



6989

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 WEDNESDAY, APRIL 20, 2005

20

21 8:30 A.M.

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23 (PAGES 6989 THROUGH 7054)

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

28 BY: Official Court Reporter 6989

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2

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1 I N D E X

2

3 Note: Mr. Sneddon is listed as "SN" on index.

4 Mr. Zonen is listed as "Z" on index. Mr. Auchincloss is listed as "A"  
on index.

5 Mr. Mesereau is listed as "M" on index. Ms. Yu is listed as "Y" on  
index.

6 Mr. Sanger is listed as "SA" on index. Mr. Oxman is listed as "O" on  
index.

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9 PLAINTIFF'S WITNESSES DIRECT CROSS REDIRECT RECROSS

10

11 BARRON, Brian 6992-A 7025-SA

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14

15 E X H I B I T S

16 FOR IN

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

18 300-335 Black notebook containing

19 Neverland Ranch logs 7004 7014

20

21

22

23

24

25

26

27

28 6991

1 Santa Maria, California

2 Wednesday, April 20, 2005

3 8:30 a.m.

4

5 THE COURT: Good morning.

6 COUNSEL AT COUNSEL TABLE: (In unison)

7 Good morning, Your Honor.

8 THE COURT: You may proceed.

9 MR. AUCHINCLOSS: Thank you, Your Honor.

10 People will call as our next witness Brian

11 Barron.

12 THE COURT: When you get to the witness

13 stand, remain standing.

14 Face the clerk and raise your right hand.

15

16 BRIAN BARRON

17 Having been sworn, testified as follows:

18

19 THE WITNESS: I do.

20 THE CLERK: Please be seated. State and

21 spell your name for the record.

22 THE WITNESS: Brian Barron, B-a-r-r-o-n.

23 THE CLERK: Thank you.

24

25 DIRECT EXAMINATION

26 BY MR. AUCHINCLOSS:

27 Q. Good morning, Mr. Barron.



28 A. Good morning. 6992

1 Q. Who do you work for, please?

2 A. Currently I work for the City of Guadalupe  
3 as a police officer.

4 Q. How long have you been a police officer?

5 A. About six and a half years.

6 Q. And for the City of Guadalupe that entire  
7 time?

8 A. Correct.

9 Q. At some time in your past, were you an  
10 employee of Neverland Ranch?

11 A. Yes.

12 Q. And what did you do for Neverland Ranch?

13 A. I was a security officer there.

14 Q. How long were you a security officer at  
15 Neverland?

16 A. For about five, five and a half years.

17 Q. Was that continuous or sporadic?

18 A. It was sporadic. It was over three periods  
19 of time.

20 Q. Can you characterize approximately what  
21 those three periods were?

22 A. I started in the fall of 1997. Worked for  
23 about a year. I was in the police academy at that  
24 time. I then got hired by Guadalupe Police  
25 Department. Left the ranch for about a year. And  
26 then went back again about nine or ten months after  
27 that, and was there for about three years, three and

28 a half years. 6993

1 Q. And when did you ultimately leave your  
2 employment at Neverland?

3 A. It was about April or May of last year.

4 Q. And whose decision was that to leave?

5 A. Mine.

6 Q. Tell me what your duties were as a security  
7 officer at Neverland Ranch.

8 A. Our duties consisted of the ranch itself,  
9 securing the ranch itself, the guests on the ranch,  
10 the owner of the ranch, and anything that had to do  
11 with the ranch as far as first aid, security.

12 Anything that we could do to help, we would do. But  
13 mostly it was to secure the ranch, the owner, and  
14 the guests that were there, the employees.

15 Q. Did you have set days and hours that you  
16 worked?

17 A. Generally, yes. Hours, yes. At times the  
18 days weren't always set, but hours, yes.

19 Q. So during your time working there, did you  
20 always work days or nights? Or you tell me.

21 A. Generally I worked nights for the entire  
22 time I was there.

23 Q. And tell me what a night shift would consist  
24 of.

25 A. Night shift would consist of 6 p.m. to 6:30  
26 a.m. And then we would do rotating shifts at the  
27 front gate. And then we would do -- which would be

28 about four hours per person at the gate. And then 6994

1 secure the ranch after you've done your -- before or  
2 after you've done your gate time.

3 Q. So if you would, if you can, give me a  
4 description of an evening of work at Neverland Ranch  
5 from the time that you check in to the time that you  
6 finish your evening's work and you go home. And I'm  
7 interested in particularly where you go, where you  
8 are on the ranch at various times.

9 A. Okay. If I were to get there at 6 p.m. and  
10 were to take the first shift at the gate, I would be  
11 at the gate from 6 p.m. till about 10:15. And that  
12 would be checking in and out people who are coming  
13 in and off the property, answering phones, doing  
14 whatever was necessary there.

15 Q. So when you'd come to work, there's a gate  
16 that is -- approximates the perimeter of the  
17 property, is that --

18 A. Correct.

19 Q. Or is that inside the property?

20 A. No, that would be the guard house at the  
21 front gate. So you'd come in the gate there and  
22 there's a guard.

23 Q. Okay. There's a house there, a guard house?

24 A. Yeah.

25 Q. And when you'd come to work, would you just  
26 check in at the gate and stay there, or would you go  
27 to the main house first and go back to the gate?

28 A. Sorry. We'd go to the main house first, get 6995

1 any pass-on information that was going to happen  
2 that we needed to know that had happened on the  
3 prior shift or the things that we needed to know  
4 from the oncoming shift. That would be just  
5 speaking with the officers who were there at the  
6 house office. Security office.

7 Q. And where is that located?

8 A. If you can imagine the entire house  
9 property, and if you were looking at it from the  
10 front, it would be on the far left. Sorry, it would  
11 be on the far left of the building. There's a main  
12 house, a walkway, Mr. Jackson's office, video  
13 library, and the security office.

14 Q. So the security office is contiguous to the  
15 main house structure?

16 A. By way of a breezeway.

17 Q. Okay. And access to the security office, is  
18 that an exterior door or an interior door?

19 A. It's an exterior door.

20 Q. Does it have any interior connection to  
21 other parts of that structure?

22 A. No.

23 Q. When you go in the security office, how many  
24 rooms are there?

25 A. There's two.

26 Q. And could you describe them for me?

27 A. First room would be -- had a desk in it.



28 Had a computer in it. So it technically had two 6996

1 desks in it, one on each side of the wall. There  
2 was a window that faced out towards the front  
3 property, the front lawn area of the house. And  
4 then as -- that would be basically the inside of  
5 that room. There was also in that room a grease  
6 board that we put pass-on information on, guest  
7 information on. And then as you go into the next  
8 room, it was basically a break room. There was  
9 lockers, refrigerator, and a table to eat on.

10 Q. What was the computer used for in the first  
11 room you mentioned?

12 A. Mostly what we used it for was generating  
13 our forms that we use on a daily basis, accident  
14 forms. It wasn't really used for much. We would  
15 create, like, reports on that computer, security  
16 reports, anything that had to do with us. If there  
17 was a -- you know, we noticed damage to something on  
18 the property, we would write it up on the computer  
19 there. But that was mostly what that computer was  
20 used for.

21 Q. All right. So moving back to our chronology  
22 of a day in the life of a security guard. You check  
23 with the main office. If you have gate duty, you go  
24 out to the gate. What next?

25 A. If you don't have gate duty, then you would  
26 start your regular patrols. First thing you would  
27 do when you got on the property was make sure --

28 you know, we would know who was there, if we had 6997

1 guests, if the owner was on the property. And we  
2 would check all of the doors around the house first.  
3 We'd do a check of the house area, make sure all the  
4 doors were locked, everything was in order. If  
5 buildings needed to be opened, that those buildings  
6 were opened around the house area. And then we  
7 would -- after completing that check, we would do a  
8 similar check to the rest of the properties on the  
9 residence, any other buildings on the residence.

10 Q. If you're on patrol, would you be doing  
11 continuous checks?

12 A. Hourly checks.

13 Q. And what would you be doing between those  
14 checks?

15 A. Stuff to keep busy. We did a lot of  
16 training. The fire department, they're trained  
17 regularly, and we would assist with that. We were  
18 all basically part of the same group.

19 Q. How many security guards are on duty during  
20 an evening shift?

21 A. When I was working there, it was between  
22 three and four.

23 Q. How many on a day shift?

24 A. About the same.

25 Q. And as far as the next thing you'd do in  
26 your evening's work, would you continue to do these  
27 security checks throughout the evening?

28 A. That's correct. 6998

1 Q. How many would you do in an evening?

2 A. If we did one an hour, 12. If we did more,  
3 just -- it would depend on need.

4 Q. Okay. And where would a security check take  
5 you on the property?

6 A. Everywhere.

7 Q. Would different officers check out different  
8 areas?

9 A. No. We'd check all -- being there would  
10 only be two of us at the house. If there was three  
11 of us working, there would be one of us at the gate  
12 and two of us at the house office. If there were  
13 guests or anyone on the property that was in -- at  
14 the house area, we would -- one of us would stay  
15 there, and the other one would check all the doors  
16 on the residence, all the buildings -- on the  
17 property, excuse me, everything.

18 Q. As far as checking the doors of the main  
19 residence, would you have -- did you have a key to  
20 the main residence?

21 A. Yes.

22 Q. And what door did that open?

23 A. The back door.

24 Q. Okay. As far as -- did -- the main  
25 residence has a punch card that can --

26 A. A key pad.

27 Q. -- that can give you access?

28 A. Like a telephone pad. 6999

1 Q. Did you have the code to that key pad?

2 A. No.

3 Q. Did you have the code to the key pad that  
4 gave access into Mr. Jackson's private suite?

5 A. No.

6 Q. Did any of the security guards, as far as  
7 you know?

8 A. Not that I'm aware.

9 Q. When you'd work in the security guard booth  
10 at the entrance to the property, tell me about what  
11 your duties would be there.

12 A. Duties there were generally letting people  
13 on and off the ranch. We had paperwork that would  
14 allow us -- that we would know ahead of time who was  
15 allowed to come on the ranch, whether that would be  
16 guests, or it would be general deliveries,  
17 contractors, things of that nature. We would know  
18 who was coming and who was supposed to be there for  
19 that day, so we would have those people come on and  
20 off.

21 We also checked in all the employees and  
22 checked out all the employees, times they were in,  
23 times they were out. Every time they came or left  
24 the property.

25 Answering phones was a large part of it.

26 The majority of the phone calls that came in,  
27 especially in the evening time, they all came



28 basically through us. 7000

1 Q. When you were conducting your duties as a  
2 security officer at Neverland, did you have occasion  
3 to see the owner of the property?

4 A. Yes.

5 Q. And that would be Mr. Jackson?

6 A. Yes.

7 Q. Is he seated to my right, the man with the  
8 black hair?

9 A. Yes.

10 Q. And how much would you see Mr. Jackson on  
11 the property, assuming -- let me strike that  
12 question.

13 How often would you see Mr. Jackson on the  
14 property during those times when he was visiting  
15 Neverland or staying at Neverland?

16 A. Daily. At least.

17 Q. Okay. And would you be able to see him --  
18 would you see him interacting with guests when they  
19 were on the property?

20 A. Occasionally.

21 Q. Would you ever talk to Mr. Jackson  
22 personally?

23 A. Only if I needed to.

24 Q. Okay. And how often would you have contact  
25 with him?

26 A. Not on a regular basis. Only if there was  
27 something pressing that he needed to know or we

28 needed to ask him. We tried to let him have his 7001

1 privacy when he was there.

2 Q. You mentioned forms that are prepared on the  
3 computer. Are there daily logs that are kept at  
4 Neverland?

5 A. Yes.

6 Q. What are the daily logs?

7 A. The daily logs that we kept at the  
8 gatehouse, where those logs were kept always, was  
9 the employee entry list, the daily activity list,  
10 which would include, like I said, anybody other than  
11 employees coming on and off the property, which  
12 would mean anything -- general contractors,  
13 deliveries, anything like that, any guests that were  
14 on the property.

15 Also our time checks for all of the -- we  
16 would call in the start of a check of the ranch, a  
17 security check, all the doors, and we would call in  
18 anything that would happen that we would find out of  
19 the ordinary and log that at the gate. And then the  
20 end of that check also.

21 Q. Were these logs used during the entire I  
22 believe four years that you said you worked there?

23 A. About five years. Yes.

24 Q. Five years you worked there?

25 A. They changed. At times they looked  
26 different, but they were basically the same.

27 Q. What about accident reports? You mentioned

28 those. How are they prepared? 7002

1 A. In the same fashion. We would -- initially  
2 we would let whoever was at the gate know that we  
3 found something or something had happened, somebody  
4 had wrecked one of the golf carts or fallen down,  
5 whatever the case may be. We would let -- either  
6 the gate would let us know, because they called the  
7 gate, or we would let the gate know, because we were  
8 notified at the house. And then we would prepare  
9 that form after the conclusion of whatever was going  
10 on.

11 Q. How often would you have to prepare accident  
12 reports?

13 A. Not often. I didn't prepare very many. The  
14 day shift usually prepared more, because more  
15 things -- there's more people, more activity on the  
16 ranch, more employees. More guest activity during  
17 the daytime generally. But, you know, a couple  
18 times a month.

19 Q. You mentioned they'd be prepared if a golf  
20 cart was wrecked?

21 A. Uh-huh.

22 Q. Would that be a common occurrence?

23 A. It happened -- it seemed to happen a lot  
24 more than it needed to, yeah.

25 Q. Why do you say that?

26 MR. SANGER: Objection, calls for  
27 speculation, Your Honor.

28 THE COURT: Sustained. 7003

1 Q. BY MR. AUCHINCLOSS: Okay. Was there --  
2 tell me, was there a difference in the attitude and  
3 demeanor of employees when Mr. Jackson was on  
4 property as opposed to when he was off?

5 A. Yes.

6 Q. How would you describe that?

7 A. Tense.

8 Q. Can you elaborate on that? Why would  
9 employees be tense?

10 A. Well, they would have to get there earlier  
11 usually. They'd have more work to do. He was --  
12 he's very -- at least the way I feel, is he's  
13 very -- like a perfectionist, everything has to be  
14 right. His property, his prerogative to be that  
15 way. But there was a lot more work to be done.  
16 Everybody just seemed to be walking on pins and  
17 needles a little bit more just to make sure things  
18 were right.

19 MR. AUCHINCLOSS: Madam Clerk, do we have a  
20 notebook with Exhibits 300, et seq.?

21 THE CLERK: Yes.

22 MR. AUCHINCLOSS: Thank you.

23 May I approach, Your Honor?

24 THE COURT: Yes.

25 Q. BY MR. AUCHINCLOSS: Mr. Barron, I show you  
26 a black notebook that appears to have numerous  
27 records in it. It is labeled as Exhibits 300



28 through 335. I'd like you to take a moment and look 7004

1 at that.

2 I don't really want you to look at every

3 exhibit, but --

4 A. That's all right.

5 Q. If you could just kind of thumb through it

6 quickly.

7 A. They look very familiar.

8 Q. All right. Have you looked at a notebook

9 like that?

10 A. Yes.

11 Q. And can you identify those records for me,

12 please?

13 A. Yes. They are the employee in-and-out logs,

14 the gate activity logs, and the daily entry access

15 logs.

16 Q. And are these the type of logs that you were

17 talking about when you said that you personally

18 would prepare records at Neverland?

19 A. They are the logs.

20 Q. Okay. Now, just to help us a little bit

21 with the various types of forms here, looking at

22 Exhibit No. 300, the first page, can you tell us

23 what that is, please?

24 A. That's an accident or damage report.

25 Q. All right. And is that the type of report

26 that would be prepared by a security officer in his

27 normal duties at Neverland Ranch?

28 A. Yes. 7005

1 Q. Did you yourself ever prepare these reports?

2 A. Yes.

3 Q. Does this look to be an authentic copy or an  
4 authentic document as far as an accident damage  
5 report?

6 A. Yes.

7 Q. Would these reports, the accident damage  
8 reports, be prepared in the normal course of your  
9 duties as a security officer at Neverland Ranch?

10 A. Yes.

11 Q. When would these reports be prepared in  
12 relation to the accident that they are describing?

13 A. Generally right after, or very soon after  
14 the -- whatever happened happened.

15 Q. And is the information -- does the person  
16 who prepares these reports have a duty to accurately  
17 describe what is in the report itself?

18 A. Yes.

19 Q. Moving on to Exhibit 301, it appears to  
20 be -- it appears to be a daily log.

21 A. Uh-huh.

22 Q. Is that, in fact, what it is?

23 A. Yes.

24 Q. And tell me what type of daily log this is.

25 A. This would be the employee in-and-out entry  
26 and exist list. So the time you were in and time  
27 you were out, if you were there overnight. You

28 notice there's "CO" here, carry-over, you were 7006

1 carried over from the midnight hour to the next day.

2 Q. Okay. And there are numerous names on  
3 there?

4 A. Yes.

5 Q. Are those the names of the employees at  
6 Neverland?

7 A. Yes.

8 Q. And the written in information, in and out,  
9 depicts the time that they checked in and the time  
10 they checked out?

11 A. Correct.

12 Q. Again, this is a report that's prepared in  
13 the ordinary course of your duties as a security  
14 officer?

15 A. Yes.

16 Q. And does the security officer have a duty to  
17 accurately record the information in this report?

18 A. Yes.

19 Q. And is it prepared at or near the time of  
20 the entries that are made?

21 A. At the time.

22 Q. Okay. Now, there appears to be a -- turning  
23 over page 301, on the back of it and on the next  
24 page there appears to be a report entitled "Daily  
25 Entry Access."

26 A. Correct.

27 Q. Tell me what that is.

28 A. That would be the entry and access of 7007

1 anybody who normally would come on the ranch. Most  
2 of these on the top part of it are deliveries, and  
3 then those on the bottom would be the guests who are  
4 on the ranch.

5 Q. Okay.

6 A. For that day.

7 Q. Again, the same question. Are those parts  
8 of your duties as an officer at the ranch?

9 A. Yes.

10 Q. And are they prepared at or near the time of  
11 the events recorded in that report?

12 A. At the time.

13 Q. And your duty is to prepare those reports  
14 accurately?

15 A. Yes.

16 Q. Okay. Now, I'm also seeing -- looking at a  
17 report now that is on the back page of Exhibit No.  
18 302.

19 A. Uh-huh.

20 Q. It's entitled "Gate Activity Log." Tell me  
21 what that is, please.

22 A. The gate activity log is, like I was  
23 explaining earlier, when something happens or  
24 there's some information that officers need to know  
25 or anybody else who may need to know, we would write  
26 it down on the gate activity log.

27 The top part of that paperwork is the



28 officer who was working the gate and the time that 7008

1 they were there. And then the center part is,  
2 again, that information that would be necessary for  
3 officers to know or to pass along to other people  
4 who are coming on and off the ranch, and that  
5 information is written down at the time it's given  
6 and then there's a time that it's given. If it  
7 says, "CO," which again is carry-over, that would  
8 mean that's something that needs to be on this list  
9 for an extended period of time, so that we're aware  
10 of it.

11 And then the bottom portion is the time we  
12 start our checks of the ranch, and then the time we  
13 finish the house checks, and then the exterior  
14 patrols also.

15 Q. Okay. I hate to be redundant, but I have to  
16 ask you the same questions. Is that prepared in the  
17 ordinary course of your duties as a security officer  
18 at the ranch?

19 A. Yes.

20 Q. Is it a document that is -- that your duty  
21 is to accurately describe the gate activity at the  
22 time that it is happening or contemporaneous with  
23 the information that's in that log?

24 A. Yes.

25 Q. And you yourself have filled these logs out  
26 and are familiar with how these are prepared?

27 A. Many of them, yes.

28 Q. All right. And I asked you previously if 7009

1 you had reviewed a book similar to this. There's  
2 one more page here that I think I'll ask you about.

3 Looking at 320, there is a security  
4 clearance and guest information form.

5 A. Correct.

6 Q. Tell me what that is.

7 A. That would be given to the gate. For  
8 instance, this one was given hopefully the day  
9 before, so it's June 18th of '02, telling us that  
10 the next day this gentleman would be coming onto the  
11 property, that did he not need to sign a  
12 confidentiality form, and then what he was going to  
13 be doing or where he needed to go.

14 Q. Okay. So before you'd let somebody on the  
15 ranch, would one of these have to be filled out if  
16 they were not already a guest or employee?

17 A. Yes.

18 Q. And were you notified beforehand whether to  
19 let a guest onto the property or not?

20 A. Yes.

21 Q. Would guests be allowed on the property if  
22 you did not have a form authorizing their admission?

23 A. No.

24 Q. Showing you Exhibit 333, there appears to be  
25 an emergency medical report.

26 A. Uh-huh.

27 Q. What is that, please?

28 A. That would be if someone was injured, one of 7010

1 the firefighters, who were for the most part all  
2 EMTs, would complete one of these forms for the  
3 ranch purposes to have record of whatever the  
4 accident -- where they had been injured had  
5 happened.

6 Q. Okay. And same questions there, duty to  
7 accurately prepare that information?

8 A. Yes.

9 Q. You're familiar with how that information's  
10 prepared?

11 A. Yes.

12 Q. You filled those out yourself?

13 A. I think maybe one I filled out for the EMT  
14 that was working on the person, just handwriting for  
15 them. I never did one of my own.

16 Q. These are prepared at or near the time of  
17 the event that's recorded?

18 A. Yes.

19 Q. And there's a duty to accurately depict the  
20 information on there?

21 A. Yes.

22 Q. And then I'm showing you lastly a Neverland  
23 Valley Medical Report Log. Have you ever seen one  
24 of those?

25 A. Yes.

26 Q. Tell me what that is.

27 A. That is a log of all the medical reports

28 that were done for the year. So all of them had 7011

1 their incident report number, the date, who took it,  
2 the time it was taken, the name of the person, what  
3 was -- what happened, the injury, and then what type  
4 of treatment they were given.

5 Q. Okay. The person filling that form out had  
6 a duty to prepare it accurately?

7 A. Yes.

8 Q. Prepared at or near the time of the act,  
9 condition or event that's depicted in the form?

10 A. Yes.

11 Q. And you're familiar with how those are  
12 prepared?

13 A. Yes.

14 Q. Okay. And then I'm showing you -- I don't  
15 think we've gone over one of these yet, have we?

16 A. Again, that's the same, it's just a  
17 different looking form. It's the blanket routine  
18 form, the guest form, and then ranch -- again, a lot  
19 of these forms changed. This is the same form as  
20 one of the earlier forms that we looked at.

21 Q. This is a form in Exhibit 335. It's on the  
22 back page of one -- well, on the second page, there  
23 appears to be one. So this is a similar form as far  
24 as guest activity?

25 A. It's the exact same, it's just written  
26 different.

27 MR. SANGER: Excuse me, Your Honor. 335 has



28 a number of pages, as far as I can tell. What page 7012

1 are we talking about?

2 MR. AUCHINCLOSS: I had said the second  
3 page. Turn the page over and it's on the back side  
4 of the first page.

5 MR. SANGER: May I approach, Your Honor?

6 I think the book that we were given may be out of  
7 order in 335.

8 THE COURT: Yes, go ahead.

9 MR. SANGER: Thank you.

10 MR. AUCHINCLOSS: Do you have 335? It  
11 should be the second page.

12 MR. SANGER: You have it on the back side.

13 MR. AUCHINCLOSS: We doubled it up.

14 MR. SANGER: All right. Thank you.

15 Q. BY MR. AUCHINCLOSS: So all the questions  
16 I'd asked you before would apply to this one as  
17 well --

18 A. Yes.

19 Q. -- that you've spoken about, guest activity  
20 logs and such?

21 A. Yes.

22 Q. Okay. And I previously asked you if you had  
23 a chance to review these records. Would your  
24 testimony be the same concerning all of the records  
25 that are contained in this notebook regarding the  
26 accuracy of the information, the duty to prepare  
27 accurate information? All these records were

28 prepared at or near the time of the events that were 7013

1 recorded?

2 A. Yes.

3 Q. And you're familiar with their method and  
4 mode of preparation?

5 A. Yes.

6 MR. AUCHINCLOSS: Your Honor, I'd ask that  
7 Exhibits 300 through 335 be admitted at this time.

8 MR. SANGER: And I take it they're offered  
9 as a business record.

10 MR. AUCHINCLOSS: They are.

11 MR. SANGER: I have no objection to that  
12 foundation.

13 THE COURT: All right. They're admitted as  
14 business records.

15 MR. AUCHINCLOSS: Thank you.

16 Q. Mr. Barron, you said when you were doing  
17 your daily duties, conducting your daily duties as a  
18 security guard, you'd have occasion to see Mr.  
19 Jackson on the property?

20 A. Yes.

21 Q. Would you have occasion to see him  
22 interacting with his guests?

23 A. Occasionally, yes.

24 Q. Would you have occasion to see guests when  
25 they weren't interacting with Mr. Jackson on the  
26 property?

27 A. Yes.

28 Q. Do you know an individual by the name of 7014

1 Frank Tyson or Cascio?

2 A. Yes.

3 Q. Who is Frank Tyson or Cascio?

4 A. From what I originally knew, he was a friend  
5 of the family -- of Mr. Jackson's family, or a  
6 friend of Mr. Jackson. His family, his parents and  
7 brothers and sister were friends. At some point I  
8 believe he became an employee of Mr. Jackson. What  
9 his exact duties were I don't really know. But he  
10 was -- at some point, he became an employee.

11 Q. And do you have a time frame for when he was  
12 an employee, approximate?

13 A. I would say probably around -- maybe around  
14 the year 2000, right around in there.

15 Q. Okay.

16 A. And whether he still is or is not, I don't  
17 know, but --

18 Q. Did Frank Cascio ever live at Neverland?

19 A. He stayed there a lot. Whether he lived  
20 there or not, as far as his primary residence, I  
21 don't know. But he was there quite often.

22 Q. Would he stay there longer than a month?

23 A. Yeah. At times I think he would, yes.

24 Q. Did you have occasion to observe his  
25 relationship with Mr. Jackson?

26 A. Not on a real personal level, between the  
27 two of them, no.

28 Q. Did you see them together? 7015

1 A. Yes.

2 Q. Would Mr. Cascio ever spend time in Mr.

3 Jackson's bedroom?

4 A. I have no idea.

5 MR. SANGER: Objection; calls for

6 speculation, Your Honor.

7 MR. AUCHINCLOSS: I'll withdraw that

8 question. And you can strike the answer, that's

9 fine.

10 MR. SANGER: So moved.

11 THE COURT: All right. So granted.

12 Q. BY MR. AUCHINCLOSS: Do you feel that you

13 could -- you have sufficient information to describe

14 their relationship?

15 A. Yes.

16 Q. And how would you describe their

17 relationship?

18 A. I would describe it --

19 MR. SANGER: I would object as no

20 foundation. I believe he said he didn't observe

21 their relationship.

22 THE COURT: Sustained.

23 Q. BY MR. AUCHINCLOSS: When you said you

24 observed them together, where would you observe

25 them?

26 A. Generally on the ranch, in the movie

27 theater. I'd seen them riding the quads on the



28 ranch before. Just doing general activities. In 7016

1 the park, I'd seen them in the park before, the  
2 theme park.

3 Q. How many times do you think you'd seen them  
4 before, approximately, if you can estimate?

5 MR. SANGER: I'm going to object as vague as  
6 to time.

7 Q. BY MR. AUCHINCLOSS: During the entire  
8 period of time that you were a security guard.

9 A. Maybe 75 to 100 times. I mean, in passing I  
10 would see them together.

11 Q. And did you -- how many times -- if you  
12 could estimate, how many nights during that period  
13 of time, five-year period of time, did Frank Cascio  
14 spend at Neverland?

15 A. Oh --

16 MR. SANGER: Well, I'm going to object as  
17 lack of foundation.

18 THE COURT: Sustained.

19 Q. BY MR. AUCHINCLOSS: You said that you were  
20 familiar with the logs in terms of who was staying  
21 on the property?

22 A. Yes.

23 Q. Was that part of your daily duties?

24 A. Yes.

25 Q. When Frank Cascio visited the property,  
26 would he be noted in that log as a visitor spending  
27 the night?

28 A. Yes. 7017

1 Q. On how many occasions, could you estimate,  
2 did Frank Cascio spend the night during that  
3 five-year period?

4 MR. SANGER: I'm going to object as lack of  
5 foundation.

6 THE COURT: Overruled.

7 You may answer.

8 THE WITNESS: Hundreds.

9 Q. BY MR. AUCHINCLOSS: Who is Vinnie? Do you  
10 know an individual -- let me start with that. Do  
11 you know an individual who visited Neverland named  
12 Vinnie?

13 A. Yes.

14 Q. Who was Vinnie?

15 A. As far as I know, Vinnie was a friend of  
16 Frank.

17 Q. And do you know the period of time when  
18 Vinnie visited Neverland?

19 A. No, not offhand I don't.

20 Q. Do you know approximately -- did Vinnie  
21 spend the night at Neverland?

22 A. Yes, I do know that he spent the night  
23 occasionally at Neverland Ranch.

24 Q. Do you know how many nights he spent?

25 A. No.

26 Q. Do you know an individual by the name of  
27 Marc Schaffel?

28 A. Yes. 7018

1 Q. How do you know Mr. Schaffel?

2 A. Just from his coming to the ranch.

3 Q. Do you know how often he would visit the  
4 ranch?

5 MR. SANGER: Vague as to time.

6 Q. BY MR. AUCHINCLOSS: During the period of  
7 time that you were a security guard.

8 A. Not very often, but he would come probably  
9 three or four times a year maybe.

10 Q. Do you know an individual by the name of  
11 Ronald Konitzer?

12 A. I know the name.

13 Q. Okay. Did you ever meet him?

14 A. Not that I'm aware of.

15 Q. How about Dieter Weizner?

16 A. Yes.

17 Q. Did you meet Mr. Weizner?

18 A. Yes.

19 Q. Where did you meet him?

20 A. At the ranch.

21 Q. And if you can characterize, again I'm  
22 asking for your best estimation, if you can provide  
23 it, how many times did Mr. -- did Dieter visit the  
24 ranch?

25 A. Several times. He was there -- he would  
26 stay sometimes for a couple of days, and then he'd  
27 be gone for a while and come back. It wasn't a

28 regular thing that he was there. For a short period 7019

1 of time it was, maybe two or three months I believe  
2 he was there on a somewhat regular basis, but  
3 generally it was off and on.

4 Q. Can you characterize the period of time that  
5 you observed Dieter on the ranch in terms of the  
6 five years you were there?

7 A. It would have been --

8 Q. Beginning time to when you left.

9 A. Probably sometime in 2002 to 2003.

10 Q. Okay. Now, did you have occasion to see  
11 children visit the ranch?

12 A. Yes.

13 Q. How were children treated at the ranch?

14 A. Well.

15 Q. What do you mean by that?

16 A. It was a fun place to go. They got to do  
17 pretty much whatever they wanted, for the most part.  
18 Not all of them. But they were treated quite well.

19 Q. Are you familiar with some visitors to the  
20 ranch who were local residents of Los Olivos?

21 A. Yes.

22 Q. Do you know their names?

23 A. Um, I can't remember right now.

24 Q. How many were there?

25 A. Three.

26 Q. Were they boys or girls?

27 A. Boys.



28 Q. What ages? 7020

1 A. Teenage.

2 Q. Were any of them related?

3 A. Two of them were.

4 Q. And how often would they visit the ranch?

5 A. For a short period of time quite regularly.

6 MR. SANGER: Do you have numbers on those?

7 MR. AUCHINCLOSS: 45, 46, and 47.

8 Q. Mr. Barron, I show you People's 45. Does

9 that look -- can you recognize that?

10 A. Yes, I recognize that.

11 Q. And who would that be?

12 A. His name -- their names are completely --

13 Q. Is that one of the people you're talking

14 about?

15 A. Yes.

16 Q. How about 46?

17 A. Yes.

18 Q. Is that one of the boys you're talking

19 about?

20 A. Yes.

21 Q. 47?

22 A. Yes.

23 Q. Okay. Did you have occasion to see how

24 those young men conduct themselves at the Neverland

25 property?

26 A. Yes.

27 Q. How would you describe their conduct?

28 A. Destructive. 7021

1 Q. And why do you say that?

2 A. Whenever they were there, we had broken  
3 carts. Damaged carts. They at some point egged --  
4 threw eggs at my security chief's car, inside,  
5 outside, we're talking dozens of eggs. There just  
6 always seemed to be something broken or some problem  
7 when they were there.

8 Q. Do you know if they ever got in trouble for  
9 this type of conduct?

10 MR. SANGER: Objection; lack of foundation.

11 THE COURT: Sustained.

12 Q. BY MR. AUCHINCLOSS: You mentioned a grease  
13 board at the security office.

14 A. Yes.

15 Q. And what specifically was that grease board  
16 used for?

17 A. Specifically it was for guest information,  
18 names of people who were in which guest unit or  
19 where they were staying on the ranch. And then a  
20 pass-on board, just write notes on the board for the  
21 oncoming shift or something that happened, just so  
22 that it was remembered. Anything that we needed to  
23 remember on a daily basis could have been put up on  
24 that board.

25 Q. Who was your supervisor?

26 A. I had -- Violet Silva was the security  
27 chief, and then Curtis Gordon was a supervisor and

28 Julio Magana was a supervisor. 7022

1 Q. Did you have any supervisory capacity as  
2 security guard?

3 A. Yeah, I had a shift supervisor. Curtis and  
4 Julio would work generally day shift. And then when  
5 I was there in the evening, I would be the shift  
6 supervisor. They were supervisors to me, but I  
7 would be in charge of the shift at night.

8 Q. Okay. At some point -- and let me just  
9 make -- be clear. What do you mean when you say  
10 "grease board"?

11 A. A white -- a white board that you use the  
12 wipeable ink markers on.

13 Q. Okay. So like a chalkboard or similar but  
14 you can --

15 A. Similar, yes.

16 Q. -- but you can wipe the ink off?

17 A. Yes.

18 Q. At some point during your employment at  
19 Neverland, did you see a directive on that board  
20 concerning Gavin Arvizo?

21 A. Yes.

22 Q. Do you know who Gavin Arvizo is?

23 A. Yes.

24 Q. First of all, tell us how you know Gavin  
25 Arvizo.

26 A. Because he was a guest at the ranch.

27 Q. Okay. So you knew him by sight?

28 A. Yes. 7023

1 Q. And tell us what that directive was.

2 A. It simply stated, "Gavin is not allowed off  
3 property."

4 Q. Can you tell me the approximate time that --  
5 your best recollection as to when that -- when that  
6 directive appeared on the grease board?

7 A. It was early part of 2003, January,  
8 February.

9 Q. Do you know the exact date?

10 A. No.

11 Q. Do you know how long it was on the grease  
12 board?

13 A. I remember it being approximately a week.

14 Q. Okay. If Gavin Arvizo appeared at the front  
15 gate during this period of -- well, let me back up,  
16 first of all. What did that directive mean to you  
17 in terms of a security officer?

18 A. That we weren't to allow him off property  
19 without some sort of permission from a supervisor.

20 Q. Okay.

21 A. That would be -- I would check first.

22 Q. Okay. So if Gavin Arvizo appeared at the  
23 gate, walking out of the ranch, would you let him  
24 pass?

25 A. No.

26 Q. If Gavin Arvizo appeared at the gate being  
27 driven out by Jesus Salas, would you let him pass?



28 A. I would check first with the ranch manager. 7024

1 Q. So would you say you wouldn't let him pass  
2 before getting authorization?

3 A. No.

4 MR. SANGER: Well -- I'll withdraw it.

5 THE COURT: All right.

6 MR. AUCHINCLOSS: Thank you. I have no  
7 further questions.

8

9 CROSS-EXAMINATION

10 BY MR. SANGER:

11 Q. Mr. Barron, how are you?

12 A. Good.

13 Q. You're a sworn peace officer; is that  
14 correct?

15 A. That is correct.

16 Q. And you went to the Allan Hancock Police  
17 Academy?

18 A. Yes.

19 Q. And you have been a police officer, an  
20 active duty police officer with the Guadalupe Police  
21 Department for how long?

22 A. Six and a half years.

23 Q. And during the entire time that -- I'm  
24 sorry, during the entire past six and a half years  
25 consecutively, you have been a police officer,  
26 correct?

27 A. That's correct.

28 Q. So at no time during the last six and a half 7025

1 years have you not been a sworn peace officer?

2 A. Correct.

3 Q. You worked at Neverland while you were going

4 to the academy, correct?

5 A. That's correct.

6 Q. And then after you finished the academy, you

7 got a job with Guadalupe as a sworn peace officer,

8 correct?

9 A. Correct.

10 Q. And when was that?

11 A. The day I started with Guadalupe?

12 Q. Sure.

13 A. September 28th of 1998.

14 Q. Okay. So since September of 1998 to the

15 present, you've been a sworn peace officer?

16 A. Correct.

17 Q. And sometimes you worked at Neverland Ranch

18 as a security person as well; is that correct?

19 A. Correct.

20 Q. So you were moonlighting, as it were?

21 A. Yes.

22 Q. And at some point you were aware that there

23 was a raid on Neverland; is that correct?

24 A. Yes.

25 Q. Were you there that day?

26 A. No.

27 Q. After you learned there was a raid at

28 Neverland, did you have a discussion with your chief 7026

1 of police at Guadalupe?

2 A. Yes.

3 Q. As a result of that discussion with the  
4 chief of police, did you determine that you should  
5 resign your position as a security guard?

6 A. Yes. It was more like step away from it for  
7 a while.

8 Q. Okay. In other words, between you and your  
9 chief, you decided there's an ongoing criminal  
10 investigation, as a peace officer, you probably  
11 should not also be working at the ranch; is that  
12 correct?

13 A. At that time that's what I decided, yes.

14 Q. And when was that, approximately? Was that  
15 right after the raid?

16 A. I was on vacation at that time, at the time  
17 of the search warrant. And then so shortly after I  
18 came home from vacation.

19 Q. All right. So sometime maybe end of  
20 November?

21 A. What day was the raid?

22 Q. November 18th, 2003.

23 A. Yeah. Correct. I think I came home from  
24 vacation the last couple days of November, so  
25 shortly after that. Maybe the first week of  
26 December.

27 Q. All right. And you did not cease your

28 employment -- I was going to say quit, but you 7027

1 actually stepped away for a while, you took a leave?

2 A. Yes.

3 Q. You did not do that because you had seen  
4 anything unlawful at the ranch; is that correct?

5 A. That's correct.

6 Q. And in fact, had you seen anything unlawful  
7 at the ranch from 1998 to the time that you stepped  
8 away from the job, you would have been duty-bound to  
9 report that, correct?

10 A. Absolutely.

11 Q. And in fact, as a sworn peace officer, you  
12 probably -- if you saw a criminal activity, you  
13 probably would have been duty-bound to either  
14 investigate or even make an arrest; is that correct?

15 A. Yes. To a point.

16 Q. Okay. At the very least report it?

17 A. Correct.

18 Q. All right. And you had no -- you found no  
19 need whatsoever to do that the entire time that you  
20 were there; is that correct?

21 A. That's correct.

22 Q. The people at Neverland Ranch that you  
23 worked with were made aware that you were a police  
24 officer; is that correct?

25 A. They all knew.

26 Q. All right. There was no secret?

27 A. No secret.



28 Q. And you were given access to every part of 7028

1 the ranch that any other security officer was given  
2 access to; is that correct?

3 A. That's correct.

4 Q. You reported, you said, to Mr. Magana and  
5 Mr. Gordon?

6 A. Correct.

7 Q. And then Violet Silva was the chief of  
8 security at the time; is that correct?

9 A. Correct.

10 Q. Did you have a good relationship with Violet  
11 Silva?

12 A. Very good.

13 Q. And was she a professional chief of  
14 security?

15 A. Yes.

16 Q. All right. Now, I know that a lot of times  
17 law enforcement might look at security guards as --  
18 somewhat cynically, is that true?

19 A. Absolutely.

20 Q. Did you feel that this security department  
21 was run in a professional fashion?

22 A. Yes.

23 Q. To a certain extent, the security department  
24 included the use of various police procedures; is  
25 that correct?

26 A. To a small extent, yes.

27 Q. General radio etiquette, for instance?

28 A. Yes. 7029

1 Q. Making sure that you logged things in  
2 appropriately?

3 A. Correct.

4 Q. Did Violet Silva, for instance -- let's take  
5 her. Did Violet Silva insist that the people under  
6 her command, as it were, keep accurate records?

7 A. Yes.

8 Q. All right. Did Violet Silva insist that the  
9 people under her make sure that the various places  
10 on the ranch were secure?

11 A. Yes.

12 Q. And there was a regular detail, or a  
13 regular -- let me withdraw that. There was a  
14 regular procedure to go through and check the  
15 various locations during the evening and the night  
16 to make sure that the ranch was secure; is that  
17 correct?

18 A. That's correct.

19 Q. Now, during the time you were there, was  
20 there a risk that intruders would get onto the  
21 ranch?

22 A. Absolutely.

23 Q. Did any intruders get onto the ranch during  
24 the time that you were there?

25 A. Yes.

26 Q. Were there ever occasions that you were  
27 aware of that intruders actually got to the house?

28 A. Yes. 7030

1 Q. Did any intruders actually get into the  
2 house?

3 A. Yes.

4 Q. Were law enforcement officers called  
5 eventually to deal with those intruders?

6 A. Yes.

7 Q. In fact, that was the protocol, if you found  
8 somebody trespassing, to call for law enforcement?

9 A. Correct.

10 Q. Now, I understand you were law enforcement,  
11 but you would call the sheriff's department at that  
12 point, correct?

13 A. Yes.

14 Q. And I may be going a little fast and then  
15 you're kind of stepping on the end of my questions,  
16 and I may be asking too quickly. It makes it hard  
17 for the court reporter.

18 A. I apologize.

19 Q. That's all right. I apologize. We'll just  
20 slow down a little bit, both of us.

21 All right. Now, you explained the situation  
22 out there and I just want to go over it in a little  
23 more detail. There are basically two main security  
24 posts, stationary posts at the ranch; is that right?

25 A. That's right.

26 Q. There's the gate, which is the little house  
27 right by the big front gates, correct?

28 A. Correct. 7031

1 Q. Now, at that little house, and the big front  
2 gates, there's -- or in the -- in the little house  
3 there's a computer and a desk; is that correct?

4 A. That's correct.

5 Q. Telephone?

6 A. Yes.

7 Q. Is the phone often answered by -- at that  
8 phone?

9 A. Yeah. A lot.

10 Q. All right. So people calling into the  
11 ranch, particularly at night, the phone will ring  
12 there, and the security guard at that phone will  
13 answer it; is that correct?

14 A. That's correct.

15 Q. All right. And then the phone -- the phone  
16 can be -- or the call can be forwarded from that  
17 phone to other phones?

18 A. Any -- basically any phone on the ranch.

19 Q. And the phone that's at the gate is a  
20 regular telephone within that -- let me back up.  
21 There's a system and the phones are pretty --

22 A. It's a multiline phone.

23 Q. They're pretty much identical phones  
24 throughout the ranch?

25 A. Yes. I believe they're all the same.

26 Q. So this is -- this is not a big phone with a  
27 lot of buttons on it. It's a smaller phone; is that



28 correct? 7032

1 A. That's correct.

2 Q. So you get an incoming call and then you  
3 would forward it by using a code to forward it; is  
4 that correct?

5 A. Transfer it to whatever extension it needed  
6 to go to.

7 Q. All right. The gates at the guard house  
8 there are big iron gates, is that correct, the front  
9 gate?

10 A. Well, maybe on the inside. They're wood.

11 Q. Or wood gates. I'm sorry, I think you are  
12 right. They're big wooden gates, in any event?

13 A. Yes.

14 Q. And they're anchored by, I think, stone  
15 walls on either side; is that correct?

16 A. Yes.

17 Q. If you stand at the gates looking out to  
18 Figueroa Mountain Road, to the road there, and you  
19 were to go to the left of the guard house --

20 A. Okay.

21 Q. -- as you're looking out to the left of the  
22 guard house, how far does the stone work extend,  
23 roughly?

24 A. Maybe 20, 25 feet. 30 feet maybe at the  
25 max.

26 Q. Okay. And after that 30 feet, what kind of  
27 fencing protection do you have?

28 A. Very little. Two-plank ranch fencing. 7033

1 It's nice. It looks like -- but it's maybe about  
2 four feet tall.

3 Q. And two rails?

4 A. Two rails and then posts however many feet.

5 Q. And there's no wire on that or anything  
6 else, correct?

7 A. No.

8 Q. So people can pretty much hop over that if  
9 they want to?

10 A. Yes.

11 Q. All right. As you go around the rest of the  
12 ranch there's -- as you get farther away from the  
13 gate, at some point there's some fencing,  
14 cattle-type fencing; is that correct?

15 A. Cattle, barbed wire fencing.

16 Q. All right. Now, you mention that there was  
17 another location which was up by the house, I think,  
18 for -- another stationary location for the guards;  
19 is that correct?

20 A. The house security office, correct.

21 Q. And that's not in the house itself?

22 A. No.

23 Q. It's at the end of the building that's  
24 adjacent to the house; is that correct?

25 A. Correct.

26 Q. And in there, you have a -- an initial room  
27 that includes a desk and the computer and so on; is

28 that correct? 7034

1 A. That's correct.

2 Q. And there's a rack of battery chargers for  
3 the portable radios?

4 A. It may be in that room, now. It was in the  
5 other room before when I was there.

6 Q. Okay. In any event, there's the initial  
7 room that you walk into, and then behind it is sort  
8 of a break room; is that correct?

9 A. Correct.

10 Q. It's got a few lockers; is that right?

11 A. That's right.

12 Q. The break table and some chairs, right?

13 A. Yes.

14 Q. Is that where that board is that you were  
15 telling us about?

16 A. No. It was in the first room.

17 Q. In the first room. All right.

18 Now, let me ask you something: The gate  
19 logs that you told us about that are among the  
20 documents that you authenticated from Exhibit 300 to  
21 335 -- I realize there's some other documents that  
22 aren't gate logs in there --

23 A. Yes.

24 Q. -- but the gate logs that are in those  
25 documents, those gate logs are used to communicate  
26 information to the various guards who are on duty or  
27 who come on duty; is that correct?

28 A. Yes. 7035

1 Q. All right. Now, I realize -- or let me ask  
2 you this: You had previously told law enforcement  
3 that you believed that this -- what you called or  
4 what Mr. Auchincloss called a directive, that this  
5 note about Gavin Arvizo was on the grease board?

6 A. Yes.

7 Q. And are you aware that none of the other  
8 officers recall seeing it on the grease board?

9 MR. AUCHINCLOSS: Objection. That assumes  
10 facts not in evidence.

11 THE COURT: Sustained.

12 Q. BY MR. SANGER: Are you aware of any other  
13 officer who claims to have seen that on the grease  
14 board?

15 A. Yes.

16 Q. Okay. Is it possible that this particular  
17 notation was, in fact, on a gate log instead of the  
18 grease board?

19 A. I'm sure it was on a gate log.

20 Q. Okay. And in fact, it's on the gate log for  
21 February the 19th; is that right?

22 A. I don't know the date that it's on there.

23 Q. You remember seeing it on the gate log; is  
24 that correct?

25 A. No.

26 Q. Okay. You said it was on the gate log?

27 A. I now know that it was on the gate log.



28 Q. Okay. All right. Do you have the book up 7036

1 there, the --

2 MR. AUCHINCLOSS: It's right here.

3 MR. SANGER: This is the official book. All  
4 right.

5 Q. Now, you say you're aware it's on the gate  
6 log. Did somebody show it to you?

7 A. I was told.

8 Q. By the prosecution?

9 A. Yes.

10 Q. Okay. And who told you that?

11 A. The District Attorney.

12 Q. Which one?

13 A. Auchincloss.

14 Q. Mr. Auchincloss.

15 A. Thank you. Sorry.

16 MR. SANGER: Okay. Your Honor, what I'd  
17 like to do, I'm going to take this page out of the  
18 book, the entire book has been admitted, and there  
19 are exhibit tabs, official court exhibit tabs on the  
20 first page of each exhibit. So I am taking a page  
21 out of 334. And at the bottom, this page says "MJ  
22 00154." And I'd ask permission to put this up on  
23 the screen, if I may.

24 THE COURT: You may.

25 MR. SANGER: Thank you.

26 Q. I'll back up, first of all. I'll represent  
27 to you I just took that -- as I said to the Court, I

28 took that out of the book here. That's one of the 7037

1 various pages. Does that appear to be a gate  
2 activity log?

3 A. Yes.

4 Q. And there's a number up on the top which  
5 we'll focus in on a little more. It says 2-19-03.  
6 It's a little fuzzy there, but --

7 A. Correct.

8 Q. And the purpose of this gate activity log  
9 would be to record pretty much contemporaneously  
10 activities that occurred during the security shift;  
11 is that true?

12 A. That's correct.

13 Q. And it's also for the purpose of recording  
14 information that should be communicated to other  
15 officers on other shifts; is that correct?

16 A. Yes.

17 Q. All right. Now, I'm going to, with any  
18 luck, focus in so we can read it, but we'll see  
19 about that.

20 Okay. Do you see there, it says -- three  
21 lines up from the bottom, on the middle of the page,  
22 it says 1752.

23 A. Yes.

24 Q. What does 1752 represent?

25 A. 5:52 p.m.

26 Q. Military time. So it's 5:52 in the  
27 afternoon, correct?

28 A. Correct. 7038

1 Q. That would be the time that somebody  
2 recorded the information on that, on that line  
3 adjacent to it; is that correct?

4 A. Correct.

5 Q. And the line adjacent to it says, "The kids  
6 are not to leave per Joe." "Kids" meaning like  
7 Gavin, Star, et cetera, correct?

8 A. Correct.

9 Q. All right. Were you aware that that  
10 particular evening was the evening that these  
11 children were to go down to Los Angeles?

12 MR. AUCHINCLOSS: Objection; assumes facts.

13 MR. SANGER: That's --

14 THE COURT: Foundation; sustained.

15 MR. SANGER: Well, I asked if he was aware.

16 Should I rephrase it? Let me do it this way, Your  
17 Honor. I won't make that request.

18 THE COURT: The foundation's a little  
19 different, too. Go ahead and rephrase it.

20 Q. BY MR. SANGER: All right. Let's do it this  
21 way: A couple of questions. Just in general, if  
22 children are on the ranch, are guests at the ranch  
23 and they're staying there and there's not a parent  
24 present, would it be the policy of the ranch not to  
25 allow those children to go off of the ranch property  
26 without supervision?

27 A. Correct.

28 MR. AUCHINCLOSS: I'll object as vague as to 7039

1 "children."

2 THE COURT: Overruled.

3 You may answer.

4 THE WITNESS: Yes, we would not let them go  
5 off the property by themself.

6 Q. BY MR. SANGER: So at this time do you know  
7 whether or not there was a parent at the ranch with  
8 Gavin, Star -- well, it was "Gavin, Star, et  
9 cetera." So we'll say with Gavin and Star.

10 A. I don't know for sure. I don't believe  
11 there was.

12 Q. All right. So that would be a reasonable  
13 instruction for security in general, correct?

14 MR. AUCHINCLOSS: Objection. Argumentative;  
15 calls for a conclusion.

16 THE COURT: Sustained on argumentative.

17 Q. BY MR. SANGER: It would not be out of the  
18 ordinary, then, to not let children such as Gavin  
19 and Star leave the ranch without approval or without  
20 supervision, correct?

21 A. Correct.

22 Q. And based on your experience, if children or  
23 any guests were scheduled to leave as a group, would  
24 it be appropriate for security to be alerted so that  
25 the people would be there to leave in the vehicle  
26 that was assigned to take them? Does that make  
27 sense? It was a long question.



28 A. Would it be appropriate to have security 7040

1 notified --

2 Q. Yeah.

3 A. -- if they were going to be leaving?

4 Q. Yes.

5 A. It would have been appropriate. It didn't

6 happen very often, but --

7 Q. So if there was a bus or a limousine that  
8 was going to leave and certain kids were going to be  
9 on it, that's something that security could well be  
10 advised of, correct?

11 A. Should well be advised of. We weren't  
12 always advised.

13 Q. Weren't always advised. But if you were  
14 advised, you'd feel that was appropriate, right?

15 A. Yes.

16 Q. Okay. I'm going to put that page back where  
17 I found it. Close the book so I don't mix things  
18 up, and we'll come back to it in a moment.

19 All right. Now let's work backwards just a  
20 little bit here. You were asked about Frank Cascio,  
21 correct?

22 A. Correct.

23 Q. And was he also known by another name?

24 A. Frank Tyson.

25 Q. Frank Tyson. Okay. Frank?

26 A. Frank.

27 Q. As far as Frank Cascio, Frank Tyson was

28 concerned, was he there -- you said he stayed over, 7041

1 as far as you could tell, quite a number of times,  
2 right?

3 A. Right.

4 Q. And the District Attorney asked you if this  
5 was logged in the logs when he might be staying  
6 over.

7 A. Correct.

8 Q. Did you go back and look at the logs and add  
9 up the times?

10 A. No.

11 Q. All right. So you're really not answering  
12 that question based on reviewing the logs; is that  
13 right?

14 A. I reviewed the logs, but did not write down  
15 or memorize how many times he'd been there.

16 Q. All right. So your general impression was  
17 that he stayed overnight quite a number of times,  
18 correct?

19 A. Yes.

20 Q. And did Frank Cascio have any other family  
21 members who you were aware of?

22 A. Yes.

23 Q. And did they often stay over?

24 A. Yes.

25 Q. Did his father come out and visit from time  
26 to time?

27 A. Yes.

28 Q. Did his brother and sister visit from time 7042

1 to time?

2 A. Yes.

3 Q. Any other family members you can recall?

4 A. His mother had been there.

5 Q. Okay.

6 A. I think he had two brothers.

7 Q. All right.

8 A. I believe.

9 Q. Very good. So his brothers, his sister, and

10 both of his parents would stay over from time to

11 time; is that correct?

12 A. Yes.

13 Q. All right. Now, were there times during

14 your -- your span there, when Frank Cascio or his

15 family might be there, and then there would be a

16 period of time where he wouldn't be around and he or

17 his family would come back at some later time?

18 A. Meaning that --

19 Q. That was a bad question.

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

21 Q. Fair enough. Just tell me.

22 In other words, you say he was there -- from

23 the time that you were employed to the time that you

24 left the ranch, you said he was there many times,

25 maybe you saw him 75 to 100 times with Michael

26 Jackson, he stayed over many times, right?

27 A. Yes.

28 Q. Was this continuously or were there periods 7043

1 of time where the Cascios might be visiting, and  
2 then months might go by before they'd come back?

3 A. Yes, that's correct.

4 Q. And did -- you were yourself gone for  
5 periods of time; is that correct?

6 A. Yes.

7 Q. You next had somebody named Vinnie. Did you  
8 know his last name?

9 A. No, I don't know it.

10 Q. You said, well, he spent the night  
11 occasionally, I think. Do you know when that was?

12 A. The actual dates of when? Or --

13 Q. If you know them.

14 A. No, I don't know the actual dates of when.

15 Q. In general, when did you see Vinnie?

16 A. Generally I saw Vinnie when Frank was there.

17 Q. And when did you start seeing Vinnie?

18 A. Probably in 2002, right around there. I  
19 don't know the exact time frame.

20 Q. Maybe late 2002?

21 A. Could have been, yes.

22 Q. All right. So you didn't really see him the  
23 entire time that you were working there?

24 A. No.

25 Q. He was a more recent visitor?

26 A. Yes.

27 Q. Same with Marc Schaffel. You said he was



28 not there -- or he did not spend the night very 7044

1 often. You recall seeing him every once in a while?

2 A. Every once in a while. Granted I worked  
3 two, three days a week, so I wasn't there all during  
4 the week.

5 Q. I understand.

6 A. But occasionally he was there, yes.

7 Q. And was he there continuously during a  
8 period of time or off and on, or two different  
9 distinct periods of time?

10 A. I remember him being there just off and on,  
11 odd times. He would just come out and -- he may  
12 stay the night, he may leave that day.

13 Q. You mentioned Ronald Konitzer and you said  
14 you recognized the name, but you couldn't really put  
15 a face to that name; is that correct?

16 A. I don't believe I could, no.

17 Q. You remember Mr. Konitzer being listed as a  
18 guest; is that correct?

19 A. Yes.

20 Q. You remember seeing the name anyway --

21 A. Yes.

22 Q. -- in the context of being a guest.

23 Do you remember Mr. Konitzer's wife and  
24 children being listed as guests?

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

26 Q. All right. Now, if they were guests,  
27 there's a good chance they would be in the guest

28 logs; is that correct? 7045

1 A. That's correct.

2 Q. And then you mentioned Dieter Weizner. You  
3 said you saw him visiting several times; is that  
4 correct?

5 A. That's correct.

6 Q. And do you know when this period of time  
7 was? Was this the entire time from 1998?

8 A. No, it would have been later into when I  
9 worked there, probably around, again, late -- mid,  
10 late '02, end of 2002, into 2003.

11 Q. Into 2003. Okay. Now, in general, besides  
12 intruders, which we talked about, actual trespassers  
13 and people who intrude, were there other concerns  
14 for security on the ranch?

15 A. Meaning --

16 Q. Well, for instance, was one of the concerns  
17 that this was Michael Jackson's home and that his  
18 privacy should be preserved?

19 A. Yes.

20 Q. So there were confidentiality agreements  
21 that new visitors would sign when they came to the  
22 gate; is that correct?

23 A. Correct. Correct. I'm sorry, yes.

24 Q. I didn't know if the court reporter got it.

25 A. I'm sorry.

26 Q. And one of the reasons for the  
27 confidentiality agreements was -- or one of the

28 provisions was that people not take pictures when 7046

1 they're at the ranch; is that correct?

2 A. That's correct.

3 Q. And you understood the reason for that to be  
4 that people would sell pictures if they could; is  
5 that right?

6 A. I understood the reason to be we were told  
7 not to let them do it. What they did with them  
8 is --

9 Q. You understand that -- there was a concern  
10 about people getting cameras on the ranch to take  
11 pictures to sell them to the tabloids?

12 A. I'm sure that there was.

13 Q. And some of the intruders that you caught  
14 had cameras with them; is that correct?

15 A. Yes.

16 Q. Did you -- were you aware of an armed  
17 intruder getting onto the ranch?

18 A. Armed with what?

19 Q. With a gun.

20 A. No.

21 Q. The ranch itself you understood to be Mr.  
22 Jackson's home, right?

23 A. Yes.

24 Q. And one of the things that security was  
25 instructed to do was to accord Mr. Jackson respect  
26 as a person who is trying to live in his home,  
27 correct?

28 A. Absolutely. 7047

1 Q. So the idea was to not unduly approach him  
2 or burden him, or take up his time while he's trying  
3 to -- while he's trying to be at home, correct?

4 A. That's correct.

5 Q. And have you ever worked for any other  
6 celebrities or people of that sort?

7 A. No.

8 Q. But that made sense to you, didn't it?

9 A. Absolutely.

10 Q. All right. When you say that when Mr.  
11 Jackson was there people were on pins and needles,  
12 did you mean by that to suggest that Mr. Jackson was  
13 a harsh or mean boss of some sort?

14 A. No.

15 Q. Just -- the structure of the people there,  
16 through the various commands and different  
17 departments, made everybody aware that when Mr.  
18 Jackson's on property that you need to be on your  
19 best behavior, right?

20 A. Yes.

21 Q. And you didn't see anything wrong with that,  
22 did you?

23 A. No. Not necessarily, no.

24 Q. Okay. And you felt personally that -- I  
25 suppose you probably felt you should be on your best  
26 behavior at all times; is that right?

27 A. Yes.



28 Q. But you didn't have any objection to 7048

1 everybody being, you know, particularly careful to  
2 be prepared and ready to perform their duties when  
3 the owner is on the property, right?

4 A. I had no objection to that. No.

5 Q. Now, you said people worked harder when Mr.  
6 Jackson was there, right?

7 A. They worked more, for sure.

8 Q. Okay. Now, there's sometimes Mr. Jackson  
9 was not there when there were big events that were  
10 scheduled; is that right?

11 A. That's correct.

12 Q. There were family days?

13 A. Yes.

14 Q. And you've gone to family days, have you  
15 not?

16 A. Several of them.

17 Q. Do you have family? I won't go into  
18 details. But did you bring family members with you?

19 A. Yes.

20 Q. And this is something that Mr. Jackson did  
21 for his employees; is that right?

22 A. That's right.

23 Q. Basically opened up the whole property, the  
24 employees could bring their children, their friends  
25 or their close friends or relatives certainly, and  
26 could enjoy the rides and all the other amenities at  
27 Neverland; is that right?

28 A. That's right. 7049

1 Q. Mr. Jackson would sometimes be there and  
2 sometimes not; is that right?

3 A. That's right.

4 Q. And then there were other days when he would  
5 have large groups of either, for instance,  
6 disadvantaged children or children who were sick or  
7 just children in general who would come to be his  
8 guest at the ranch; is that correct?

9 A. That's correct.

10 Q. During those times, Mr. Jackson was often  
11 not on the property; is that right?

12 A. Often not on the property?

13 Q. Yes.

14 A. That's right.

15 Q. And he was sometimes on the property; is  
16 that correct?

17 A. Yes.

18 Q. Whether he was on the property or not, the  
19 entire staff was instructed to treat all of the  
20 people, adults and children, as guests, as if they  
21 were guests at somebody's private home; is that  
22 correct?

23 A. That's correct.

24 Q. The only difference is that there would be  
25 certain boundaries, you can't go into certain parts  
26 of the house and that sort of thing; is that  
27 correct?

28 A. That's correct. 7050

1 Q. But other than that, if the kids want  
2 something, if the adults want something, everybody  
3 is there to serve; is that right?

4 A. That's right.

5 Q. Now, you mentioned that the security guards  
6 often did the job of other -- let me withdraw that.  
7 You mentioned the security guards worked with the  
8 fire department from time to time; is that correct?

9 A. Basically they were the same department.

10 Q. All right. And you had at least one fire  
11 truck there?

12 A. Yes.

13 Q. Was there a time when you had more than one?

14 A. Well, there was a time when there was --  
15 when I was there, there was a time that there was  
16 more than one, one was not working.

17 Q. Okay.

18 A. But there were two. And then prior to me  
19 being there, yes, there was, I believe, more than  
20 one.

21 Q. Eventually they turned one of those fire  
22 trucks into a water truck, I think.

23 A. Water tender, yes.

24 Q. There you go. But they have one operating  
25 professional fire truck there; is that correct?

26 A. Not in the sense -- fire rescue, like a  
27 brush truck. It would be not like a large city fire

28 truck. But, yes, a working -- held water, medical 7051

1 equipment.

2 Q. All right. Not a hook and ladder, but  
3 something that was an emergency vehicle --

4 A. Yes.

5 Q. -- that could be used to tend to emergencies  
6 on this ranch, correct?

7 A. Correct.

8 Q. And anywhere from somebody being injured,  
9 to having a brush fire, to anything else that was  
10 needed on an emergency basis; is that right?

11 A. Yes.

12 Q. And both the people who were assigned as  
13 security officers and those assigned as firemen were  
14 somewhat interchangeable in these tasks. If it  
15 needed to be done, you all would respond and do it;  
16 is that correct?

17 A. That is correct.

18 Q. Now, there were a number of people who were  
19 in the fire department from time to time who  
20 eventually became employed in other fire  
21 departments; is that correct?

22 A. Yes.

23 Q. All right. So this was an area where people  
24 could work, gain additional experience in order to  
25 go work someplace else; is that right?

26 A. Yes.

27 Q. And did you feel -- as a professional law



28 enforcement officer, did you feel that the -- that 7052

1 the operation was run professionally?

2 A. Yes.

3 Q. All right. Now, the duties of security and  
4 fire you said were pretty much merged. But in  
5 addition to those duties, you also had duties to  
6 attend to the needs of guests and Mr. Jackson, or  
7 anybody else who required some assistance on the  
8 ranch; is that correct?

9 A. Yes.

10 Q. And they were not always law enforcement  
11 duties or fire duties, correct?

12 A. Generally, no.

13 Q. Generally not.

14 So, if somebody needed something, you or  
15 anybody else that worked there -- say a guest needed  
16 something, you or anybody else that worked there was  
17 expected to respond as favorably as possible; is  
18 that right?

19 A. Yes.

20 Q. All right.

21 THE COURT: Counsel? Take our break.

22 MR. SANGER: Okay. Thank you.

23 (Recess taken.)

24 --o0o--

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26

27



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 6992 through 7053

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 20, 2005, and thereafter

20 reduced to typewriting by computer-aided

21 transcription under my direction.

22 DATED: Santa Maria, California,

23 April 20, 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

15

16

17 REPORTER'S TRANSCRIPT OF PROCEEDINGS

18

19 WEDNESDAY, APRIL 20, 2005

20

21 8:30 A.M.

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23 (PAGES 7055 THROUGH 7115)

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26

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

28 BY: Official Court Reporter 7055

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28 7056

1 I N D E X

2

3 Note: Mr. Sneddon is listed as "SN" on index.

4 Mr. Zonen is listed as "Z" on index. Mr. Auchincloss is listed as "A"  
on index.

5 Mr. Mesereau is listed as "M" on index. Ms. Yu is listed as "Y" on  
index.

6 Mr. Sanger is listed as "SA" on index. Mr. Oxman is listed as "O" on  
index.

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9 PLAINTIFF'S WITNESSES DIRECT CROSS REDIRECT RECROSS

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11 BARRON, Brian 7058-SA (Continuing)

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28 7057

1 THE COURT: Go ahead.

2 MR. SANGER: Thank you.

3 Q. All right. Mr. Barron --

4 A. Uh-huh.

5 Q. -- or Officer Barron, across the street

6 from --

7 THE BAILIFF: Can you turn your microphone

8 on?

9 MR. SANGER: Oh, sorry. There you go.

10 Q. Across the street from Neverland on Figueroa

11 Mountain Road, there are two schools; is that

12 correct?

13 A. That's correct.

14 Q. What kind of schools are they?

15 A. One is a boarding school, and one is like

16 a -- an elementary school, I believe.

17 Q. Okay. And are these private schools?

18 A. Yes.

19 Q. People are there during the day?

20 A. Yes.

21 Q. So there's activity, at least during the

22 school year; is that correct?

23 A. Correct.

24 Q. All right. February and March of 2003,

25 those schools would have been open; people would

26 have been there?

27 A. Yes.

28 Q. Parents coming and going? 7058

1 A. Yes.

2 Q. Teachers?

3 A. Yes.

4 Q. Administrators?

5 A. Yes.

6 Q. Now, you told us about the security staff

7 that you were a member of, correct?

8 A. Correct.

9 Q. And you told us about the fire department?

10 A. Correct.

11 Q. Did Mr. Jackson also have personal security

12 or personal bodyguards?

13 A. Yes.

14 Q. And are these people who traveled with him?

15 A. Yes.

16 Q. You did not travel with Mr. Jackson; is that

17 correct?

18 A. No.

19 Q. So your duties were pretty much restricted

20 to the ranch. I shouldn't say restricted. It's a

21 big ranch, but you were there at the ranch, correct?

22 A. Yes.

23 Q. If he went to Los Angeles or Miami or went

24 on tour or anything else, you would not go with him;

25 is that correct?

26 A. No.

27 Q. And who would go with him?

28 A. Whomever was his personal security at the 7059

1 time. It did change.

2 Q. All right. So he did have people who were  
3 generally experienced in going on the road and  
4 protecting a celebrity under those circumstances; is  
5 that correct?

6 A. There were times when he did, yes.

7 Q. Okay. There were some times when you  
8 thought his personal security may not have been --

9 A. Yes.

10 Q. -- quite as -- okay. All right.

11 Now, do you remember Janet Arvizo?

12 A. I know she was there. I do not remember her  
13 face until yesterday.

14 Q. All right. But you remember her being there  
15 and you remember having some contact with her; is  
16 that correct?

17 A. Yes.

18 Q. And you remember Gavin Arvizo?

19 A. Yes.

20 Q. You remember Star Arvizo?

21 A. Yes.

22 Q. And in general, did Janet Arvizo ever appear  
23 to not want to be at the ranch?

24 A. In general, I couldn't answer.

25 MR. AUCHINCLOSS: Objection. I'm going to  
26 object on the basis of foundation.

27 THE COURT: Sustained.



28 Q. BY MR. SANGER: All right. Would it be your 7060

1 opinion, based on your seeing her there at the  
2 ranch, that what stood out in your mind was that  
3 Mrs. Arvizo appeared that she wanted to be there?

4 MR. AUCHINCLOSS: Objection. Same  
5 objection.

6 THE COURT: Sustained.

7 Q. BY MR. SANGER: All right. What kind of  
8 contact did you have with Janet Arvizo?

9 A. Probably talked to her on the phone once or  
10 twice. Other than that, relatively none.

11 Q. When you talked to her on the phone, did it  
12 appear that she wanted to be there at the ranch?

13 A. Yes.

14 Q. And Janet Arvizo had access to the house,  
15 full access to the house; is that correct?

16 MR. AUCHINCLOSS: Objection. Foundation.

17 THE COURT: Overruled.

18 You may answer.

19 THE WITNESS: I don't know.

20 Q. BY MR. SANGER: Okay. Do you recall  
21 testifying before the Santa Barbara Grand Jury on  
22 April the 12th, 2004?

23 A. Yes.

24 Q. Do you recall telling the grand jury that  
25 Janet Arvizo was one of the people who had access;  
26 she would have access to the house?

27 A. Yes.

28 Q. And when you were -- when the District 7061

1 Attorney said, "Okay," you said, "No question."

2 A. Yes.

3 Q. Is that correct? And she had full access to  
4 the house because her children were there; is that  
5 correct?

6 A. Yes.

7 Q. All right. Now, did you have any personal  
8 observations about the behavior of Gavin and Star?

9 A. No.

10 Q. They appeared -- from what you could see,  
11 they appeared to want to be at the ranch; is that  
12 correct?

13 MR. AUCHINCLOSS: Objection. Foundation.

14 THE COURT: Sustained.

15 Q. BY MR. SANGER: Did you see them from time  
16 to time at the ranch?

17 A. Seldom.

18 Q. Was there any indication -- from the seldom  
19 times that you saw them, was there any indication  
20 that they did not want to be at the ranch?

21 A. No.

22 Q. You indicated that part of the security --  
23 part of security's job was to monitor who was coming  
24 onto the property, correct?

25 A. Correct.

26 Q. And that was recorded, to a large extent, in  
27 the gate logs; is that correct?

28 A. Yes. 7062

1 Q. Were you aware that in addition to just  
2 plain interlopers, that there would be people who  
3 would try to gain some kind of introduction to Mr.  
4 Jackson to get into his favor?

5 MR. AUCHINCLOSS: Objection. Ambiguous;  
6 foundation.

7 THE COURT: Overruled.

8 You may answer.

9 THE WITNESS: How do you mean?

10 Q. BY MR. SANGER: Well, were there people who  
11 seemed to be trying to get close to Mr. Jackson?

12 A. Yes.

13 Q. And sometimes Mr. Jackson really wouldn't  
14 want those people to be around him, correct?

15 A. Correct.

16 Q. So if they were allowed on the ranch, they  
17 were to be treated courteously?

18 A. Yes, yes.

19 Q. But nevertheless, you were to try to help  
20 Mr. Jackson not be bothered by people; is that  
21 right?

22 A. That's right.

23 Q. And Mr. Jackson, of course, during the time  
24 you were there, and now, for that matter, is an  
25 international celebrity, an artist, a very well-  
26 known person, correct?

27 A. Yes.

28 Q. And there would be people who would 7063

1 basically be trying to get into his good graces; is  
2 that right?

3 MR. AUCHINCLOSS: Objection. Foundation.

4 THE COURT: It's argumentative. Sustained.

5 Q. BY MR. SANGER: All right. Now, let me ask  
6 you one other thing before we get to the gate logs  
7 and some of the other documents you identified.

8 You were actually asked -- let me put it a  
9 different way. You were contacted by the Santa  
10 Barbara County Sheriff's Office in December of 2003;  
11 is that correct?

12 A. That's correct.

13 Q. And in particular, Detective Bonner of the  
14 Santa Barbara Sheriff's Department contacted you; is  
15 that correct?

16 A. Correct.

17 Q. And he did an interview of you to determine  
18 if you'd seen anything unlawful and so on; is that  
19 correct?

20 A. That's correct.

21 Q. But then he asked that you work as an  
22 informant; is that correct?

23 A. Yes.

24 Q. And you were at that time a sworn peace  
25 officer of the Guadalupe Police Department, correct?

26 A. That's correct.

27 Q. And he basically wanted you to go back to



28 work for Mr. Jackson in December of 2003 to be an 7064

1 informant, correct?

2 A. That's correct.

3 Q. And at that time, you know that the raid had  
4 already occurred on Mr. Jackson's house, correct?

5 A. Correct.

6 Q. You knew Mr. Jackson had a lawyer, had  
7 counsel, right?

8 A. Yes.

9 Q. And you were being asked to go in as a law  
10 enforcement informant into his ranch, at his home,  
11 and inform for the sheriff; is that correct?

12 MR. AUCHINCLOSS: Objection. Asked and  
13 answered.

14 THE COURT: Overruled.

15 You may answer.

16 THE WITNESS: Yes.

17 Q. BY MR. SANGER: And you refused to do that;  
18 is that right?

19 A. Yes.

20 Q. What I'd like to do now is go through some  
21 of the exhibits that you've identified and ask you,  
22 based on your training and experience, to interpret  
23 the documents, okay?

24 To the extent you were there, you made an  
25 entry, and then you can contribute that as well and  
26 say, "Yes, I actually wrote that."

27 A. Yes.

28 Q. But to the extent that you introduced these 7065

1 documents, you said they were kept in the ordinary  
2 course of business, I'd like you to explain what  
3 they mean, if you could.

4 A. Okay.

5 MR. SANGER: So I'm going to start with  
6 Exhibit 300, and, Your Honor, if this procedure is  
7 acceptable, I'd like to do this without asking each  
8 time -- or I can. Whatever the Court wants me to  
9 do.

10 What I propose to do is identify the  
11 document by exhibit number. If there is more than  
12 one page to the exhibit, I'll indicate which page of  
13 the exhibit. If -- in the Exhibits 334 and 335,  
14 there are hundreds of pages, so I'll refer to the  
15 Bates stamp number on the bottom of the page for  
16 that purpose.

17 And if that procedure is acceptable, what  
18 I'd like to do then is put each of these up on  
19 the -- not all of them, but each of the ones I want  
20 to point out on the overhead projector, and I'll  
21 just make reference to it at the time.

22 THE COURT: That's a fine procedure.

23 MR. SANGER: Okay. Thank you. In other  
24 words, I won't ask leave each time. I'll just do  
25 it.

26 THE COURT: That's good.

27 MR. SANGER: Thank you. Okay. In that

28 case, with the Court's permission in advance, I'll 7066

1 put Exhibit 300 up.

2 THE BAILIFF: Can you put "Input 4"?

3 MR. SANGER: Or we'll put up Mr.

4 Auchincloss's....

5 THE COURT: That was "Input 4."

6 Q. BY MR. SANGER: What I'm going to do, I

7 hope, is put it up in a way so we can show the

8 exhibit tag number, if such exists, and then I'll

9 give you an opportunity here to see what the

10 document is, best we can.

11 If you want me to -- this was printed pretty

12 large, so we can do it this way, if you want me to

13 scroll it up or down. If you'd like me to approach

14 and give it to you, if you can't read it, I'll just

15 walk up and show it to you. So just let me know.

16 A. Okay.

17 Q. This is Exhibit 300. And it appears at the

18 top to be an accident damage report, okay?

19 A. Okay.

20 Q. And I think you told us that was kept in the

21 ordinary course of business; is that correct?

22 A. Correct.

23 Q. And the accident damage report appears to

24 have been generated on a computer; is that right?

25 A. Correct.

26 Q. In other words, it's not just a form that's

27 handwritten in, but somebody generated the whole

28 thing on a computer, correct? 7067

1 A. Yes.

2 Q. And the format is such that it appears to be  
3 a standard format, and then you put in particular  
4 information based on the particular incident; is  
5 that correct?

6 A. That's correct.

7 Q. All right. Now, what would be the purpose  
8 of this particular accident damage report? Let me  
9 rephrase that. What does this accident damage  
10 report refer to?

11 A. One of the golf carts.

12 Q. All right. And from that report and from  
13 the records, and based on your training and  
14 experience, can you explain what happened and why  
15 this report was written?

16 A. I can read it.

17 Q. Okay. Well, let's do it this way, because  
18 we'll start this way and then the other ones will  
19 speak for themselves.

20 There's a date up there at the very top,  
21 right?

22 A. Yes.

23 Q. 6-21-02.

24 A. Yes.

25 Q. Would that be the date of the incident?

26 A. Yes.

27 Q. And then you have a date at the bottom.



28 Would that be the date the report was written? 7068

1 A. Yes.

2 Q. And there's a time, 1610, so 4:10 in the  
3 afternoon, correct?

4 A. Correct.

5 Q. And the time at the top would be 1530, which  
6 would be 3:30 in the afternoon, correct?

7 A. Correct.

8 Q. All right. So this report is designed to  
9 document the fact that Gavin Arvizo was involved in  
10 crashing a golf cart into the theater fountain; is  
11 that correct?

12 A. That's correct.

13 Q. And the cause of the accident was recorded  
14 as reckless driving; is that correct?

15 A. That's correct.

16 Q. All right. Now, you told us that you're  
17 supposed to be very courteous to the guests, no  
18 matter who they are, where they're from or whatever.  
19 Is it appropriate, however, for security officers to  
20 warn guests, particularly children, if they're  
21 involved in unsafe behavior?

22 A. Yes.

23 Q. And based on this report, does it appear  
24 that there was a warning given to Gavin Arvizo about  
25 driving the golf cart?

26 A. Yes.

27 Q. And the warning was to slow down or the golf

28 cart would be taken away; is that correct? 7069

1 A. Correct.

2 Q. So based on your experience in these  
3 records, that would indicate that an officer gave  
4 that warning to Gavin Arvizo?

5 A. Yes.

6 Q. All right. Were you aware of other  
7 incidents involving Gavin or Star Arvizo that  
8 involves destruction of property or accidents or  
9 that sort of thing?

10 A. No.

11 Q. Okay. Did you review these records to see  
12 if you could find such evidence?

13 A. Not for that purpose, no.

14 Q. Okay. That's fair enough. Actually, I  
15 didn't see that. I don't think it was on my copy.  
16 Maybe it was.

17 On the back of 300 is a photograph. Does  
18 that appear to be a Polaroid-type photograph?

19 A. Yes.

20 Q. Is that the front of a golf cart?

21 A. Yes.

22 Q. And it kind of looks like a car.

23 A. Well, you couldn't hold golf clubs on them.

24 They're more of a car.

25 Q. It's essentially the frame of a golf cart  
26 and it's got a little fiberglass car body on it?

27 A. Correct.

28 Q. And this one, I think, is the Batmobile one; 7070

1 is that --

2 A. We call it "the Batman cart."

3 Q. "The Batman cart," okay. In any event, this  
4 photograph is taken to show damage that was  
5 associated with that report; is that correct?

6 A. That's correct.

7 Q. I'm going to go to Exhibit 301.

8 And just so nobody gets too nervous, Your  
9 Honor, I'm going to try to -- I'm going to keep  
10 these in order, but it's too hard to put them back  
11 on the sprocket there, and I'll do that when we're  
12 through, if that's all right.

13 THE COURT: Yes.

14 MR. SANGER: 301 consists of a number of  
15 pages. And in the book, I would say it's page four.  
16 It's the back of the second sleeved page. No, I'm  
17 sorry, it's the back of the first sleeved page, so  
18 it would be page two, I suppose. And let me put  
19 this up, if I may.

20 Do you want to see it first?

21 MR. AUCHINCLOSS: Uh-huh.

22 Q. BY MR. SANGER: All right. Exhibit 301 is  
23 the front, and then the back of the sleeve is the  
24 next page. And we'll use this document for the  
25 purpose of orienting everybody to the way this  
26 works.

27 At that time, there was a form that looked

28 like this, correct? 7071

1 A. Correct.

2 Q. And that form was changed slightly as time  
3 went on; is that correct?

4 A. Yes.

5 Q. But essentially you've got -- at the top,  
6 you have the blanket "Routine Authorized Entries."  
7 That's people who might be making deliveries, that  
8 sort of thing; is that correct?

9 A. That's correct.

10 Q. I see up there, for instance, "Santa Barbara  
11 Surfacing." Looks like somebody may have been there  
12 to do some surfacing work on the roads; is that  
13 correct?

14 A. I don't know what they were doing, but, yes.

15 Q. Okay. Just as an example, all right. And  
16 then I see -- looks like it says "Santa Ynez Ford."  
17 It is a little hard to see.

18 A. "Santa Ynez Feed."

19 Q. That would make more sense. "Santa Ynez  
20 Feed." That would be, for instance, you would  
21 assume somebody came on at 11:30 to deliver some  
22 feed, and by 11:57, or whatever that says, they went  
23 back out the gate, correct?

24 A. Correct.

25 Q. And the in-and-out times on this are  
26 recorded at the time somebody comes in the gate,  
27 right?



28 A. Yes. 7072

1 Q. And the time they leave, right?

2 A. Yes.

3 Q. So when somebody comes in the gate, the  
4 gates are opened if they're allowed to have access?

5 A. Right.

6 Q. They stop the car or the truck right there  
7 by the guard house, correct?

8 A. Right.

9 Q. And the guard comes up and greets them?

10 A. Yes.

11 Q. And will write down who the person is and  
12 write down the exact time that it is at that moment;  
13 is that correct?

14 A. Yes.

15 Q. And when they leave, the same thing occurs  
16 in reverse. They're stopped before the gate. The  
17 guard will record who's in the vehicle and the time  
18 that they're leaving; is that correct?

19 A. Well, yes. We would make sure it's the same  
20 person, and then we wouldn't record their name  
21 again, but we would just record their time out.

22 Q. Their time out, okay.

23 So if somebody came in with three people and  
24 only left with one, you'd want to know about that?

25 A. Yes.

26 Q. All right. Now, we have the guest names  
27 down there. And guests would be people who are

28 guests of the owner staying at the ranch, correct? 7073

1 A. Correct.

2 Q. And they might be guests who stay all day  
3 and they might be guests that are coming and going  
4 that same day; is that correct?

5 A. That's correct.

6 Q. All right. Now, I don't know if it's the  
7 glare or what. It's a little hard to read. Can you  
8 read it from there?

9 A. For the most part.

10 Q. Okay. Right at the top of "Guests," it  
11 says, "Grace"; is that correct?

12 A. Yes.

13 Q. And it says, "C/O." And that means?

14 A. Carried over. They were carried over from  
15 the previous 24-hour period.

16 Q. So, in other words, there's no entry time  
17 for Grace, because Grace was already there?

18 A. Already there at midnight the night before.

19 This was prepared at midnight the night before.

20 Q. And there's no indication that Grace left,  
21 so one would assume that she would still be there  
22 the next day?

23 A. At midnight of this day, this would be  
24 completed, and that "CO," carry-over, would be put  
25 in the "out" box. So she would continue to be  
26 carried over for the period.

27 Q. So let's look down the list. And the third

28 person on the list appears to have gotten there at 7074

1 1205; is that correct?

2 A. Correct.

3 Q. And that would be five minutes after noon;

4 is that correct?

5 A. Correct.

6 Q. And then left at 1440 hours, which would be

7 2:40 in the afternoon; is that correct?

8 A. Yes.

9 Q. Can you tell me who that person is?

10 A. I can't read that.

11 MR. SANGER: All right. May I approach with

12 a copy?

13 THE COURT: Yes.

14 Q. BY MR. SANGER: Now that you have it in

15 front of you, can you read the name?

16 A. Yes.

17 Q. What does it say?

18 A. "M. Bashir."

19 Q. So Mr. Bashir came there at five minutes

20 after noon and left at about 2:40, or left at

21 exactly 2:40, correct?

22 A. Yes.

23 Q. Let me leave that with you just for the

24 moment, just in case you have trouble reading the

25 rest of it.

26 A. Uh-huh.

27 Q. On that same day, it appears Chris Tucker

28 arrived; is that correct? 7075

1 A. Yes.

2 Q. And Chris Tucker arrived at?

3 A. 1500, or 3 p.m.

4 Q. So 3 p.m. And it appears that at the same  
5 time Chris Tucker arrived, a number of other people  
6 came through the gate; is that correct?

7 A. Yes.

8 Q. And those people include Gavin Arvizo?

9 A. Yes.

10 Q. Star Arvizo?

11 A. Yes.

12 Q. There are a couple of other people there,  
13 and then I think there are three other people, and  
14 then there's something that says, "Gavellin." Or  
15 what do you think it says?

16 A. Well, it looks like maybe "Aubrey."

17 Q. Below that. Right below that.

18 A. "Gavel" -- yeah, "Gavellin." I --

19 "Gavellin."

20 Q. "Gavellin." Do people always get the  
21 spelling right at the gate?

22 A. Not always, no.

23 Q. Okay. You try your best, but sometimes you  
24 just spell it the way you thought you heard it?

25 A. The way it sounds, yeah.

26 Q. All right. So those people, plus Adrian,  
27 Kelly Bond and Aubrey, or Audrey, whatever that



28 says, all those people seem to have come at three 7076

1 o'clock on the dot, correct?

2 A. Yes.

3 Q. All right. Now, it appears that Mr. Tucker  
4 and the Arvizos did not leave -- and I'll ask you to  
5 assume, just for the sake of this question, that  
6 "Gavellin" is an Arvizo. But those three people  
7 came at three o'clock and they did not leave that  
8 day; is that right?

9 A. Correct.

10 Q. All right. Let me retrieve my book, if I  
11 may. Thank you. I guess I was asking permission of  
12 the Court to approach there, to be specific.  
13 I'm now going to go to Exhibit 302, and this  
14 would be what appears to be the third page of 302 in  
15 the exhibit, the official exhibit book. So this  
16 does not have a tag on it, but the first page does.  
17 And I'm sure I would be corrected if I were wrong.  
18 This is 302 I'm putting up, the third page.  
19 So let's start up here, first of all. This  
20 is on 6-22, the date following the day that we just  
21 saw; is that correct?

22 A. Yes.

23 Q. And we look down here, and we see that it  
24 appears that Chris Tucker, Gavin, Star, and the  
25 other people we talked about, and then this  
26 "Gavellin," all show that they are carried over; is  
27 that correct?

28 A. Correct. 7077

1 Q. And they're carried over not only from the  
2 day before, but they appear to be carried over to  
3 the next day.

4 A. Correct.

5 Q. And if we look at 303 -- and we'll take  
6 page two of 303. It's on the back of the envelope  
7 here. So that's 303, and I'll turn it over, and  
8 that's the guest names. And once again, Chris  
9 Tucker, Gavin, Star, and "Gavellin" are all carried  
10 over as guests; is that correct?

11 A. Correct.

12 Q. And I'm sorry, that's the next day, 6-23; is  
13 that correct?

14 A. Yes.

15 Q. We go to 304, Exhibit 304. Looking at  
16 page two of 304, page two, 6-24-02?

17 A. Yes.

18 Q. And again, we show Chris Tucker, Gavin, Star  
19 and "Gavellin" all carried over; is that correct?

20 A. Yes.

21 Q. And it doesn't show any check-out time for  
22 them or any time they went by the gate; is that  
23 correct?

24 A. No. That's correct.

25 Q. And then 305, this would be the third page,  
26 6-25-02. And it shows Chris Tucker, Gavin, Star.

27 And I don't see "Gavellin" on there or "Davellin" or

28 anything else like that. But it shows that Chris 7078

1 Tucker's group left at 7:54 in the morning; is that  
2 correct?

3 A. Correct.

4 Q. So they would have been there overnight and  
5 then they left together?

6 A. Correct.

7 Q. Okay. Now, if we skip ahead timewise to --  
8 it's Exhibit 306, and it's page two of 306, it says  
9 "6-29-02" on the top, and it appears that Gavin,  
10 Star, and Davellin, or Davellin, and a limo driver  
11 all showed up at 46 minutes after midnight; is that  
12 correct?

13 A. Correct.

14 Q. And Gavin, Star and Davellin all stayed  
15 there overnight that day, correct?

16 A. Correct.

17 Q. And the limo driver got a cup of coffee and  
18 left, looks like.

19 A. Yes.

20 Q. Okay. And then going to Exhibit 307, about  
21 6-30-02, we have Gavin, Star and Davellin all  
22 staying overnight at the ranch, correct?

23 A. Correct.

24 MR. SANGER: All right. Excuse me just one  
25 second.

26 (Off-the-record discussion held at counsel  
27 table.)

28 MR. SANGER: Excuse me, Your Honor. I'm 7079

1 sorry. I just had to clear something up.

2 Q. Okay. I want to -- just because it's in  
3 sequence in the exhibits, let me show you 308, and  
4 this is a different kind of a form. And we'll be  
5 able to go a lot quicker here. And actually, we'll  
6 skip quite a ways ahead in a moment, just so  
7 everybody has something to anticipate.

8 308, okay, and I'll try to get as much of a  
9 wide angle as I can and still read it. Do you see  
10 that? It says, "Security Clearance and General  
11 Information"?

12 A. Yes. "Guest Information."

13 Q. Or, I'm sorry, I can't read it. All right.

14 I can read it here. "Guest Information."

15 And this is information about the people who  
16 were arriving. And actually, this dates back a  
17 little out of sequence. It dates back to 6-21-02,  
18 correct?

19 A. Correct.

20 Q. And basically this is information so you  
21 know how to treat the guests and what they can do;  
22 is that right?

23 A. We know who's coming and what they're able  
24 to do.

25 Q. Okay. So this tells you the estimated time  
26 of arrival; is that correct?

27 A. Correct.



28 Q. And you never know exactly if somebody's 7080

1 going to arrive on time, but it gives you a  
2 heads-up, right?

3 A. Right.

4 Q. And it shows Chris Tucker, Gavin Arvizo,  
5 Star Arvizo, Adrian, Kelly, Gavellin and Aubrey, it  
6 looks like.

7 So on 6-21, this was telling you these  
8 people are really going to show up, right?

9 A. Yes.

10 Q. And then at the bottom, it says Mr. Jackson  
11 has cleared the guests to have full access, correct?

12 A. Correct.

13 Q. So Chris Tucker and his guests are allowed  
14 to have full access to all of these activities; is  
15 that right?

16 A. That's right.

17 Q. And those activities include the hill house,  
18 pool, spa, water fort, dance studio, and then quad  
19 runners; is that right?

20 A. Yes.

21 Q. And what were the quad runners?

22 A. ATVs.

23 Q. Were people supposed to keep those on the  
24 property?

25 A. They were property of the ranch.

26 Q. But, I mean, they weren't supposed to go  
27 drive on Figueroa Mountain Road.

28 A. Correct. 7081

1 Q. And they definitely were not supposed to go  
2 into Los Olivos.

3 A. No.

4 Q. All right. And then there's scooters,  
5 right?

6 A. Uh-huh.

7 Q. Golf carts?

8 A. Yes.

9 Q. Jet skis. The main house. And written in  
10 is "horseback riding"?

11 A. Yes.

12 Q. So Mr. Jackson, according to this record,  
13 kept in the ordinary course of business, had cleared  
14 the guests to have full access to all of those  
15 activities?

16 A. Yes.

17 Q. And those guests would be Mr. Tucker and the  
18 Arvizos and his other guests; is that correct?

19 A. I believe Mr. Tucker, there, says he was the  
20 driver. Whether or not he had access to that stuff  
21 at the same time, probably, but --

22 Q. Do you know who Chris Tucker is?

23 A. Yes.

24 Q. Okay. Who is Chris Tucker?

25 A. He was an employee of the ranch.

26 Q. Okay. Are you thinking --

27 A. Or of Mr. Jackson.

28 Q. Are you thinking of Chris Carter? 7082

1 A. I'm sorry. Chris Tucker. Excuse me. I  
2 apologize.

3 Q. Chris Tucker is the actor?

4 A. Chris Tucker is the actor, yes. I'm sorry.

5 Q. Do you remember him visiting the ranch?

6 A. Yes.

7 Q. And you would assume Chris Tucker would  
8 have --

9 A. Chris Tucker, I'm sorry. Thank you.

10 Q. He would have full access to --

11 A. Yes, he would.

12 Q. All right. Now, if we go to Exhibit 309,  
13 you may recall -- let's show 309. There we go.

14 You may recall that when we went through the  
15 gate logs, it appeared that Gavin, Star and Davellin  
16 came back and Mr. Tucker was not there; is that  
17 correct?

18 A. Correct.

19 Q. Now, when they came back this time, they're  
20 estimated to arrive sometime in the evening. And if  
21 I'm not mistaken, I think they got there very early  
22 in the morning the next day. But here, Mr. Tucker  
23 is not there. They were not cleared for the quad  
24 runner or the jet skis; is that correct?

25 A. Yes.

26 Q. And they were not cleared for horseback  
27 riding; is that correct?

28 A. Correct. 7083

1 Q. Based on your experience and understanding  
2 of these records kept in the ordinary course of  
3 business, who would have given those instructions?

4 A. Those instructions there?

5 Q. Yes.

6 A. They would -- this would have come to us  
7 through the administration office.

8 Q. All right. So somebody in the chain of  
9 command above decided that, under these  
10 circumstances, that these children should not have  
11 access to the quads or the jet ski?

12 A. Correct.

13 Q. All right. We'll go to Exhibit 310. And  
14 this will be the second page of 310. And it appears  
15 that -- 7-1-02. And it appears that Gavin, Star and  
16 Davellin stayed overnight, correct?

17 A. Correct.

18 Q. And then they left at 2114 hours, which  
19 would be 9:14 in the evening, correct?

20 A. Correct.

21 Q. Now, then we skip ahead in time to September  
22 the 15th, which is the next record in the exhibit  
23 book which was presented to you by Mr. Auchincloss.  
24 And that shows 9-15-02; is that correct?

25 A. That's correct.

26 Q. And on 9-15-02, we have Chris Tucker, Gavin,  
27 Star, sister, it looks like it says Chris's nephew;



28 is that correct? 7084

1 A. Correct.

2 Q. There's a star there. What does that mean?

3 A. Probably means that the time was either not  
4 written down when they came in, or it was -- at that  
5 time, whomever was checking people in the gate  
6 failed to write them in, or we just didn't know when  
7 they came in.

8 Q. Okay. So every once in a while somebody  
9 makes a mistake, true?

10 A. Yes.

11 Q. That will happen.

12 And then it shows on that day, which is  
13 9-15-02, Mr. Tucker and his group, including Gavin,  
14 Star, sister, and Chris's nephew, all stayed  
15 overnight; is that correct?

16 A. Correct.

17 Q. I'm going to go to Exhibit 312. 9-16-02.

18 And here we have a record that Chris Tucker and his  
19 group stayed overnight. It also shows "bus driver,"  
20 correct?

21 A. Yes.

22 Q. Do you remember if Chris Tucker had a bus?

23 A. I don't know if he personally had a bus. I  
24 don't remember.

25 Q. Well, looks like the bus driver left with  
26 Chris Tucker and the rest of the party at 6:54 in  
27 the morning; is that correct?

28 A. Yes. 7085

1 Q. Now, do you know if Mr. Jackson was at the  
2 ranch at these various times that we've covered so  
3 far?

4 A. I don't know.

5 Q. Okay. Now, 9-26 -- I'm sorry, this would be  
6 Exhibit 313, the second page. 9-26 at the top, '02.

7 And I think you can read this, but if you can't,  
8 just tell me.

9 I don't know if I made it better or worse.

10 Okay. All right. Looks like Martin Bashir  
11 arrived at two o'clock in the afternoon and left at  
12 6:13; is that correct?

13 A. Yes.

14 Q. And it looks like he probably arrived with  
15 some other people there. There's three other  
16 people, correct?

17 A. Correct.

18 Q. We see -- we see Gary Hearn arrived at 2:30;  
19 is that correct?

20 A. Yes.

21 Q. All right. Looks like somebody adjusted  
22 that, but that was the way it was entered at the  
23 time; is that correct?

24 A. Correct.

25 Q. All right. And it looks like -- now, first  
26 of all, Gary Hearn is who?

27 A. Gary's a driver.

28 Q. He's a driver for Michael Jackson and for 7086

1 Neverland; is that correct?

2 A. Yes.

3 Q. He often drives a limousine or whatever car

4 is appropriate to transport people, correct?

5 A. Correct.

6 Q. And Gary Hearn seems to have arrived with

7 Gavin, Star, and "Davida" or "Davila" or something,

8 whatever that says, right?

9 A. Yes.

10 Q. All at the same time. And then it appears

11 that they were there from 2:30 and stayed overnight;

12 is that right?

13 A. Correct.

14 Q. And then I'm going to put up 314, the second

15 page. And it shows Gavin, Star, and "Davida" - I

16 think that's what it says - stayed over that night

17 as well, correct?

18 A. Correct.

19 Q. And then I'm going to put up 315, page two,

20 for 9-28, okay? I'm going to go down to the bottom,

21 and it looks like Gavin, Star, and "Davida," or

22 whatever that says - all right? - stayed overnight,

23 but they left at four o'clock in the afternoon; is

24 that correct?

25 A. That's correct.

26 Q. And it appears that Gary -- down at the

27 bottom, that's probably "Gary Hearn"; is that

28 correct? 7087

1 A. Most likely, yes.

2 Q. And Gary Hearn came and went, but he came in  
3 about three o'clock, and then left at exactly four  
4 o'clock; is that correct?

5 A. Yes.

6 Q. So based on that, you would assume that he  
7 drove the -- Gavin, Star, and whoever Davida is; is  
8 that correct?

9 A. Yes.

10 Q. And it looks like it -- it's really hard to  
11 see what that says there, but it does look like  
12 there's an entry, and I just want to clarify it so I  
13 don't get confused. It says something like "Maxim  
14 Bahit"?

15 A. Your guess is as good as mine.

16 Q. All right. It's not "Martin Bashir,"  
17 though?

18 A. It doesn't look like "Martin Bashir" to me.

19 Q. All right. Now, if somebody checks out --  
20 in other words, I say "checks out." If somebody  
21 goes through the gate, out, and then they go to  
22 dinner or to town or whatever, and they come back,  
23 when they come back, they should be logged back in  
24 again with the time?

25 A. Yes.

26 Q. Does that sometimes not happen?

27 A. For employees? Sometimes.



28 Q. For anybody. 7088

1 A. Yeah, I'm sure there's times when it  
2 happens.

3 Q. All right. Now, I'm going to skip way  
4 ahead, and you guys are going to be happy to hear  
5 that, to Exhibit 331.

6 Okay. I'm sorry. Better yet, 333. And I'm  
7 going to put 333 up. This is the second page of it.  
8 And there's a -- wide angle here. Okay. A medical  
9 report log; is that correct?

10 A. Correct.

11 Q. And that logs in various medical emergencies  
12 or skinned knees or anything else that happens that  
13 requires somebody to respond?

14 A. Each medical report for the year.

15 Q. And on the other side, actually the front  
16 side of 333, there's a medical report for Star  
17 Arvizo; is that correct?

18 A. Yes.

19 Q. Can you read that?

20 A. Not well. Actually, that really hurts my  
21 eyes. If you could bring it up, that would be  
22 great.

23 Q. Actually, I don't blame you.

24 May I approach, Your Honor?

25 THE COURT: Yes.

26 Q. BY MR. SANGER: I'm giving you a copy of  
27 that page. Can you take a quick look at it there?

28 And what I want to ask you is, basically, 7089

1 does this document reflect that Star Arvizo  
2 apparently had a fall on a scooter, slid on some  
3 loose gravel or something?

4 A. Yes.

5 Q. And he had minor scrapes to his left knee,  
6 right ankle and right knee?

7 A. Yes.

8 Q. So that sort of thing was documented  
9 carefully at Neverland, and that's an example of it;  
10 is that right?

11 A. Yes.

12 MR. SANGER: All right. May I approach to  
13 retrieve that, Your Honor?

14 THE COURT: Yes.

15 Q. BY MR. SANGER: All right. I'm now going to  
16 go to Exhibit 334. For the benefit of the Court and  
17 everybody else, it's probably about 90 pages, and so  
18 this is a part where I'm going to refer to -- I'll  
19 just put the first page up so we can see it here,  
20 334, and it's again one of the logs, which I believe  
21 here actually starts February 1 of '03, correct?

22 A. Yes.

23 Q. All right. And now I'm going to refer to a  
24 Bates stamp number, which is a number in the lower  
25 part of the document, generally the lower right  
26 corner, and I believe in all of these it starts out  
27 with "MJ" and two zeroes and then a number. And I

28 will refer to that so we're on the same page. 7090

1 THE COURT: Okay.

2 Q. BY MR. SANGER: And I'm going to skip to  
3 page 116. That's MJ00116. And I'm going to show  
4 you this here.

5 Now, this appears to be the format that was  
6 being used in 2003; is that correct?

7 A. Correct.

8 Q. And I think it's a little different, at  
9 least a little different than some of the forms that  
10 were used because under "Guest Information" you also  
11 have "Ranch Vehicle Information" --

12 A. Yes.

13 Q. -- showing when people come in and out.

14 On this particular document -- oops, sorry.

15 Let's try here. This is for February the 6th, 2003;  
16 is that correct?

17 A. Correct.

18 Q. And it appears that at 2243 hours -- let's  
19 see. 2245 hours, it should be 10:45 at night, it  
20 says, "Owner and guests"; is that correct?

21 A. Yeah. Could I see that page? I -- I would  
22 assume it does.

23 MR. AUCHINCLOSS: May I see that?

24 MR. SANGER: May I approach?

25 THE COURT: Yes.

26 THE WITNESS: Based on the paperwork that we  
27 fill out, we would not have put "owner" or

28 "Mr. Jackson" or anything that would represent him 7091

1 on this paperwork. In the time that I worked there,

2 I have never done that, that I can remember.

3 It could be -- it could be, "Owner and

4 guest," which I didn't write it, but definitely

5 could be.

6 Q. BY MR. SANGER: Okay. That's fair enough.

7 I'll ask you about that a little more so it makes

8 sense.

9 MR. AUCHINCLOSS: Could I see that again?

10 MR. SANGER: Sure.

11 Q. This is Mr. Jackson's home, right?

12 A. Correct.

13 Q. And so you were not -- not only not required

14 to, but you were really not supposed to write down

15 Mr. Jackson comes and goes and log him in like

16 somebody else; is that right?

17 A. That is correct.

18 Q. Okay. You saw what you thought said, "Owner

19 and guest," may have said, "Owner and guest," you're

20 not sure --

21 A. No.

22 Q. -- but it would not be typical for you to

23 write down "Owner"?

24 A. I've never done it. The whole time I was

25 there, I'd never done it.

26 Q. That's fine. And it does -- it looks like

27 it says, "Guest."



28 A. Yes. 7092

1 Q. All right. It doesn't say who the guests  
2 are?

3 A. No.

4 Q. And that's somewhat unusual, isn't it?

5 A. If someone had come in with Mr. Jackson, we  
6 don't routinely stop his vehicle and look in his  
7 vehicle. Again, it's privacy for him. We try to  
8 bother him as little as possible.

9 So if someone had -- if that is "Owner and  
10 guest" and someone had come with him, we would not  
11 have just stopped his vehicle and, for the most  
12 part, asked who was in there, unless we really felt  
13 it was necessary.

14 MR. SANGER: Do you want to leave that on?

15 MR. AUCHINCLOSS: Yeah.

16 MR. SANGER: Okay. All right. I won't put  
17 it here. I'll --

18 MR. AUCHINCLOSS: Yeah, that's fine.

19 Q. BY MR. SANGER: I want to see if we can  
20 reconstruct this a little bit. Where it just says,  
21 "Guests," there are no names?

22 A. Correct.

23 Q. So does that suggest to you that those  
24 guests were probably in a vehicle with Mr. Jackson?

25 A. It could have -- yes, it could have been.

26 Q. All right. And now we're going to go to --

27 and I'm sorry, that was on 2-6, February 6, 2003,

28 correct? I'll put it up again if you want. 7093

1 A. Yes. That's correct.

2 Q. All right. February 6th, 2003.

3 Do you know if Mr. Jackson was returning

4 from Miami that night?

5 A. I don't know.

6 Q. Okay. All right. And you're welcome to

7 look at this whole exhibit, if you want me to bring

8 the book down so you can see it, if you feel you

9 need to look at the pages in order or anything,

10 okay?

11 I'm going to put up 2-7-03, which is

12 MJ00120. And that is still a part of Exhibit 334,

13 okay? And you can see we're referring to the "120"

14 down there on the bottom, just so we're all

15 oriented. That's what we call the Bates stamp

16 number.

17 This is for 2-7-03; is that correct?

18 A. Yes.

19 Q. All right. Now, if you look at the

20 guests -- and I'm going to bring it a little closer

21 and give everybody a headache, all right? If you

22 look at the "Guests," it appears that there's an

23 M. Nicole Cascio --

24 A. Yes.

25 Q. -- who stayed overnight; is that right?

26 A. Yes.

27 Q. And it looks like a Dr. Farshshian stayed

28 overnight; is that correct? 7094

1 A. Yes.

2 Q. Actually, I'm going backwards. He's at the  
3 top of that list, right?

4 A. Right.

5 Q. It looks like he left at 8:30 in the  
6 morning, right?

7 A. Right.

8 Q. And then he may have come back at 10:15?

9 A. Yes.

10 Q. Okay. So let's go down to -- to "Marie  
11 Nicole," or it says, "M," something, Nicole Cascio."

12 You assume that's Marie Nicole?

13 A. Yes, uh-huh.

14 Q. So -- it says stayed over or carried over,  
15 so that would tell you she stayed overnight; is that  
16 right?

17 A. Yes.

18 Q. Now that you think about that in conjunction  
19 with the whatever-it-was "and guests," does that  
20 suggest that Marie Nicole Cascio was probably one of  
21 the guests that came in the day before?

22 A. Do you have the other pages for this?

23 Q. I have --

24 A. There's usually like three pages per day.

25 Q. Yes. Yes. You're welcome to look at them.

26 We have to be careful because we've got the book  
27 apart, and I want to put it back. So we have to

28 keep it in the same order here. 7095

1 Before I do, I'll let you see the whole  
2 thing, but it's safe to say you've got Gavin Arvizo,  
3 Star Arvizo, looks like "Daviella" now, Arvizo, Aldo  
4 Cascio, and Mom Arvizo, right?

5 A. Correct.

6 Q. And those are all carry-overs. So that  
7 would mean, to you, that they were there --

8 A. The night before.

9 Q. -- the night before?

10 A. Prior to midnight of that day.

11 Q. Of this day, which was 2-7 --

12 A. Correct.

13 Q. -- 03.

14 Okay. And it also appears that they then  
15 continued to stay overnight on the 7th; is that  
16 right?

17 A. Yes.

18 MR. SANGER: Okay. So now having said that,  
19 if it's all right with the Court, I'll approach with  
20 the book so that the witness can see everything in  
21 context.

22 Q. And I'll just speak loud for a moment, if I  
23 can.

24 The pages are in the exact order of the  
25 exhibit, so keep them in that same order, if you  
26 would.

27 A. Yes.



28 At some point they came in on the 6th and 7096

1 were there on the 7th.

2 Q. All right. And as you look at that --  
3 before I come up and retrieve it, as you look at  
4 that, there's no specific record where those  
5 particular individuals, that is, the Cascios and the  
6 Arvizos, were logged in by name as coming in.

7 A. No.

8 Q. Other than perhaps just that reference to  
9 "Owner and guest," or whatever it says; is that  
10 correct?

11 A. Correct.

12 MR. SANGER: All right. May I approach to  
13 retrieve the book, Your Honor?

14 THE COURT: Yes.

15 MR. SANGER: Okay. Thank you, sir.

16 Q. Now, I'm going to go to page 121 of the same  
17 exhibit. It will still be 334 until further notice,  
18 if that's all right.

19 So it's -- it says 121, MJ00121 at the  
20 bottom. And then this is -- at the top, rather than  
21 "Guest," there are a number of people who are listed  
22 there. And this is -- there's no date at the bottom  
23 of this, correct?

24 A. Correct.

25 Q. So you need to try to ascertain the date by  
26 figuring out where it falls within the context of  
27 the other documents, right?

28 A. Correct. The -- it would have been, again, 7097

1 with at least one, most likely two other pieces of  
2 paper that -- gate logs.

3 Q. All right. And for the purpose of -- well,  
4 I'll withdraw that.

5 This shows that at the ranch, there were  
6 quite a number of people; is that correct?

7 A. Yes.

8 Q. And it says, "CBS Entertainment" there; is  
9 that correct?

10 A. Yes.

11 Q. Now, it appears that on that list -- I won't  
12 read them all, but on that list is "Ed Bradley";  
13 is that right?

14 A. Yes.

15 Q. Are you familiar with Ed Bradley of CBS?

16 A. Yes.

17 Q. And Jack Sussman, is he a producer at CBS?

18 You don't know?

19 A. I have no idea.

20 Q. That's okay. There are a number of other  
21 people associated with CBS there, right?

22 A. Yes.

23 Q. And it indicates that all the people  
24 associated with CBS, at least down to the point that  
25 it's recorded -- let me withdraw that.

26 It looks like Jack Sussman arrived at 9:40;

27 is that right?

28 A. Yes. 7098

1 Q. Doesn't show that he was checked out?

2 A. No.

3 Q. Okay. We assume he's not still there.

4 A. Yes.

5 Q. Okay. You got Ed Bradley. Can you read

6 that?

7 A. Yes. The times?

8 Q. Yeah, the times.

9 A. 10:30 to -- it's either 18 or 1900. So

10 6 or 7 p.m.

11 Q. And then the rest of them are 10:30 to

12 7 p.m., is that correct?

13 A. Yes.

14 Q. 10:30 to 7 p.m.

15 Were you on duty that day?

16 A. I don't know.

17 Q. Do you remember there being a large group of

18 people?

19 A. I don't remember being there when CBS was

20 there.

21 Q. All right. That's fair enough.

22 All right. Now we go to page 123, which is

23 dated -- by that I mean MJ00123, which is dated

24 2-9-03, correct?

25 A. Yes.

26 Q. And here we show on the 9th of February,

27 2003, that you have Gavin Arvizo, Star Arvizo,

28 Davellin Arvizo. It shows they were all -- if you 7099

1 just look at those entries, they were all carried  
2 over from the night before?

3 A. Correct.

4 Q. And then it shows that they left at about  
5 1:30 --

6 A. Yes.

7 Q. -- and apparently left with the person right  
8 before there, whose name is, oh, Marie Nicole.

9 A. Yes.

10 Q. That says "Marie Nicole" right above "Gavin  
11 Arvizo"?

12 A. Yes.

13 Q. So they all left at 1:30. Doesn't tell you  
14 where they went; is that correct?

15 A. That's correct.

16 Q. And then they came back at 4:15 in the  
17 afternoon?

18 A. Yes.

19 Q. It does appear that there are two other  
20 people down at the bottom, Anna Ruiz and looks like  
21 Silvana Ruiz. Do you see those?

22 A. Yes.

23 Q. Looks like they left at 1330, which is 1:30,  
24 and came back at 4:15, right?

25 A. Correct.

26 Q. And it says "limo" there. Does that mean  
27 they went by limo?



28 A. Yes. 7100

1 Q. And you don't know how the Arvizos traveled  
2 on that occasion, do you?

3 A. No.

4 Q. You would assume that somebody gave them a  
5 ride, though?

6 A. Yes.

7 Q. Okay. And then it shows next they're  
8 carried over -- that being the Arvizos -- they're  
9 carried over. They stayed overnight; is that  
10 correct?

11 A. Yes.

12 Q. And then we have page MJ00126, which shows  
13 2-10-03, correct?

14 A. Correct.

15 Q. And here we see the Arvizos and Marie Nicole  
16 staying overnight; is that correct?

17 A. That's correct.

18 Q. And it shows there "Mrs. Arvizo," as well,  
19 under "Anna Ruiz," correct?

20 A. Yes.

21 Q. And it appears that they stayed overnight.

22 Not only were they overnight the night before, but  
23 they're staying overnight the next night; is that  
24 correct?

25 A. Yes.

26 Q. So that's the 10th.

27 Now, did the -- did the procedures change at

28 some point to where you would start logging in where 7101

1 people were staying at the ranch?

2 A. Yes.

3 Q. All right. I want to show you 2-11-03,

4 which is 00129, Bates stamp number 129. Okay,

5 2-11-03, correct?

6 A. Yes.

7 Q. And here on 2-11 -- oops, sorry -- it

8 appears that Dieter Weizner was staying in Guest

9 Unit No. 4.

10 A. Yes.

11 Q. And he stayed overnight?

12 A. Yes.

13 Q. If you go down to the next, it shows Janet

14 Arvizo.

15 A. Yes.

16 Q. All right. I'm sorry, when I said "the

17 next," I meant to say skip one. It goes down to

18 Janet Arvizo, Guest Unit No. 2.

19 A. Yes.

20 Q. Stayed overnight, or she was staying

21 overnight, correct, from the night before?

22 A. Yes.

23 Q. But on this day, and again, "this day" being

24 February the 11th, then Arvizo leaves at 5:04 in the

25 afternoon, correct?

26 A. Correct.

27 Q. And she comes back at three minutes to 8:00?

28 A. Correct. 7102

1 Q. Okay. It shows, "Gavin and Star, house"?

2 A. Yes.

3 Q. That means they're staying at the house,  
4 according to this?

5 A. Yes.

6 Q. And then it shows -- now, what does that say  
7 now?

8 A. It looks like "Daniella."

9 Q. Okay. Seems this name changes continuously.

10 But anyway, whoever that is, D. Arvizo, whatever it  
11 says there, is staying in Unit No. 2; is that  
12 correct?

13 A. Yes.

14 Q. And then Marie Nicole is staying in the doll  
15 room, right?

16 A. Yes.

17 Q. That's in the house?

18 A. Correct.

19 Q. And Aldo, her brother, is staying in the  
20 house; is that correct?

21 A. Yes.

22 Q. Now, Ronald Konitzer is there in Unit No. 1,  
23 correct --

24 A. Yes.

25 Q. -- is that right?

26 And his wife and two children are also

27 staying there at the ranch in Unit No. 1; is that

28 correct? 7103

1 A. Yes.

2 Q. Now, Units 1, 2, 3 and 4 are the four guest  
3 units that are right by the lake; is that correct?

4 A. That's correct.

5 Q. And they're just across the front --

6 A. Grass.

7 Q. Yeah, the front entrance.

8 A. The driveway.

9 Q. The driveway for the entry of the house.

10 They're right across from the front of the house in  
11 a building that has four units in it?

12 A. Yes.

13 Q. All right. So according to this, Ronald  
14 Konitzer, his wife and children, are staying in 1.  
15 Davellin's in 2 with Janet. And there are these  
16 other two people. Dieter's in 4. And this Mark  
17 Lester, whoever that is, is in 3, right?

18 A. Right.

19 Q. Now, excuse me one second. I think it got  
20 cut off here. Hold on.

21 Yeah, okay. On this -- at the bottom here,  
22 same page, we're still on 129 for February 11th,  
23 '03, at the very bottom, you have "Ranch Vehicles,"  
24 right?

25 A. Yes.

26 Q. And I'm going to direct your attention to  
27 the one just before the bottom. It says "Katie,"



28 and it's kind of cut off, but it's Katie Bernard; is 7104

1 that correct?

2 A. Yes.

3 Q. Do you know who Katie Bernard is?

4 A. Yes.

5 Q. Who is she?

6 A. She's a secretary for the ranch.

7 Q. Works at the ranch?

8 A. Yes.

9 Q. Is she a nice person?

10 A. Very nice.

11 Q. It says, "Black van," right?

12 A. Yes.

13 Q. And what is the black van?

14 A. Black van. It would be the -- it's a ranch

15 vehicle that usually Gary drives.

16 Q. Okay. So it's a vehicle that's used to

17 drive people places, if the guests want to go to

18 town or do something else, or go to the airport or

19 whatever, it can be used for that, correct?

20 A. Yes.

21 Q. All right. Now, it looks like Katie Bernard

22 checks the black van out and then she leaves at four

23 minutes -- at 5:04; is that correct?

24 A. Correct.

25 Q. So it appears that she is taking Janet

26 Arvizo off the ranch, correct?

27 A. They at least left at the same time.

28 Q. If it's down to the minute, they're either 7105

1 right in the same car or one right behind the other.

2 A. Yes.

3 Q. But usually it's the same car, right?

4 A. Yes.

5 Q. It would be 1705 by the time you get to the  
6 next car, probably, right?

7 A. Yes.

8 Q. Now, it looks like Katie Bernard was gone  
9 long enough to, say, go to town, drop somebody off  
10 and come back, right?

11 A. Yes.

12 Q. All right. Now we go to 2-12. And this is  
13 page 132, 00132, and it shows February the 12th,  
14 2003; is that correct?

15 A. That's correct.

16 Q. All right. Now, here, let's start with the  
17 guests. And I take it -- I think it's obvious to  
18 everybody, the Xerox machine evidently cut off the  
19 edge of the page there, correct?

20 A. Yes.

21 Q. Here it appears that there are a number of  
22 guests overnight, including Gavin, Star, and  
23 Davellin, however her name is spelled, all right?

24 A. Yes.

25 Q. We'll call her Davellin, all right?

26 A. Okay.

27 Q. It appears that they stayed overnight,

28 correct? 7106

1 A. Yes.

2 Q. And then it appears -- and Janet as well,  
3 correct? It says Janet, Gavin, Star, Davellin?

4 A. Yes.

5 Q. They all stayed overnight, and then they all  
6 left at 1:38 in the morning; is that right?

7 A. That's right.

8 Q. So when they went to the gate, whoever was  
9 driving them stopped the vehicle and said, "We're  
10 leaving. And we have Janet, Gavin, Star and  
11 Davellin here," correct?

12 A. Yes.

13 Q. So the person at the gate, the guard at the  
14 gate, could check all these people out at that date?

15 A. Yes.

16 Q. There was no secret spiriting of people  
17 away. This was checking right out at the gate?

18 MR. AUCHINCLOSS: Objection; argumentative.

19 MR. SANGER: That probably was. I'll

20 withdraw it.

21 THE COURT: All right. I'll sustain the

22 objection.

23 MR. SANGER: There we go.

24 Q. In other words, this is done according to  
25 procedure. A car comes up; the driver identifies

26 the people in the car?

27 A. Either the driver or the security officer.

28 Q. Or the security officer looks in and sees 7107

1 who it is, and he opens the gate and they go, right?

2 A. Correct.

3 Q. All right. If you look at the bottom here,

4 we also have something that says, "Salas," and it

5 just says, "u-s Salas," but your bet would be that's

6 "Jesus Salas," correct?

7 A. Yes.

8 Q. Just got cut off by the Xerox machine.

9 And he checks out the Rolls Royce, right?

10 A. Correct.

11 Q. Do you know what kind of Rolls Royce that

12 is?

13 A. I don't know which one exactly that is.

14 There was a couple. They were older.

15 Q. Nice car?

16 A. Nice, yes.

17 Q. Nice car, all right. And he checked it out

18 according to the ranch procedures, correct?

19 A. Correct.

20 Q. And he checks out -- it goes out at 1:38,

21 correct?

22 A. Yes.

23 Q. He does whatever he does, and he gets back,

24 in the Rolls Royce, by 9:08 in the morning, correct?

25 A. Yes.

26 Q. Now, Gary Hearn was there. He's a driver,

27 correct?



28 A. Yes. 7108

1 Q. And he was staying overnight; is that right?

2 A. Yes.

3 Q. Okay. I think I'm going to go to 135. Hold  
4 on one second. Excuse me, Your Honor. I'm sorry.

5 Let me skip ahead a little bit.

6 Okay. I'm going to go to 149. Show the  
7 bottom first. 149.

8 Now, it says 2-17 through 2-26-03. Is that  
9 a typical way to do this?

10 A. It has -- I've seen it done. I think it  
11 says 2-20, but --

12 Q. 2-20, you're right, I'm sorry. 2-17 through  
13 2-20?

14 A. The reason we would do something like this  
15 would be if we knew we were going to have guests for  
16 a certain period of time.

17 Q. So you have here -- and let me do this,  
18 first of all, so we can see it, and then I'll focus  
19 in a little better for you.

20 At the top where it says -- ordinarily you'd  
21 put your service people and whatnot up there, that's  
22 crossed out and it just says, "Guest List" and the  
23 whole page is used for "Guest List"?

24 A. Yes.

25 Q. Down through the first two parts of it, in  
26 any event; is that right?

27 A. Yes.

28 Q. And on the guest list -- let me see if we 7109

1 can get closer and read it.

2 Can you find the one that I did?

3 MS. YU: Yeah.

4 MR. SANGER: Let me borrow that.

5 Q. 2-17 through 2-20, it shows -- well, it

6 looks like Davidia Arvizo was staying overnight, had

7 been staying overnight; is that correct?

8 A. Stayed overnight at least once.

9 Q. All right. And then it shows "out" at 1951;

10 is that correct?

11 A. Yes.

12 Q. Do you know what day she left at 1951, 7:51

13 in the evening?

14 A. No.

15 Q. All right. And then you have Gavin is also

16 staying overnight and leaves at 1951, correct?

17 A. Yes.

18 Q. And you have Janet, who leaves at 2145?

19 A. Yes.

20 Q. And then, again, Star is 1951?

21 A. Yes.

22 Q. And here it shows that the Arvizos are

23 staying -- it says --

24 A. I would assume it's "Dance Studio."

25 Q. Staying at the dance studio?

26 A. Yes.

27 Q. All right. And it shows the Cascios, Aldo

28 and Marie Nicole, are staying at the main house; is 7110

1 that correct?

2 A. Yes.

3 Q. And then there's a number of other people  
4 there who are staying in the guest units down there.  
5 We don't have to go through all of the names, but I  
6 see Ann Konitzer and kids is in one.

7 A. Yes.

8 Q. With Ronald Konitzer?

9 A. Yes.

10 Q. And there are other people staying in the  
11 other units, right?

12 A. Yes.

13 Q. Okay. Now, if we go to MJ00151, it says  
14 2-18. And it doesn't show all those guests that you  
15 showed -- I'm sorry, it does not show all the guests  
16 that were shown on page 149 that we just looked at;  
17 is that right?

18 A. Correct.

19 Q. So since the other one said 2-17 through  
20 2-20, you would assume that some or all of those  
21 people were continuing to stay overnight; is that  
22 correct?

23 A. Yes. We most likely had that one that you  
24 just showed without the guests, we had that for  
25 every day --

26 Q. Okay.

27 A. -- up through that period, because we would

28 still need to have written down somewhere where 7111

1 those people, or general deliveries, contractors or  
2 whatever, were still coming in.

3 Q. If we go to 155, which is for 2-19, it  
4 doesn't show all those other guests that were  
5 listed, correct?

6 A. Correct.

7 Q. But it does show some new guests, for  
8 instance, fan club people there?

9 A. Yes.

10 Q. Who apparently came onto the ranch for a  
11 while; is that correct?

12 A. For the day, it looks like.

13 Q. Okay. Now, I'm going to go to 2-20-03,  
14 which is 157. And again, if you want to look at any  
15 of the pages in between, you're welcome to do it.  
16 I'm trying to pick out the ones that count here, but  
17 you can look at anything you want.

18 So this is 2-20-03, and this shows guests as  
19 of 2-20. It shows Aja Pryor coming in at 1420  
20 hours.

21 A. Yes.

22 Q. Along with Dustin Tucker. Is that her son?

23 A. I don't know.

24 Q. Okay. Aja Pryor is Chris Tucker's  
25 girlfriend? Or you don't --

26 A. I have no idea.

27 Q. Okay. Do you know who Aja Pryor is at all?



28 A. No. 7112

1 Q. In any event, whoever they are came in at  
2 1420. At the same time, Gavin, Star and Davellin  
3 came in at 1420 hours; is that correct?

4 A. Yes.

5 Q. So evidently they left sometime before the  
6 time that they returned on 2-20, right?

7 A. Yes.

8 Q. And I showed you that other page where it  
9 said 2-17 to 2-20; is that correct?

10 A. Yes.

11 Q. And it showed some "out" times, but it  
12 didn't tell you the day?

13 A. Right.

14 Q. So if somebody were to have left, say, on  
15 the 19th, the time was there, but you wouldn't have  
16 the day to determine whether it was the 19th, the  
17 17th, or what?

18 A. If that's how that particular paper was  
19 kept, yes. I don't know exactly what was going on,  
20 why -- I'm sure we had the extra sheet because we  
21 had so many people.

22 Q. All right.

23 THE COURT: One thing you need to do is to  
24 keep referring to the page number.

25 MR. SANGER: Did I fail to do that on the  
26 last one?

27 THE COURT: I don't -- I don't think you did.

28 Maybe I missed it, but -- 7113

1 MR. SANGER: Okay. I'm sorry. The one that

2 I just put up was 00157.

3 THE COURT: Yes.

4 MR. SANGER: And that is for 2-20-03.

5 THE COURT: You did refer to it. I just

6 missed it. I'm sorry.

7 Is this a good place to stop?

8 MR. SANGER: Fine, Your Honor.

9 THE COURT: All right. We'll reconvene

10 tomorrow morning at 8:30. Remember the admonition.

11 (The proceedings adjourned at 11:30 a.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 7058 through 7114

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 20, 2005, and thereafter

20 reduced to typewriting by computer-aided

21 transcription under my direction.

22 DATED: Santa Maria, California,

23 April 20, 2005.

24

25

26

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



