service, correct?

14 A. That is correct.

15 Q. And when Janet came with just her children,  
16 she had all the privileges that guests get at  
17 Neverland, right?

18 A. That is correct.

19 Q. She was able to enter the main residence,  
20 right?

21 A. Yes.

22 Q. She was able to order food when she wanted,  
23 correct?

24 A. Yes.

25 Q. She could sit at the dinner table at the  
26 main house and have dinner, or lunch, or breakfast,  
27 right?

28 A. That is correct. 4714

1 Q. She also was allowed to enter the kitchen  
2 and sit at that bar area and order breakfast when  
3 she chose, right?

4 A. That is correct.

5 Q. She also ordered room service when she  
6 wanted, right?

7 A. That is correct.

8 Q. And do you know which quarters she stayed  
9 in?

10 A. If I remember, it was on Unit 4.

11 Q. And that's one of the most beautiful rooms  
12 on that property, isn't it?

13 A. Yes, it is.

14 Q. It's a room where Elizabeth Taylor and  
15 Marlon Brando request to stay, or used to request to  
16 stay from time to time, correct?

17 MR. AUCHINCLOSS: Objection; relevancy.

18 THE COURT: Sustained.

19 Q. BY MR. MESEREAU: Janet was entitled to the  
20 same service that guests like Elizabeth Taylor and  
21 Marlon Brando would get, correct?

22 MR. AUCHINCLOSS: Objection; relevancy.

23 THE COURT: Overruled.

24 Q. BY MR. MESEREAU: Right?

25 A. That is correct.

26 Q. And when you told the jury that the theater  
27 would be open day and night, adult guests also were

28 allowed to go into the theater day or night, right? 4715

1 A. That is correct.

2 Q. And when you told the prosecutor that there  
3 was some rooms in the theater with beds in them,  
4 adults could use those rooms, true?

5 A. That is correct.

6 Q. The prosecutor talked about candy and sodas  
7 and food being available at all hours of date. They  
8 were also available for adult guests, correct?

9 A. That is correct.

10 Q. And isn't it true that Mr. Jackson wanted  
11 his adult guests to have special, classy service,  
12 right?

13 A. That is correct.

14 Q. Now, you saw kids at Neverland visiting when  
15 Mr. Jackson wasn't there, correct?

16 A. That is correct.

17 Q. And typically, if kids visited Neverland  
18 when Mr. Jackson wasn't there, there were rules that  
19 were supposed to be followed for safety, as you  
20 said, right?

21 A. That is correct.

22 Q. And typically, it was their parents or  
23 whatever adults were with them that appeared to be  
24 in charge of them, correct?

25 A. That is correct.

26 Q. And you saw busloads of children from  
27 various locations visit Neverland from time to time,

28 correct? 4716



1 A. That is correct.

2 Q. And to your knowledge, Mr. Jackson wasn't in  
3 charge of all of those busloads of children, was he?

4 A. No, he wasn't.

5 Q. In fact, most of the time when lots of kids  
6 would visit Neverland, some other adult appeared to  
7 be in charge of those kids, right?

8 A. That is correct.

9 Q. And adults and children would visit  
10 Neverland and be given tours of Neverland, right?

11 A. That is correct.

12 Q. Who typically would give those tours?

13 A. We assigned different people, employees of  
14 Neverland Valley.

15 Q. And tell the jury how a tour would be  
16 conducted when children and adults would visit  
17 Neverland.

18 A. They were --

19 MR. AUCHINCLOSS: Objection. Relevancy;

20 beyond the scope.

21 THE COURT: Overruled.

22 Go ahead.

23 THE WITNESS: They would arrive at Neverland  
24 Valley Ranch, park on the outside parking lot, walk  
25 to the train station. And from there, they were  
26 picked up either by train or walk, whatever they  
27 preferred to do, okay, take them back to the

28 theater. Enjoy, you know, the petting zoo. They 4717

1 were allowed to visit where they wanted to. I mean,  
2 we had a schedule for them and took them everywhere,  
3 the property, to show them the place and enjoy the  
4 place. And they ended up at the theater and at the  
5 park.

6 Q. BY MR. MESEREAU: And you would schedule  
7 lots of tours from time to time, right?

8 A. That is correct.

9 Q. Sometimes you'd have a couple of hundred  
10 children visiting with adults, correct?

11 A. That is correct. Sometimes more than that.

12 Q. What's the largest number of kids you  
13 remember visiting at one time to Neverland?

14 A. I would say about 300, 300 kids.

15 Q. And did they come with adults who were in  
16 charge of them?

17 A. Yes.

18 Q. Okay. And did you arrange tours for these  
19 children as well?

20 A. Yes. We assigned the personnel to give them  
21 a tour, yes.

22 Q. Okay. And sometimes, if Michael Jackson was  
23 on the premises, he would come out and say hello,  
24 right?

25 A. That is correct.

26 Q. But he never was in charge of what these  
27 kids did, right?

28 A. That is correct. 4718

1 MR. AUCHINCLOSS: Objection; vague as to

2 "kids."

3 THE COURT: Overruled. The answer's in.

4 Next question.

5 Q. BY MR. MESEREAU: Who would prepare the

6 schedule to indicate whether children were coming to

7 Neverland on a particular day?

8 A. I believe that came from L.A. office.

9 Q. And would it be posted somewhere?

10 A. Yes. All Neverland personnel got a schedule

11 of the kids coming to Neverland.

12 Q. And would you get a schedule typically the

13 day before or that morning?

14 A. Normally we got it, like, two days before, a

15 day before, yes.

16 Q. And as part of your work, you had to look at

17 the future schedule every day, didn't you?

18 A. That is correct.

19 Q. Because almost every day something unusual

20 or special would be going on at Neverland, right?

21 A. That is correct.

22 Q. And how long did you work at Neverland?

23 A. The total was 20 years.

24 Q. During that 20-year period, would it be

25 accurate to say that many, many thousands of

26 children came through, right?

27 A. That is correct.

28 Q. They came from Los Angeles, right? 4719

1 A. That is correct.

2 Q. They came from Santa Barbara, right?

3 A. Right.

4 Q. They came from foreign countries, right?

5 A. That is correct, yes.

6 Q. Based upon your experience over 20 years,

7 Neverland was a real attraction for children around

8 the world, wasn't it?

9 A. Yes, it was.

10 Q. And you considered a major part of your

11 responsibility to be making sure that Neverland was

12 kept up properly so that when children from all over

13 the world came, they'd have a good time, right?

14 A. That is correct.

15 Q. Over 20 years, it may have been hundreds of

16 thousands of children you saw visit, right?

17 A. That is correct.

18 Q. Now, the prosecutor asked you about the time

19 Janet Arvizo asked you to drive her to Los Angeles,

20 okay?

21 A. Correct.

22 Q. You told Jesus Castillo, our investigator,

23 that at no time did anyone forcibly keep her at

24 Neverland Ranch, right?

25 A. That is correct.

26 Q. And at no time was she ever locked in her

27 room, right?

28 A. Not that I was aware of. 4720



1 Q. And at no time was she kept at Neverland  
2 Ranch against her will, right?

3 A. That is exactly what I said, yes.

4 Q. She called you upset and asked you to take  
5 her home and you did so, right?

6 A. Yes.

7 Q. You took her, yourself, in December; is that  
8 correct? Do you remember what month you took her  
9 yourself in the Rolls Royce?

10 A. It was December or January, somewhere around  
11 there. Pretty bad on dates.

12 Q. And then she came back, what, in less than a  
13 week?

14 A. I would say in about a couple weeks,  
15 thereabout.

16 Q. She came back, and then, a few weeks later,  
17 wanted to leave again, right?

18 A. That is correct.

19 Q. And you arranged transportation for her to  
20 leave again, right?

21 A. Yes, I had to call a limo.

22 Q. And that was, as far as you know, the last  
23 time you ever saw the Arvizos, correct?

24 A. Correct.

25 Q. When you drove Ms. Arvizo and her children  
26 in the Rolls Royce, she never made any complaints  
27 about the way she'd been treated at Neverland,

28 right? 4721

1 A. That is correct.

2 Q. She never said she'd been abused at

3 Neverland, right?

4 A. That is correct.

5 Q. She never said her children had been taken

6 advantage of at Neverland, right?

7 A. That is correct.

8 Q. But she didn't seem to like Dieter or

9 Ronald, right?

10 A. That is correct, yes.

11 Q. And she told you she was concerned about

12 media attention on her family, right?

13 A. She mentioned about that, yes.

14 Q. Her concerns to you were media attention and

15 the fact that she didn't like Dieter, right?

16 A. That is correct, yes.

17 Q. She never complained about anything else,

18 did she?

19 A. No.

20 Q. In fact, she told you she respected and

21 liked Michael Jackson, right?

22 A. Yes, she did.

23 Q. She never complained to you about Michael

24 Jackson at all, did she?

25 A. Never.

26 Q. When you drove her in the Rolls Royce, she

27 was in the front seat with you, right?

28 A. Yes. 4722

1 Q. Her children were in the back seat, right?

2 A. That is correct.

3 Q. And you and she spoke during that three-hour  
4 trip, right?

5 A. She didn't spoke too much, but, yes, she  
6 did.

7 Q. Did you speak to her very much when she used  
8 to stay at Neverland?

9 A. No.

10 Q. Okay. And in -- on that trip, excuse me,  
11 Janet Arvizo never complained that she was being  
12 taken out of the country against her will, did she?

13 A. No, she never said anything.

14 Q. Do you remember when she returned, you  
15 think, within the next couple of weeks?

16 A. It was in the next couple of weeks, yes.

17 Q. Do you remember seeing her suddenly show up  
18 with her children again?

19 A. Yes.

20 Q. And do you know what time of day that was?

21 A. I believe it was afternoon.

22 Q. Did you talk to her when you saw her return?

23 A. Yes, I did.

24 Q. You never got the impression she was there  
25 against her will at that point, did you?

26 A. No, I didn't.

27 Q. The last time Janet and the kids left

28 Neverland, do you know who drove them home? 4723

1 A. Yes, I called a limousine service.

2 Q. So you took her in a Rolls Royce one time,  
3 and the last time it was a limousine service that  
4 you arranged, true?

5 A. That is correct.

6 Q. Do you remember any other times that Janet  
7 and the children left Neverland?

8 A. That was the last time I saw them.

9 Q. So you're only personally aware of two times  
10 where they left Neverland; is that right?

11 A. Yes.

12 Q. That you had anything to do with?

13 A. That is correct.

14 Q. Okay. Now, the prosecutor asked you about a  
15 safe that was brought onto the property to lock  
16 keys. Do you remember that?

17 A. Uh-huh.

18 Q. And if you remember, whose idea was it to  
19 put a safe where the keys could be locked?

20 A. It was the ranch manager idea and my idea.

21 Q. Did you discuss it with Michael Jackson?

22 A. No, we never did.

23 Q. You just ordered a safe?

24 A. We just ordered a safe.

25 Q. And you put the keys in the safe?

26 A. That is correct.

27 Q. And before that, where were the keys kept?

28 A. They were kept in the same room, behind 4724



1 the -- behind the door to the entry to the room,

2 yes.

3 Q. Is that the entrance to the wine cellar?

4 A. No, no, no. That's the entrance to the

5 maids' room.

6 Q. Okay. Okay. But they were hung out in open

7 view, right?

8 A. That is correct, yes.

9 Q. Do you remember Frank Tyson's sister, Marie

10 Nicole?

11 A. Yes.

12 Q. Do you remember her staying at Neverland?

13 A. Yes.

14 Q. Do you remember her walking around the

15 property and playing with Michael Jackson?

16 A. Yes, I do.

17 Q. Was it your impression that the family was

18 close to Michael Jackson?

19 A. Yes.

20 Q. Did you see Frank Tyson's parents visit from

21 time to time?

22 A. That is correct, yes.

23 Q. And do you remember their names?

24 A. I don't. Sorry.

25 Q. Did you see Frank Tyson's brothers visit

26 from time to time?

27 A. Yes.

28 Q. Okay. You talked about a combination to Mr. 4725

1 Jackson's room. Remember that?

2 A. Yes.

3 Q. And did you always have that combination?

4 A. Yes, I did.

5 Q. Do you know if anyone else had it, to your  
6 knowledge?

7 A. Ranch manager.

8 Q. What about staff who cleaned the room? Did  
9 they typically have it?

10 A. Yes. Yes. We have -- we had another guy  
11 there that also had it, know the combination of the  
12 room.

13 Q. And that combination was changed  
14 periodically, right?

15 A. My time there, we changed it about a couple  
16 times.

17 Q. Okay. Do you remember it being changed  
18 because too many people seemed to have it?

19 A. We noticed there was so many kids going into  
20 the room, so we figured we change the combination,  
21 yes.

22 Q. Do you remember Michael Jackson complaining  
23 that Frank was going into his bedroom when Michael  
24 was out of town?

25 MR. AUCHINCLOSS: Objection; hearsay.

26 THE COURT: Sustained.

27 Q. BY MR. MESEREAU: Was it your understanding

28 that Frank could get into that room on occasion? 4726

1 MR. AUCHINCLOSS: Objection; foundation.

2 THE COURT: Sustained.

3 Q. BY MR. MESEREAU: Do you know whether or not

4 Frank seemed like he could get into Michael's

5 bedroom from time to time?

6 MR. AUCHINCLOSS: Objection; foundation.

7 THE COURT: Sustained.

8 Q. BY MR. MESEREAU: Did you ever observe Frank

9 in Michael Jackson's bedroom?

10 A. Yes.

11 Q. Did you ever see Marie Nicole in Michael

12 Jackson's bedroom?

13 A. Yes.

14 Q. And again, when I say "bedroom," we're

15 talking about two levels, right?

16 A. That is correct.

17 Q. It's a rather large area, isn't it?

18 A. That is correct, yes.

19 Q. And on the lower level, people can sit down

20 and enjoy themselves, can't they?

21 A. That is correct. Yes.

22 Q. What do you recall there being on the lower

23 level of Michael Jackson's bedroom when you were

24 working there?

25 A. I just recall that it was a peaceful area

26 that people can sit and enjoy themselves there.

27 Fireplace or -- it was pretty peaceful place to be.

28 Q. And he would entertain people in the lower 4727

1 portion of his bedroom, correct?

2 A. That is correct, yes.

3 Q. People would get served food there, correct?

4 A. That is correct, yes.

5 Q. People would get served drinks there, right?

6 A. That is correct.

7 Q. And you say there's a fireplace?

8 A. There's a fireplace there.

9 Q. People would sit around the fireplace and

10 chat, correct?

11 A. Yes.

12 Q. And sometimes they did it when Mr. Jackson

13 was there, and sometimes they did it when he wasn't

14 there, right?

15 MR. AUCHINCLOSS: Objection. Foundation;

16 assumes facts.

17 THE COURT: Overruled.

18 You may answer. Do you want the question

19 read back?

20 MR. MESEREAU: Do you want -- I'm sorry.

21 THE WITNESS: Answer it?

22 THE COURT: Yes. Do you want the question

23 read back?

24 THE WITNESS: No, I understood the question.

25 Pretty much when Mr. Jackson wasn't there,

26 nobody was allowed to go into his room.

27 Q. BY MR. MESEREAU: There were times when he

28 let people in, weren't there? 4728



1 A. Yes, there was.

2 Q. And they would have some fun when Mr.

3 Jackson wasn't even there, right?

4 A. That is correct, yes.

5 Q. Okay. Now, approximately what year did you

6 start working at Neverland?

7 A. Since the beginning, do you mean?

8 Q. Yes.

9 A. I would say in '83, 1983.

10 Q. '83?

11 A. Uh-huh.

12 Q. So, there was a point in time where your

13 daughter used to visit Neverland, right?

14 A. That is correct.

15 Q. And what is her name?

16 A. Sandra.

17 Q. Sandra used to visit when she was

18 approximately five years old, right?

19 A. Five, six, yes.

20 Q. She used to play with Michael Jackson,

21 right?

22 A. Yes, that is correct.

23 Q. He used to give her gifts, right?

24 A. That is correct, yes.

25 Q. Now, normally do people who work at

26 Neverland bring their children there very often?

27 A. We have -- they have what is called "Family

28 Day," yes. 4729

1 Q. And please tell the jury what "Family Day"  
2 is.

3 A. Family Day is a day where it's open for the  
4 employees to bring all your family and have access  
5 to all the facilities there, yes.

6 Q. And how often does that happen?

7 A. Once a year at least.

8 Q. And that's a big event at Neverland, right?

9 A. That is correct, yes.

10 Q. And Michael Jackson closes Neverland off for  
11 other visits and lets all of the help and their  
12 family take over pretty much, right?

13 A. Yes, sir.

14 Q. And it starts in the morning, doesn't it?

15 A. Yes.

16 Q. Goes late into the evening, right?

17 A. Yes.

18 Q. Now, you mentioned a petting zoo before.

19 Please tell the jury what the petting zoo is.

20 A. The petting zoo is a place where they have  
21 just little animals for kids, where they can go and  
22 play with the animals. We have -- I mean, they have  
23 a variety of animals where kids can, pretty safe, go  
24 and touch the animals.

25 Q. And what kind of animals do you have in the  
26 petting zoo?

27 A. Well, they have llamas. They have deers.

28 They are rabbits. They have pigs. Birds. What 4730

1 else do they have? They have lots of animals.

2 Q. And the petting zoo is primarily designed

3 for kids, correct?

4 A. That is correct, yes.

5 Q. And then you have a larger zoo, right?

6 A. That is correct.

7 Q. And please tell the jury what's in the

8 larger zoo.

9 A. Well, that's where you can find the big

10 animals. Like you can find elephants, lions,

11 chimpanzees. You can find llamas and different

12 other animals. Wolves. Stuff like that.

13 Q. You got giraffes, right?

14 A. Giraffes.

15 Q. There's a camel?

16 A. Right, exactly.

17 Q. And typically, at least once a day, the

18 trainers walk two elephants through the property,

19 right?

20 A. That is correct, yes.

21 Q. And they walk the elephants through the

22 property, and very often guests, if they follow the

23 rules, can feed them, right?

24 A. That is correct, yes.

25 Q. And Mr. Jackson will pay for bags of

26 doughnuts and goodies to give to the elephants,

27 right?

28 A. That is correct, yes. 4731

1 Q. Is that a once-a-day affair?

2 A. Yes, pretty much once a day.

3 Q. Okay. It's usually a big thing for kids and  
4 their parents, right?

5 A. Right.

6 Q. Now, as part of your duties at Neverland,  
7 you often would pay for toys for kids, correct?

8 A. That is correct. Yes.

9 Q. And you would be reimbursed, typically, if  
10 you spent your own money on toys, right?

11 A. That is correct, yes.

12 Q. You would get a reimbursement check of --  
13 for as much as \$11,000 from time to time, right?

14 A. That is correct, yes.

15 Q. And what kind of rules did you follow as far  
16 as buying toys for kids is concerned?

17 A. Really wasn't any rules. We just went and  
18 bought some toys.

19 Q. But the prosecutor asked you questions about  
20 how influential Mr. Jackson was in running affairs.

21 Didn't he give you a lot of flexibility in just  
22 going out, buying hundreds of toys, and then just  
23 charging him for it?

24 A. That is correct, yes.

25 Q. And where would you go buy those toys?

26 A. Toys-R-Us.

27 Q. Okay. Would you drive there yourself?

28 A. Pretty much Mr. Jackson came along or with 4732



1 the kids or some adults, yes.

2 Q. And Mr. Jackson would from time to time let  
3 you drive parents and their children to Toys-R-Us,  
4 right?

5 A. That is correct. Yes.

6 Q. And he would tell you to buy them whatever  
7 they'd like, right?

8 A. That is correct, yes.

9 Q. You'd spend thousands of dollars on these  
10 kids, right?

11 A. That is correct, yes.

12 Q. And that was one of your responsibilities as  
13 ranch manager, right?

14 A. That is correct. Yes.

15 Q. To try and take care of the children as best  
16 you could, right?

17 A. Correct, yes.

18 Q. Now, what are the safety regulations in  
19 effect at the zoo, to your knowledge?

20 A. Well, there's certain regulations for the  
21 zoo, especially with the big animals. Again, for  
22 the safety of the guests or kids, yes.

23 Q. And you have all these amusement rides as  
24 well, right?

25 A. That is correct, yes.

26 Q. Please tell the jury what amusements rides  
27 you have for the kids and the parents.

28 A. Well, there's different rides. The Ferris 4733

1 wheel. They have the merry-go-round. They have a  
2 big slide. They have a -- oh, got -- they have the  
3 Sea Dragon. They have various rides also for kids,  
4 for small kids, yes.

5 Q. And when you have these busloads of kids and  
6 adults show up and they want to use the rides, what  
7 safety precautions do you have?

8 A. Well, we have a -- we just got to make sure  
9 that the kids don't get hurt. We have regulations  
10 for that. We have personnel there guiding the kids  
11 and taking care of the kids so nobody gets hurt.

12 Q. And the personnel specialize in the  
13 amusement park portion of Neverland, right?

14 A. That is correct, yes.

15 Q. And are they in charge of maintaining the  
16 rides, making sure the machinery's okay?

17 A. That is correct, yes.

18 Q. And were they under your supervision?

19 A. No.

20 Q. Okay. Who was supervising the people who  
21 run the amusement park?

22 A. There's -- Neverland has different groups of  
23 people, you know, like departments, what we call it,  
24 and it was the person in charge of the amusement  
25 park.

26 Q. Just like there's a group in charge of the  
27 petting zoo and the bigger zoo, right?

28 A. That is correct, yes. 4734

1 Q. And when these children and these adults  
2 visit Neverland, these different groups are all  
3 available to make sure kids are safe, right?

4 A. That is correct. Yes.

5 Q. Now, when you have hundreds of children  
6 running around Neverland, they can sometimes get  
7 into all kinds of mischievous situations, right?

8 A. Absolutely, yes.

9 Q. You've seen kids caught in the house in  
10 various rooms, right?

11 A. That is correct.

12 Q. And they've been politely asked to leave,  
13 right?

14 A. That is correct, yes.

15 Q. You've seen kids trying to get in doors  
16 they're not supposed to get through, correct?

17 A. Correct.

18 Q. You've seen kids trying to get into the  
19 arcade whenever they can, right?

20 A. That is correct, yes.

21 Q. And kids are sometimes caught with things in  
22 their hands, little things they found in the main  
23 house and they have -- you have to take them away  
24 from them, right?

25 A. That is correct, yes.

26 Q. And it's never been your understanding that  
27 Mr. Jackson is personally supervising all of this,

28 right? 4735

1 A. No.

2 Q. In fact, he's amazingly generous in letting  
3 people come into his home and go through it, and see  
4 it, right?

5 A. Yes, he is.

6 Q. And this is a large home that has a lot of  
7 beautiful antiques, correct?

8 A. That is correct, yes.

9 Q. A lot of family pictures, right?

10 A. That is correct, yes.

11 Q. He has things he's collected from all over  
12 the world, right?

13 A. Yes.

14 Q. And he often lets whoever visits come  
15 through the house so they can see all of this,  
16 right?

17 A. Yes.

18 Q. And when he has guests stay over in the  
19 guest quarters, I believe you said that they pretty  
20 much can walk into that main house when they want,  
21 right?

22 A. That is correct, yes.

23 Q. He has staff available all the time to  
24 prepare a meal for them if they want one, right?

25 A. Yes.

26 Q. And in that kitchen area, you have  
27 unlocked -- an unlocked refrigerator area, correct?

28 A. That's correct. It's open. 4736



1 Q. And they can go in there all the time and  
2 get sodas, right?

3 A. That is correct.

4 Q. Juice, right?

5 A. Yes.

6 Q. Milk?

7 A. Whatever their choice is.

8 Q. And you'll find wine in there, right?

9 A. That is correct, yes.

10 Q. And he lets his adult guests go in there and  
11 get wine when they choose, correct?

12 A. That is correct, yes.

13 Q. And glasses are nearby if they want a glass,  
14 right?

15 A. Yes.

16 Q. It's a very large refrigerator area, isn't  
17 it?

18 A. It is.

19 Q. How many glass doors do you think are on  
20 that large refrigerated area?

21 A. Oh, God. About six, eight, something like  
22 that.

23 Q. Six or eight transparent doors they can go  
24 into to get all kinds of beer, wine, soda, milk,  
25 orange juice, right?

26 A. That is correct, yes.

27 Q. And there's a menu that's posted on a

28 blackboard most days, right? 4737

1 A. That is correct, yes.

2 Q. And what do you typically find on that menu?

3 A. You find the menu for the food or whatever  
4 the people wants to use.

5 Q. There's usually some special dishes that the  
6 staff are preparing for that day, right?

7 A. Exactly, yes. Right.

8 Q. And there also is a standard menu that  
9 Michael Jackson printed up that he gives that people  
10 have to order from, right?

11 A. That is correct, yes.

12 Q. And you got sandwiches and soup and stuff  
13 like that, right?

14 A. Yes.

15 Q. And on that bar area where people can come  
16 anytime of day, you can sit there and just ask  
17 whoever is there to prepare eggs or an omelet,  
18 whatever you want, right?

19 A. That is correct, yes.

20 Q. And there are homemade buns and doughnuts  
21 that are put on there every day, right?

22 A. Right.

23 Q. Anytime of day, 24 hours a day, you can go  
24 into that main house and get what you want, correct?

25 A. That is correct, yes.

26 Q. Even when Mr. Jackson is upstairs with his  
27 children, very often people will come downstairs to

28 either see the house or get something to eat, right? 4738

1 A. That is correct, yes.

2 Q. The prosecutor asked you about candy and ice  
3 cream and stuff like that. That's available to  
4 everybody, isn't it?

5 A. That is correct, yes.

6 Q. It's not just available to children. It's  
7 available for adults as well, right?

8 A. That is correct, yes.

9 Q. And when you walk into that theater, you've  
10 got a whole candy/ice cream area in the front,  
11 right?

12 A. Yes.

13 Q. And typically, Mr. Jackson will have one of  
14 his people there just to serve whatever people want,  
15 right?

16 A. That is correct, yes.

17 Q. Ice cream sandwiches, ice cream cones,  
18 right?

19 A. Whatever they prefer, yes.

20 Q. There's a big popcorn area, correct?

21 A. Correct.

22 Q. And you will see sometimes visitors looking  
23 at movies anytime of day, right?

24 A. That is correct, yes.

25 Q. And there's a huge collection of movies they  
26 can sometimes choose from, right?

27 A. Right.

28 Q. And other times there are just a couple that 4739

1 you can choose for the day, right?

2 A. That is correct, yes.

3 Q. Okay. There are other areas of Neverland

4 people want to see, right?

5 A. Right.

6 Q. There are areas where they can see Mr.

7 Jackson's costumes that he's worn on music tours,

8 right?

9 A. That is correct, yes.

10 Q. There are areas where they can see his

11 glove? Kids love to see the gloves he's worn,

12 right?

13 A. That is correct, yes.

14 Q. In fact, some of the memorabilia from his

15 musical tours around the world are actually in an

16 area not far from the wine cellar; correct?

17 A. That is correct, yes.

18 Q. You also have sleeping bags stored down in

19 the area near where the wine cellar is, correct?

20 A. That is correct.

21 Q. Did you work there before Mr. Jackson

22 purchased the property?

23 A. Yes, I did.

24 Q. That wine cellar area was already there when

25 Mr. Jackson purchased the property, right?

26 A. Yes, it was.

27 Q. Now, there is a procedures manual at

28 Neverland that, at least on paper, identifies what 4740



1 people are supposed to do or not do, right?

2 A. That is correct.

3 Q. And security is a concern there, is it not?

4 A. Yes.

5 Q. Because if you really look at the perimeter  
6 of Neverland, you can get in those fences, can't  
7 you?

8 A. Absolutely, yes.

9 Q. In fact, it's -- it's easy for anyone to go  
10 in or out of those three-rail fences anytime, right?

11 A. Absolutely.

12 Q. And you've caught people on the property who  
13 tried to get over to Neverland and find Mr. Jackson,  
14 correct?

15 A. Many times.

16 Q. And there are roads around the property  
17 where cars drive at high speeds, correct?

18 A. Yes.

19 Q. And there is also a concern that children  
20 will somehow wander on the road, right?

21 A. That is correct, yes.

22 Q. Let me get back to Janet Arvizo.

23 Didn't she complain one time that she felt  
24 Frank and Vinnie were separating her from Michael  
25 Jackson?

26 A. I don't recall her telling me that, no.

27 Q. Did she complain that Dieter and Ronald were

28 separating her from Michael Jackson? 4741

1 A. Yes.

2 Q. She appeared not to like Dieter or Ronald at  
3 all, right?

4 A. That is correct, yes.

5 Q. When Janet and the children would arrive on  
6 the property, were they given assistance in  
7 transporting their luggage to their rooms?

8 A. Absolutely.

9 Q. Who would help Janet transport her luggage  
10 to her rooms?

11 A. Many times it was security, Neverland Valley  
12 security, or myself.

13 Q. And would Janet pretty much tell you what to  
14 carry from her car or however she got there?

15 A. No, not really.

16 Q. Who would assign the rooms to the Arvizos  
17 when they visited and stayed at Neverland?

18 A. I did.

19 Q. And what would determine, for you, what room  
20 to put them in?

21 A. It would depend. Many times we had some  
22 other guests on the property. And if we have one  
23 available, that was the only one that was going to  
24 be for them. And many times I ask them, "Okay,  
25 which room do you guys want to stay in?" So that's  
26 how I decided.

27 Q. Did anyone ever complain about the room that

28 they were placed in? 4742

1 A. No, not really.

2 Q. Did the kids ever complain?

3 A. No.

4 Q. The rooms they were placed in, as far as  
5 you're concerned, were all beautiful rooms, weren't  
6 they?

7 A. Yes, they are.

8 Q. They were cleaned every day, correct?

9 A. That is correct.

10 Q. And they had constant room service if they  
11 wanted it, right?

12 A. That is correct. Yes.

13 Q. Mr. Jackson wanted them treated just as well  
14 as any other guests, right?

15 MR. AUCHINCLOSS: Objection; asked and  
16 answered.

17 THE COURT: Sustained.

18 Q. BY MR. MESEREAU: How many times, Mr. Salas,  
19 has the prosecution contacted you to talk to you  
20 about the case?

21 A. A couple times.

22 Q. And how many times did you meet with  
23 representatives of the sheriff's department?

24 A. A couple times.

25 Q. They never asked you if you ever brought  
26 nonalcoholic beverages for the Arvizo children, did  
27 they? They never asked you that question, did they?

28 A. No, they didn't. 4743

1 Q. Now, I think you said that Michael Jackson  
2 appeared frustrated at what Frank was doing on the  
3 property from time to time, right?

4 A. That is correct. Yes.

5 MR. AUCHINCLOSS: Objection; misstates the  
6 evidence.

7 MR. MESEREAU: I don't think it does, Your  
8 Honor.

9 THE COURT: Overruled. The answer was,  
10 "Yes." Next question.

11 Q. BY MR. MESEREAU: Michael Jackson was  
12 frustrated that Frank was bringing guests to  
13 Neverland without him knowing about it, right?

14 A. That is correct, yes.

15 Q. And how old was Frank at the time, do you  
16 think?

17 A. I'm not sure how old was he. I will say he  
18 was about, what, 35.

19 Q. Early twenties?

20 A. Somewhere around there, yes.

21 Q. To your knowledge, how was Frank able to  
22 bring guests to the property without Michael Jackson  
23 knowing about it?

24 MR. AUCHINCLOSS: Objection; foundation.

25 THE COURT: Overruled.

26 You may answer.

27 THE WITNESS: It was his own decision.

28 Q. BY MR. MESEREAU: But what would Frank do, 4744



1 if you know, to bring guests onto the property

2 without Michael Jackson knowing about it?

3 A. What he would do there?

4 Q. Yes.

5 A. Just have fun at Neverland.

6 Q. Oh, no, excuse me. I didn't state it

7 properly. It's my mistake.

8 If Frank wanted to bring guests onto the

9 property without Michael Jackson knowing about it,

10 what would he do?

11 A. He would just call security and tell -- let

12 security know that he had some guests coming in, or

13 tell me.

14 Q. Would he typically tell them that Michael

15 wants them visiting?

16 A. No, he never said that.

17 Q. He just said he wanted them to visit, right?

18 A. That is correct.

19 Q. Okay. And he would bring a number of female

20 guests from time to time, correct?

21 A. Correct.

22 MR. AUCHINCLOSS: Objection; relevance.

23 THE COURT: Overruled. The answer is,

24 "Correct."

25 Q. BY MR. MESEREAU: In fact, he tried to bring

26 a lot of girls onto the property, didn't he?

27 A. That is correct.

28 Q. He used to brag to them that he was a friend 4745

1 to Michael Jackson, right?

2 MR. AUCHINCLOSS: Objection. Hearsay;

3 relevance.

4 THE COURT: Sustained.

5 Q. BY MR. MESEREAU: Now, you mentioned someone

6 named Malnik visited the property one time, right?

7 A. Right.

8 Q. Did you speak to him?

9 A. Not in a conversation, no, I didn't.

10 Q. You just saw him?

11 A. Just saw him, say hi. And that was it.

12 Q. The prosecutor mentioned someone named Zia,

13 right?

14 A. That's correct. That is correct.

15 Q. Did you see Zia on the property?

16 A. Yes, I did.

17 Q. Did you talk to him?

18 A. Just for a short time. Not --

19 Q. And Zia was, to your knowledge, Mr.

20 Jackson's attorney, right?

21 A. Yes.

22 Q. Did you see him there often?

23 A. No, I only saw him there a couple times.

24 Q. And what did you see him doing?

25 A. Just had a meeting with Mr. Jackson.

26 Q. Okay. You would see all kinds of people

27 visit from time to time to meet with Mr. Jackson,

28 right? 4746

1 A. Yes.

2 MR. AUCHINCLOSS: Objection; vague.

3 MR. MESEREAU: I'll rephrase.

4 Q. The prosecutor has limited his questions to  
5 you to Dieter, Ronald, Frank. Mr. Jackson didn't  
6 spend all of his time meeting with these people, did  
7 he?

8 A. Not all the time, no.

9 Q. Mr. Jackson from time to time would have  
10 numerous visitors to Neverland to see him, correct?

11 A. That is correct.

12 MR. AUCHINCLOSS: Objection; vague as to  
13 time.

14 THE COURT: Overruled.

15 You may answer.

16 THE WITNESS: That is correct.

17 Q. BY MR. MESEREAU: You would often see a full  
18 schedule of people visiting Neverland to see Mr.  
19 Jackson, right?

20 MR. AUCHINCLOSS: Objection; foundation.

21 THE COURT: Overruled.

22 You may answer.

23 THE WITNESS: That is correct.

24 Q. BY MR. MESEREAU: Do you recall Mr. Jackson  
25 doing work in his studio at Neverland?

26 A. Yes.

27 Q. And what do you recall seeing him doing?

28 A. Doing some recording. Dancing. Practicing. 4747

1 Yes.

2 Q. Did you watch him practice dance?

3 A. No, I didn't.

4 Q. And how did you know he was practicing  
5 dance? Would he tell you?

6 A. Right.

7 Q. And would he tell you not to let anyone in,  
8 that he's doing his creative work?

9 MR. AUCHINCLOSS: Objection; hearsay.

10 THE COURT: Overruled.

11 You may answer.

12 THE WITNESS: Because of his work, yes, he  
13 did not want to be bothered, yes.

14 Q. BY MR. MESEREAU: Did you also see him  
15 teaching kids how to dance from time to time?

16 A. I never saw that.

17 Q. Okay. How about in his recording studio,  
18 would he bring kids and adults into his recording  
19 studio to see it?

20 A. Yes, he did.

21 Q. And didn't he used to show them how he does  
22 his work in his recording studio?

23 A. Yes.

24 Q. And sometimes he wanted to just be left  
25 alone in there, right?

26 A. That is correct. Yes.

27 Q. And when he wanted to be left alone, he'd

28 spend hours and hours in there, right? 4748



1 A. That's correct, yes.

2 Q. Okay. Now, you would see Mr. Jackson awake  
3 on his property at all different hours, right?

4 A. Yes.

5 Q. Sometimes he gets up at 3:00 in the morning,  
6 doesn't he?

7 A. That is correct, yes.

8 Q. And he will take walks alone on his  
9 property, right?

10 A. That's right.

11 Q. That's how he does a lot of his composing,  
12 right?

13 A. That is correct.

14 MR. AUCHINCLOSS: Objection; foundation.

15 THE COURT: Sustained.

16 Q. BY MR. MESEREAU: You'd also see Mr. Jackson  
17 from time to time driving alone on his property,  
18 right?

19 A. That is correct, yes.

20 Q. Would you know in advance if Mr. Jackson was  
21 going to leave the property to go somewhere?

22 A. Yes.

23 Q. And who would you -- who would tell you that  
24 Mr. Jackson was leaving the property?

25 A. Sometimes I found out about -- by his  
26 bodyguard.

27 Q. Okay. And what are some of the other ways

28 that you would find out Mr. Jackson might be either 4749

1 leaving the property or going out of town?

2 A. By Mr. Jackson.

3 Q. Okay. Did you speak to Mr. Jackson every  
4 day when he was there?

5 A. Pretty much, yes.

6 Q. When he wasn't there, who would you speak  
7 to?

8 MR. AUCHINCLOSS: Objection. Ambiguous;  
9 relevance.

10 THE COURT: Overruled.

11 THE WITNESS: When he wasn't there, well,  
12 nobody is -- the ranch manager.

13 Q. BY MR. MESEREAU: Let me ask you this: When  
14 Mr. Jackson's out of town, which you saw him do  
15 quite often during your 20 years there, right?

16 A. Right.

17 Q. You saw him go on music tours, right?

18 A. That is correct.

19 Q. And you saw him travel to various cities in  
20 America, right?

21 A. Yes.

22 Q. And he would travel to various cities around  
23 the world, right?

24 A. Yes.

25 Q. When he's not there, does the place pretty  
26 much run the way it runs when he's there?

27 A. It runs the same way.

28 Q. And that's because there are various 4750

1 procedures in effect to make sure it runs properly,  
2 correct?

3 A. That is correct, yes.

4 Q. When Mr. Jackson's there, he's not walking  
5 around the property just running everything, is he?

6 A. No, no.

7 Q. In fact, very often when he's there, you  
8 hardly see him, right?

9 A. That is correct, yes.

10 Q. Because Mr. Jackson is doing his creative  
11 work for hours and hours on end, right?

12 A. Correct.

13 Q. So how does the place sort of run when he's  
14 not there? I mean, if you can explain it.

15 A. Because of the people in charge of running  
16 the place, so we'll -- the place always running the  
17 same, so -- whether he's there or not.

18 Q. And even if he's there, you have to report  
19 to other individuals to get information, don't you?

20 A. That is correct, yes.

21 Q. Okay. So when the prosecutor asked you  
22 about your reporting directly to Michael Jackson,  
23 you didn't mean you're talking to him all day about  
24 what's going on?

25 A. No.

26 Q. And if you report to him on a given day, it  
27 might be just one time, right?

28 A. That is correct, yes. 4751

1 Q. Okay. In response to the prosecutor's  
2 questions, you mentioned some things about Frank  
3 saying he'll take care of things, correct?

4 A. Correct, yes.

5 Q. But Frank also used to brag about how close  
6 he was to Michael Jackson, didn't he?

7 A. Right.

8 Q. You didn't get the impression he was always  
9 telling the truth, did you?

10 MR. AUCHINCLOSS: Objection; calls for a  
11 conclusion.

12 THE COURT: Sustained.

13 Q. BY MR. MESEREAU: You said, in response to  
14 the prosecutor's questions, that on occasion you  
15 would see Frank and Michael Jackson together, right?

16 A. Right.

17 Q. But you also often saw Frank not around Mr.  
18 Jackson, correct?

19 A. Oh, yes.

20 Q. And you often saw Mr. Jackson without Frank,  
21 right?

22 A. That is correct, yes.

23 Q. And you didn't really know what work Frank  
24 was doing, correct?

25 A. That is correct, yes.

26 Q. But from time to time, he would try and brag  
27 that he was in the music business, right?

28 A. Correct. 4752



1 MR. AUCHINCLOSS: Objection; hearsay.

2 THE COURT: Sustained.

3 Q. BY MR. MESEREAU: I want to ask you a little  
4 more about security at Neverland, okay? It's about  
5 2800 acres of property, right?

6 A. Uh-huh.

7 Q. Very spread out over hills, right?

8 A. Yes.

9 Q. And it's surrounded by these fences that you  
10 said anybody could come in, right?

11 A. That is correct, yes.

12 Q. You have a front gate that you have to stop  
13 at if you're driving in, right?

14 A. Correct.

15 Q. And you have to push a button and identify  
16 who you are, right?

17 A. That is correct, yes.

18 Q. And people at that security gate typically  
19 have a list of who's supposed to be allowed in,  
20 right?

21 A. Right.

22 Q. And I think what you said is that Frank  
23 would often call the people at that gate and say,  
24 "Let so and so in," right?

25 A. That is correct, yes.

26 Q. Okay. Now, you did indicate there had been  
27 efforts by people to drive and get onto the property

28 and find Mr. Jackson, right? 4753

1 A. Right.

2 Q. And you have some security guards who patrol  
3 the property a bit, right?

4 A. Correct.

5 Q. And they don't have weapons, right?

6 A. Not to my knowledge.

7 Q. Because Michael Jackson doesn't want weapons  
8 on his property, right?

9 A. Correct.

10 MR. AUCHINCLOSS: Objection. Foundation;

11 hearsay.

12 THE COURT: Sustained.

13 Q. BY MR. MESEREAU: Do you know whether or not  
14 Mr. Jackson has a policy that he doesn't want  
15 weapons on his property?

16 A. Yes, I do.

17 Q. And he's typically very concerned about his  
18 children's safety, correct?

19 A. That is correct.

20 Q. You said that Frank was staying in the video  
21 library, right?

22 A. Correct.

23 Q. And was there a bed in there?

24 A. It's a couch that turns into a bed, yes.

25 Q. Is that where he would stay when he visited?

26 A. Correct.

27 Q. There were long periods of time Frank wasn't

28 even there, right? 4754

1 MR. AUCHINCLOSS: Objection as to -- vague

2 as to time.

3 Q. BY MR. MESEREAU: Let's go to 2003.

4 I'll rephrase it, Your Honor.

5 THE COURT: All right.

6 Q. BY MR. MESEREAU: Let's take the year 2003.

7 There were periods of time you wouldn't even see

8 Frank on the property, right?

9 A. There was some times, yes.

10 Q. And there are times you would also see him,

11 correct?

12 A. Correct. Yes.

13 Q. There were times you would see Dieter on the

14 property, right?

15 A. Correct.

16 Q. And there were times you wouldn't see him at

17 all, right?

18 A. Correct. Yes.

19 Q. There were times you'd see Ron on the

20 property, correct?

21 A. That is correct. Yes.

22 Q. And there were times you wouldn't see him at

23 all?

24 A. Right.

25 Q. And during this period of time, you had your

26 constant visitors on a daily basis to the property,

27 correct?

28 A. Yes. 4755

1 Q. You had many other people who had scheduled  
2 meetings with Michael Jackson, right?

3 A. Right. Yes.

4 Q. And you also had your periodic tours of  
5 children and adults to Neverland, right?

6 A. That is correct, yes.

7 Q. You indicated that you think that Mr.  
8 Jackson was at Neverland when the Arvizos visited in  
9 2003, right?

10 A. Right.

11 Q. You're not sure that he was there every day,  
12 though, are you?

13 A. That is right, yes.

14 Q. If there were days he wasn't there when the  
15 Arvizos were there in 2003, you're just not sure,  
16 correct?

17 That's a bad question. Let me -- I don't  
18 think I could answer that one.

19 In 2003 when the Arvizos were at Neverland,  
20 sometimes Michael Jackson was there and sometimes he  
21 wasn't, right?

22 A. That is correct. There was days that he was  
23 not there, yes.

24 Q. There were times he was out of town, right?

25 A. Right.

26 Q. There were times he was gone from the  
27 premises during the day, right?

28 A. That is correct, yes. 4756



1 Q. There were times he was in his studio,  
2 right?

3 A. That is correct, yes.

4 Q. There were times he was doing his dance  
5 routines, correct?

6 A. Correct.

7 Q. There were times he was taking children  
8 around Neverland on a tour, right?

9 A. Correct, yes.

10 Q. And there would be constant meetings of one  
11 form or another involving Michael Jackson with other  
12 people, correct?

13 A. That is correct, yes.

14 Q. Okay. The prosecutor asked you about  
15 Michael Jackson playing with kids. Michael Jackson  
16 plays with kids all the time at Neverland, doesn't  
17 he?

18 A. Yes, he does.

19 Q. He often acts like a kid himself, doesn't  
20 he?

21 A. Yes.

22 Q. And he takes pride particularly in bringing  
23 inner city kids to Neverland to have fun, doesn't  
24 he?

25 A. Correct. Yes.

26 Q. We're talking about kids from poverty, kids  
27 from broken homes, right?

28 A. That is correct, yes. 4757

1 Q. He sometimes personally arranges those  
2 visits himself, doesn't he?

3 MR. AUCHINCLOSS: Objection; foundation.

4 THE COURT: Sustained.

5 Q. BY MR. MESEREAU: Do you know whether or not  
6 Michael Jackson sometimes personally arranges visits  
7 by kids to Neverland?

8 A. Yes.

9 Q. And typically when these busloads of kids  
10 get to Neverland, they all want to see Michael  
11 Jackson, right?

12 A. Correct.

13 Q. And sometimes you schedule all these kids  
14 and these adults to be at a certain location to wait  
15 for Michael to come out and see them, right?

16 A. That is correct.

17 MR. AUCHINCLOSS: I'll object as cumulative.

18 THE COURT: Overruled.

19 Q. BY MR. MESEREAU: Isn't that true?

20 A. That is correct, yes.

21 Q. And he would call you and arrange to have  
22 toys available for all these kids when they would  
23 visit, right?

24 A. Correct.

25 Q. And you would typically have all the kids  
26 assemble on the property, and staff would start  
27 distributing toys to them, right?

28 A. That is correct, yes. 4758

1 Q. And very often in the middle of the toy  
2 distribution, Michael comes out to see the kids,  
3 right?

4 A. On some occasion, yes.

5 Q. And you'll see them running to Michael.

6 They want to see him; they want to touch him, right?

7 A. Correct.

8 Q. The adults will do the same, correct?

9 A. Correct, yes.

10 Q. Now, the prosecutor asked you what these  
11 children do at Neverland, and you talked about bike  
12 riding.

13 A. Yes.

14 Q. What did you mean by bike riding?

15 A. He's got so many toys, they can just take  
16 off on the quad-runners, scooters. That's what I  
17 meant.

18 Q. And you never got the impression Michael  
19 Jackson was supervising the bike riding, did you?

20 A. No.

21 Q. People on the property who worked for Mr.  
22 Jackson take care of that, don't they?

23 A. Especially security, yes.

24 Q. And also you expect the parents or the  
25 adults in charge to have some responsibility, right?

26 A. Yes.

27 Q. You talked about quads, okay. And what did

28 you mean by that? 4759

1 A. They have those four-wheelers that they can  
2 go off, off the road. That's --

3 Q. And they typically ride on the roads at  
4 Neverland, right?

5 A. Yes.

6 Q. And who supervises that, typically?

7 A. Oh, themself. Themselves or security.

8 Q. You have never thought Michael Jackson was  
9 walking around supervising who got into those  
10 vehicles, did you?

11 A. No, no.

12 Q. He doesn't seem to supervise any of that,  
13 does he?

14 A. No, he doesn't.

15 Q. Okay. He assumes staff on the premises  
16 will, right?

17 MR. AUCHINCLOSS: Objection. Objection. No  
18 foundation, as to what Mr. Jackson assumes. Calls  
19 for speculation.

20 THE COURT: Sustained.

21 Q. BY MR. MESEREAU: You told the prosecutor  
22 that sometimes Michael Jackson would play with kids  
23 on a daily basis, right?

24 A. That is correct, yes.

25 Q. And you would see him playing with kids all  
26 over the premises, right?

27 MR. AUCHINCLOSS: Objection; asked and

28 answered. 4760



1 THE COURT: Sustained.

2 Q. BY MR. MESEREAU: Did you see Michael

3 Jackson take these kids to the petting zoo?

4 A. Yes.

5 Q. Did you see him take them to the bigger zoo?

6 A. Yes.

7 Q. Did you see him take them to the arcade?

8 A. Yes.

9 Q. Did you see him take them to the theater?

10 A. Yes.

11 Q. How about ride with them on the train?

12 A. Correct.

13 Q. Okay. This went on all the time, didn't it?

14 A. That is correct, yes.

15 Q. Now, the prosecutor asked you questions

16 about Mr. Jackson appearing intoxicated, okay?

17 A. Right.

18 Q. Now, you never saw him drinking, right?

19 A. No, I didn't.

20 Q. And were you aware that there were times

21 when he had a prescription drug problem?

22 A. Yes, I -- yes, I was.

23 Q. And he had gotten a lot of injections from

24 various physicians?

25 A. That is correct, yes.

26 MR. AUCHINCLOSS: Objection; foundation.

27 THE COURT: Sustained.

28 Q. BY MR. MESEREAU: Did you know Michael 4761

1 Jackson had -- excuse me, let me rephrase. Did you  
2 know whether or not Mr. Jackson at various times had  
3 a prescription drug problem?

4 A. Yes, I did.

5 Q. And did you know he was treated for that?

6 A. Yes.

7 Q. When you saw him appearing intoxicated, you  
8 don't know what the cause was, correct?

9 A. That is correct, yes.

10 Q. You knew he had suffered severe burns on his  
11 body, didn't you?

12 MR. AUCHINCLOSS: Objection. Foundation;  
13 relevance.

14 THE COURT: Foundation; sustained.

15 Q. BY MR. MESEREAU: Did you know whether or  
16 not, during one entertainment event, Mr. Jackson  
17 suffered severe burns all over his body?

18 MR. AUCHINCLOSS: Ob -- I'll --

19 THE WITNESS: Yes.

20 Q. BY MR. MESEREAU: Did you know he was being  
21 treated for that?

22 MR. AUCHINCLOSS: Objection; vague as to  
23 time.

24 THE COURT: Sustained.

25 Q. BY MR. MESEREAU: Did you know whether or  
26 not Mr. Jackson was being treated by physicians with  
27 medication because he'd been badly burned?

28 MR. AUCHINCLOSS: Objection; vague as to 4762

1 time.

2 Q. BY MR. MESEREAU: At any time?

3 A. Yes.

4 Q. That was common knowledge at Neverland, was  
5 it not?

6 MR. AUCHINCLOSS: I'll object and move to  
7 strike the last answer. Still vague as to time.

8 THE COURT: Stricken.

9 Q. BY MR. MESEREAU: During the year 2002, were  
10 you aware -- excuse me. During the year 2002, do  
11 you know whether or not Michael Jackson was being  
12 treated by various physicians for health problems?

13 MR. AUCHINCLOSS: Objection. Vague as to  
14 "health problems."

15 THE COURT: Overruled.

16 You may answer.

17 MR. AUCHINCLOSS: I'll object as to  
18 foundation.

19 THE COURT: The answer -- the question calls  
20 for a "yes" or "no" answer. You may answer.

21 THE WITNESS: Yes.

22 Q. BY MR. MESEREAU: And during the year 2002,  
23 were you aware that Mr. Jackson --

24 MR. AUCHINCLOSS: Objection to the form of  
25 the question. "Were you aware" assumes facts.

26 THE COURT: You have to let him finish the  
27 question.

28 Q. BY MR. MESEREAU: During the year 2002, were 4763

1 you aware -- excuse me. During the year 2002, did  
2 you know whether or not Mr. Jackson was taking  
3 medications for a broken leg?

4 A. Yes.

5 Q. During the year 2002, did you know whether  
6 or not Mr. Jackson was taking medications for a foot  
7 problem?

8 A. Yes.

9 Q. And during the year 2002, did you know  
10 whether or not Mr. Jackson had recurring problems  
11 because he had been badly burned?

12 A. Yes.

13 Q. During the year 2002, did you know whether  
14 or not Mr. Jackson had back problems?

15 A. Yes.

16 MR. AUCHINCLOSS: I'm going to object as to  
17 foundation.

18 THE COURT: Sustained.

19 Q. BY MR. MESEREAU: During the year 2003, did  
20 you know whether or not Mr. Jackson was taking  
21 prescription drugs for a leg problem?

22 MR. AUCHINCLOSS: Objection; foundation.

23 THE COURT: Sustained.

24 Q. BY MR. MESEREAU: Do you know whether or not  
25 Mr. Jackson took prescription drugs in the year 2003  
26 while you were working there?

27 MR. AUCHINCLOSS: Objection; foundation.

28 THE COURT: Overruled. 4764



1 THE WITNESS: Yes.

2 Q. BY MR. MESEREAU: Do you recall seeing Mr.

3 Jackson's children in his bedroom?

4 A. Yes.

5 Q. They would be in there a lot during the time

6 you worked there, right?

7 A. That is correct, yes.

8 Q. You would see his children at the lower

9 level, right?

10 A. Correct.

11 Q. You would see them in his bedroom upstairs,

12 right?

13 A. Correct, yes.

14 Q. Did you typically spend much time with Mr.

15 Jackson's children?

16 A. I would say I didn't spend too much time

17 with them because -- but saw them, I mean, every day

18 there, yes.

19 Q. Every day?

20 A. Yes.

21 Q. And you would mainly see them in the main

22 house?

23 A. Yes.

24 Q. Would you see them on the property also?

25 A. Yes.

26 Q. But you saw them in his room quite often,

27 didn't you?

28 A. Yes. 4765

1 Q. Do you know anything about an alarm system  
2 that one has to use to get into Mr. Jackson's  
3 bedroom?

4 MR. AUCHINCLOSS: Objection; vague as to  
5 "one has to use" an alarm system.

6 THE COURT: Overruled.

7 You may answer.

8 THE WITNESS: Yes.

9 Q. BY MR. MESEREAU: And have you set off that  
10 alarm from time to time?

11 A. No, not really.

12 Q. Have you heard the alarm go off?

13 A. No.

14 Q. Okay. Do you know much about that alarm  
15 system?

16 A. I know about it, but I -- you know, not --  
17 didn't get involved in that too much.

18 Q. It's not something that you would typically  
19 handle?

20 A. No.

21 Q. Okay. Okay. Have you seen Mr. Jackson  
22 entertain adults at his home in the evening?

23 A. Oh, yes.

24 Q. He does that quite often, doesn't he?

25 A. That is correct, yes.

26 Q. And when he does that, you often see adults  
27 drinking alcohol, don't you?

28 A. Right. 4766

1 Q. You see staff serving them alcohol, right?

2 A. That's correct.

3 Q. And they're free to go into the kitchen area  
4 and grab alcohol if they want to, typically, right?

5 A. That is correct, yes.

6 Q. You've also seen them served alcohol in his  
7 bedroom, correct?

8 A. Correct.

9 Q. You've seen adults sitting in the lower  
10 level of his bedroom drinking, right?

11 A. That is correct, yes.

12 Q. And typically there would be an order placed  
13 by someone, and staff will bring alcohol into his  
14 bedroom for that purpose, right?

15 A. Right.

16 Q. Okay. Now, the prosecutor asked you about  
17 complaints involving kids in the wine cellar, right?

18 A. Right.

19 Q. During the 20 years you worked at Neverland,  
20 that area you call the wine cellar was always a wine  
21 cellar, was it not?

22 A. That is correct, yes.

23 Q. And this is the area that you said, close  
24 by, has an area which has Mr. Jackson's memorabilia  
25 from tours around the world, right?

26 A. Correct, yes.

27 Q. And in that area nearby is where you can see

28 his costumes, his gloves, and things of that sort, 4767

1 right?

2 A. That is correct, yes.

3 Q. And typically kids and adults want to go  
4 there and see all these costumes from his very  
5 successful music career, right?

6 A. That is right, yes.

7 Q. And once in a while, somebody will bring  
8 people down to that cellar area so they can see all  
9 that memorabilia, right?

10 A. Right.

11 MR. AUCHINCLOSS: Objection. Misstates the  
12 evidence that the memorabilia is in the cellar area.

13 MR. MESEREAU: That's what he testified to,  
14 Your Honor.

15 THE COURT: No, it's not. Rephrase your  
16 question.

17 MR. MESEREAU: Yes, sir.

18 Q. Let's take the area that we've identified as  
19 the wine cellar, okay? You got to go down the  
20 stairs to get there, right?

21 A. Right, yes.

22 Q. When you get down those stairs, where do you  
23 see the wine cellar when you reach the foot of the  
24 stairs?

25 A. It's on the wall. Placed on the wall.

26 Q. There are other areas around the wine cellar  
27 which have other purposes in the house, right?

28 A. Right. 4768



1 Q. And doesn't one of those areas have  
2 costumes, gloves, and memorabilia from Mr. Jackson's  
3 tours?

4 A. Not specifically in that area.

5 Q. Well, it's not far away, though, right?

6 A. It's outside there.

7 Q. But you can certainly -- from time to time,  
8 he has stored stuff there, hasn't he?

9 A. Yes. I would say that, yes.

10 Q. And sometimes people have gone down to look  
11 at that stuff, right?

12 A. That is correct, yes.

13 Q. And there's some other areas at Neverland  
14 where that stuff is stored as well, right?

15 A. The main part, yes.

16 Q. Because there's a ton of stuff.

17 A. Yes.

18 Q. From a long, successful career.

19 A. Yes.

20 Q. Now, during the 20 years you've been at  
21 Neverland, there have been very few complaints about  
22 children being in the wine cellar, right?

23 A. That is correct.

24 Q. You're talking about maybe a couple over a  
25 20-year period, right?

26 A. That is correct, during my time there, yes.

27 Q. Mr. Jackson's policy is not to let kids in

28 the wine cellar, right? 4769

1 A. That is correct, yes.

2 Q. The prosecutor talked about young boys from  
3 Los Olivos, and you identified their pictures,  
4 right?

5 A. Right.

6 Q. And you've seen them there with their  
7 parents from time to time, haven't you?

8 A. No, not with their parents.

9 Q. The parents have visited?

10 A. Yes, yes.

11 Q. But they also have come from time to time on  
12 their own, correct?

13 A. Themselves, yes.

14 Q. And they've come from time to time when Mr.  
15 Jackson wasn't even there, right?

16 A. That is correct, yes.

17 Q. And people on the property know them,  
18 correct?

19 A. Correct.

20 Q. And generally nobody objects to their  
21 visiting Neverland, right?

22 A. That is correct, yes.

23 Q. They sometimes come alone and they sometimes  
24 come with their parents, right?

25 A. Yes.

26 Q. They're really neighbors, aren't they?

27 A. Yes.

28 Q. And once in a while they've gotten into some 4770

1 trouble there, correct?

2 A. That is correct, yes.

3 Q. They've been known as mischievous kids,

4 right?

5 A. Right.

6 Q. They've been caught in various places around

7 Neverland, haven't they?

8 A. That is correct, yes.

9 Q. They've been caught in rooms, true?

10 A. Correct.

11 Q. They were caught playing hide-and-seek in

12 the house, weren't they?

13 A. Right, yes.

14 Q. Now, if you catch kids playing hide-and-seek

15 in the house or getting into trouble, typically what

16 do you do?

17 A. Well, you try to explain to them that -- you

18 know, if you caught them doing something they're not

19 supposed to be doing, you just let them know that,

20 you know, that's not what they should be -- you

21 know, that there's some certain things that, you

22 know, they're allowed to do, there's things that

23 they're not allowed to do, so we let them know.

24 Q. But like -- let's take these kids from Los

25 Olivos that are neighbors who are allowed on the

26 property, and sometimes their parents aren't there.

27 Who kind of watches them when they come alone?

28 A. Pretty much nobody. They're on their own. 4771

1 Q. Do people on the property keep an eye on  
2 them, or what happens?

3 A. Well, you know, I would say yes, security,  
4 just for safety reasons, yes. Or the staff  
5 personnel if they're at the amusement park, yes.

6 Q. If they go into the main house, which they  
7 do from time to time, who would be in the main house  
8 typically, who might see them?

9 A. I would say that will be the maids, the  
10 cooks, yes. Or myself.

11 Q. And if they start going upstairs into the  
12 bedrooms, who are they likely to run into?

13 A. Well, they'll run into the doors. They  
14 can't go in.

15 Q. Besides the doors, who might they see? Will  
16 they see the people who are cleaning?

17 A. Yes, they might run into maids or somebody  
18 else from the house staff. Yes.

19 Q. And how many kids are we talking about?

20 A. We're talking about the --

21 Q. Three?

22 A. Three kids, yes.

23 Q. All right. And how long have they been  
24 coming onto the property, to your knowledge? Excuse  
25 me, let me rephrase that.

26 When you were working there, for how long a  
27 period of time do you remember their coming freely

28 on and off the property? 4772



1 A. They would come in frequently.

2 Q. Regularly?

3 A. Yes.

4 Q. Would it be in the evening, morning,  
5 weekends? What would it be?

6 A. It would be weekends or days, yes.

7 Q. And how would they get on? Would they go  
8 through the main gate?

9 A. Yes, they did.

10 Q. And do people in the main gate know them?

11 A. Yes.

12 Q. And do they typically just let them walk  
13 onto the property?

14 A. Yes.

15 Q. Would somebody drive them anywhere?

16 A. Well, sometimes they drove to the place,  
17 so -- yes, they drove their own car.

18 Q. And how old were these young boys?

19 A. Young kids; 15, 16.

20 Q. 15, 16?

21 A. Yes, yes.

22 Q. And they're the ones that got in trouble  
23 from time to time?

24 A. Right.

25 Q. All right. Would anyone call their parents  
26 up typically and say, "Your teenaged kids are in  
27 trouble"?

28 A. Not my knowledge. 4773

1 Q. Okay. Were they ever asked to leave the  
2 property, to your knowledge?

3 A. Not to my knowledge.

4 Q. Actually, Mr. Jackson didn't want them to  
5 get in trouble with their parents, did he?

6 MR. AUCHINCLOSS: Objection. Calls for  
7 speculation; no foundation.

8 THE COURT: Sustained.

9 Q. BY MR. MESEREAU: Let me ask you a few more  
10 questions about the Arvizos at Neverland.

11 You saw the Arvizo children roaming freely  
12 around Neverland when they stayed there, correct?

13 A. Correct.

14 Q. They'd use the amusement rides when they  
15 chose, correct?

16 A. That is correct.

17 Q. They'd go into the theater when they wanted  
18 to, right?

19 A. Right.

20 Q. They jumped on the train when they wanted  
21 to, right?

22 A. Correct.

23 Q. And they would visit the zoo when they  
24 chose, right?

25 A. That is correct, yes.

26 Q. Did you ever see the mother supervising the  
27 children at Neverland?

28 A. No. 4774

1 Q. Did you ever see her keeping an eye on the  
2 children at Neverland?

3 A. No.

4 Q. When you saw them at the zoo, do you recall  
5 the mother ever being with them?

6 A. No.

7 Q. When you saw the Arvizo children at the  
8 amusement park on the rides, did you ever see the  
9 mother with them?

10 A. No.

11 MR. AUCHINCLOSS: Objection; cumulative.

12 THE COURT: Overruled.

13 THE WITNESS: No.

14 Q. BY MR. MESEREAU: When you saw the Arvizo  
15 children on the train, did you ever see their mother  
16 with them?

17 A. No.

18 Q. When you saw the Arvizo children in the  
19 theater, did you see the mother with them?

20 A. No.

21 Q. But you saw the mother eating in the main  
22 house, didn't you?

23 A. That is correct, yes.

24 Q. And you saw her walking around the property,  
25 right?

26 A. Right.

27 Q. Would you describe the Arvizo children as

28 mischievous? 4775

1 A. At some point.

2 Q. Well, they got in trouble at the amusement  
3 park, didn't they?

4 A. Yes.

5 Q. Tell the jury what happened.

6 MR. AUCHINCLOSS: Objection; 403.

7 THE COURT: The objection is overruled. But  
8 we're going to take our break, so we'll start with  
9 that question when we come back.

10 (Recess taken.)

11 THE COURT: Counsel? Go ahead.

12 MR. MESEREAU: Thank you, Your Honor.

13 Q. Just a couple more questions.

14 You mentioned that the Arvizo family  
15 returned to Neverland a number of times in 2003,  
16 right?

17 A. That is correct, yes.

18 Q. Do you know how they got to Neverland?

19 A. I believe they did on the limo.

20 Q. A limo?

21 A. Yes.

22 Q. Was it your impression that the Arvizos had  
23 access to a limousine service when they wanted to?

24 MR AUCHINCLOSS: Objection; foundation.

25 MR. MESEREAU: I think there is a  
26 foundation, Your Honor.

27 THE COURT: I'll sustain the objection.

28 Q. BY MR. MESEREAU: You indicated that on at 4776



1 least one occasion you called a limousine service so  
2 the Arvizos could leave Neverland, right?

3 A. That is correct. Yes.

4 Q. And you said on the other occasion you took  
5 Michael's Rolls Royce and drove them yourself,  
6 right?

7 A. Correct.

8 Q. And that was in the middle of the night when  
9 Janet wanted to leave, right?

10 A. That is correct, yes.

11 Q. And I believe you said on other occasions  
12 when the Arvizos left Neverland, it was your  
13 understanding they always had a limousine, correct?

14 A. That is correct, yes.

15 Q. Do you know who would arrange for the  
16 limousines to transport the Arvizos?

17 A. I called them personally.

18 Q. You would do it personally?

19 A. Yes.

20 Q. How many times do you think you personally  
21 called a limousine service to transport the Arvizos?

22 A. I think it was around three times.

23 Somewhere around there.

24 Q. Is there a particular limousine service that  
25 you would normally call?

26 A. It's out of Santa Barbara. And it's  
27 called -- what is it called? Limo Link, I believe.

28 Q. Okay. Now, you wouldn't discuss with 4777

1 Michael Jackson the fact that you wanted to call a  
2 limousine service, right?

3 A. No.

4 Q. You had enough authority to do that if you  
5 thought it was the appropriate thing to do, right?

6 A. That is correct, yes.

7 Q. And was it your understanding that from time  
8 to time guests of Mr. Jackson would need a  
9 limousine?

10 A. Correct.

11 Q. And you would get a call from someone asking  
12 for you to arrange for a limousine, correct?

13 A. That is correct, yes.

14 Q. Actually, Mr. Jackson was pretty generous  
15 with arranging for limousines to take his guests off  
16 the property, wasn't he?

17 A. Correct, yes.

18 Q. Do you recall Janet Arvizo from time to time  
19 leaving the premises to go into town?

20 A. I believe there was only one time.

21 Q. And did she talk to you about that?

22 A. Yes, she did.

23 Q. Was it your understanding she was getting a  
24 body wax that day?

25 A. That is correct, yes.

26 Q. And was it arranged for a limousine to take  
27 her to the body wax place?

28 A. No, it wasn't. 4778

1 Q. How did she get to the body wax place?

2 A. I sent one of the maids with her.

3 Q. So you arranged for a maid to drive her to  
4 the body wax?

5 A. That, yes.

6 Q. That was a salon, right?

7 A. That is correct.

8 Q. And was that in Los Olivos, if you know?

9 A. Los Olivos or Solvang, somewhere in there.

10 Q. Okay. Okay. She was away for quite a while  
11 that day, correct?

12 A. Correct, yes.

13 Q. Do you recall it being three or four hours?

14 A. Somewhere around there, yes.

15 Q. Now, did Janet tell you she wanted to get a  
16 body wax at a salon that day?

17 MR. AUCHINCLOSS: Objection; hearsay.

18 THE COURT: Sustained.

19 Q. BY MR. MESEREAU: Why did you arrange for  
20 one of the maids to drive Janet Arvizo off the  
21 premises to get a body wax?

22 MR. AUCHINCLOSS: Objection. Foundation;  
23 hearsay.

24 THE COURT: Sustained.

25 Q. BY MR. MESEREAU: Do you know why one of the  
26 maids drove Janet Arvizo off the premises to get a  
27 body wax?

28 MR. AUCHINCLOSS: Same objection. 4779

1 THE COURT: Sustained.

2 Q. BY MR. MESEREAU: Were you in charge of the  
3 maid who drove Janet Arvizo off the premises to get  
4 a body wax?

5 A. Yes, I was.

6 Q. Did you ask the maid to do that?

7 A. Yes, I did.

8 MR. AUCHINCLOSS: Objection; hearsay.

9 THE COURT: Overruled.

10 Q. BY MR. MESEREAU: Why did you ask the maid  
11 to do that?

12 A. Well, I figured it was a --

13 MR. AUCHINCLOSS: Objection. Hearsay;  
14 foundation.

15 THE COURT: Sustained.

16 Q. BY MR. MESEREAU: Do you know which car the  
17 maid used?

18 MR. AUCHINCLOSS: Objection; relevance.

19 THE COURT: Sustained.

20 Q. BY MR. MESEREAU: Just a couple more  
21 questions. Do you recall -- do you recall Mr.  
22 Jackson traveling to Florida during 2003?

23 A. Yes.

24 Q. Do you recall Mr. Jackson traveling to Las  
25 Vegas during 2003?

26 A. Yes.

27 Q. Do you recall him traveling anywhere else,

28 if you can recall? 4780



1 A. Pretty much, that I can remember was just  
2 Florida and Vegas.

3 Q. Okay. Finally, the prosecutor asked you  
4 questions about some beds in the theater. Remember  
5 that?

6 A. Correct.

7 Q. Aren't those hospital beds for handicapped  
8 kids?

9 A. Yes, they are.

10 MR. MESEREAU: No further questions.

11

12 REDIRECT EXAMINATION

13 BY MR. AUCHINCLOSS:

14 Q. Mr. Salas, those hospital beds in the  
15 theater, does Mr. Jackson use those beds personally?

16 A. Occasionally, yes, to watch a movie.

17 Q. Do other kids who were not handicapped use  
18 those beds?

19 A. Yes, they do.

20 Q. As far as the limousines go, you testified  
21 on direct examination that you were told not to let  
22 the Arvizos off the property unless you got  
23 approval; is that correct?

24 A. That is correct, yes.

25 Q. And you said that you arranged for three  
26 limousines -- three times that you arranged for  
27 limousines to transport the Arvizos off the

28 property? 4781

1 A. That I can remember, yes.

2 Q. Okay. Was this all -- those three times,  
3 were they all in 2003 during that period of time  
4 you've testified about?

5 A. I believe it was one time in 2002.

6 Q. Okay. So the other two times that you  
7 ordered a limousine service to transport the  
8 Arvizos, did you get permission from somebody at the  
9 ranch to let them off the property?

10 A. Yes, I did.

11 Q. Who did you get permission from?

12 A. I got permission from -- it was Frank, yes.

13 Q. All right. You talked a little bit about a  
14 time at the dinner table when you suspected that  
15 Gavin had been drinking. Do you remember --

16 A. Correct.

17 Q. -- testifying about that?

18 Was Michael Jackson present at the dinner  
19 table that night?

20 A. No, he was not.

21 Q. Was Frank present at the dinner table that  
22 night?

23 A. Yes, he was.

24 Q. And did you ultimately determine whether  
25 Gavin had been drinking that night?

26 A. Didn't really specify that, but I -- just by  
27 the way he was acting, I knew that he was drinking.

28 Q. Was there another time when you saw Gavin 4782

1 when he appeared to be drinking?

2 A. That was the only time.

3 Q. And that only time that you saw him

4 drinking, that he appeared to be intoxicated, what

5 was he doing that made you think that?

6 A. The way he was acting, just not normal.

7 Just his reactions.

8 Q. Had you had occasion to see Gavin a number

9 of times before that or after that when he was

10 acting normal, in your opinion?

11 A. Ask the question again.

12 Q. I guess my question is, did you have a good

13 frame of reference for judging whether Gavin was

14 acting normal or not?

15 MR. MESEREAU: Objection. Vague;

16 foundation.

17 THE COURT: Overruled.

18 You may answer.

19 THE WITNESS: That was the only time I saw

20 that I noticed that.

21 Q. BY MR. AUCHINCLOSS: Okay. So my question

22 was, did you spend enough time around Gavin to feel

23 as if you could make a call as to whether or not he

24 was acting drunk or not? Do you understand that

25 question?

26 A. Yes, I do.

27 I would say yes, I --

28 Q. Okay. And how was he acting that made you 4783

1 think he was -- how was he acting differently on  
2 that evening that made you think he was drunk?

3 A. Pretty simple. Just when somebody's drunk,  
4 I mean, you can tell by the way they look, their  
5 reaction, of the way they look, the way they talk.  
6 Just verbal, the way he was talking.

7 Q. Was it obvious to you he'd been drinking?

8 A. I would say yes.

9 Q. And you said Frank was at the table. Who  
10 else was at the table that night?

11 A. I believe it was Vinnie and some of Frank's  
12 guests, I believe it was. A couple girls, something  
13 like that.

14 Q. Was Gavin's mother around?

15 A. No, she was not.

16 Q. Now, as far as where the kids slept -- and  
17 maybe I'll back up, because I don't think I asked  
18 this question.

19 What time of day was it that you saw Gavin  
20 where you thought he'd been drinking?

21 A. I would say it was about around nine  
22 o'clock, nighttime.

23 Q. Nighttime?

24 A. Uh-huh.

25 Q. Was Mr. Jackson on the property at that  
26 time?

27 A. Yes, he was.

28 Q. When children slept in Mr. Jackson's 4784



1 bedroom, do you know, personally know, where they  
2 slept in the bedroom, as far as where they slept,  
3 upstairs or downstairs? Did you see it?

4 A. I didn't see exactly who slept on Mr.  
5 Jackson's bed, but I know there was kids there  
6 and -- yes.

7 Q. So you never spent the night in Mr.  
8 Jackson's bedroom, I take it?

9 A. No.

10 Q. So you don't know where the kids slept after  
11 you left the room?

12 A. No.

13 Q. But you were in the room at times when kids  
14 were there?

15 A. Right. Yes.

16 Q. And in terms of these kids, were they all  
17 boys that slept in Mr. Jackson's room?

18 A. Pretty much, yes.

19 Q. Now, Mr. Mesereau asked you about the  
20 first-class treatment that everyone received at  
21 Neverland. And you basically said that the adults  
22 got first-class treatment, too?

23 A. That is correct, yes.

24 Q. Okay. So did the kids get the same  
25 first-class treatment that the adults did?

26 A. Absolutely.

27 Q. Were they basically treated just like the

28 adults? 4785

1 A. Just like the adults.

2 Q. And these kids, when they were at Neverland  
3 during the 20 years you were there, did these kids  
4 ever have supervision?

5 A. Do you mean by --

6 Q. By Neverland. Any organized supervision of  
7 these children while they were at Neverland?

8 A. We really didn't have supervision. They had  
9 security that would keep an eye on the guests, or  
10 even the Neverland staff working at certain places,  
11 they had to make sure that the kids were safe. Not  
12 supervising them, but just for safety.

13 Q. Okay. So if an employee was around and saw  
14 something dangerous, they might intervene; is that  
15 fair to say?

16 A. Of course, yes.

17 Q. But the employees, they weren't running  
18 around supervising these kids where they were?

19 A. No.

20 Q. They were allowed to run around wherever  
21 they wanted, do whatever they wanted?

22 A. Absolutely.

23 MR. MESEREAU: Objection; leading.

24 THE COURT: Sustained.

25 MR. AUCHINCLOSS: Some of this is offered as  
26 impeachment.

27 THE COURT: Well, that was leading, so....

28 MR. AUCHINCLOSS: All right. 4786

1 Q. Now, as far as the busloads of children go,  
2 were these children treated differently than the  
3 children who were guests at Neverland?

4 A. No.

5 Q. Were the busloads of children allowed to  
6 spend the night in Michael Jackson's room?

7 A. None of those kids spent the night in his  
8 room.

9 Q. Okay. Were they given the access code to  
10 the house?

11 A. No.

12 Q. Okay. Were they allowed to -- were these  
13 children, did they bring their own supervision with  
14 them, adult supervision?

15 A. Yes, they did.

16 Q. Was it organized? Were they organized as to  
17 where they would go and how they would spend their  
18 time at Neverland?

19 A. Absolutely, yes.

20 Q. Was Mr. Jackson even there when those  
21 busloads of kids would arrive or be there?

22 A. Many times he was there. Many times he  
23 wasn't there.

24 Q. Okay. When he was there, would he always  
25 come out or sometimes come out?

26 A. Sometimes come out.

27 Q. So there were times busloads of kids would

28 arrive and Mr. Jackson wouldn't even come out to say 4787

1 hi?

2 A. Yes. There was times that he --

3 MR. MESEREAU: Objection. Leading;

4 misstates the evidence.

5 THE COURT: Overruled. The answer is, "Yes."

6 Next question.

7 Q. BY MR. AUCHINCLOSS: As far as Janet, when

8 she was -- when she left Neverland the first time

9 with her family, in the interview with the sheriff's

10 department, didn't you say that, "The whole family,

11 they were not allowed to go nowhere"?

12 A. Yes. That's what I said, yes.

13 Q. And that, "They had them there always, and

14 they were with supervision"?

15 A. According to what she told me, yes.

16 Q. Didn't you say Frank Tyson was one of the

17 individuals involved in the handling of the Arvizo

18 family?

19 A. Correct.

20 Q. And did you say that Salas -- did you say

21 that ranch employees were required to go through

22 Frank Tyson with questions or problems regarding the

23 Arvizo family?

24 A. That is correct, yes.

25 Q. Did you also say that Tyson -- that you

26 believed Tyson would then, in turn, go through Mr.

27 Jackson?

28 MR. MESEREAU: Objection; leading. 4788



1 MR. AUCHINCLOSS: This is impeachment.

2 MR. MESEREAU: No foundation.

3 THE COURT: The objection is overruled.

4 You may answer.

5 Q. BY MR. AUCHINCLOSS: Did you say that Tyson

6 would then, in turn, go through Mr. Jackson?

7 A. Correct, yes.

8 Q. Did you say that the Arvizo family was not

9 being allowed to leave the Neverland Ranch even

10 though the mother wished to leave with her children?

11 A. That's correct, yes.

12 Q. In the grand jury, when you testified, you

13 were asked this question: You were asked whether or

14 not you believed Janet Arvizo and her family was

15 being kept against their will. You said, "Yes"; is

16 that true?

17 A. Yes.

18 MR. MESEREAU: Objection. Foundation;

19 leading.

20 MR. AUCHINCLOSS: Offered as impeachment.

21 THE COURT: Overruled. He said, "Yes."

22 Q. BY MR. AUCHINCLOSS: And is that a true

23 statement?

24 THE COURT: He said, "Yes."

25 MR. AUCHINCLOSS: Okay.

26 Q. You said -- I believe when Mr. Mesereau was

27 up here, you said that Mrs. Arvizo was never

28 forcibly kept at Neverland; is that true? 4789

1 A. That is correct, yes.

2 Q. So no one ever used physical force on her?

3 A. No.

4 Q. You said that when you took her home, that  
5 she told you that she was -- you told Mr. Mesereau  
6 that she was upset with the people at Neverland  
7 Ranch?

8 MR. MESEREAU: Objection; misstates the  
9 evidence.

10 Q. BY MR. AUCHINCLOSS: Upset with Ronald -- I  
11 believe it was Dieter.

12 THE COURT: Do you want to rephrase the  
13 question?

14 MR. AUCHINCLOSS: Yeah.

15 Q. You told Mr. Mesereau that when you were  
16 taking Janet and the children home that first time,  
17 that she was upset with Dieter; is that correct?

18 A. That is correct, yes.

19 Q. Didn't you also previously state that she  
20 said she was upset with Frank as well, or no? You  
21 tell me.

22 A. No.

23 Q. Now, you also told Mr. Mesereau that the --  
24 at that time, when she left Neverland Ranch the  
25 first time, she was not angry at Michael Jackson?

26 A. That is correct, yes.

27 Q. Okay. After she left Neverland that first

28 time, did you ever talk to her about whether she was 4790

1 still angry at Michael Jackson?

2 A. No.

3 Q. Did you have much contact with her after  
4 that first time?

5 A. No.

6 Q. Do you have any idea whether she is angry at  
7 Michael Jackson today?

8 A. I have no idea.

9 Q. You mentioned that you allowed your daughter  
10 Sandra to visit Mr. Jackson at Neverland.

11 A. That is correct, yes.

12 Q. When was that?

13 A. '91, '92, somewhere around there maybe.

14 Maybe later than that. I'm not quite sure.

15 Q. So early '90s?

16 A. I would say so, yes.

17 Q. Was it one occasion?

18 A. I believe it was about three times.

19 Q. Three times that she personally spent time  
20 with Mr. Jackson?

21 A. Yes.

22 Q. Were all three of those occasions in '90,  
23 '91, in that early -- early 1990s?

24 A. It was during the same time, yes.

25 Q. Did you ever allow your daughter to sleep  
26 with Mr. Jackson?

27 A. She never slept over there.

28 Q. Okay. Would you ever allow your daughter to 4791

1 sleep with Mr. Jackson?

2 MR. MESEREAU: Objection. Calls for

3 speculation; leading; foundation.

4 THE COURT: It's argumentative; sustained.

5 Q. BY MR. AUCHINCLOSS: Knowing what you know

6 today, based upon all your time at Neverland, do you

7 believe this place is a healthy place, would be a

8 healthy place for your daughter to visit?

9 MR. MESEREAU: Objection. Opinion;

10 foundation; relevance.

11 MR. AUCHINCLOSS: This was offered as an

12 opinion as to --

13 THE COURT: The objection is sustained.

14 Q. BY MR. AUCHINCLOSS: Is it true to say that

15 the kids do get hurt at Neverland?

16 MR. MESEREAU: Objection. Relevance; beyond

17 the scope; leading.

18 THE COURT: Sustained.

19 Q. BY MR. AUCHINCLOSS: Do kids ever get hurt

20 at Neverland?

21 MR. MESEREAU: Same objection.

22 THE COURT: Sustained.

23 MR. AUCHINCLOSS: Counsel asked the

24 question.

25 MR. MESEREAU: I never asked that question.

26 MR. AUCHINCLOSS: Talked about safety.

27 THE COURT: All right. Quit talking to each

28 other. 4792



1 MR. AUCHINCLOSS: Yes, sir.

2 Q. You said that some people invade Neverland  
3 or come in from the outside, correct?

4 A. Correct, yes.

5 Q. How far is Neverland away from the nearest  
6 town?

7 A. Six miles.

8 Q. How do these people get out there?

9 MR. MESEREAU: Objection; foundation.

10 Q. BY MR. AUCHINCLOSS: If you know.

11 THE COURT: The foundation is sustained.

12 Q. BY MR. AUCHINCLOSS: Okay. Do you know how  
13 these people get out there?

14 A. Yes, sir.

15 Q. How do they get out there?

16 A. Driving.

17 Q. Okay. So these people who visit -- who try  
18 to get into Neverland have a car?

19 A. Yes.

20 Q. Where is the car?

21 A. They park on the outside of the property.

22 Q. You also said that Janet complained about  
23 being separated from Michael, that Dieter was  
24 separating her from Michael. Yes?

25 A. Yes. That was her expression, yes.

26 Q. Didn't she say that she was -- didn't she  
27 complain that Dieter was separating her from Michael

28 Jackson and her children? 4793

1 A. Not exactly what she said. She said that  
2 she was being separated from Michael.

3 Q. Okay. But didn't she reference her children  
4 when she was talking about that?

5 MR. MESEREAU: Objection; asked and  
6 answered.

7 THE COURT: Sustained.

8 Q. BY MR. AUCHINCLOSS: You say "not exactly."  
9 What do you mean?

10 A. She never mentioned the kids.

11 Q. Did she ever complain about being separated  
12 from her kids?

13 A. No, sir.

14 MR. MESEREAU: Objection; hearsay.

15 Q. BY MR. AUCHINCLOSS: When Janet was at  
16 Neverland --

17 THE COURT: Wait. There was an objection.

18 MR. AUCHINCLOSS: I'm sorry.

19 MR. MESEREAU: I'll withdraw the objection.

20 THE COURT: Go ahead, Counsel.

21 (Laughter.)

22 Q. BY MR. AUCHINCLOSS: When Janet was at  
23 Neverland, did she -- well, let me strike that.

24 Do you know where Janet would spend most of  
25 her time while she was at Neverland?

26 A. She spent most of her time in the  
27 guesthouse.

28 Q. Do you know where she would take her meals? 4794

1 A. Many times she -- most of the time she took  
2 it in the room. There was times that she went in  
3 the kitchen.

4 Q. When Mr. Mesereau asked you if things kind  
5 of run themselves or keep running at Neverland when  
6 Michael is not there, who is it that makes the  
7 determination in general about how Neverland is run  
8 as a ranch? Who is it that makes the ultimate call?

9 A. Okay, for the place would be run, I mean, we  
10 have a staff. We have a ranch manager.

11 Q. Uh-huh.

12 A. And that's how we do it. I mean, that's how  
13 they used to do it. Just do it together.

14 Q. Who tells the ranch manager how he wants  
15 that place run?

16 A. On the major decisions, I guess it comes  
17 from L.A. also.

18 Q. Does Michael have anything to do with how he  
19 wants that place run?

20 A. I'm not sure if he has something to do with  
21 that, but he will tell you what he likes.

22 Q. When Mr. Jackson is on the property, do the  
23 employees act differently?

24 A. No. They shouldn't.

25 Q. There's no difference between when he's on  
26 the property or off the property?

27 A. No, because the place needs to run the same

28 way whether he's there or not. 4795

1 Q. But isn't Neverland Ranch run exactly the  
2 way Michael Jackson wants it?

3 MR. MESEREAU: Objection. Leading and asked  
4 and answered.

5 MR. AUCHINCLOSS: Offered as impeachment.

6 THE COURT: Sustained.

7 Q. BY MR. AUCHINCLOSS: Who is the person who  
8 ultimately makes the determination as to what  
9 happens at Neverland?

10 MR. MESEREAU: Objection. It's been asked  
11 and answered a couple of times.

12 THE COURT: Sustained.

13 MR. AUCHINCLOSS: Okay.

14 Q. Let me back off, then, and go to -- okay, so  
15 sometimes someone in Los Angeles makes the decision,  
16 right?

17 A. Uh-huh.

18 Q. Who tells the person in Los Angeles what  
19 they want?

20 MR. MESEREAU: Objection; foundation.

21 THE COURT: Sustained.

22 Q. BY MR. AUCHINCLOSS: Have you ever seen guns  
23 on Neverland Ranch?

24 A. Not now, okay.

25 Q. Not now?

26 A. Before, at the beginning, yes.

27 Q. There were guns?

28 A. Yes. 4796



1 Q. Tell me about it.

2 A. That was at the beginning when Mr. Jackson  
3 bought the place. Security was carrying guns.

4 Q. Was there a period of time when guns were  
5 not kept -- not -- the security was not armed?

6 A. Yes, it came to the point that I guess Mr.  
7 Jackson didn't want any guns at the place, and  
8 nobody was carrying any weapons anymore.

9 Q. Did that ever change again?

10 A. No.

11 Q. Was there a time when a few people carried  
12 guns at Neverland?

13 A. Not that I was aware of.

14 Q. You said that when the Arvizo children were  
15 there, that Mr. Jackson was in constant meetings.  
16 You also said that he was constantly playing with  
17 the children.

18 A. That is correct, yes.

19 Q. So he was doing both of those things at the  
20 same time or --

21 A. Not at the same time. You know, when he was  
22 in meetings, he was in meetings. When he had some  
23 time free, he was playing with kids or he was by  
24 himself.

25 Q. Okay. Who was he having these constant  
26 meetings with? Who was there when he was having  
27 these constant meetings?

28 A. Hard to remember. Many people. 4797

1 Q. Okay. How about -- was Frank Tyson one of  
2 them?

3 A. Not really.

4 Q. But he did have meetings with Frank?

5 MR. MESEREAU: Objection; asked and  
6 answered.

7 THE COURT: Sustained.

8 Q. BY MR. AUCHINCLOSS: You also said that Mr.  
9 Jackson was -- you answered some questions about him  
10 taking prescriptions, prescription medication.

11 A. Correct.

12 Q. Do you know the difference between somebody  
13 who is drunk and somebody who is taking some  
14 medication?

15 MR. MESEREAU: Objection; vague.

16 THE COURT: Overruled.

17 Q. BY MR. AUCHINCLOSS: Go ahead.

18 A. No, I guess I don't have a way of describing  
19 that.

20 Q. Well, were there times when you were serving  
21 Mr. Jackson alcohol when he appeared to be drunk?

22 A. Yes.

23 Q. And do you know how often Mr. Jackson would  
24 have alcohol?

25 MR. MESEREAU: Objection; vague as to time.

26 MR. AUCHINCLOSS: I'll be specific.

27 Q. During this period in early 2003.

28 A. He was having a regular basis. 4798

1 Q. Daily?

2 A. I said regular basis.

3 Q. Could you smell alcohol on him when you saw  
4 him during these periods he appeared to be drunk?

5 A. No, I never got so close to him to be able  
6 to smell.

7 Q. You said that Mr. Jackson's policy was not  
8 to let kids in the wine cellar. Was this a --

9 A. That is correct, yes.

10 Q. Was that a written policy?

11 A. That was a policy, yes.

12 Q. Was that -- was it okay for kids to be in  
13 the wine cellar if he was there?

14 MR. MESEREAU: Objection; leading.

15 THE COURT: Overruled.

16 You may answer.

17 THE WITNESS: I believe when he was there, I  
18 guess it was okay for the kids, yes.

19 Q. BY MR. AUCHINCLOSS: Okay. And did you  
20 testify that there were times when he was in the  
21 wine cellar with children?

22 A. Yes.

23 MR. MESEREAU: Objection; misstates the  
24 evidence.

25 MR. AUCHINCLOSS: I'll rephrase it.

26 Q. Were there times when he was in the wine  
27 cellar with children?

28 A. Yes. 4799

1 Q. You have spoken to myself and various  
2 members of law enforcement in preparation for this  
3 case.

4 A. Correct.

5 Q. Has anyone ever told you to tell anything  
6 but the truth?

7 A. That is correct, nobody did.

8 Q. I'm sorry?

9 A. No.

10 MR. AUCHINCLOSS: Okay. Thank you. No  
11 further questions.

12

13 RE-CROSS-EXAMINATION

14 BY MR. MESEREAU:

15 Q. Just briefly. During the 20 years you  
16 worked at Neverland for Mr. Jackson, it was always  
17 his policy that children are not to be in the wine  
18 cellar, true?

19 MR. AUCHINCLOSS: Objection; foundation.

20 THE COURT: Overruled.

21 You may answer.

22 THE WITNESS: That is correct, yes.

23 Q. BY MR. MESEREAU: And Mr. Jackson sometimes  
24 would give people tours of his own home, correct?

25 A. That is correct.

26 MR. AUCHINCLOSS: Objection; beyond the  
27 scope.

28 THE COURT: Overruled. 4800



1 Q. BY MR. MESEREAU: And obviously, as the  
2 owner of the home, he can take people anywhere he  
3 wants in his home, right?

4 A. Correct.

5 Q. Now, when you were driving Janet to Los  
6 Angeles, she never asked you to call the police, did  
7 she?

8 A. No.

9 Q. When you arranged for the limousine to take  
10 the Arvizos to Los Angeles, they never asked you to  
11 call the police, did they?

12 A. No.

13 Q. In fact, she never asked you to call the  
14 police at any time, did she?

15 A. No, she didn't.

16 MR. MESEREAU: No further questions.

17 MR. AUCHINCLOSS: Nothing further.

18 THE COURT: All right. Thank you. You may  
19 step down.

20 MR. ZONEN: Your Honor, we'll call Jason  
21 Francia to the stand, please.

22 MR. MESEREAU: Your Honor, before we start,  
23 is there an instruction?

24 THE COURT: Yes.

25 BAILIFF NARRON: Step up to the chair.

26 Remain standing and face the clerk.

27 MR. FRANCIA: The clerk.

28 THE COURT: Raise your right hand, please. 4801

1

2 JASON FRANCIA

3 Having been sworn, testified as follows:

4

5 THE WITNESS: I do.

6 THE CLERK: Please be seated. State and

7 spell your name for the record.

8 THE WITNESS: Jason Francia. And spell my

9 last name? F-r-a-n-c-i-a.

10 THE COURT: Mr. Francia, I'm going to ask you

11 to sit back with the bailiff just for a moment.

12 THE WITNESS: Okay.

13 THE COURT: (To the witness) If you'll just

14 have a seat while I instruct, please.

15 (To the jury) Ah, I can see you again.

16 (Laughter.)

17 THE COURT: Before -- I'm going to give you a

18 special instruction now.

19 One of the things I want to mention before I

20 give you these special instructions, though, is that

21 I know this daylight savings time is tough on us. I

22 was noticing a few drooping eyelids along here. If

23 you start, you know, feeling sleepy or something,

24 hold up your hand, and maybe we'll stand up and

25 stretch or something. It's really hard during these

26 time changes, and I know that, so I just want you to

27 know we can help you on that, too.

28 Okay. I'm now going to instruct you on two 4802

1 different types of evidence which you may hear. One  
2 relates to a prior uncharged sexual offenses. And  
3 two relates to a prior conduct -- to prior conduct  
4 leading to possible uncharged sexual offenses.

5 First, the instruction for the prior sexual  
6 offenses:

7 If you find that the defendant committed a  
8 prior sexual offense, you may, but are not required  
9 to infer that the defendant had a disposition to  
10 commit sexual offenses. If you find that the  
11 defendant had this disposition, you may, but are not  
12 required to infer that he was likely to commit and  
13 did commit the crime or crimes of which he is  
14 accused.

15 However, if you find, by a preponderance of  
16 the evidence, that the defendant committed a prior  
17 sexual offense, that is not sufficient, by itself,  
18 to prove beyond a reasonable doubt that he committed  
19 the charged crime.

20 If you determine an inference properly can  
21 be drawn from this evidence, this inference is  
22 simply one item for you to consider, along with all  
23 other evidence, in determining whether the defendant  
24 has been proved guilty beyond a reasonable doubt of  
25 the charged crime.

26 Unless you are otherwise instructed, you  
27 must not consider this evidence for any other

28 purpose. 4803

1 Within the meaning of the preceding  
2 instruction, the prosecution has the burden of  
3 proving, by a preponderance of the evidence, that  
4 the defendant committed sexual offenses other than  
5 for which he is on trial. You must not consider  
6 this evidence for any purpose unless you find, by a  
7 preponderance of the evidence, that the defendant  
8 committed sexual offenses.

9 If you find other crimes were committed by a  
10 preponderance of the evidence, you are nevertheless  
11 cautioned and reminded that before a defendant can  
12 be found guilty of any crime charged in this trial,  
13 the evidence of the whole must persuade you beyond a  
14 reasonable doubt that the defendant is guilty of  
15 that crime.

16 This is the second part of the evidence:

17 You will hear evidence that is being  
18 introduced for the purpose of showing conduct of the  
19 defendant leading to possible sexual offenses other  
20 than that for which he is on trial. This evidence,  
21 if believed, may not be considered by you to prove  
22 that Mr. Jackson is a person of bad character or  
23 that he has a disposition to commit crimes. It may  
24 be considered by you only for the limited purpose to  
25 determine if it tends to show a characteristic  
26 method, plan or scheme in the commission of criminal  
27 acts similar to the method, plan or scheme used in

28 the commission of the offense in this case, which 4804



1 would further tend to show the existence of the  
2 intent, which is a necessary element of the crime or  
3 a motive for the commission of the crime charged.

4 For the limited purpose for which you may  
5 consider such evidence, you must weigh it in the  
6 same manner as you do all other evidence in this  
7 case. You are not permitted to consider such  
8 evidence for any other purpose.

9 "Preponderance of the evidence" means  
10 evidence that has more convincing force than that  
11 opposed to it. If the evidence is so evenly  
12 balanced that you are unable to find that the  
13 defendant -- that the evidence on either side of an  
14 issue preponderates, your finding on that issue must  
15 be against the party who had the burden of proving  
16 it. You should consider all of the evidence bearing  
17 upon every issue regardless of who produced it.

18 So, we are -- we have two possible types of  
19 evidence that you may hear, starting now. One  
20 relates to prior uncharged sexual offenses. That  
21 evidence, if the burden of proof - preponderance of  
22 the evidence is met - may be used to show a  
23 propensity to commit a similar crime.

24 The second type of evidence that you may  
25 hear is evidence that -- of conduct leading up to  
26 possible sexual offenses. And that may not be used  
27 to show a propensity to commit a crime. It can only

28 be used to show the things that I mentioned to you. 4805

1 I won't go through them again.

2 Complicated, yes. I'll discuss it more with  
3 you later. It's just an advantage to have it given  
4 to you in advance of hearing the evidence.

5 MR. ZONEN: Was the witness sworn?

6 THE COURT: He was sworn. You may proceed.

7

8 DIRECT EXAMINATION

9 BY MR. ZONEN:

10 Q. Mr. Francia, good afternoon.

11 Sir, we've had to tell everybody so far that  
12 you need to stay fairly close to the microphone  
13 because it's hard to be heard in the far reaches of  
14 the courtroom otherwise.

15 Tell me, how old are you at this time?

16 A. 24.

17 Q. Where do you work? What kind of work do you  
18 do?

19 A. I sell auto parts right now. And I run a  
20 mentoring program for kind of like the probation  
21 department. Probation department refers kids to me,  
22 to my organization, and we mentor them through them  
23 not being truants and not committing crimes again.

24 Q. Let's start with the auto parts, and then we  
25 can go to the other ones.

26 A. Okay.

27 Q. What do you do in the auto parts store?

28 A. I literally sell parts. If somebody comes 4806

1 to me with a car that's broken, and then they ask  
2 for advice, and I just sell them a starter or an  
3 alternator, or so on, so forth.

4 Q. You've been doing that for about how long?

5 A. I did this prior, so six -- probably a  
6 little less than a year.

7 Q. Okay. Let's go to the mentoring program.

8 Who do you work for in the mentoring program?

9 A. Pete Taylor. It's through a church that I  
10 belong to, but yet it's still its kind of own  
11 identity. It's Foursquare Youth Programs. That's  
12 the official title.

13 Q. And the nature of the work, by "mentoring,"  
14 what do you mean?

15 A. I'm the lead mentor. And the ultimate goal  
16 is, let me see, the probation department kind of  
17 says these kids need to be mentored. They needed to  
18 go through three programs. Sometimes community  
19 service or community service, mentoring, or some  
20 sort of jobs program or something else. And I'm one  
21 of their steps to get off of probation.

22 So what we try to do is match them up with a  
23 mentor, and that's my job, to try to match them up  
24 with mentors. And I take them out the first and  
25 third Saturdays of every month and we try -- just  
26 hang out with them and show them that there's  
27 something more to life than crime, or than ditching,

28 or than partying, or than drugs, or than anything 4807

1 else. There's more to life. We show them there's  
2 Frisbee golf. I've showed the guys how to change  
3 the oil and change a tire.

4 My wife is helping. And she shows them how  
5 to cook, make purses with the girls and --

6 Q. You've been doing this for how long?

7 A. I've been doing this, this exact job, for  
8 about six months. This type of work for probably  
9 since I was 18.

10 Q. Okay. When you were 18, did you start some  
11 kind of an internship program dealing with this?

12 A. Yeah, I have started an internship with  
13 Santa Maria Foursquare Church. Was -- and was  
14 pretty much training to be -- to work with junior  
15 high, to high school, to college-aged people. And I  
16 just -- I -- I wanted to be trained in that, because  
17 I have a passion for that, so I started that. I did  
18 that for about two and a half years with Santa Maria  
19 Foursquare Church.

20 Q. Did you ever work as a youth pastor?

21 A. Yeah. I did that in 2003 to 2004, from my  
22 understanding. I can't really remember right now.  
23 I'm kind of nervous, just to let you guys know.

24 Q. That's okay. What is a youth pastor?

25 A. Well, I was a youth pastor. That was, I  
26 guess, my official title. But I worked with  
27 13-year-olds to 25- or 26-year-olds. And pretty

28 much -- it's kind of like its own little church 4808



1 within a church. And you work with junior high and  
2 high schoolers. And then what I try to do is  
3 address the collegers in a different format. And  
4 then I've had the college students help me with the  
5 junior highers and high schoolers. So just talk  
6 about ethics, God, morals, and doing good.

7 Q. You've been doing htis consistently since  
8 age 18?

9 A. Yeah, pretty much.

10 Q. Tell us which church this is again, please.

11 A. The one I was a youth pastor, I did that  
12 through Oceano Foursquare. It was really known as  
13 Kings Way a long time ago. But pretty much Oceano  
14 Foursquare.

15 Q. Mr. Francia, you've been living in the Santa  
16 Maria area for how long?

17 A. In the Santa Maria area -- let me see. We  
18 moved up here in '88. Then I moved away when I  
19 graduated high school for like four months. And I'm  
20 still living here now.

21 Q. All right. You say "we" moved up here in  
22 '88. Who moved in '88?

23 A. My mom and I. It was just me and my mom.

24 Q. Based on what you tell us is your age, can I  
25 assume you were born in 1980?

26 A. Yes.

27 Q. Okay. What type of work did your mother do

28 when you moved up here? 4809

1 A. She was working for Michael Jackson.

2 Q. All right. Is Michael Jackson in this  
3 courtroom today?

4 A. Yes.

5 Q. And could you --

6 A. He's right there.

7 Q. By telling us what he's --

8 A. He's the light-complected gentleman.

9 MR. ZONEN: Thank you.

10 Could the record so reflect, Your Honor?

11 THE COURT: Yes.

12 Q. BY MR. ZONEN: What type of work did your  
13 mother do for Michael Jackson?

14 A. She was a personal maid. At first she was  
15 just a maid. And from my understanding, my mom's  
16 just a hard worker and she moved up.

17 Q. Was she his maid prior to moving up here to  
18 Santa Maria?

19 A. I don't know if she was his full-on, like,  
20 personal maid and -- but she was, yeah. Yeah, she  
21 was his maid.

22 Q. From what period of time in Los Angeles was  
23 she working for Michael Jackson?

24 A. I think '86. But my mom tells me '85. I  
25 have no -- it's around '86, '85. I don't know.

26 Q. When did you first meet Mr. Jackson?

27 A. I was probably six. I think. Six or seven.

28 And the reason I say that is just it was a long time 4810

1 ago.

2 Q. Did you ever have occasion to go to his  
3 residence in Los Angeles?

4 A. Yeah, the one in Encino, yeah. I went there  
5 probably a lot, like 10, 11, 12 times. I don't  
6 know. Often my mom -- it was just me and my mom, so  
7 a single mom and just me. She needed to babysit me  
8 pretty much, so we had nobody else; no dad, no  
9 brothers and sisters.

10 Q. Your father wasn't in the picture?

11 A. Correct.

12 Q. And there was no other kids; is that  
13 correct?

14 A. That is correct.

15 Q. During the time that you were living in Los  
16 Angeles before moving up to Santa Maria, from the  
17 time your mother began working for Mr. Jackson, tell  
18 us approximately how often you went to his  
19 residence.

20 A. I'm sorry, can you repeat that?

21 Q. Tell us approximately how often you went to  
22 his residence.

23 A. Throughout my whole life of my --

24 Q. While living in Los Angeles.

25 A. Oh.

26 Q. Before moving to Santa Maria.

27 A. I went to Encino. He owned a lot of stuff.

28 But I -- there's an Encino, which is like the big 4811

1 mansion, and then there's the, like, apartment  
2 hideaway thing. I think I went to Encino, which is  
3 the big mansion, I don't know, about six, seven  
4 times.

5 Q. Did other members of the Jackson family  
6 reside at that location as well?

7 A. Yeah. Yeah.

8 Q. Can you tell us who lived there?

9 A. Mom and dad, I know that. I think they  
10 lived above the garages. I think. That's where I  
11 met them.

12 Q. Okay.

13 A. I think Janet lived there as well. By -- I  
14 don't know. Other than that, that's all I remember.

15 Q. We're talking about almost 20 years ago; is  
16 that correct?

17 A. Correct. Yeah. That -- yeah.

18 Q. Did you go to a different location where  
19 Michael Jackson lived in the Los Angeles area as  
20 well?

21 A. Yeah. In the Los Angeles area, yeah, like  
22 Hollywood.

23 Q. And can you describe that place for us?

24 A. Yeah. It was -- it didn't have much  
25 furniture. It was probably the tenth floor, because  
26 you could look over pretty much a lot of Hollywood  
27 and Beverly Hills. I think it was Beverly Hills.

28 Didn't have a lot of furniture. Had a train set. 4812



1 Had a couple toys, telescope. Kitchen. But just  
2 not a lot of furniture. It was like a condo pretty  
3 much.

4 Q. And the reason that you would go to that  
5 location?

6 A. My mom had to clean everything. My mom was  
7 just a clean lady.

8 Q. Was she the only person cleaning his  
9 residence, as far as you knew?

10 A. No, there was other maids. But from my  
11 understanding, just my mom did a kickin' job. She  
12 just did a really good job at cleaning, a really  
13 good job at working just as a whole. She was just a  
14 good worker.

15 Q. And there was nowhere to leave you when she  
16 went off to clean?

17 A. Yeah. Sometimes she may -- she would leave  
18 me with my aunt, but my aunt had to go to work as  
19 well. Everybody in my family was workers.

20 Q. Okay.

21 A. And even -- even -- shoot, even I helped my  
22 aunt at times.

23 Q. Now, on the occasions when you would go to  
24 the -- what was it called? The hideout or hideaway?

25 A. Yeah, my mom called it "the hideout."

26 Q. Do you know why?

27 A. Probably because nobody knew about it. I

28 don't think it was registered. 4813

1 MR. MESEREAU: Calls for speculation.

2 MR. ZONEN: Withdraw the question.

3 Q. Did Mr. Jackson ever mention the name of  
4 that place to you in any of his conversations to  
5 you?

6 A. I don't remember.

7 Q. All right. Was that something you enjoyed  
8 doing, going to either of those two places?

9 A. The mansion I did, just because of the  
10 arcade. I was young. It was fun. There was toys.

11 Q. Tell us about the arcade at the mansion.

12 A. Shoot. It had an old karate game. It just  
13 had a lot of video games in there, and it was fun  
14 for kids. It was -- I think he even had a laser tag  
15 set. I don't remember. But he had a lot of stuff,  
16 a lot of toys.

17 Q. There was a lot that you could do while you  
18 were there?

19 A. At the mansion, yeah.

20 Q. And you enjoyed doing that?

21 A. Yeah.

22 MR. MESEREAU: Objection; leading.

23 THE WITNESS: I'm sorry?

24 THE COURT: Overruled. Go ahead. Next  
25 question.

26 THE WITNESS: Okay.

27 Q. BY MR. ZONEN: At the other place, the place

28 in Los Angeles, the hideaway, was that something you 4814

1 enjoyed doing?

2 A. Yes and no. There wasn't that many toys.

3 My mom wouldn't let me go out anywhere else, and  
4 there wasn't that many toys. It was a condo, so  
5 it's not like I could play with the elevator all day  
6 long. There was not that many toys. There was just  
7 a train set. A train set gets boring. It just goes  
8 around in circles. And there wasn't that many toys.

9 Q. Did you ever spend the night at either of  
10 those two locations?

11 A. Encino -- the mansion I didn't, which is in  
12 Encino. And the hideaway we did, I believe, with my  
13 mom.

14 Q. All right. Do you know approximately how  
15 many occasions?

16 A. I don't recall. I don't remember.

17 Q. Were there beds or furniture there?

18 A. I don't believe so. I think there was an  
19 L-shaped couch like one of those that you put in a  
20 corner. There was a chair. I know that, because --  
21 stuff. There wasn't that much furniture.

22 Q. How old were you when you moved to Santa  
23 Maria?

24 A. '88 or '89. Eight years old. Yeah.

25 Because I stopped playing baseball. Played baseball  
26 for a little.

27 Q. When you moved to the Santa Maria area, what

28 job did your mother have? 4815

1 A. She was -- I believe her title, from what  
2 she told me, was Michael Jackson's personal maid,  
3 and she had, like, all the keys. She was the best  
4 maid he had, I guess.

5 Q. Did you ever go to Neverland?

6 A. Yeah. Yeah, I did.

7 Q. Tell us approximately how old you were  
8 during that period of time.

9 A. I think when it first opened, it was just --  
10 I went there. They probably had a party there. How  
11 old was I? Probably around nine. Eight.

12 Q. Approximately how many times do you think  
13 you went to Neverland?

14 A. Five, four. Five or four.

15 Q. Always with your mother?

16 A. Yeah. There was no other way to get up  
17 there, yeah.

18 Q. Did you ever spend the night at Neverland?

19 A. Yes. With -- yeah, I remember distinctly,  
20 because I think I was hearing bats or something, on  
21 the ranch, or something, and I couldn't sleep, so --  
22 but I was sleeping with my mom, like in the same  
23 room, in the same area with my mom, and, yeah. I  
24 couldn't sleep.

25 Q. Were you ever in Michael Jackson's bedroom?

26 A. Yes.

27 Q. On how many occasions?

28 A. Two, I think. Two. I'm pretty sure. 4816



1 Once -- one I know for sure, because we were  
2 all laying in the bed watching T.V.

3 Q. And who is "we were all"?

4 A. Michael and a bunch of other kids.

5 Q. Okay. Do you know how many?

6 A. I don't. Seven. Six. But I don't -- I  
7 don't.

8 Q. Do you know any of the names?

9 A. I'm really bad at names. Even to this day.

10 I called you "Mark" earlier.

11 Q. That's not me.

12 A. Yeah, I know.

13 Q. Do you know how old you were when your  
14 mother stopped her employment at Neverland?

15 A. I'm thinking 11, because I was -- I remember  
16 hearing about -- I was playing in the pool, and she  
17 told me, "I quit."

18 Q. You were playing in the pool where?

19 A. At a friend's house, and when I was 11, I  
20 was friends with him.

21 Q. I'd like to go back to, if I could, please,  
22 the period of time in Los Angeles prior to moving up  
23 to Santa Maria.

24 Was there ever an occasion that you were  
25 with Michael Jackson where something happened that  
26 made you feel uncomfortable?

27 A. Yes.

28 Q. Did that happen more than once? 4817

1 A. Yeah.

2 Q. Do you have a recollection of these events?

3 A. Yeah.

4 Q. Let's begin with the first one. What

5 happened?

6 A. Okay. Well, the first time that I felt

7 uncomfortable with him was in the hideout, which is

8 the place in Encino -- not in Encino, I'm sorry. In

9 Hollywood. And -- shoot. I was seven and -- I

10 don't know, at seven years old, I don't think --

11 okay. I may have not felt uncomfortable, but then

12 now I think about it, that shouldn't have been done.

13 But I didn't feel uncomfortable.

14 Q. What happened?

15 A. I was sitting on his lap, and I was young,

16 and I was small. I'm still thin. I was even

17 thinner then. Sitting on his lap, watching T.V.,

18 which that's normal enough in itself. And then

19 we -- I was kind of facing the T.V., and he was

20 facing the T.V. as well, so my back was to his

21 chest. And it was -- there was just one chair, and

22 there wasn't much furniture in that hideout place.

23 And I was just sitting there watching T.V., and so

24 was he. I think we were watching cartoons. And he

25 just started tickling me, which, cool, shoot, I was

26 a tickle guy. I tickled him back, but still kind of

27 from the back, kind of reaching around.

28 And then we went to the floor, I think, but 4818

1 I can't completely remember right now. But we  
2 somehow got on the floor, tickling still, because  
3 I'm doing what -- these little kid things, you know,  
4 when you shimmy back and forth.

5 And then I'm tickling and he's tickling, and  
6 I'm tickling and he's tickling, and it eventually  
7 moved down to -- to -- to my little private region  
8 when you're a little kid. I don't know if you want  
9 me to call it specifically something, but around my  
10 crotch area. And I didn't -- you know, you're  
11 seven. I didn't think it was wrong. Well, I did.  
12 Because he's tickling, but I'm laughing, and I'm  
13 tickling him back, trying to get him to stop, but  
14 then I'm tickling too much. I'm laughing too much.  
15 And eventually it stopped. I don't know how.

16 Q. Did he actually make contact with your  
17 genital area?

18 A. Not skin to skin, but, yeah. Yeah, he was  
19 on my clothes, yeah.

20 Q. Do you know for approximately how long?

21 A. Distinctly I can't remember. It was a  
22 while, though.

23 Q. By a little while, can you give us a sense  
24 of it?

25 A. More than three minutes, less than 20. Less  
26 than ten minutes, I think.

27 Q. Okay.

28 A. But a while. It was -- it was tickling. It 4819

1 didn't end soon. It didn't end fast.

2 Q. But the amount of time that his hand was  
3 actually in the region of your genitalia?

4 A. I cannot remember.

5 Q. Okay. And you commented that this was not  
6 skin to skin touching; in other words, his hand  
7 directly on either your penis or testicles.

8 Is that --

9 MR. MESEREAU: Objection; asked and  
10 answered.

11 THE COURT: Overruled.

12 You may answer.

13 Q. BY MR. ZONEN: That it was not directly on  
14 your genitalia; is that correct?

15 A. Correct. It wasn't -- he didn't touch me.

16 He was touching on top of the skin, but -- but  
17 not -- on top of my shorts, but still --

18 Q. Do you remember what you were wearing at the  
19 time?

20 A. Probably shorts. I don't remember  
21 specifically. I think those orange shorts that my  
22 mom made me, because, again, we were poor, but my  
23 mom made me clothes. And I was always wearing  
24 shorts, always wearing shorts.

25 Q. And she had orange shorts that she had made  
26 for you?

27 A. Yeah, there was orange shorts that she made

28 for me. And then she -- yeah. 4820



1 Q. Were they shorts you wore a lot?

2 A. Probably, yeah. Because -- yeah.

3 Q. Did -- as you think back now, today, of  
4 course we're talking about quite some number of  
5 years ago, do you remember how you felt at the time  
6 this happened, if that was at all strange for you?

7 A. You know, I don't. It was -- I don't  
8 remember. At seven, it probably -- well, I probably  
9 did think it was weird, but not super weird. Just  
10 because you're tickling, and it's -- but I guess  
11 that would be weird. My fault.

12 Q. Was there another instance?

13 A. Yeah.

14 Q. Was that also at the hideout?

15 A. Yeah.

16 Q. Tell us what happened, please.

17 A. I was watching cartoons again, and probably  
18 in the same room, because I think there was only one  
19 room in that whole place.

20 And we somehow -- I was somehow -- there was  
21 a sleeping bag involved. I don't know -- I think I  
22 was on top of it. And I was watching T.V., laying  
23 down on the ground, and Michael was pretty much  
24 behind me, like spooning me. I don't know how we  
25 got there. I was like eight, eight and a half. It  
26 was a little while after. And again with the  
27 tickling. But this time it wasn't as long, and I

28 was -- well, I'm sorry. It was longer, but I wasn't 4821

1 laughing as much, I guess.

2 Q. You were in a sleeping bag, or on a sleeping  
3 bag?

4 A. On, I think.

5 Q. Okay.

6 A. On, not in.

7 Q. All right. Do you remember -- you said this  
8 was in the hideout?

9 A. Yes.

10 Q. Were there a number of rooms in the hideout?

11 A. I think there was only one, I think. Yeah.

12 I think there was only one, if I could -- hold on.

13 Let me -- there was a rest room. There was a  
14 kitchen. There was a big main room. And there was  
15 a room off to the left, if you're looking out the  
16 window. Yeah, I think there was only one.

17 Q. All right. Where was your mother during  
18 this time?

19 A. Probably cleaning. She was always cleaning.

20 Q. But --

21 A. To this day she cleans.

22 Q. Do you know in what room at that point?

23 A. No, I don't. I don't know.

24 Q. Was she in the room with you at the time?

25 A. No, she wasn't, or else she probably would  
26 have kicked my butt or something.

27 Q. In the private -- in the prior event that

28 you described, was your mother in the room at that 4822

1 time?

2 A. No, she wasn't in the room.

3 Q. But if you were at the hideout, then she was  
4 there; is that a correct statement?

5 A. Correct. Or sometimes she may have run down  
6 to get something to eat. Remembering now, there was  
7 a couple times that Michael actually asked her to  
8 get chips, or get something, or get something from  
9 downstairs, or maybe even from the lobby. That's  
10 what I'm thinking.

11 Q. What was downstairs? Was that a --

12 A. I think there was probably like a restaurant  
13 or something downstairs, but I don't really -- I  
14 have no clue.

15 Q. But the apartment that you're describing is  
16 a single floor? There's no upstairs or downstairs  
17 to it?

18 A. Oh, yeah.

19 Q. And this is a large building in Los Angeles?

20 A. Yeah.

21 Q. All right. When do you think was the last  
22 time that you had been to that building?

23 A. When was the last time I was there?

24 Q. Yeah.

25 A. I'm thinking nine, eight.

26 Q. Age eight or age nine?

27 A. Yeah.

28 Q. Even after you moved up to Santa Maria? 4823

1 A. I believe so. Just because my mom had no  
2 one to leave me up in Santa Maria with. We -- new  
3 town.

4 Q. Let me go back to the second event. In the  
5 second event we're talking about, you were in a  
6 sleeping bag?

7 A. Yes.

8 Q. Was there a bed in that room?

9 A. No.

10 Q. Was that Mr. Jackson's bedroom; do you know?

11 A. I don't know.

12 Q. Was there a television in that room?

13 A. Yes.

14 Q. Was there more than one T.V. in that  
15 apartment, to your knowledge?

16 A. I don't think so.

17 Q. Were you watching television at that time?

18 A. Yeah.

19 Q. Do you remember if it was late at night or  
20 midday? Do you have any way of knowing?

21 A. It may have been midday, but I don't know.

22 Q. Can you describe the building for us in  
23 general, in terms of how it was laid out?

24 A. Almost like a typical apartment or a condo.

25 You walk in the front door, there's a big living  
26 room. There's -- there's a telescope in there.

27 There's a bunch of toys. There's a couch. And then

28 there's the kitchen. 4824



1 Q. Okay. The room that has the couch, is that  
2 the room where the sleeping bag was?

3 A. No, the room that has the couch didn't have  
4 any furniture but the chair, I think. I'm pretty  
5 sure.

6 Q. And now the sleeping bag itself, on the  
7 floor?

8 A. Yes.

9 Q. Was it a normal-sized sleeping bag?

10 A. I believe so. I would think so.

11 Q. You used the expression "spooning." What  
12 does that mean?

13 A. Something that you do with your wife.

14 Something that you do with a girlfriend. Spooning.

15 Like --

16 Q. Describe the position for us, if you would.

17 A. Wow. When somebody is holding you and  
18 you're laying on your side and they're holding you  
19 from behind.

20 Q. Okay.

21 A. Thanks.

22 Q. Was that the position that you were in with

23 Mr. Jackson?

24 A. Yeah.

25 Q. Were you in front or behind?

26 A. I was in front.

27 Q. Do you remember where his arms were?

28 A. I couldn't specifically tell you. 4825

1 Q. Was the tickling done again?

2 A. Yeah.

3 Q. Was this something that you and Mr. Jackson  
4 did frequently, tickling?

5 A. Whenever something happened.

6 Q. Okay. On this occasion, when he was  
7 tickling you, what happened?

8 A. We were tickling -- oh, he was tickling me  
9 at first, and I was just watching T.V. Probably  
10 cartoons again. And he was just tickling me from  
11 behind, and in my genital area. And I was laughing,  
12 and I was trying to tickle him back. And -- go  
13 ahead.

14 Q. His hands made contact with your genitalia?

15 A. From the top of the clothes.

16 Q. Do you remember what you were wearing on  
17 that occasion?

18 A. Probably shorts again.

19 Q. Simply because you do?

20 A. Simply because it's hot in L.A., yeah, and I  
21 always wore shorts. I think every picture I have --  
22 well, not "every," but there was a lot of pictures  
23 of me wearing shorts when I was younger.

24 Q. Are you mindful of his hand reaching your  
25 crotch at the time; you were thinking about that at  
26 the time?

27 MR. MESEREAU: Objection; leading.

28 THE WITNESS: I don't even know what he 4826

1 asked me.

2 THE COURT: Just a moment.

3 THE WITNESS: I don't understand, yeah.

4 MR. ZONEN: Thank you.

5 Q. Was it -- were you aware of it happening  
6 while it was happening?

7 A. Yes.

8 Q. Okay.

9 A. Yes.

10 Q. And how long was his hand there?

11 A. Two cartoons' worth. A cartoon and a half  
12 worth.

13 Q. And you were watching cartoons on television  
14 at the time?

15 A. Yeah.

16 Q. How long is a cartoon? It's been a while  
17 since I've seen one.

18 A. It's been a while for me, too.

19 Does anybody here watch cartoons?

20 Q. Tell us the best of your recollection. We  
21 can't let them be witnesses at the moment.

22 A. A "Woody Woodpecker" I guess would last  
23 four, five minutes.

24 Q. Okay.

25 A. Five, six minutes.

26 Q. So the contact in the area of your genitalia  
27 was at least four or five minutes?

28 A. Yeah. 4827

1 Q. Did it feel strange to you at the time?

2 A. Yes and no. "No" because -- "no" because

3 it's all fun, and it's supposed to be innocent, and

4 you're a little kid, and you're having fun, and --

5 you're a little kid.

6 Q. Okay.

7 A. And "yes" it's not right.

8 Q. Did Mr. Jackson ever give you money?

9 A. Yeah.

10 Q. On how many occasions did he give you money?

11 A. Pretty much at every tickle thing there was

12 money.

13 Q. Explain that, what you mean by that, "at

14 every tickle thing there was money." Explain what

15 you mean, please.

16 A. Every time I was being tickled, there was

17 always some sort of money exchanged. Not exchanged.

18 There was money given. It was just that.

19 Q. Before, after, during?

20 A. After. And it was kind of a, "Don't tell

21 your mom, about the money."

22 Q. Well, what would he give you?

23 A. A hundred-dollar bill.

24 Q. A hundred-dollar bill?

25 A. Yeah.

26 Q. Did he do this on more than one occasion?

27 A. Yeah, because I had a lot of money. Well, I

28 didn't have a lot of money. My mom took the money, 4828



1 because she would find out that I got hundred-dollar  
2 bills, and then she'd get mad at me for taking some  
3 stranger's -- well, not stranger's, but somebody's  
4 money.

5 Q. Do you remember if, in fact, you got the  
6 money on both of those two occasions?

7 A. Yeah. Yeah, I did.

8 Q. Were there ever any other occasions, whether  
9 in Los Angeles or any other occasion or any other  
10 location where something happened that made you feel  
11 uncomfortable?

12 A. Yeah.

13 Q. And where was that?

14 A. At the ranch.

15 Q. Do you remember how old you were?

16 A. Ten and a half, ten. I was older.

17 Q. And you have a recollection of this event?

18 A. Yeah.

19 Q. There's water there also, if you need  
20 anything.

21 A. Oh, I was wondering. I thought it was  
22 coffee. I was hoping it wasn't.

23 Q. No, it's water. And feel free to take some  
24 if you need some.

25 A. Okay.

26 Q. You think you were about ten or ten and a  
27 half?

28 A. Yeah. 4829

1 Q. It was prior to the time that your mother  
2 quit her job there?

3 A. Yeah.

4 Q. Did you ever go back to Neverland after your  
5 mother quit her job there?

6 A. No.

7 Q. Do you remember where this event took place,  
8 where at Neverland?

9 A. What, the event?

10 Q. That made you feel uncomfortable.

11 A. Yeah. It was in the arcade room. There was  
12 a loft area.

13 Q. Describe what the arcade is.

14 A. A place where there's a bunch of video  
15 games, and there was a pool table, and I think there  
16 was a fireplace. I think that was up in the loft.

17 I think. That was a long time ago. But, yeah, it's  
18 Street Fighter, the original one, in there, and  
19 pool tables, and a couple of other video games.

20 Q. On what part of the arcade were you at the  
21 time this happened?

22 A. I was in the loft.

23 Q. Upstairs?

24 A. Yeah.

25 Q. Was anybody else up there with you?

26 A. No.

27 Q. Was Mr. Jackson there?

28 A. Yeah. 4830

1 Q. By "other people," I mean other people than  
2 you and Mr. Jackson.

3 A. It was just him and I.

4 Q. Do you recall approximately what time of day  
5 or evening it was?

6 A. No. Nighttime.

7 Q. Was your mother working that day?

8 A. Yes.

9 Q. Were there ever occasions when you were at  
10 Neverland and your mother wasn't working?

11 A. Yeah, when we'd have parties and stuff, but  
12 I think she'd still work, because she'd always walk  
13 around cleaning even though she wasn't dressed for  
14 it.

15 Q. Were there ever occasions when you were at  
16 Neverland and your mother was not there?

17 A. No, she was always there.

18 Q. On this occasion, was your mother in the  
19 arcade?

20 A. No.

21 Q. Was she working that day?

22 A. Probably.

23 Q. Do you remember where her assignment would  
24 have taken her? Did she go to specific locations?

25 A. In the ranch?

26 Q. Yes.

27 A. At the ranch area. She was cleaning

28 everything. 4831

1 Q. Okay.

2 A. She wasn't in the arcade.

3 Q. Okay. And what happened when you were in  
4 the arcade.

5 A. In the loft?

6 Q. Yes, please.

7 A. I think I was playing Sega Genesis.

8 Q. Tell us what that is, please.

9 A. It's -- it's a video game. I was just a  
10 video-game-playing kid.

11 Q. Okay.

12 A. There was a video game. There was a T.V. up  
13 there, I believe. It was a really big T.V., and I  
14 was playing, and then he started tickling me, and I  
15 think there was -- there was a couch up there,  
16 because we somehow managed to end up on the couch.  
17 It took a lot of counseling to get over,  
18 just to let you know.

19 MR. MESEREAU: Objection. Move to strike;  
20 nonresponsive.

21 THE WITNESS: I'm sorry.

22 Q. BY MR. ZONEN: Let's see if we can restrict  
23 our answers just to the questions, if we can. I'll  
24 ask you some questions about that later.

25 You were on the couch. Do you know if both  
26 of you were sitting on the couch?

27 A. Hold on.

28 We were laying down on the couch. 4832



1 Q. Okay. How were you laying down? How were  
2 you positioned relative to Mr. Jackson?

3 A. Probably about -- no, it was in the spooning  
4 position again.

5 Q. Okay. Was he behind you or in front of you?

6 A. Behind me.

7 Q. And then what happened?

8 A. We were tickling -- well, he was tickling  
9 and I was laughing. And -- and -- and we -- it  
10 was -- he was -- he was tickling me in the....

11 So much happening right now. Can we take a  
12 break or something?

13 MR. ZONEN: Can we take just a moment, Your  
14 Honor?

15 THE COURT: Okay. Sure.

16 MR. ZONEN: Just a break for a moment or  
17 two?

18 Q. Okay.

19 A. All right.

20 Q. You were on the couch, and you said in the  
21 spooning position?

22 A. Yeah.

23 Q. Tell us what happened, please, the best you  
24 can.

25 A. He was tickling me. And then I was wearing  
26 shorts again, I'm pretty sure, and, yeah, because he  
27 had to have reached under. We were tickling; I was

28 laughing. He reached on my leg, and I'm still 4833

1 laughing, and he's tickling. And then he reached up

2 and -- and to my privates, yeah.

3 Q. Did he actually touch your --

4 A. Yeah.

5 Q. Touch you?

6 A. Yeah.

7 Q. Did he touch your penis or your testicles?

8 A. I think option two, yeah.

9 Q. Your testicles?

10 A. Yeah, that one.

11 Q. For what period of time?

12 A. I don't remember. Three minutes, two

13 minutes.

14 Q. Was it tickling?

15 A. Probably, because I think I was still

16 laughing. But, you know, it may have been the other

17 hand.

18 Q. Were you mindful of it at the time? Were

19 you aware at the time he was doing it?

20 A. Yes.

21 Q. What were you thinking at the time? You're

22 now ten and a half years old. What were you

23 thinking?

24 A. "I should probably go."

25 Q. How did it end; do you know?

26 A. Either my mom -- I don't -- I don't remember

27 how it ended.

28 Q. Do you have a sense of it? 4834

1 A. Huh-uh.

2 Q. Do you remember getting up?

3 A. No.

4 Q. Did you think about it afterward?

5 A. Yeah. No, well, not instantly right

6 afterwards. You're ten. You don't want to think

7 about that stuff.

8 Q. Was Mr. Jackson still giving you money at

9 that time?

10 A. That time I didn't get any money.

11 Q. Did you tell anybody about that right

12 afterward?

13 A. No.

14 Q. Did you tell your mother, ever?

15 A. No. I don't even think to this day she

16 knows.

17 Q. All right. At some point in time this

18 became known to somebody; is that right?

19 A. Yeah.

20 Q. Who did you tell? Who was the first person

21 you told about it?

22 A. Probably God. But --

23 Q. Let's go to number two, then. Who was the

24 second person?

25 MR. MESEREAU: Move to strike that comment,

26 Your Honor. Nonresponsive.

27 THE COURT: Well, it's responsive.

28 Overruled. Go ahead. 4835

1 Q. BY MR. ZONEN: Who else did you --

2 A. Who did I tell? I forgot their names, but  
3 there was two detectives. Yeah, I told those two  
4 guys.

5 Q. Before or after your mother had quit her  
6 position at Neverland?

7 A. She had already quit.

8 Q. All right. At some point in time police  
9 came to you and said they wanted to talk to you; is  
10 that right?

11 MR. MESEREAU: Objection; leading.

12 THE WITNESS: This is going to be hard for  
13 me to get through. Sorry.

14 THE COURT: Okay. The objection is  
15 overruled.

16 You may answer.

17 Q. BY MR. ZONEN: Go ahead.

18 A. Yeah, they wanted to come and talk to me.  
19 I was 13. I was in eighth grade, I think. Yeah.  
20 I -- yeah.

21 Q. Around 1993?

22 A. Yeah. It was '93, I think, yeah.

23 Q. Did you know in advance that they wanted to  
24 speak with you?

25 A. No. Not until the big day that this  
26 crappiness started.

27 Q. Okay. At some point in time, they showed

28 up? 4836



1 A. Yeah. They showed up probably around 4:00,  
2 because I had judo practice at, like, 6:00.

3 Q. So it was about -- I'm sorry, you had judo  
4 practice afterward?

5 A. Yeah, I had to go to judo practice right  
6 after, and I don't think I went because I was  
7 crying.

8 Q. So you think it was about four o'clock in  
9 the afternoon?

10 A. I think they came around four o'clock.

11 Q. Do you remember how many people came?

12 A. I think two. But I don't remember.

13 Q. Was your mother present during the course of  
14 that interview?

15 A. No.

16 Q. Do you know if that interview was  
17 tape-recorded?

18 A. Yeah, it was tape-recorded because I  
19 listened to the tapes.

20 Q. You listened to it recently?

21 A. Yeah.

22 Q. Do you know if a transcription had ever been  
23 prepared of that interview?

24 A. A trans -- yeah, it has been.

25 Q. And did you, in fact, review that  
26 transcription as well?

27 A. Yeah. While I was reading it, yeah.

28 Q. The people who were present during the 4837

1 course of that interview, you and how many  
2 detectives?

3 A. Two. Two detectives. Me and two other  
4 guys.

5 Q. They were both men?

6 A. Yeah.

7 Q. Had you ever -- did you know them prior to  
8 that time?

9 A. No. No.

10 Q. Have you seen either one of them since?

11 A. Yeah, I just bumped into one outside. We  
12 were talking a while. I was waiting for -- to be  
13 called up here.

14 Q. Okay. Just today, right before you  
15 testified you saw one of them?

16 A. Yeah.

17 Q. Did you recognize him?

18 A. No, I didn't. He said, "You probably don't  
19 remember me." And I said, "No." And he told me who  
20 he was. And then I was like, "Hey, that was you."

21 Q. Do you know where they were from, the  
22 agency?

23 A. The police?

24 Q. Yes.

25 A. No.

26 Q. At the time that you were having that  
27 conversation?

28 A. No. 4838

1 Q. I don't mean now, but at the time you had  
2 the conversation with them.

3 A. No, I just knew they were police officers.

4 Q. Did you know they were tape-recording it at  
5 the time?

6 A. Yeah, because he showed me and -- he showed  
7 me the tape-recording. And the tape-recorder was  
8 sitting right in front.

9 Q. Did you know what it was all about at the  
10 time you sat down at the table with them?

11 A. I knew it was about Michael Jackson just  
12 because it was on T.V. all the time, and -- yeah.

13 Q. So there was already something going on in  
14 the news; is that correct?

15 A. Yeah.

16 Q. Okay. Did your mother know that you were  
17 entering an interview with them?

18 A. Yes. She had to have let me go.

19 Q. All right.

20 A. My mom knew where I was at all times.

21 Q. Do you remember where you were for this  
22 interview?

23 A. Yeah. At the juvenile hall, or the  
24 sheriff's department.

25 Q. So it was over in the -- in where, in Santa  
26 Maria?

27 A. Yeah, in Santa Maria. Well, in Orcutt,

28 but -- yeah, in the sheriff's department. 4839

1 Q. Do you recall how long that conversation  
2 was?

3 A. I don't recall. An hour, hour and a half.

4 Q. All right. And that's consistent with your  
5 having reviewed that tape-recording as well?

6 A. Right. Right.

7 Q. And your mother did know that you were going  
8 to be there; is that right?

9 A. Yes.

10 Q. Was she at the building at the time you were  
11 there?

12 A. I don't think so. I think she was in our  
13 little studio apartment still.

14 Q. Okay. In the course of that interview, did  
15 you discuss with them what had happened to you?

16 A. Let me drink some water.

17 Q. Go ahead.

18 A. Pump?

19 Q. It's confusing. There's a button on the  
20 top.

21 A. I'm not a coffee drinker, sorry. It's a  
22 coffee thing, I think.

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

24 Q. Did you discuss with the detectives what had  
25 happened to you with Mr. Jackson?

26 A. Yes. Eventually. But at first I didn't  
27 want to. I was fighting it with everything that I

28 could. 4840



1 Q. Why?

2 A. Because it's embarrassing. It's  
3 embarrassing now, and I'm 24 years old.

4 Q. Okay. Was it harder then, at age 13?

5 A. Yeah.

6 MR. MESEREAU: Objection. Relevance; move  
7 to strike; leading.

8 THE COURT: Sustained; stricken.

9 Q. BY MR. ZONEN: Ultimately --

10 A. It was difficult for me.

11 Q. -- did you disclose to them the information  
12 that you gave us today?

13 A. Yes.

14 Q. At some point in time, did you have an  
15 interview or were you represented by a private  
16 lawyer?

17 A. At some point, yeah, in time I was.

18 Q. Do you remember the name of that lawyer?

19 A. Yeah, Terry -- Terry Cannon. And Kris  
20 Kallman.

21 Q. There were two lawyers who represented you?

22 A. Yeah.

23 Q. Do you know if -- was this after this  
24 interview?

25 A. Yes, it was after this interview. It was  
26 like two months after this interview, I think.

27 Q. Were you ever called for a deposition?

28 A. I was never called for a deposition. 4841

1 Q. Did you ever know a young man by the name of  
2 Jordan Chandler, or Jordie Chandler?

3 MR. MESEREAU: Objection; relevance.

4 THE WITNESS: Did I --

5 MR. MESEREAU: Relevance; foundation; move  
6 to strike.

7 THE COURT: Overruled.

8 You may answer.

9 THE WITNESS: Did I ever meet him?

10 Q. BY MR. ZONEN: Yes.

11 A. I probably did, but I -- I don't remember  
12 names. I'm really bad with names. And I'm not --

13 Q. Do you know if you were being prepared at  
14 any time to give a deposition in a case involving  
15 Mr. Chandler?

16 A. No. What -- prepared by -- I don't know  
17 what you mean by "prepared."

18 Q. Did your attorneys ever talk to you about  
19 the possibility of your going in and giving a  
20 deposition?

21 A. No. I don't think so. I don't remember.

22 Q. At some point in time, was there a  
23 settlement of some kind of a case involving you and  
24 Mr. Jackson? We're not going to get into the  
25 specifics of the amounts, but was there a  
26 settlement?

27 A. Yes.

28 Q. Do you know if a lawsuit was ever actually 4842

1 filed?

2 A. No. I don't think so, no. Because there  
3 was a settlement, so there was no lawsuit.

4 Q. All right. Did you have anything to do with  
5 it? In other words, did you say anything one way or  
6 the other about asking to have money?

7 A. No.

8 Q. But were you consulted in any way about what  
9 was going to happen on that?

10 A. No.

11 Q. Okay. Was -- did you go into counseling at  
12 this time?

13 A. Yeah.

14 Q. And --

15 MR. MESEREAU: Objection; relevance.

16 THE WITNESS: Oh, I'm sorry.

17 MR. ZONEN: I think it's relevant.

18 MR. MESEREAU: And leading.

19 THE COURT: I'll allow the question. The  
20 question and answer was, "Yes."

21 Q. BY MR. ZONEN: For what period of time did  
22 you stay in counseling?

23 MR. MESEREAU: Objection. Relevance; 352.

24 MR. ZONEN: I believe it's appropriate under  
25 People vs. Bledsoe and Shirley.

26 THE COURT: Go ahead. I'll allow the  
27 question.

28 Q. BY MR. ZONEN: For what period of time did 4843

1 you stay in counseling?

2 A. Shoot, like a week after the sheriffs  
3 interviewing me, or police, or whoever they were.

4 And --

5 Q. That's when it started?

6 A. Till I was 18, yeah.

7 Q. Till you were 18?

8 A. Yeah.

9 Q. Mr. Francia, recently have you been under  
10 surveillance?

11 A. Yeah.

12 MR. MESEREAU: Objection. Relevance; 352.

13 THE WITNESS: We might be going there. I  
14 don't know.

15 THE COURT: I'm not sure what the relevance  
16 is. Do you want to approach?

17 MR. ZONEN: Yes, I think so.

18 (Discussion held off the record at sidebar.)

19 THE COURT: Looks like it's time for our  
20 afternoon break.

21 (Recess taken.)

22 THE COURT: For the record, the objection  
23 was sustained.

24 Q. BY MR. ZONEN: Mr. Francia, you stated  
25 earlier, you gave the statement, "When all this,"  
26 and I think you used the word "crappiness began."  
27 What were you referring to?

28 A. I guess coming out with it. Just because I 4844



1 had hidden it, and it was stowed away in a far off  
2 place. And that's what I meant. It was time for it  
3 to come out.

4 Q. Were you aware of your mother going on  
5 television at some time back in 1993 or '94?

6 A. I knew about it when she was finally on  
7 T.V., yeah. I -- she told me --

8 MR. MESEREAU: Objection; hearsay.

9 THE COURT: Sustained.

10 Q. BY MR. ZONEN: Were you consulted about that  
11 prior to --

12 THE COURT: They can't hear.

13 Who didn't hear back there? Counsel here?

14 MR. ZONEN: Is it on or off? I can't tell.

15 Is it on? It's on.

16 Q. Were you consulted by anybody prior to your  
17 mother going on television?

18 A. Was I?

19 Q. Yes.

20 A. No.

21 Q. Okay. Did it cause you problems when that  
22 happened?

23 A. Yeah.

24 Q. And in what way?

25 MR. MESEREAU: Objection; relevance.

26 THE WITNESS: It made --

27 THE COURT: Sustained.

28 THE WITNESS: Okay. 4845

1 MR. ZONEN: I have no further questions.

2 THE WITNESS: Can I get a jacket? It's cold  
3 over here. I think I heard them say it's cold, too.

4 Thanks.

5

6 CROSS-EXAMINATION

7 BY MR. MESEREAU:

8 Q. Good afternoon.

9 A. Hi.

10 Q. My name is Tom Mesereau, and I speak for

11 Michael Jackson.

12 A. Okay.

13 Q. If anything I ask you is not clear, please

14 don't answer. Just say, "I don't understand it,"

15 okay? And I'll try to rephrase it.

16 If you ever want to take a break, just say

17 so, and if Judge Melville lets you, you can. But I

18 don't want you to answer anything I ask you unless

19 it's very clear to you what I'm asking you and you

20 feel like you can answer it, okay?

21 A. Sounds good.

22 Q. So you know who I am, I'm on his side, okay?

23 A. Okay.

24 Q. We've never met before, right?

25 A. Correct.

26 Q. And we've never spoken before, right?

27 A. I don't think so.

28 Q. Okay. Now, the prosecutor mentioned the 4846

1 fact that your mother, at one point many years ago,  
2 went on the television show Hard Copy, right?

3 A. Correct.

4 Q. And at some point you learned about that,  
5 right?

6 A. At some point I learned about what?

7 Q. Your mom going on the television show Hard  
8 Copy?

9 A. At some point I learned about it, yes.

10 Q. Okay. And at some point you learned that  
11 she took \$20,000 to go on the T.V. show Hard Copy,  
12 correct?

13 A. No.

14 Q. You don't know anything about that?

15 A. I do not.

16 Q. You've never heard that to date?

17 A. I have heard of it today.

18 Q. When did you first learn that your mother  
19 have gone on the T.V. show Hard Copy and accepted  
20 \$20,000?

21 A. Right now. Well, it may actually -- two  
22 days ago, I think.

23 Q. You never knew it until two days ago?

24 A. That is correct. The reason....

25 Q. Now, at some point, your mother met with  
26 someone from The National Enquirer, right?

27 A. I don't know.

28 Q. You don't know anything about that? 4847

1 A. No.

2 Q. When did you first learn that your mom had  
3 gone on the T.V. show Hard Copy to talk about Mr.  
4 Jackson?

5 A. When did I first learn --

6 Q. Yes.

7 A. -- that my mom went on T.V.?

8 Q. Yes.

9 A. On Hard Copy?

10 Q. Yes.

11 A. I think it was when I saw it on T.V.

12 Q. And that would have been when?

13 A. I have no clue.

14 Q. Do you have any idea what year?

15 A. No.

16 Q. Does more than ten years ago sound right to  
17 you?

18 A. If you told me five years ago, I'd say okay.

19 This whole past -- all these incidents, yeah.

20 Q. Now, your mother at some point retained  
21 lawyers to represent you and she, correct?

22 A. I don't know if she got them. I don't think  
23 she did.

24 Q. Well, you were a -- really a little boy,  
25 right, when lawyers were suddenly with you?

26 A. I'm sorry?

27 Q. Weren't you very little, very young, when

28 lawyers started appearing? 4848



1 A. I was young when all of this stuff happened,  
2 yes.

3 Q. How old do you think you were when you first  
4 met a lawyer involving Mr. Jackson?

5 A. Were those two detectives lawyers?

6 Q. No. No, they're with the sheriff's --

7 A. They're just detectives?

8 Q. And you met them recently, haven't you?

9 A. No, I just met one of them right outside.

10 Q. Okay. One of the two detectives that first  
11 talked to you?

12 A. Yeah. We were talking about life.

13 Q. Okay. Now, when you first met them, you  
14 knew they were with law enforcement, right?

15 A. When I first met them?

16 Q. Yes.

17 A. I don't really know who they -- no, I  
18 don't -- I didn't think -- yes. I don't know.  
19 I didn't understand the question I guess.

20 Q. Okay. Just tell me if you don't understand  
21 a question.

22 A. Okay.

23 Q. You learned at some point your mother went  
24 on Hard Copy, correct?

25 A. I learned at some point that my mom went on  
26 Hard Copy.

27 Q. Yes.

28 A. Okay. 4849

1 Q. And you saw it on T.V., right?

2 A. Right.

3 Q. And at some point you learned that your  
4 mother accepted \$20,000 to be on Hard Copy, correct?

5 A. You already asked that.

6 MR. ZONEN: And I so object as asked and  
7 answered.

8 THE COURT: Sustained.

9 Q. BY MR. MESEREAU: When did you first, if you  
10 remember, talk to a lawyer about anything Mr.  
11 Jackson allegedly did?

12 A. What he -- when did I tell somebody or tell  
13 the lawyer? Repeat that.

14 Q. Yeah, when did you first meet a lawyer to  
15 talk about your claim regarding Mr. Jackson's  
16 behavior?

17 A. I don't remember.

18 Q. Do you know approximately when it was?

19 A. I think the only -- I don't think I ever  
20 told Terry or Kris if he molested me or not.

21 Q. Okay. Now, Terry is who?

22 A. Terry?

23 Q. Terry is the lawyer?

24 A. Terry is a lawyer.

25 Q. That's Terry Cannon, correct?

26 A. Correct.

27 Q. And Kris is who?

28 A. Kris -- I forgot his last name. He's a 4850

1 lawyer.

2 Q. You mentioned him in response to the  
3 prosecutor's questions. Didn't you say Kris was a  
4 lawyer?

5 A. I don't remember the prosecutor's questions.

6 Q. Do you have a lawyer named Kris?

7 A. Right now? No.

8 Q. Have you ever had a lawyer named Kris?

9 A. I believe so.

10 Q. And do you know Kris's last name?

11 A. That's what I just said. I don't remember.

12 Q. Okay. Now, did I hear you just say you  
13 never told either lawyer that you had been molested?

14 A. I don't -- I'm sorry?

15 Q. Did I hear you just say that you never told  
16 either lawyer you'd been molested?

17 A. I said I didn't know. That's what I said.

18 Q. You told the lawyers you didn't know?

19 A. No, I told you I didn't know.

20 Q. You told me you didn't know whether or not  
21 you had told any lawyer you'd been molested, right?

22 A. Not any lawyer.

23 Q. Okay. I'm not understanding you.

24 A. I'm not understanding you either.

25 Q. Let me rephrase the question.

26 A. Okay.

27 Q. Did you ever tell Attorney Terry Cannon

28 you'd been molested? 4851

1 A. Yes.

2 Q. And did you ever tell Attorney Kris you'd  
3 been molested?

4 A. Yes.

5 Q. Okay. Approximately when did you do that?

6 A. I don't remember. I was young.

7 Q. Do you know approximately what year it would  
8 have been?

9 A. I'd go with '94 or '93 or '95.

10 Q. And how old were you in '93?

11 A. I was 13. Well, yeah. My birthday's May  
12 30th, so --

13 Q. How old were you when you claim Mr. Jackson  
14 first tickled you improperly?

15 A. Seven and a half the first time.

16 MR. ZONEN: I'm going to object as vague  
17 when we're referring to the claim or the tickling.

18 MR. MESEREAU: I think I was -- I'll  
19 rephrase it if the Court wants me to. I think I was  
20 clear.

21 THE COURT: The objection's overruled. The  
22 answer was given.

23 Q. BY MR. MESEREAU: Are you telling the jury  
24 that at some point -- excuse me. Let me start  
25 again.

26 As of today, you're telling this jury you've  
27 never told your mother what you claim Mr. Jackson

28 did to you, right? 4852



1 A. I believe in counseling. I never told her  
2 specifics on -- that I was molested, but I did in  
3 counseling tell her that I was molested.

4 Q. Okay.

5 A. But it was in -- shoot. It was a crying  
6 time for --

7 Q. Okay. I'm not asking you about the details.

8 Just answer my questions.

9 A. It was just hard for me to remember because  
10 I was crying.

11 Q. Okay.

12 A. So -- I was young, and I was 14 or 15.

13 Q. So when you told the jury earlier that you  
14 never told your mother about this, that wasn't true,  
15 right?

16 A. I'm sorry, I probably spoke quickly.

17 Q. So when you told that to the jury, that was  
18 not really correct, right?

19 MR. ZONEN: I'm going to object as vague.

20 What is "not," or "that"?

21 THE COURT: The objection's overruled.

22 I'll have the court reporter read the  
23 question back to you.

24 THE WITNESS: Okay.

25 (Record read.)

26 THE WITNESS: And when I told "that" being --

27 Q. BY MR. MESEREAU: Let me rephrase it.

28 When you told the jury, in response to the 4853

1 prosecutor's questions, that you had never told your  
2 mother you were molested, that wasn't true, right?

3 A. I was mistaken.

4 Q. Okay.

5 A. Yeah.

6 Q. Okay. In fact, you had told your mother  
7 that you were molested, right?

8 A. Yeah, I must have misunderstood his question  
9 with the -- with the details of it. I never told my  
10 mom that I was molested three times by Michael  
11 Jackson. My mom, I don't even think to this day,  
12 knows that I was molested three times and the  
13 specifics of it. If she does, then she does, and  
14 that sucks.

15 Q. Your mother went on the T.V. show Hard Copy  
16 in the early '90s, right?

17 A. Okay. I --

18 Q. Do you know if that's true?

19 A. She was on Hard Copy.

20 Q. She was on Hard Copy in 1993, was she not?

21 A. If you told me '94, I'd agree. I don't  
22 know. I don't know the exact year. I do not.

23 Q. Are you telling the jury that before your  
24 mother went on Hard Copy, you never discussed what  
25 you claim Mr. Jackson did to you with your mother?

26 A. Yeah, I'm pretty sure that I never told my  
27 mom that he molested me before Hard Copy.

28 Q. And before sheriffs came to talk to you for 4854

1 the first time, had you told anyone that you had  
2 been molested by Michael Jackson?

3 A. I don't think so, no.

4 Q. They just kind of came one day and surprised  
5 you?

6 (Laughter.)

7 A. Yeah.

8 THE COURT: Just a moment, Counsel.

9 (To the audience) I'm not going to put up  
10 with that.

11 THE WITNESS: Thanks.

12 THE COURT: If there's any laughing again,

13 I'll remove people from the courtroom.

14 Go ahead, Counsel.

15 MR. MESEREAU: Thank you, Your Honor.

16 Q. You have -- you all right?

17 A. Yeah. I was just a little tense. Sorry.

18 Q. You have reviewed the tape and transcript of  
19 your first interview with the sheriffs, correct?

20 A. Yes.

21 Q. And when did you review that interview?

22 A. Like when did I listen to the tapes again?

23 Is that what you're asking?

24 Q. Yes.

25 A. Sunday.

26 Q. And how did you get the tape?

27 A. Chris - I don't know his last name - gave

28 them to me. 4855

1 Q. Is that the lawyer?

2 A. No. He's not a lawyer, I don't think.

3 Q. Is he a sheriff?

4 A. It's a tall man.

5 Q. Is he a sheriff?

6 A. I don't know. I believe so.

7 Q. How did you run into him?

8 A. I met him when I met all these gentlemen.

9 Q. The prosecutors?

10 A. Correct.

11 Q. Okay. So Chris was with the prosecutors

12 when you met them last, right?

13 A. I'm sorry?

14 Q. Chris was with the prosecutors when you

15 spoke to the prosecutors, correct?

16 A. Yes.

17 Q. And Chris gave you a tape of your interview

18 from 1993, correct?

19 A. I believe that's the year, yes.

20 Q. And if you remember, who was at that

21 interview in 1993?

22 A. I don't remember. Two men. Detectives, I

23 believe.

24 Q. And where did it take place?

25 A. I already answered that to him.

26 Q. Would you please answer it again for me?

27 Where did it take place?

28 A. At the sheriff's station, or the probation -- 4856



1 I think it was the sheriff's.

2 Q. Was that in Santa Maria?

3 A. In Orcutt.

4 Q. In Orcutt, okay.

5 You were given a copy of the tape to listen

6 to, right?

7 A. Right.

8 Q. And you were given a transcript of the tape

9 to read, right?

10 A. Yeah.

11 Q. And you did that, right?

12 A. Yeah.

13 Q. And a Detective Russell Birchim from the

14 Santa Barbara County Sheriff's Department was

15 present for that interview, right?

16 A. I don't remember his name.

17 Q. Would it refresh your recollection if I just

18 show you a copy of the transcript?

19 MR. ZONEN: I'll object as to which

20 interview. Talking about the 1993 one, or the

21 recent one where he reviewed the transcript?

22 MR. MESEREAU: I'm talking about the 1993

23 one.

24 MR. ZONEN: I'm sorry.

25 Q. BY MR. MESEREAU: Let's get back to the 1993

26 interview.

27 A. Okay.

28 Q. You have recently reviewed a transcript of 4857

1 that interview, right?

2 A. In the '93 interview?

3 Q. Yes.

4 A. The tape and the transcript?

5 Q. Yes.

6 A. Have I reviewed them both?

7 Q. Yes.

8 A. Didn't I answer you that already?

9 Q. Would you please clarify it? Because

10 there's been some confusion.

11 A. Yes, I have.

12 Q. You have listened to the tape and you've

13 read the transcript, right?

14 A. Correct.

15 Q. But as you sit here today, you're not sure

16 who was at the interview with you in 1993, right?

17 A. I was 13 years old.

18 Q. Would it refresh your recollection if I show

19 you a copy of the transcript with the names of the

20 people who were with you?

21 A. Sure.

22 MR. MESEREAU: May I approach, Your Honor?

23 THE COURT: Yes.

24 MR. MESEREAU: Thank you.

25 THE WITNESS: Okay.

26 Q. BY MR. MESEREAU: Have you had a chance to

27 look at that transcript? Mr. Francia, have you had

28 a chance to look at the transcript I just showed 4858

1 you?

2 A. Yes.

3 Q. Okay. Did it refresh your recollection

4 about who was there for that interview?

5 A. Yeah. I just read it. It said Vince and

6 Russell.

7 Q. Vince Neglia and Russell Birchim, right?

8 A. Correct.

9 Q. Okay. Okay. Now, did someone tell you to

10 review that transcript before you testified?

11 A. Yes.

12 Q. Who told you to review that transcript

13 before you testified?

14 A. I'm under some pressure. Mark -- it's not

15 Mark. It's Russ. I'm so bad with names.

16 Q. Is it Prosecutor Zonen, who just asked you

17 questions?

18 A. Yes.

19 Q. Okay. Okay. Did he tell you you'd be asked

20 questions about that?

21 A. About --

22 Q. What you said in that interview in 1993?

23 A. Yes.

24 Q. Okay. Did he tell you to study it carefully

25 and make sure you knew what you said and didn't say,

26 right?

27 A. Actually, he didn't say, "Study it

28 carefully." 4859

1 Q. Did he tell you to read it?

2 A. He told me to review it.

3 Q. Okay. Okay. Now, you were how old when you  
4 were interviewed in 1993?

5 A. I think on that, it says the date. I could  
6 tell you the -- I could tell you how old I was.

7 Q. Okay. The date was November 4th, 1993.

8 A. I was 13.

9 Q. 13. Okay. Is that the first time you were  
10 ever interviewed by any police officer regarding  
11 Michael Jackson?

12 A. Yes.

13 Q. Okay. Now, you told the police that you and  
14 Mr. Jackson were talking to one another in that  
15 hideout area, right?

16 A. I -- I was kind of banging my -- I told the  
17 police that I was --

18 Q. Talking to Mr. Jackson at a place you  
19 described as the hideout.

20 A. Yes, I have talked to Jackson at the place,  
21 at the hideout.

22 Q. And that was a place where Mr. Jackson used  
23 to go when he didn't want the public or the press or  
24 anyone knowing he was there, true?

25 A. I'm assuming that.

26 MR. ZONEN: Objection as speculative.

27 THE COURT: Just --

28 Q. BY MR. MESEREAU: Did Mr. Jackson ever tell 4860



1 you --

2 THE COURT: I haven't ruled on it.

3 MR. MESEREAU: Oh, I thought you had, Your  
4 Honor. Sorry.

5 THE COURT: I'll allow the question, and the  
6 answer was, "I assume that."

7 Go ahead, Counsel.

8 Q. BY MR. MESEREAU: Did Mr. Jackson tell you  
9 that this was a place that he didn't want the public  
10 or the press following him to?

11 A. I don't know.

12 Q. Okay. All right. In that interview, you  
13 told the police that you were sitting on Mr.  
14 Jackson's lap, right?

15 A. I'm sorry?

16 Q. In that interview, you told the police you  
17 were sitting on Mr. Jackson's lap, correct?

18 A. In the '93 11 -- is that this one that  
19 you're reviewing right now?

20 Q. Yes.

21 A. The one you showed me? Yes.

22 Q. Yes. And you told them that at one point,  
23 he started tickling you and you started tickling  
24 him, right?

25 A. Yeah.

26 Q. And then you told the police, "I have this  
27 blackout. I can't remember anything else," right?

28 A. Yeah. I -- I tried to black everything out. 4861

1 Q. I understand. But I just want to go forward  
2 and ask you some questions about it.

3 A. Oh, okay.

4 Q. But on that particular date, you told the  
5 police that you had blacked everything out after you  
6 and Mr. Jackson started tickling, right, tickling  
7 each other, correct?

8 A. Yeah.

9 Q. Okay. You told the police you knew that  
10 Michael Jackson had a reputation of being nice to  
11 kids, right?

12 A. I'm sorry?

13 Q. You told the police that Mr. Jackson had a  
14 reputation for being very nice to kids, right?

15 MR. ZONEN: Objection; hearsay.

16 THE COURT: Sustained.

17 Q. BY MR. MESEREAU: What did you tell the  
18 police about Mr. Jackson's reputation?

19 MR. ZONEN: Objection; irrelevant.

20 THE WITNESS: I don't remember.

21 MR. ZONEN: And hearsay.

22 THE COURT: Sustained.

23 Q. BY MR. MESEREAU: You were in that apartment  
24 because your mother brought you there, right?

25 A. My mom did bring me there to the hideout.

26 Q. She brought you there and she was working in  
27 the apartment, correct?

28 A. Yeah. 4862

1 Q. And how many rooms do you remember there  
2 being in that apartment?

3 A. I remember one, but I could be mistaken.

4 Q. The first time you claim you were improperly  
5 tickled, was that on a chair?

6 A. Yeah.

7 Q. And that was when your mom was cleaning the  
8 apartment, correct?

9 A. She wasn't in the room.

10 Q. She wasn't in the room then?

11 A. She was not in the room with me.

12 Q. You sure of that?

13 A. Yeah.

14 Q. Well, you told the police you had a blackout  
15 and didn't remember anything after -- after you and  
16 Mr. Jackson were tickling each other, right?

17 A. I blocked it out. I didn't blank it out.

18 I just didn't never want to repeat that stuff again.

19 Q. Okay. Do you remember, in one of your  
20 police interviews, the police telling you, "This is  
21 what happened, right?" And you said, "Well, I'll  
22 have to work on that"? Do you remember using words  
23 like that?

24 A. No.

25 Q. Okay. Have you looked at the transcripts of  
26 both your police interviews?

27 A. No.

28 Q. Okay. Just looked at the one in '93? 4863

1 A. I believe so.

2 Q. Okay. Okay. Now, you told the police you  
3 didn't want to sit on the floor, right?

4 A. I don't know what you're talking about right  
5 now.

6 Q. Did you ever tell the police you wouldn't  
7 want to sit on Mr. Jackson's floor?

8 A. Are you talking about the hideout?

9 Q. Yes.

10 A. I -- yeah, I remember -- I don't remember  
11 saying that. I remember hearing that on the tape.

12 Q. You did hear it on the tape, right?

13 A. Yeah.

14 Q. And it's your voice, right? Right?

15 A. Yeah.

16 Q. Okay. You told the police....

17 Let's talk about the first incident you  
18 claim happened, okay?

19 A. Okay.

20 Q. Now, you claim you both were clothed,  
21 correct?

22 A. Yes.

23 Q. You claim you were sitting in Mr. Jackson's  
24 lap, right?

25 A. On one leg, yeah.

26 Q. Okay. And you claim he started tickling  
27 you, right?

28 A. Right. 4864



1 Q. You tickled back, correct?

2 A. Yeah.

3 Q. And you were watching cartoons, right?

4 A. Yeah.

5 Q. Had you ever watched cartoons with Mr.

6 Jackson before?

7 A. I don't remember.

8 Q. Had you ever watched cartoons with him in

9 Encino?

10 A. I'm sorry?

11 Q. Had you ever watched cartoons with Mr.

12 Jackson in Encino?

13 A. I don't remember.

14 Q. Okay. Do you remember either Mr. Jackson

15 tickling you or tickling him at the home in Encino?

16 A. I don't remember any of that in Encino.

17 Q. Where was your mother, if you know, when you

18 say you were improperly tickled?

19 A. I don't.

20 Q. Did she come back at some point?

21 A. I had to have left there with my mother, so

22 I think she did.

23 Q. And how old were you on that particular day?

24 A. I answered that already, and I thought seven

25 and a half. Seven, eight.

26 Q. Okay. You told the jury that you tickled

27 each other and then you went to the floor and you

28 don't remember after that, correct? 4865

1 A. I don't remember after what?

2 Q. You went to the floor.

3 A. I don't remember after he was playing with  
4 my balls.

5 Q. Well, that's what you said later on.

6 Earlier interviews you denied that, didn't you?

7 MR. ZONEN: I think we're vague now.

8 THE WITNESS: Yeah.

9 MR. ZONEN: I'll object as vague.

10 THE COURT: Sustained.

11 Q. BY MR. MESEREAU: Early in your interviews,  
12 you denied being touched in your private areas,  
13 didn't you?

14 A. Yeah. I was scared.

15 Q. They were pretty long interviews, weren't  
16 they?

17 A. I believe so. Yeah, they were. They were  
18 long in my time. To a kid, an hour's a long time.

19 Q. Do you remember in your first police  
20 interview in 1993 telling the police, "I'll just say  
21 this out flat. I don't remember him trying anything  
22 with me except for the tickling"? Do you remember  
23 that?

24 A. Do I remember saying that?

25 Q. Yes.

26 A. No. But I've heard that on the voice.

27 Yeah, I was fighting them with everything I had.

28 Q. I understand. I understand. You told the 4866

1 police that at that apartment there was a humongous  
2 T.V., right?

3 A. In what apartment?

4 Q. Mr. Jackson's apartment, where you say you  
5 were improperly tickled, right?

6 A. The hideout?

7 Q. That's what you call the hideout. I'm  
8 calling it the apartment. You call it the hideout,  
9 right?

10 A. Okay. My mom called it the hideout. That's  
11 why I called it the hideout.

12 Q. You told the police in 1993 there was a  
13 humongous T.V., right?

14 A. I don't know.

15 Q. You said, "It was 46-inch, something like  
16 it"?

17 MR. ZONEN: I'm going to object as to  
18 hearsay.

19 THE WITNESS: I don't know.

20 THE COURT: Just a moment.

21 Sustained.

22 You need to wait until I rule on the  
23 objection.

24 THE WITNESS: Oh, sorry.

25 THE COURT: Go ahead.

26 Q. BY MR. MESEREAU: Do you remember telling  
27 the police in that interview, "We started tickling

28 each other and my mom just grabbed me and, 'Let's 4867

1 go' "?

2 A. I don't remember.

3 Q. Would it refresh your recollection if I just

4 show you a page of it?

5 A. Probably would.

6 MR. MESEREAU: May I approach, Your Honor?

7 THE COURT: You may.

8 MR. ZONEN: What page?

9 MR. MESEREAU: It would be page 26.

10 MR. ZONEN: Thank you.

11 THE WITNESS: Okay. I see that.

12 Q. BY MR. MESEREAU: Have you had a chance to

13 look at that? Does it refresh your recollection

14 about what you told the police in that interview?

15 A. No, not really.

16 Q. Well, on a number of occasions, you told

17 them, "We tickled each other and then I left,"

18 didn't you, words to that effect?

19 A. Yeah. Again, I was fighting with everything

20 I had.

21 Q. I'm not asking you what you were doing. I'm

22 just asking if that's true, okay? On a number of

23 occasions, you said, "We just tickled each other and

24 then I left," right?

25 A. Okay.

26 Q. Is that correct?

27 A. Yes. And then I also told them that he

28 molested me. 4868



1 Q. On many occasions in that interview you  
2 denied being molested, didn't you?

3 A. Yeah, at first.

4 Q. And the police kept leaning on you to admit  
5 you had been molested, true?

6 A. It wasn't like a twisting the arm. It  
7 was -- I was again fighting. I didn't want to be  
8 embarrassed at school. I didn't want to be  
9 embarrassed anywhere. I was 13.

10 Q. So you were lying to the police?

11 A. Yeah. I was at first.

12 Q. Okay. Now, shortly after this -- let me  
13 rephrase that.

14 How long after this did you and your mother  
15 get lawyers and threaten to sue Mr. Jackson; do you  
16 know?

17 MR. ZONEN: Objection as compound, "you and  
18 your mother." And vague.

19 THE COURT: Sustained. Compound.

20 Q. BY MR. MESEREAU: Do you remember in that  
21 interview being asked, "Is Mr. Jackson  
22 touchy-feely?" And you said, "I don't remember.  
23 I distinctly don't remember"?

24 A. I don't remember that interview.

25 Q. Would it refresh your recollection if I show  
26 you that page?

27 A. If you show me the page, I'm still not going

28 to remember. 4869

1 Q. Well, you've --

2 A. I could -- if it says on the transcript,  
3 then I'll say, okay, I said it when I was younger.  
4 But I don't remember right now.

5 Q. But you've listened to the tape and read the  
6 transcript to prepare for today, correct?

7 A. This is pretty nerve-racking being here  
8 right now, so for me to say I'm prepared for this?  
9 I'm not prepared for this.

10 Q. Well, I do have to ask you questions, you  
11 understand that?

12 A. I totally understand.

13 Q. Okay. Now, you told police in that  
14 interview, they asked you if Mr. Jackson was  
15 touchy-feely, and you said, "I don't remember. I  
16 distinctly don't remember." Remember that?

17 A. Do I remember that? No, I don't remember  
18 that.

19 Q. Might it refresh your recollection if I just  
20 show you that page?

21 A. We just did this again.

22 MR. ZONEN: Objection; asked and answered.

23 THE COURT: Sustained.

24 Q. BY MR. MESEREAU: Remember telling the  
25 police you just remember the tickling; it was fun?

26 A. It was fun to be tickled, to laugh. That's  
27 fun.

28 Q. Okay. That's what you told the police in 4870

1 that interview, correct?

2 A. What I'm telling you right now is that it's  
3 fun to laugh. I don't know what I told them.

4 Q. Might it refresh your recollection if I just  
5 show you a page of transcript?

6 A. I'll agree with it if it says it on there,  
7 but I -- to remember that all right now, I don't  
8 remember.

9 Q. You told the police Mr. Jackson never kissed  
10 you, right?

11 A. I remember saying that. I remember hearing  
12 that on the tape.

13 Q. And you told them that he just hugged you  
14 goodbye when you left with your mom, right?

15 A. At first. I believe that's in the very  
16 beginning of the transcript.

17 Q. You were asked if you had met Brooke Shields  
18 by the police. Do you remember that?

19 MR. ZONEN: Objection; hearsay.

20 THE COURT: Sustained.

21 Q. BY MR. MESEREAU: Did you ever meet Brooke  
22 Shields?

23 MR. ZONEN: Objection; irrelevant.

24 THE COURT: Overruled.

25 You may answer.

26 THE WITNESS: Heck if I know.

27 Q. BY MR. MESEREAU: Do you remember whether or

28 not Mr. Jackson was dating Brooke Shields at that 4871

1 point in his life?

2 MR. ZONEN: Objection; speculative.

3 THE COURT: You may answer.

4 THE WITNESS: When I was --

5 THE COURT: The question is, do you know?

6 Just "yes" or "no."

7 THE WITNESS: Okay. I don't know.

8 Q. BY MR. MESEREAU: Now, at this point, do you  
9 know whether or not you've ever obtained money from  
10 Mr. Jackson?

11 A. One more time.

12 Q. At this point in time, do you know whether  
13 or not you've ever obtained money from Mr. Jackson  
14 other than what you just described?

15 A. Other than the money that he put down my  
16 pants?

17 Q. Yes.

18 A. Yes.

19 Q. At some point you and your mother settled a  
20 case with Mr. Jackson, correct?

21 A. I don't remember signing papers.

22 Q. You're how old today?

23 A. I'm 24.

24 Q. And you're telling the jury you don't know  
25 whether you and your mother ever reached a financial  
26 settlement with Mr. Jackson?

27 A. There was a financial settlement.

28 Q. Okay. And when did you learn about that? 4872



1 A. I believe I was 17.

2 Q. Do you remember signing documents in that?

3 A. At 17, I don't remember.

4 Q. Okay. Do you remember looking at that  
5 agreement?

6 A. At 17, I did not look at that agreement.

7 Q. And now, at 17, you knew that your mother  
8 had already gone on television attacking Mr.  
9 Jackson, right?

10 A. When she was on Hard Copy, is that what  
11 you're talking about?

12 Q. Yes.

13 A. Yes. At 17, I heard she had already been on  
14 Hard Copy.

15 Q. And at some point she met with Attorney  
16 Larry Feldman, did she not?

17 A. I don't know.

18 Q. Okay. But at 17, you certainly knew that  
19 your mother had hired attorneys who were threatening  
20 to sue Mr. Jackson if they didn't get some money,  
21 right?

22 A. No, I do not.

23 Q. Didn't know anything about that at 17?

24 A. Call me a stupid kid. I didn't know.

25 Q. Okay. But you certainly learned about it at  
26 some point?

27 A. Yeah. I learned about it at some point.

28 Q. Which did you learn about the fact that your 4873

1 lawyers were threatening to go public and sue Mr.

2 Jackson unless you and your mother got money?

3 A. All of that stuff I don't know about. I

4 knew that there was a settlement. I don't know how

5 they fought, or what they argued about, or what they

6 talked about.

7 Q. You've never discussed it with your mom?

8 A. About -- I have never discussed what, the

9 settlement?

10 Q. Yes.

11 A. Yes, I have.

12 Q. Have you ever discussed how the settlement

13 came about with your mom?

14 A. No.

15 Q. Okay. Okay. And do you remember reading a

16 settlement document?

17 MR. ZONEN: Objection; asked and answered.

18 THE COURT: Sustained.

19 Q. BY MR. MESEREAU: You were asked to sign a

20 settlement document at some point, right?

21 A. Probably.

22 Q. And in that document, Mr. Jackson denied

23 doing anything wrong, correct?

24 MR. ZONEN: Objection; assumes facts not in

25 evidence.

26 THE COURT: Sustained.

27 Q. BY MR. MESEREAU: Do you know whether or not

28 in that settlement document you signed Mr. Jackson 4874

1 denies ever doing anything wrong?

2 MR. ZONEN: Objection. No evidence he  
3 signed it, he viewed a document or signed a  
4 document.

5 THE COURT: The objection is sustained. He  
6 said -- when you asked him if he signed it, he said,  
7 "Probably." So you haven't established that he  
8 signed it.

9 MR. MESEREAU: Okay.

10 Q. At the age of 24, and as you sit here today,  
11 you don't know if you ever signed a settlement  
12 document with Mr. Jackson?

13 A. That is correct.

14 Q. As you sit here today, at the age of 24, do  
15 you know if your mother ever signed a settlement  
16 document with Mr. Jackson?

17 A. I think she did.

18 Q. Do you know if any money has come your way  
19 through a settlement with Mr. Jackson?

20 A. Money has, yes.

21 Q. Okay. And when did you first learn about  
22 that?

23 A. I answered that I thought. At 17.

24 Q. Okay. And you've had many discussions with  
25 your mom about that, right?

26 A. No. We -- me and my mom have a weird  
27 relationship. Well, not a weird relationship. We

28 just don't talk about much stuff. 4875

1 Q. Okay. Do you remember constantly telling  
2 the people who interviewed you in 1993 that you  
3 didn't remember Mr. Jackson doing anything improper?

4 A. I don't remember now, but I -- in listening  
5 to the tapes, I remember when I was -- at first I  
6 was denying everything.

7 Q. You've told the police that he tickled you,  
8 you tickled him, you both laughed, and then you went  
9 home, right, early in the interview?

10 A. I think I told him that I blacked it out  
11 or -- yeah.

12 Q. And you told the police at one point as they  
13 tried to get you to say he had molested you, you  
14 said, "If I don't remember, I don't remember,"  
15 right?

16 A. Yeah.

17 Q. The police kept trying to tell you to say  
18 that Mr. Jackson put his hands somewhere that was  
19 improper, right?

20 A. No, they didn't.

21 Q. Do you remember these long paragraph  
22 questions where they'd say, essentially, "Admit to  
23 us he did something improper"?

24 A. They said, "If he did something, then tell  
25 us." That's what I remember. You could give me  
26 that, and I'll read it.

27 Q. Would it refresh your recollection if I show

28 you one of the paragraph questions they asked you? 4876



1 A. Well, this is -- I'm telling you what I  
2 remember. It's not going to change my memory.

3 Q. It's not going to change your memory to look  
4 at the transcript?

5 A. No. What I remember is them telling me, "If  
6 he did something, then tell us." And I was, "No,  
7 I'm not gay." I was fighting it again.

8 Q. You repeatedly told them, "I have nothing to  
9 tell you. I don't remember anything," right?

10 A. I'm sorry?

11 Q. You repeatedly told them you had nothing to  
12 tell them because you didn't remember anything  
13 improper?

14 A. In the very beginning, yeah.

15 Q. Yes. Now, in your response to the  
16 prosecutor's questions about the first time you say  
17 you were improperly touched - okay? -

18 A. Okay.

19 Q. -- did you say words to the effect, "At some  
20 point we were on the floor"?

21 A. I believe I did, yeah.

22 Q. Okay. And then you said, in response to the  
23 prosecutor's questions, "I can't remember anything  
24 after that," right?

25 A. I'm sorry?

26 Q. After saying that you went to the floor,  
27 earlier today --

28 A. Okay. 4877

1 Q. -- you then said, "I don't remember anything  
2 after that," correct?

3 MR. ZONEN: I'm going to object as asked and  
4 answered.

5 THE COURT: Sustained.

6 Q. BY MR. MESEREAU: Do you remember anything  
7 that happened after you went to the floor during the  
8 first time you say you were improperly touched?

9 A. Isn't that the same question that you just  
10 asked?

11 MR. MESEREAU: Your Honor, could the witness  
12 be instructed to respond?

13 MR. ZONEN: I'm not certain as to the --

14 THE COURT: Just a moment.

15 (To the witness) The problem we have is you  
16 don't get to object to his questions. If the  
17 District Attorney wants to object, he can. If the  
18 District Attorney doesn't object, then you just  
19 answer the question.

20 THE WITNESS: Okay.

21 THE COURT: Just a moment. I'll have the  
22 question read back.

23 MR. MESEREAU: Thank you, Your Honor.

24 THE WITNESS: Sorry.

25 (Record read.)

26 THE WITNESS: After he touched me? Like in  
27 my genitalia?

28 Q. BY MR. MESEREAU: Did you then go to the 4878

1 floor?

2 A. I thought we were already on the floor.

3 THE COURT: You're asking him a different  
4 question.

5 MR. MESEREAU: Okay.

6 Q. Do you want the first question? Do you want  
7 the first question read back again?

8 I'll start again, Your Honor.

9 THE COURT: Okay.

10 MR. MESEREAU: Okay.

11 Q. You said you were sitting in a chair with  
12 Mr. Jackson, right?

13 A. Okay. I was on his lap, yeah.

14 Q. You said you were tickling each other at one  
15 point, right?

16 A. Right.

17 Q. And at one point you said you went to the  
18 floor, correct?

19 A. Right.

20 Q. Were you tickling each other on the floor,  
21 as far as you remember?

22 A. As far as I remember, I believe so, yeah.

23 Q. And there was a lot of laughing going on,  
24 right?

25 A. Yeah. Yeah.

26 Q. And then at some point your mom came back,  
27 right?

28 A. Did I say that? 4879

1 Q. I'm just asking you.

2 THE COURT: Just answer.

3 THE WITNESS: No, I'm literally asking you.

4 No, I don't think I said that.

5 Q. BY MR. MESEREAU: Didn't she come back at

6 some point and then take you home?

7 A. She must have, yeah. She had to have taken

8 me home.

9 Q. In your interview in 1993, the police asked

10 you if Mr. Jackson rubbed your penis, and you said,

11 "No," correct?

12 A. Yeah.

13 Q. Right?

14 A. In the beginning, yeah.

15 Q. Well, pretty late in the interview, wasn't

16 it?

17 A. I have no clue.

18 Q. You said, "It was a tickling. He didn't rub

19 me there," correct?

20 A. Oh. Okay. If we're going that --

21 Q. Is that right?

22 A. Yeah, he was playing with my stuff, not

23 rubbing it. In a stroking manner.

24 Q. I know the point you're trying to make to

25 the jury, but I'm just asking you the facts, okay?

26 MR. ZONEN: I think that's argumentative.

27 THE COURT: Sustained.

28 Q. BY MR. MESEREAU: You told the police that, 4880



1 "He never rubbed me there. It was just a tickling,"

2 correct?

3 MR. ZONEN: Objection; asked and answered.

4 THE COURT: Overruled.

5 You may answer.

6 THE WITNESS: One more time.

7 THE COURT: I'll have the court reporter....

8 (Record read.)

9 THE WITNESS: I don't remember.

10 Q. BY MR. MESEREAU: Would it refresh your

11 recollection if I show you a transcript?

12 A. I don't remember. I'll say I don't

13 remember, but I'll agree with what the transcript

14 says.

15 Q. Okay. Well, I'm not trying to put words in

16 your mouth. Would you like to look at it?

17 A. Okay.

18 MR. MESEREAU: May I approach, Your Honor?

19 THE COURT: All right.

20 MR. ZONEN: What page, Counsel?

21 MR. MESEREAU: 45.

22 MR. ZONEN: Thank you.

23 THE WITNESS: Okay.

24 Q. BY MR. MESEREAU: Have you had a chance to

25 look at that transcript?

26 A. I did.

27 Q. Does it refresh your recollection about what

28 you told the police in that interview? 4881

1 A. No. But in reading it, it said, "Well,  
2 yeah" in the very beginning of that sentence.

3 Q. It says, "Well, yeah, he's not rubbing it,  
4 but tickling," right?

5 A. That's what it said, I believe.

6 Q. And you said it was on top of your pants; is  
7 that correct?

8 A. The first time --

9 Q. Yes.

10 A. -- that he molested me?

11 Q. The first time you say he molested you, you  
12 say it was on top of your pants, right?

13 A. Pants or shorts. My clothing.

14 Q. You said he never put his hands in your  
15 shorts, right?

16 A. Right now? Do I say he never -- no, he did  
17 it at the very end. The last time he molested me,  
18 he did put his hands in my shorts.

19 Q. Okay. We're talking about the first time.

20 A. The first time he didn't.

21 Q. Okay. And how much time elapsed, if you  
22 know, between the first time you say you were  
23 touched and the second time?

24 A. I'm guessing a year.

25 Q. And how much time elapsed between the second  
26 time you claim you were improperly touched and the  
27 third time?

28 A. I'm guessing two years. 4882

1 Q. Okay. So let me just, for the record, get  
2 your ages each time. The first time you were around  
3 seven, right?

4 A. Sounds about right. Seven, seven and a  
5 half.

6 Q. The next time you were around eight?

7 A. Eight, eight and a half, or nine. Yeah.

8 Q. And the third time you're how old, do you  
9 think?

10 A. Ten, ten and a half.

11 Q. Okay. And did you have any contact with Mr.  
12 Jackson in between those three events you've  
13 described?

14 A. I believe I did.

15 Q. Now, let's talk about contact between the  
16 first event that you've described and the second.  
17 What kind of contact did you have with Mr. Jackson?

18 A. Actually, between the first time he molested  
19 me and the second time he molested me, I don't think  
20 there was contact between those two times.

21 Q. Now, has someone told you to make sure you  
22 use the word "molest" repeatedly in your testimony?

23 A. No.

24 Q. Have you discussed your testimony with any  
25 lawyer before you came in today?

26 A. No.

27 Q. Discussed it with your mom before you came

28 in today? 4883

1 A. No.

2 Q. Not at all?

3 A. Me and my mom?

4 Q. Yeah.

5 A. I haven't -- no. I haven't talked to her  
6 much.

7 Q. Does she know you're here today, to your  
8 knowledge?

9 A. Yeah, I think she does.

10 Q. You're not sure?

11 A. I'm pretty sure she does.

12 Q. Okay. Have you talked to her about it?

13 A. About me coming on the stand?

14 Q. Yes.

15 A. No, I have not.

16 Q. Okay. Now, the prosecutor asked you how  
17 long the tickling continued the first time, right?

18 A. Okay. Yes.

19 Q. But you didn't time how long the tickling  
20 continued?

21 A. No, I didn't have a stopwatch.

22 Q. You don't really know how long it continued,  
23 do you?

24 A. I could go by Woody Woodpecker, but -- I  
25 could go by cartoons, but I didn't have a -- I  
26 probably did have a watch on, but I didn't time it.

27 Q. You've told the police nothing happened skin

28 to skin, right? 4884



1 A. At first.

2 Q. Well, you still say nothing -- there was no  
3 touching skin to skin --

4 MR. ZONEN: Objection.

5 Q. BY MR. MESEREAU: -- in the first event,  
6 right?

7 MR. ZONEN: Withdraw the objection.

8 THE WITNESS: Are we talking -- yes, we are  
9 talking the first event, so -- correct?

10 Q. BY MR. MESEREAU: Yes. No skin-to-skin  
11 touching, correct?

12 A. Correct. I just sometimes get confused if  
13 you're talking first event, second event, third  
14 event.

15 Q. Unless I say otherwise, let's assume I'm  
16 talking about the first event. Okay?

17 A. Okay.

18 Q. Now, after that first event happened --

19 A. Okay.

20 Q. -- you claim you never told anyone about it,  
21 right?

22 A. Correct.

23 Q. After the second event happened, you claim  
24 you never told anyone about it, right?

25 A. After the second time it happened?

26 Q. Yes.

27 A. Yes, I did not.

28 Q. After the third time it happened, you claim 4885

1 you never told anyone about it, and then suddenly  
2 the police came one day, right?

3 A. Right.

4 Q. Okay. Between the first and the second  
5 event, how often did you see Michael Jackson?

6 A. Between the first and the second?

7 Q. Yes.

8 A. I thought I said none. I didn't think I saw  
9 him in between 1 and 2.

10 Q. You didn't see him at all?

11 A. I don't think so. I don't remember.

12 Q. Okay. I mean, your mother still was working  
13 for Mr. Jackson, right?

14 A. Yeah.

15 Q. And she used to clean his house, right?

16 A. Clean the mansion, yeah.

17 Q. And would you go over to the mansion with  
18 her, still, from time to time?

19 A. At times, yeah.

20 Q. Do you recall seeing Mr. Jackson anytime  
21 after -- or excuse me, between the first and the  
22 second event?

23 A. I don't recall it.

24 Q. Okay. The second event you've described --  
25 actually, let me go back to the first one.  
26 You said you don't remember how it felt, you  
27 were too young, right?

28 A. I'm sorry? 4886

1 Q. Yeah. Going back to the first event.

2 A. Okay.

3 Q. Correct me if I'm wrong, I think you said,

4 "I don't remember how it felt. I was too young,"

5 right?

6 A. I believe that's what I said, yeah. When he

7 was doing his interview or --

8 Q. Pardon me?

9 A. -- when he was asking me the questions?

10 Q. Yes. Yes.

11 A. Yeah.

12 Q. Okay. And you don't recall -- excuse me.

13 And the year you think that happened was

14 when? When do you think?

15 A. The first time?

16 Q. Yes, please.

17 A. I'm thinking '87, '88.

18 Q. '87, '88?

19 A. Yeah, around there.

20 Q. Okay. 17, 18 years ago, right?

21 A. Right.

22 Q. Okay.

23 A. Well, yeah.

24 Q. You said that you've done some therapy,

25 right?

26 A. That I've gone through counseling, yeah.

27 Q. Yes. And without going into what you said,

28 because that's confidential -- 4887

1 A. Okay.

2 Q. -- have you done anything, exercises or  
3 anything, to try and refresh your memory about what  
4 happened in '87 or '88?

5 A. No.

6 Q. Okay. And has any representative of the  
7 police department been involved in any of your  
8 counseling sessions?

9 A. No, I don't think so. Well, there was the  
10 one time that the -- that I first met Mr. Sneddon, I  
11 think that's his name. And it wasn't a counseling  
12 session. But Mike Craft, which was my counselor,  
13 was there.

14 Q. Was there with Mr. Sneddon present?

15 A. I think he was there, but I was 13.

16 Q. Okay. And to your knowledge, was Mr.  
17 Sneddon talking to your counselor?

18 A. I don't know.

19 Q. Okay. This is 12 years ago, approximately?

20 A. In '93.

21 Q. Okay. Okay.

22 A. Or '94.

23 Q. Okay. But you don't know what your  
24 counselor or Mr. Sneddon said to each other, right?

25 You wouldn't know?

26 A. I wouldn't know.

27 Q. Okay. Do you know how long Mr. Sneddon and

28 your counselor met? 4888



1 MR. ZONEN: Objection; assumes facts not in  
2 evidence, that they met.

3 THE COURT: Overruled.

4 You may answer.

5 THE WITNESS: I don't even know if they met.

6 I don't even -- well, they had to have met because  
7 they were in the same room, if they were in the same  
8 room. But I don't know.

9 Q. BY MR. MESEREAU: Do you know where they  
10 were in the same room?

11 A. Yeah, when they were in front of me.

12 Q. Do you know where that room was?

13 A. Yeah, it was in where I got my counseling.

14 It was my counselor's office.

15 Q. So Mr. Sneddon came to your counselor's  
16 office, correct?

17 A. That's what it -- I'm telling you this,  
18 because I think I remember meeting him there.

19 Q. Okay. Do you know if your counselor's been  
20 in touch with Mr. Sneddon?

21 A. I don't.

22 Q. Do you know if he's spoken to Mr. Sneddon at  
23 any time other than that day?

24 A. I don't.

25 Q. Okay. All right. Now, the second time you  
26 claim you were improperly tickled, you said you were  
27 lying on top of a sleeping bag, correct?

28 A. In or on, yeah. 4889

1 Q. Well, you told the police it was on top.

2 You were not in, right?

3 A. I think it says that on the transcripts.

4 Q. Okay. And that was a large sleeping bag

5 that took up most of the floor, correct, as far as

6 you remember?

7 A. I can't see a sleeping bag taking up the

8 whole floor in a room, now, because it's gigantic.

9 But I think I said that when I was younger.

10 Q. Okay. Do you remember mentioning Steven

11 Segall to the police?

12 A. Yeah, I do.

13 Q. And why did you Steven Segall?

14 A. Why did I mention him? I don't know.

15 Because I played pool against him, I think.

16 Q. Was that with Michael Jackson?

17 A. I think he was there.

18 Q. Okay. Was that at Neverland; do you know?

19 A. I think it was -- yeah, I'm pretty sure it

20 was at Neverland. It was at Neverland.

21 Q. Now, in the second event that you've

22 described, you also claim that there was no

23 skin-to-skin touching, correct?

24 A. On the second event, I don't -- yes, that is

25 what I claim.

26 Q. And what you said was that that also began

27 like tickling, correct?

28 A. Yeah. 4890

1 Q. Okay. You were tickling each other, right?

2 A. I'm sorry?

3 Q. You were tickling each other at that point?

4 A. Yeah, it started off with him tickling me.

5 Q. Okay. And that was at the -- what you call

6 the hideout as well, right, the second event?

7 A. Yes.

8 Q. Okay. Where was your mom at that point?

9 A. I don't know. Not in the room.

10 Q. Okay. All right. You're on the floor, and

11 you're in that position you described, right?

12 A. What -- when he's kind of spooning in and

13 holding me? Yeah.

14 Q. And he starts tickling you, right?

15 A. Correct.

16 Q. You tickle him back, right?

17 A. Probably.

18 Q. You're watching television, right?

19 A. Probably, yeah.

20 Q. Okay.

21 A. Yeah. Well, I mean -- I'm sorry. I am

22 watching T.V., but I don't know whether I'm tickling

23 him back or watching T.V.

24 Q. You're both laughing, right?

25 A. Probably.

26 Q. And then you say at some point he improperly

27 tickled you in your private area, correct?

28 A. Yeah, he did. 4891

1 Q. Do you remember telling the police it was --  
2 it was no more than a 30-second thing?

3 A. I don't remember that.

4 Q. Would it refresh your recollection if I show  
5 you a portion of the transcript of your police  
6 interview?

7 A. It wouldn't. I could look at it again, but  
8 it wouldn't make me remember.

9 Q. Do you want to give it a try?

10 A. Okay.

11 MR. MESEREAU: May I approach, Your Honor?

12 THE COURT: Yes.

13 Q. BY MR. MESEREAU: Have you had a chance to  
14 look at that page?

15 A. I did.

16 Q. Does it refresh your recollection about what  
17 you told the police?

18 A. No.

19 Q. You don't remember their asking you if it  
20 was just like a passing thing, and you said, "It's  
21 no more than a 30-second thing"?

22 THE COURT: Counsel, that's not how you  
23 refresh recollection. He said it didn't refresh his  
24 recollection.

25 MR. MESEREAU: Okay.

26 Q. Do you remember telling the police, when  
27 they asked you how long it was, you don't know, "We

28 were just laughing the whole time"? 4892



1 A. No, I don't remember that.

2 Q. Okay. Okay. Do you remember being asked if  
3 anything improper happened at the ranch, and you  
4 said, "I was around too many people"?

5 A. I'm sorry?

6 Q. Do you remember police saying to you, "Did  
7 anything improper ever happen at the ranch?" And  
8 you said, "I was around too many people"?

9 A. I remember hearing that on the tape.

10 Q. Okay. But you don't remember saying that?

11 A. I don't remember saying that.

12 Q. Do you remember hearing your voice say that  
13 on the tape?

14 A. Correct.

15 Q. And in that 1993 interview, when it came to  
16 talking about what happened at the arcade, you  
17 didn't know if he'd really touched you improperly,  
18 right?

19 A. I knew.

20 Q. Well, you kept responding, "I don't know,"  
21 and then you'd say, "If he really did touch, it was  
22 in the arcade"?

23 A. No --

24 Q. And you were asked, "Do you think he did  
25 it?" And you said, "I don't know"?

26 A. I knew.

27 Q. But you told the police you didn't know,

28 correct? 4893

1 A. I don't remember. If you bring that thing  
2 to me again, I'm going to -- yes.

3 Q. Would it refresh your recollection to look  
4 at it?

5 A. Yes, bring it over.

6 MR. MESEREAU: May I approach, Your Honor?

7 THE COURT: Yes.

8 THE WITNESS: You should just drop one off.

9 Okay.

10 MR. ZONEN: What page, Counsel?

11 MR. MESEREAU: That would be 57 and 58.

12 MR. ZONEN: Thank you.

13 THE WITNESS: Okay.

14 Q. BY MR. MESEREAU: Have you had a chance to  
15 look at those pages?

16 A. I did.

17 Q. Does looking at those pages refresh your  
18 recollection about what you have told the police --

19 A. No.

20 Q. -- in '93?

21 A. I was 13. Eleven years ago.

22 Q. You weren't even sure you were tickled at  
23 all. Remember that?

24 A. I don't remember that I -- I knew.

25 Q. Remember telling the police, "You guys are  
26 pushy"?

27 A. Yeah. I remember telling the police that.

28 Q. Okay. And after they kept pushing you, you 4894

1 finally said, "You know, I think he did tickle me,"

2 right?

3 A. No.

4 Q. Do you remember that? Do you remember at  
5 first saying you didn't know, and then after --

6 A. Yeah, I remember saying at first, "I don't  
7 know."

8 Q. And after telling the police, "You guys are  
9 pushy," you eventually finally said, "Yes, he  
10 tickled me," right?

11 A. I believe that's how it went.

12 Q. Okay. You kind of went back and forth  
13 during the interview, didn't you? One second you'd  
14 say, "He tickled me," and the next second you'd say  
15 you're not sure, right?

16 A. I was trying to figure out how to get out of  
17 there.

18 Q. I understand. And you remember exactly how  
19 you felt in 1993 during the interview, right?

20 A. The feeling of, yeah, crying and crappiness.

21 Q. Okay. Do you remember the police kept  
22 trying to get you to say he's a molester?

23 A. No.

24 Q. Would it refresh your recollection if I show  
25 you what one officer said to you about that?

26 A. Bring it over.

27 MR. MESEREAU: May I approach?

28 MR. ZONEN: Perhaps the witness could 4895

1 indicate whether it would refresh his recollection.

2 THE WITNESS: It wouldn't.

3 THE COURT: When he said "Bring it over,"

4 that sort of means like he'll see if it refreshes

5 his recollection.

6 THE WITNESS: Okay.

7 THE COURT: It's a shortcut. Go ahead.

8 MR. MESEREAU: Thank you, Your Honor.

9 THE COURT: We're down to the last seconds

10 here. Run.

11 (Laughter.)

12 MR. ZONEN: What page, Counsel?

13 MR. MESEREAU: 60.

14 MR. ZONEN: What line, please? It's not

15 numbered. Never mind.

16 MR. MESEREAU: Towards the bottom. Towards

17 the bottom.

18 THE WITNESS: Okay.

19 Q. BY MR. MESEREAU: You're 13 years old.

20 You're sitting there, and one officer said to you --

21 THE COURT: Wait a minute now. Are you going

22 to ask him if it refreshes his memory?

23 Q. BY MR. MESEREAU: Have you had a chance to

24 look at that transcript? Does it refresh your

25 recollection that an officer looked at you said --

26 THE COURT: Just a moment, Counsel.

27 MR. MESEREAU: Okay.

28 THE COURT: He said, no, it didn't refresh 4896



1 his recollection.

2 All right. This is the end of the day.

3 (Laughter.)

4 See you tomorrow.

5 THE COURT: Go to bed one hour early.

6 (The proceedings adjourned at 2:30 p.m.)

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1 REPORTER'S CERTIFICATE

2

3

4 THE PEOPLE OF THE STATE )

5 OF CALIFORNIA, )

6 Plaintiff, )

7 -vs- ) No. 1133603

8 MICHAEL JOE JACKSON, )

9 Defendant. )

10

11

12 I, MICHELE MATTSON McNEIL, RPR, CRR,

13 CSR #3304, Official Court Reporter, do hereby

14 certify:

15 That the foregoing pages 4702 through 4897

16 contain a true and correct transcript of the

17 proceedings had in the within and above-entitled

18 matter as by me taken down in shorthand writing at

19 said proceedings on April 4, 2005, and thereafter

20 reduced to typewriting by computer-aided

21 transcription under my direction.

22 DATED: Santa Maria, California,

23 April 4, 2005.

24

25

26

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



