



April 5, 2005

6 MR. ZONEN: We'll call Blanca Francia to the
7 stand.

8 THE COURT: Come to the front of the
9 courtroom, please.

10 When you get to the witness stand, remain
11 standing. Face the clerk over here, and raise your
12 right hand.

13 Remain standing.

14 BAILIFF CORTEZ: Remain standing.

15 THE COURT: Face the clerk here. Right over
16 here.

17 BAILIFF CORTEZ: Right over there, please.
18

19 BLANCA FRANCIA

20 Having been sworn, testified as follows:
21

22 THE WITNESS: Yes, I do.

23 THE CLERK: Please be seated. State and
24 spell your name for the record.

25 THE WITNESS: Blanca Francia. B-l-a-n-c-a;
26 F-r-a-n-c-i-a.

27 BAILIFF CORTEZ: Ma'am, you need to move
28 over here, please. 4976

1 THE WITNESS: Oh.

2 MR. ZONEN: Would you like her to spell her
3 name again?

4 THE COURT: Did the court reporter get the
5 spelling?

6 THE REPORTER: Yes.

7 THE COURT: That's fine.

8 THE JURY: (In unison) We didn't.
9 (Laughter.)

10 THE COURT: Yes, please ask her to spell her
11 name again.

12 MR. ZONEN: Could you please spell your name
13 again?

14 THE WITNESS: B-l-a-n-c-a; F-r-a-n-c-i-a.
15

16 DIRECT EXAMINATION

17 BY MR. ZONEN:

18 Q. Miss Francia, good morning.

19 A. Good morning.
20 Q. Do you currently live in Santa Barbara
21 County?
22 A. Yes.
23 Q. Up in the North County area?
24 A. Uh-huh.
25 Q. Are you the mother of Jason Francia?
26 A. Yes, I am.
27 Q. What kind of work are you currently doing?
28 A. Caregiving. 4977
1 Q. All right. What we need to do, we have a
2 problem here. And it's not just with you, a lot of
3 witnesses. You have to be as close as you can get
4 to the microphone so that you can be heard all the
5 way to the back of the courtroom. Okay?
6 A. Okay.
7 Q. All right. Are you the mother of Jason
8 Francia?
9 A. Yes.
10 Q. And what kind of work are you currently
11 doing?
12 A. Caregiving.
13 Q. I'm sorry?
14 A. Caregiving.
15 Q. And what does that mean, a caregiver?
16 A. Taking care of elderly people. Disabled.
17 Q. Do you have a couple clients who you work
18 for?
19 A. Yes.
20 Q. And are they disabled in some fashion?
21 A. Yes. I deal with one six years, almost six
22 years, yeah.
23 Q. Okay.
24 A. And another one just recently, about a
25 couple of months.
26 Q. And how long have you been doing this kind
27 of work?
28 A. On and off, I've been doing it for about 15 4978
1 years.
2 Q. And prior to that, what kind of work did you
3 do?
4 A. Housekeeping. Housecleaning.
5 Q. And for what period of time did you do that
6 work?
7 A. Since I came to the country.
8 Q. When did you come to the United States?
9 A. 1975.
10 Q. And from what country did you come from?
11 A. El Salvador.
12 Q. You have been to -- in this country
13 continuously since 1975?
14 A. Yes.

15 Q. Have you been back to El Salvador to visit
16 at all?

17 A. A couple of times.

18 Q. Your English, how did you learn English?

19 Did you go to school?

20 A. No.

21 Q. How did you learn English?

22 A. Reading, and listening to people, and

23 that's --

24 Q. How old were you when you came to this
25 country?

26 A. About 21.

27 Q. Okay. Do you know Mr. Jackson, Michael

28 Jackson? 4979

1 A. Yes.

2 Q. Do you see him in this courtroom?

3 A. Yes.

4 Q. Would you indicate where he is sitting,
5 please?

6 A. He's sitting right there.

7 MR. ZONEN: Your Honor, could the court
8 record reflect that the witness has identified the
9 defendant?

10 THE COURT: All right.

11 Q. BY MR. ZONEN: How do you know Mr. Jackson?

12 A. I work -- work about five years.

13 Q. When did you begin working for Mr. Jackson?

14 A. 1986.

15 Q. And where did you begin working for Mr.
16 Jackson, at what location?

17 A. Havenhurst. Encino, California.

18 Q. Havenhurst is the name of the street?

19 A. Yes.

20 Q. And was there a house on that street --

21 A. Yes.

22 Q. -- where he lived?

23 All right. What were you doing for Mr.

24 Jackson at the Havenhurst residence?

25 A. I was hired to be his personal housekeeper.

26 Q. Were there other members of the Jackson

27 family living at the Havenhurst residence?

28 A. Yes. 4980

1 Q. Can you tell us who they were?

2 A. At that time Janet and LaToya, and his
3 father and mother.

4 Q. Would you describe the Havenhurst residence
5 for us, just briefly? A large home?

6 A. Their whole house? Yeah. He has his
7 separate quarters in the house. But it was in the
8 same house.

9 Q. Okay. Was it a large home?

10 A. Yes.

11 Q. And his quarters, were you responsible for
12 just his quarters or did you clean in the whole
13 house?

14 A. Well, yes, just his quarters. His place.
15 But eventually when he will go out on tour, I will
16 stay at the house and help the household.

17 Q. You would clean the rest of the house as
18 well?

19 A. Uh-huh.

20 Q. Did Mr. Jackson ever have an additional
21 residence other than the residence on Havenhurst?

22 A. After I was there for about a year, I think,
23 or less than a year, he got another one. Like --
24 kind of an apartment, suite. Called it "The
25 Hideout."

26 Q. Where was that; do you know?

27 A. I know it's on Wilshire. And I don't know
28 the other street. 4981

1 Q. And describe that location for us, if you
2 would.

3 A. What do you mean?

4 Q. Tell us what it was like, his apartment.

5 A. Oh.

6 Q. Or his residence. How many rooms in it; do
7 you know? Do you recall?

8 A. Three. It had a master bedroom, and two
9 other rooms, bedrooms.

10 Q. Did it have a living room?

11 A. Yes.

12 Q. I assume a kitchen?

13 A. Kitchen, and another little room.

14 Q. Okay. At least a couple bathrooms?

15 A. I don't remember.

16 Q. You don't recall --

17 A. No.

18 Q. -- how many bathrooms?

19 A. I don't remember.

20 Q. It's okay. Do you recall for what period of
21 time you cleaned that residence?

22 A. For about a year.

23 Q. Was he living at that residence during that
24 time, Mr. Jackson?

25 A. Yeah, he totally move his --

26 Q. I'm sorry?

27 A. He totally move from Encino to that hide --
28 to that place. He move his office to -- to near 4982
1 that location.

2 Q. Okay. Was there a bed at that residence?

3 A. No.

4 Q. Never?

5 A. Never.

6 Q. The whole time that you were cleaning there?

7 A. Yeah.
8 Q. Okay. Did you go to a different location
9 after the hideout? Was there yet another residence?
10 A. Yeah, he was in process to get a ranch.
11 Q. Okay.
12 A. In Los Olivos.
13 Q. And was that Neverland?
14 A. Yeah.
15 Q. Was that the ranch that he actually did
16 purchase?
17 A. Uh-huh. Yes.
18 Q. Did he move to that ranch?
19 A. Eventually, yeah. But he was on and off.
20 They sent me over here before he moved in.
21 I mean --
22 Q. I'm not sure I understood that, "They sent
23 me over here before he moved in." Who is "they,"
24 first of all?
25 A. Well, they arrange, Mr. Jackson and Bill
26 Bray and one of the secretaries.
27 Q. Okay. Bill Bray was who?
28 A. His personal assistant I guess. 4983
1 Q. All right. And you said, "They sent me
2 here." Where is "here"?
3 A. Santa Maria.
4 Q. Santa Maria. So did you actually move to
5 Santa Maria?
6 A. Yeah. They pay me to move here.
7 Q. And did you move with your child?
8 A. Yes.
9 Q. Is Jason your only child?
10 A. My only son.
11 Q. Did Jason grow up with his father at all?
12 A. No.
13 Q. Has he had contact with his father at all?
14 A. No.
15 Q. How old was Jason when you moved to Santa
16 Maria?
17 A. I guess about nine.
18 Q. About nine years old?
19 A. Eight or nine, yeah.
20 Q. Okay. Did you continue working for Mr.
21 Jackson after you moved to Santa Maria?
22 A. Excuse me?
23 Q. Did you continuing to work for Mr. Jackson --
24 A. Yes.
25 Q. -- after you moved to Santa Maria?
26 A. Yes.
27 Q. And was that at Neverland?
28 A. Yes. 4984
1 Q. All right. What were your responsibilities
2 at Neverland? What did you do for Mr. Jackson?

3 A. To clean his room.
4 Q. I'm sorry?
5 A. To clean his bedroom. And taking care of
6 his clothes and his personal stuff.
7 Q. All right.
8 A. His -- all his -- you know, whatever he
9 needed. And to clean up and arrange all his
10 clothes, press them, iron them, and, you know,
11 everything.
12 Q. What was your schedule at Neverland? How
13 often did you work there?
14 A. In the beginning, I think I was just -- he
15 was there, I will come, you know, and work for three
16 days, whatever time he will stay there, and then,
17 you know, not to be there for another two days. But
18 eventually he move to -- like to 9:00 to 5:00.
19 Q. Five days a week?
20 A. Five days a week. Six days.
21 Q. Six days? Did you ever work more than 9:00
22 to 5:00?
23 A. Yeah.
24 Q. Your hours, times, would they vary different
25 days?
26 A. Yeah. Christmastime and -- you know,
27 whatever time they needed me, because he was there.
28 Q. Were there occasions that you would work 4985
1 late?
2 A. Yes.
3 Q. And you say six days a week. Was that
4 common?
5 A. Was that what?
6 Q. Was that a common event, that you would work
7 six days a week?
8 A. Yeah.
9 Q. Okay. During that time, did you ever bring
10 Jason with you to work? And by "this time," I'm
11 referring to at Neverland.
12 A. Yes.
13 Q. Okay. Did you ever bring Jason to work with
14 you at the Havenhurst residence in Encino?
15 A. Yes, it was.
16 Q. Did you ever bring Jason to work with you at
17 the hideout on Wilshire Boulevard?
18 A. Yeah.
19 Q. And why did you do that?
20 A. Well, the first time I didn't know that
21 I was allowed to do it. But Mr. Jackson asked me
22 to -- to bring him.
23 Q. You said the first time. Where was that?
24 A. At the Encino house.
25 Q. At the Encino house?
26 A. Yeah.

27 Q. Did he say why?
28 A. He just told me to bring him. 4986
1 Q. Okay. And did you bring him on occasion?
2 A. Yeah. From then on, he was there a lot of
3 times.
4 Q. Okay. How often would you bring him to the
5 residence at Encino?
6 A. Probably every weekend. And probably twice
7 a month, then, different -- differently. I don't
8 remember.
9 Q. Was that schedule more or less at the
10 hideout? Did you bring him to the hideout as often?
11 More often?
12 A. Uh-huh.
13 Q. Less often? What?
14 A. Not a lot of times, because he was in
15 school, so probably on Saturday or Sundays.
16 Q. Did you continue cleaning at the hideout
17 even after Mr. Jackson moved to Neverland in '88?
18 A. Yes.
19 Q. How often?
20 A. Probably every week. Sometimes twice a
21 week.
22 Q. At Neverland, what were your specific
23 responsibilities? What were your obligations? What
24 did you do at Neverland?
25 A. Do you mean for him?
26 Q. Yes, for Mr. Jackson. Yes.
27 A. Like I said, taking care of his clothes, his
28 room. 4987
1 Q. Okay.
2 A. And right after he leave the room, I will
3 have to clean it right away, because sometime he
4 will stay there, you know, he'll come out, and then
5 he'll go back in right away.
6 Q. Okay. Were your responsibilities beyond his
7 room as well? In other words, did you clean the
8 rest of the house?
9 A. Yes.
10 Q. Did you ever clean other buildings at
11 Neverland?
12 A. Yes.
13 Q. The arcade?
14 A. The arcade, yeah.
15 Q. The theater?
16 A. The theater.
17 Q. Okay.
18 A. Yeah.
19 Q. Most of the time where did you work?
20 A. In the house.
21 Q. Were there other maids at Neverland --
22 A. Yes.

23 Q. -- who were -- there were other maids at
24 Neverland?
25 A. Yes.
26 Q. Yes, all right. At any given time, how many
27 maids were working at Neverland at any given time?
28 A. Maybe about six. 4988
1 Q. Were there others who had responsibility for
2 cleaning Mr. Jackson's bedroom?
3 A. No.
4 Q. You were the only one?
5 A. Yeah.
6 Q. Did you have a key?
7 A. Yes.
8 Q. Is that the only way you got in?
9 A. Yeah.
10 Q. Was there a combination lock at any point?
11 A. No.
12 Q. Not while you were there? Is that a key
13 that you carried around with you?
14 A. Yes.
15 Q. Okay. Would you just let yourself in?
16 A. Yes.
17 Q. How would you announce your presence? How
18 would you let Mr. Jackson know you were coming in,
19 if, in fact, he was there?
20 A. I'll knock.
21 Q. Uh-huh. Now, could you describe the suite
22 that is his bedroom? It's actually more than one
23 room; is that right?
24 A. Yeah. It's two rooms. One downstairs and
25 one upstairs.
26 Q. And is there a hallway that goes into it?
27 A. Closet.
28 Q. I'm sorry? 4989
1 A. A closet.
2 Q. There's a closet, okay.
3 A. Yeah.
4 Q. When you go --
5 A. A walk-in closet.
6 Q. When you go into his suite, do you go
7 through a door that is locked?
8 A. No.
9 Q. All right. Is there any way of securing his
10 bedroom suite?
11 A. Well, his bedroom suite, with a key --
12 Q. Yes.
13 A. -- that I would have.
14 Q. Where is that door, the one that you unlock
15 with the key that you carry?
16 A. In the hallway.
17 Q. In the hallway?
18 A. Yeah.

19 Q. So you unlock that door and you go through
20 that door. And where do you find yourself at that
21 point?
22 A. Yeah.
23 Q. I'm sorry?
24 A. Yes.
25 Q. Where are you? As soon as you walk through
26 that door, the door that you unlock, where are you
27 at that point? Are you in a room or a hallway?
28 A. In the bedroom. 4990
1 Q. In the bedroom, all right.
2 A. Uh-huh.
3 Q. Was there at that time some kind of an alarm
4 or a bell?
5 A. Yeah, that's before you get to the door.
6 Q. Before you get to the door?
7 A. Yeah, that's in the hallway.
8 Q. All right. And you would announce your
9 presence when you came in?
10 A. Yeah.
11 Q. Were there ever occasions that you would
12 announce your presence and Mr. Jackson would be in
13 the room?
14 A. Yeah.
15 Q. Were there ever occasions where you would
16 announce your presence and he wasn't there?
17 A. Yeah.
18 Q. Did you try to go to his room when he wasn't
19 there to clean?
20 A. When he was there? When he wasn't?
21 Q. Yeah, what did you try to do, what was your
22 preference? To clean while he was there, or to
23 clean while he wasn't there?
24 A. I'll -- well, sometimes he'll be there and
25 I'll be cleaning.
26 Q. Uh-huh.
27 A. It didn't matter.
28 Q. Okay. Where was his bed, incidentally, at 4991
1 that time? Where did he sleep?
2 A. As soon as you came into the bedroom, that's
3 his bed.
4 Q. So his bed was downstairs?
5 A. Yes.
6 Q. Was there another bed upstairs?
7 A. Yes.
8 Q. Which bed did he sleep in?
9 A. Downstairs.
10 Q. And you would make --
11 A. Most of the --
12 Q. And you would make that bed; is that right?
13 A. Yes.
14 Q. All right. Did he ever have visitors over

15 at his home?
16 A. Yeah.
17 Q. Visitors who stayed?
18 A. Excuse me?
19 Q. Visitors who stayed for periods of time?
20 A. Yes.
21 Q. Did you know a person by the name of Wade
22 Robeson?
23 A. Yeah.
24 Q. Who was Wade Robeson?
25 A. He was a young kid, a young little boy.
26 Q. How old was Wade Robeson when you first met
27 him?
28 A. Probably eight. Seven or eight. 4992
1 Q. Do you know where Mr. Robeson -- where Mr.
2 Robeson - an eight-year-old - where Wade Robeson
3 came from?
4 A. Yes. From a different country. I mean,
5 from another country. Switzer --
6 Q. Do you know which country?
7 A. No, I don't remember.
8 Q. But you recall that it was from a different
9 country?
10 A. Yeah.
11 Q. Was it an English-speaking country or a
12 country with a different language?
13 A. Different language.
14 Q. Did you ever talk to Wade Robeson?
15 A. A little bit.
16 Q. Was he there with family?
17 A. With his mother.
18 Q. Do you remember --
19 A. I think he has a little sister. I don't
20 remember.
21 Q. All right. Did Wade Robeson --
22 MR. MESEREAU: Objection. The prosecutor
23 didn't let the witness finish.
24 MR. ZONEN: I'm sorry, I thought she had.
25 Q. Please go ahead, if you hadn't finished that
26 answer.
27 A. Excuse me?
28 Q. I think you said he has a little sister? 4993
1 A. Yeah. I don't remember, tell you the truth.
2 Q. Do you have a recollection of a sister?
3 A. I -- you know, I don't remember, tell you
4 the truth.
5 Q. Do you remember his mother?
6 A. His mother, yeah.
7 Q. Where did she stay when they were there?
8 A. In the guesthouse outside. They call them
9 the guest quarters.
10 Q. The guest quarters?

11 A. Uh-huh.
12 Q. Do you remember if Wade Robeson's father was
13 there?
14 A. No.
15 Q. Where did Wade Robeson stay?
16 A. In Mr. Jackson's room.
17 Q. All right. In the bedroom?
18 A. Yeah.
19 Q. For what period of time was Wade Robeson
20 visiting Mr. Jackson?
21 A. Weeks.
22 Q. Weeks?
23 A. Yeah.
24 Q. When he would come, would he stay -- what's
25 the longest that he would stay at any one time?
26 MR. MESEREAU: Objection; foundation.
27 THE COURT: Sustained.
28 MR. ZONEN: Well, let me ask a couple 4994
1 preliminary questions.
2 Q. You've already told us that you cleaned Mr.
3 Jackson's room.
4 A. Yes.
5 Q. Were you the only one who cleaned Mr.
6 Jackson's room?
7 A. Yes.
8 Q. Did you go into Mr. Jackson's room daily,
9 every single day, when you were working?
10 A. Yes.
11 Q. Were you working at that period of time, as
12 you said, at least five and sometimes six days a
13 week?
14 A. Yeah.
15 Q. Would you be the first one in his room in
16 the morning?
17 A. Yes.
18 Q. Would you have to fix his bed?
19 A. There were times when nobody knew that he
20 was going to be there, and they call me at home,
21 telling me, "He's here, and so you have to come and
22 clean up."
23 Q. Did you see Wade Robeson there?
24 A. Yeah.
25 Q. All right. Did you see him there for days
26 at a time?
27 A. Yeah. Yes.
28 Q. Did you see where he was staying? 4995
1 A. Yes.
2 Q. Okay. Where was he staying?
3 A. In Mr. Jackson's room.
4 Q. All right. Did you see Wade Robeson's
5 belongings?
6 A. Yeah.

7 Q. What kind of belongings did he have?
8 A. He had clothes, little suitcase, kids'
9 suitcase, and his clothes in there.
10 Q. All right. Would you wash Michael Jackson's
11 clothing as part of your job?
12 A. Yeah.
13 Q. Did you wash Wade Robeson's clothing?
14 A. As well, yes.
15 Q. Always?
16 A. Yes.
17 Q. Whenever he was there?
18 A. Yes. I find them on the floor, so I'll --
19 I'll wash them.
20 Q. And his clothing was found on the floor in
21 where?
22 A. Different places.
23 Q. Whose room?
24 A. Mr. Jackson's room.
25 Q. All right. Would you find Mr. Jackson's
26 clothing there as well?
27 A. Yes.
28 Q. And that was your responsibility, your job, 4996
1 to simply gather up the clothing and launder it?
2 A. Yeah. Yes.
3 Q. And then return it to his room?
4 A. Uh-huh.
5 MR. MESEREAU: Objection. Leading; move to
6 strike.
7 THE COURT: It's leading; sustained.
8 Stricken.
9 Q. BY MR. ZONEN: Was there a place that --
10 where you kept Wade Robeson's clothing after you
11 laundered it?
12 A. No, I put them together with his clothes and
13 in his case, his little suitcase.
14 Q. Now, tell us how often Wade Robeson came to
15 visit.
16 I have two questions and we'll do one at a
17 time. Let me tell you both of them. How often he
18 came, and how often -- how long he stayed each time
19 he came. So let's start with the first one.
20 How often did he come, Wade Robeson?
21 MR. MESEREAU: Objection; foundation.
22 THE COURT: Overruled.
23 You may answer.
24 THE WITNESS: How often did he come?
25 Q. BY MR. ZONEN: How often did he come to
26 Neverland to visit Mr. Jackson?
27 A. Uh --
28 MR. MESEREAU: Vague as to time; objection. 4997
1 THE COURT: Sustained.
2 Q. BY MR. ZONEN: Well, tell me when he first

3 came. You said he was eight years old. Do you
4 remember what year that was?
5 Excuse me.
6 A. Probably --
7 Q. I'm sorry.
8 A. '99.
9 Q. '99 or '89?
10 A. '89, I mean.
11 Q. You quit working there when?
12 A. In '90 -- '91, I think. '91.
13 Q. '91. All right. So you think it might have
14 been in 1989 that Mr. Robeson visited?
15 A. '89.
16 Q. Young Wade Robeson?
17 A. Yeah.
18 Q. And were you the one who was working for
19 Mr. Jackson exclusively in his bedroom during that
20 time?
21 A. Yes. One occasion I left and somebody else
22 got in charge. The manager --
23 Q. Uh-huh.
24 A. -- got in charge of cleaning, you know, when
25 I left for vacation.
26 Q. And for how long was that?
27 A. Probably about two weeks.
28 Q. All right. But for the rest of the time, 4998
1 you were there cleaning?
2 A. Yes.
3 Q. And during that period of time when Wade
4 Robeson was there, were you able to see him?
5 A. Yes.
6 Q. Were you able to do his laundry?
7 A. Yes.
8 Q. Were you able to see him daily? Did you
9 ever actually see him in Mr. Jackson's bedroom?
10 A. Yes.
11 Q. Daily?
12 A. (Nods head up and down.)
13 Q. Daily?
14 A. Yes.
15 Q. Okay. Now, you said that he first came, you
16 think, in 1999?
17 A. Uh-huh yes.
18 Q. How many separate times? When was the last
19 time he came? In other words, how long after the
20 first visit was the final visit, to your knowledge?
21 A. I don't remember. It was, I guess, about a
22 year, less than a year before I left.
23 Q. So were the visits, then, over a period of
24 time of one year?
25 A. Yeah.
26 Q. Do you know how many separate times he came

27 during that one-year period to visit?
28 A. He'll be there for weeks, and then he'll 4999
1 leave and come back after two weeks.
2 Q. And stay for how long?
3 A. For another week.
4 Q. Did he generally stay for at least a week?
5 A. Yes.
6 Q. Mr. -- Wade Robeson was there for quite some
7 time?
8 A. Yes.
9 Q. All right. And during that time, are you
10 aware of him staying anyplace other than Michael
11 Jackson's bedroom?
12 A. No. He'll stay there as far as I know.
13 Q. Now, your obligation, of course, was not
14 just to clean up, but to do the linens?
15 A. Yes.
16 Q. The sheets off the beds; is that right?
17 A. Change.
18 Q. You said that there were two beds --
19 A. Uh-huh, yeah.
20 Q. -- at least? Were there more than two beds
21 in his suite or just two?
22 A. No, just two.
23 Q. Did you make the beds every single day?
24 A. Yes.
25 Q. During the time that Wade Robeson was there,
26 how many beds did you make? One or more than one?
27 A. Just that one.
28 Q. The one that was Mr. Jackson's bed? 5000
1 A. Yeah. The one upstairs was rarely used.
2 Q. All of the visits when Wade Robeson came,
3 was his mother there for all of the visits?
4 A. Sometimes.
5 Q. Were there some times that she was not
6 there?
7 A. Yes.
8 Q. But Wade Robeson came by himself?
9 A. Yeah.
10 Q. Do you know how?
11 A. Mr. Jackson will bring him.
12 Q. He would bring him?
13 A. Yeah.
14 Q. And during that entire year of visits, did
15 you ever see Wade Robeson's father?
16 A. You know, that I don't remember. I --
17 Q. You don't have a picture of him in your
18 mind?
19 A. No.
20 MR. MESEREAU: Objection. Leading; move to
21 strike.
22 THE COURT: Sustained. It's stricken.

23 Q. BY MR. ZONEN: Do you have a picture of him
24 in your mind?
25 A. Of the little boy?
26 MR. MESEREAU: Objection; asked and
27 answered.
28 THE COURT: The objection is overruled. But 5001
1 she's asked for clarification.
2 MR. ZONEN: Let me change the question, if I
3 can. I'll withdraw the question.
4 THE COURT: All right.
5 Q. BY MR. ZONEN: Can you describe Wade
6 Robeson's father to us?
7 A. No.
8 Q. And I think that you said that there might
9 have been a sister. Do you recall a sister?
10 A. I don't remember. So many kids there, I
11 don't remember.
12 Q. Okay. Was there ever an occasion, to your
13 recollection, where any other child stayed with Mr.
14 Jackson in his room while Wade Robeson was there?
15 A. No.
16 Q. Only Wade Robeson?
17 A. Yes.
18 Q. All right. Was there ever an occasion where
19 you walked into his room and you saw some kind of a
20 separate sleeping arrangement, what you believe to
21 be a separate sleeping arrangement for Wade Robeson?
22 MR. MESEREAU: Objection. Vague; leading;
23 foundation.
24 THE COURT: I'll sustain vague.
25 Q. BY MR. ZONEN: Did you ever see a sleeping
26 bag on the floor?
27 A. No.
28 Q. Did you ever see anything that causes you to 5002
1 believe that Wade Robeson was sleeping someplace
2 other than in Michael Jackson's bed?
3 A. No.
4 Q. Was there an occasion that you went into
5 Michael Jackson's room and came upon Michael Jackson
6 and Wade Robeson?
7 MR. MESEREAU: Objection; leading.
8 THE COURT: Overruled.
9 You may answer.
10 THE WITNESS: Did I what?
11 Q. BY MR. ZONEN: Come into Michael Jackson's
12 room and discover that Michael Jackson was there
13 with Wade Robeson.
14 A. Yeah.
15 Q. Okay. Was there an occasion when you went
16 in and they were in the shower?
17 MR. MESEREAU: Objection; leading.
18 THE COURT: Sustained.

19 Q. BY MR. ZONEN: Did you ever come in and find
20 them in a situation that made you uncomfortable?
21 MR. MESEREAU: Objection; leading.
22 THE COURT: Overruled.
23 Q. BY MR. ZONEN: Do you understand what I'm
24 asking?
25 A. That I was what?
26 Q. Where you were uncomfortable. You found
27 them and you were uncomfortable.
28 MR. MESEREAU: Objection; leading. 5003
1 THE COURT: Overruled.
2 You may answer.
3 THE WITNESS: Well, I came one time and -- in
4 the bedroom.
5 MR. ZONEN: Uh-huh.
6 THE WITNESS: And first I thought they were
7 playing.
8 MR. MESEREAU: Objection.
9 THE WITNESS: And --
10 MR. MESEREAU: Nonresponsive.
11 THE COURT: Sustained.
12 Q. BY MR. ZONEN: All right. The question was
13 "yes" or "no."
14 A. Yes.
15 Q. Okay. Tell us what you heard when you first
16 walked into the room.
17 A. Laughing.
18 Q. Okay.
19 A. And playing; like playing around.
20 Q. Okay. What did you do?
21 A. I came in, and I -- first I thought that
22 they were playing in the bathtub, Jacuzzi, and I
23 didn't see them. And then I thought they were
24 outside, playing outside the house; I mean, in his
25 garden. And I walked and they were in the shower.
26 Q. You have to explain to us a little bit the
27 layout here.
28 A. Uh-huh. 5004
1 Q. Is there a Jacuzzi inside his house, inside
2 his bedroom?
3 A. Inside his bedroom, yeah.
4 Q. So explain that for us. Describe to us what
5 you get to first. The shower? The Jacuzzi?
6 Explain how it's laid out.
7 A. First, you get to the bed. And then you get
8 in the bathroom, they call it the ladies' bathroom,
9 and there's a big Jacuzzi there.
10 Q. Okay. Was there a door that goes to that
11 bathroom?
12 A. Yeah.
13 Q. Was the door open or was the door closed?
14 A. No, the door is open. It was open.

15 Q. And what did -- did you look into that door?
16 A. Which door?
17 Q. The door that goes to the bathroom.
18 A. Well, I have to go through there.
19 Q. Okay.
20 A. Yeah.
21 Q. What do you mean, you have to go through
22 there?
23 A. To get to the bathroom.
24 Q. And did you do that?
25 A. Yeah.
26 Q. What did you see?
27 A. And then I was going to walk outside to the
28 garden, but then -- 5005
1 Q. Okay.
2 A. -- on my way going, I peek, and it was in
3 the shower.
4 Q. And what did you see?
5 A. And I hear this playing around. That's
6 where he was taking a shower, I guess.
7 Q. Okay.
8 A. With little Wade.
9 Q. What did you see? Tell me what you saw.
10 A. I -- what I saw, I -- just some clothes on
11 the floor.
12 Q. You saw clothes on the floor in the bathroom
13 or in the bedroom?
14 A. No, in the shower.
15 Q. In --
16 A. By the shower.
17 Q. By the shower. What clothing did you see on
18 the floor?
19 A. Underwear.
20 Q. Underwear?
21 A. (Nods head up and down.)
22 Q. More than one pair?
23 A. Yeah.
24 MR. MESEREAU: Objection; leading.
25 THE COURT: Overruled. Next question.
26 Q. BY MR. ZONEN: How many pair did you see?
27 A. Two.
28 Q. Two pair of underwear? 5006
1 A. Yeah.
2 Q. Did you recognize the underwear?
3 A. Yeah.
4 Q. And how did you happen to recognize the
5 underwear?
6 A. The -- Mr. Jackson's, I knew they were
7 white. And the little boy, they were colored.
8 Q. All right.
9 A. They were little underwear.
10 Q. Can you describe the little boy's underwear?

11 A. They were little green underwear.
12 Q. Green underwear?
13 A. Uh-huh. Had like a neon color.
14 Q. Neon green?
15 A. Yeah.
16 Q. Just in case he lost them?
17 You did his underwear previously, didn't
18 you? You had washed his underwear previously?
19 A. Uh-huh.
20 Q. Did you know Wade Robeson's underwear?
21 A. Yeah.
22 Q. Okay.
23 A. They have little, you know, characters, like
24 Spiderman and things like that.
25 Q. Child's?
26 A. Child's.
27 Q. A small child's underwear?
28 A. Yeah. 5007
1 Q. And Mr. Jackson's underwear you washed
2 regularly as well?
3 A. Yeah.
4 Q. And his underwear was what type?
5 A. I don't know. I think they call them
6 briefs.
7 Q. And what color?
8 A. White.
9 Q. Okay. You say you found two pair. Where
10 were they?
11 A. On the floor.
12 Q. Okay. And on the floor in the bathroom?
13 A. Yeah.
14 Q. Now, how far is the underwear from either
15 the Jacuzzi or the shower?
16 A. Well, they're right by -- they were right by
17 the door, by the shower.
18 Q. Okay. Was water running?
19 A. Yeah.
20 Q. Excuse me. And the water was running in
21 the -- in the shower?
22 A. Yes.
23 Q. Did you -- did you know that, that the water
24 was running, when you first came into his bedroom
25 suite?
26 A. Well, I heard the radio, and then eventually
27 I hear the water going.
28 Q. I'm sorry, I heard the first part. 5008
1 A. The radio. I heard the radio.
2 Q. You heard the radio?
3 A. Yeah, playing. And then eventually I hear
4 the water going.
5 Q. And then you heard the water?
6 A. Yeah, because I hear two people, you know,

7 playing.
8 Q. And you say you heard two people playing.
9 What were the sounds that you heard?
10 MR. MESEREAU: Objection; asked and
11 answered.
12 THE COURT: Sustained.
13 Q. BY MR. ZONEN: Did you hear two voices?
14 A. Yeah.
15 MR. MESEREAU: Objection; asked and
16 answered.
17 THE COURT: Leading; sustained.
18 Q. BY MR. ZONEN: For what period of time did
19 you hear sounds?
20 A. Maybe about a minute.
21 Q. Did you recognize the voices that you heard?
22 A. Yeah.
23 Q. Whose voices were they?
24 A. Mr. Jackson.
25 Q. Did you recognize the second voice?
26 A. Yeah.
27 Q. Whose voice was that?
28 A. The little kid, the -- 5009
1 Q. Wade?
2 A. Wade's, little boy.
3 Q. When you finally reached a spot where you
4 could see in, was your vision obscured by anything?
5 MR. MESEREAU: Objection. Leading; assumes
6 facts not in evidence.
7 MR. ZONEN: Withdraw the evidence --
8 withdraw the question.
9 Q. In that bathroom, is there a shower curtain?
10 A. No.
11 Q. What is there in that bathroom?
12 A. A glass door.
13 Q. A glass door. Is it a glass door that is
14 fogged or is it a glass door that is clear?
15 A. It's clear, but at that time it was smoky.
16 Q. Okay. Smoky?
17 A. Cloudy.
18 Q. Cloudy? From the shower?
19 A. Yeah.
20 Q. All right. When there's no shower going,
21 can you see through the glass?
22 A. Yeah.
23 Q. On this occasion when the shower was going,
24 could you see through the glass?
25 A. No.
26 Q. Could you see any figure at all? What could
27 you see?
28 MR. MESEREAU: Asked and answered. 5010
1 THE WITNESS: I saw a figure.
2 MR. ZONEN: Hold on.

3 THE COURT: Just a minute.
4 The objection is overruled. "I saw a
5 figure" is the answer. Go ahead.
6 Q. BY MR. ZONEN: Did you see more than one
7 figure?
8 A. Yeah.
9 Q. All right. Did you recognize either of the
10 figures that you saw?
11 A. Mr. Jackson.
12 Q. All right.
13 A. And the little kid.
14 Q. Was one figure larger than the other?
15 A. Yeah.
16 Q. Was the second figure the size of Wade
17 Robeson?
18 A. Yeah. Yes.
19 Q. What did you do at that point?
20 A. That he was going to get mad, or --
21 MR. MESEREAU: Objection; nonresponsive.
22 THE COURT: Sustained.
23 MR. MESEREAU: Move to strike.
24 Q. BY MR. ZONEN: What did you do at the time
25 that you saw Mr. Jackson and Wade Robeson in the
26 shower? What did you do then?
27 A. I was going to talk to them, but then I
28 thought, "No, I better not," so I just went back. 5011
1 Q. Did you leave the room?
2 A. I -- yeah, I left the room.
3 Q. Did you tell Mr. Jackson that you had been
4 in the room?
5 A. No.
6 Q. Did you back into the room at a later time?
7 A. Yeah, to clean the room.
8 Q. Miss Francia, was there ever an occasion
9 where you saw your son Jason with Mr. Jackson and
10 you were concerned?
11 MR. MESEREAU: Objection; leading.
12 THE COURT: Overruled.
13 You may answer.
14 Q. BY MR. ZONEN: Go ahead.
15 A. I was concerned for my son, yes.
16 Q. Can you tell us when that happened?
17 A. The first time, it was -- I think it was in
18 Encino.
19 Q. Okay.
20 A. That I remember that I walked in, because I
21 had the key to that room, too.
22 MR. MESEREAU: Objection. Nonresponsive;
23 move to strike.
24 THE WITNESS: And I walked in --
25 THE COURT: Wait. Just a moment, please.
26 All right. No question was pending, so I'll

27 strike her answer.
28 Q. BY MR. ZONEN: All right. It was in Encino. 5012
1 Do you remember when that was?
2 A. Do you mean the date?
3 Q. Or the year.
4 A. Probably '86. I don't remember.
5 Q. Okay. How old was Jason?
6 A. Probably about seven or eight, probably.
7 Seven.
8 Q. Seven. And what did you see that concerned
9 you?
10 A. Well, I saw little things before that with
11 other kids, and --
12 MR. MESEREAU: Objection; nonresponsive.
13 Q. BY MR. ZONEN: Just tell us what you saw --
14 THE COURT: Sustained.
15 Q. BY MR. ZONEN: Just tell us what you saw
16 with Jason.
17 A. Well, he was sitting on his lap.
18 Q. Okay. And what concerned you?
19 A. And I walked in, and he was sitting on his
20 lap, and Mr. Jackson was just reclining, reclining
21 to the back.
22 Q. Reclining?
23 A. Reclining to the back.
24 Q. Okay.
25 A. And having my son in his lap.
26 Q. And where was Jason positioned on his lap?
27 A. His legs.
28 Q. Okay. And what did you do? 5013
1 A. I just told my son to get out. And he
2 was -- I remember he say, "No, I'm fine."
3 MR. MESEREAU: Objection. Nonresponsive;
4 move to strike.
5 Q. BY MR. ZONEN: You told your son to get out?
6 THE COURT: Just a moment.
7 Stricken.
8 Q. BY MR. ZONEN: You told your son to get out?
9 A. Yeah.
10 Q. Did he do so?
11 A. No.
12 Q. What did you do then?
13 A. I think I push him, and -- oh, he was --
14 some kind of -- reading a book or coloring. And Mr.
15 Jackson say, "I want him to read," or "I'm reading a
16 story," something like that.
17 Q. Did you take your son off of his lap?
18 A. Yeah. Yes.
19 Q. Was there another occasion that you were
20 concerned?
21 MR. MESEREAU: Objection; leading.
22 THE COURT: Overruled.

23 Q. BY MR. ZONEN: You can answer.

24 A. Yeah, I remember one time, too, at the
25 Encino house that I want my son to stay downstairs,
26 because he -- he will come and -- Mr. Jackson will
27 come and, you know, probably wanted to be by
28 himself, and I said, "You stay here," and I -- 5014

1 Q. You said that to who?

2 A. To my son, you know, to "Stay here. Stay
3 here, because Michael is here, and," you know, "he
4 probably want to be by himself."

5 And then he find out -- I guess Mr. Jackson
6 find out that my son was there, and so he took him
7 upstairs.

8 And I got mad, because my -- I told my son
9 not to go with him, but I got concerned because my
10 son --

11 MR. MESEREAU: Objection. Nonresponsive;
12 move to strike.

13 THE COURT: I'll strike the last sentence.

14 Q. BY MR. ZONEN: Did you go look for your son?

15 A. No.

16 Q. When did you next see your son?

17 A. What do you mean?

18 Q. On that day, on that occasion.

19 A. Oh. Well, I -- I did my cleaning, or
20 whatever I was doing, and after, he came -- he came
21 down.

22 Q. Okay. Let me ask you about the hideout. At
23 the hideout, you had mentioned that there wasn't a
24 bed. What did Mr. Jackson sleep in?

25 A. He sleeps in a sleeping bag.

26 Q. All right. The whole time that he was at
27 the hideout?

28 A. Yeah. There was no bed. 5015

1 Q. I'm sorry?

2 A. There was no bed there.

3 Q. Was there ever an occasion that you and your
4 son stayed the night at the hideout?

5 A. No.

6 Q. You always left at the end of the day?

7 A. Yeah.

8 Q. And did you have an apartment that was
9 someplace in Los Angeles at that time?

10 A. He?

11 Q. You.

12 A. Oh, yeah, I did.

13 Q. So during the time that you were going to
14 the hideout regularly --

15 A. Yeah.

16 Q. -- you had an apartment.

17 And I think that you had testified that even
18 after you moved to Santa Maria, there were still

19 occasions that you went back to clean at the
20 hideout?

21 A. Many times, yeah.

22 Q. Do you know for approximately how long after
23 you moved to Santa Maria?

24 A. Probably a year.

25 Q. Okay. Now, what did he -- I asked you what
26 he slept on, and you said a sleeping bag. Describe
27 the sleeping bag for us. What kind of a sleeping
28 bag was it? 5016

1 A. A regular sleeping bag that you sleep on.

2 Q. Sleeping bag for one person? For two
3 people? How big?

4 A. A regular one.

5 Q. Just a regular sleeping bag?

6 A. Yeah.

7 Q. Was that sleeping bag always open, or was it
8 rolled up?

9 A. It was open.

10 Q. Always?

11 A. Well, when I made it, I would try to make it
12 like a bed, you know.

13 Q. Were there any blankets on the sleeping bag
14 or under the sleeping bag?

15 A. Yeah, there were blankets.

16 Q. Which? On the sleeping bag or --

17 A. On the sleeping bag, yes.

18 Q. Was the sleeping bag simply on the floor?

19 A. Yeah.

20 Q. Was there carpet on the floor?

21 A. Yes.

22 Q. Did you ever see Jason on or in the sleeping
23 bag?

24 A. One time.

25 Q. Was Mr. Jackson there?

26 A. Yes.

27 Q. Were they on the sleeping bag or were they
28 in the sleeping bag? 5017

1 A. They were on the sleeping bag, yeah.

2 Q. On top of the sleeping bag?

3 A. Yeah.

4 Q. Could you see their body -- bodies, both of
5 them?

6 A. Not Mr. Jackson's.

7 Q. Why not?

8 A. Because it was covered.

9 Q. Okay. So the sleeping bag covered Mr.
10 Jackson?

11 A. Yeah.

12 Q. How about Jason? Where was Jason?

13 A. He was in the sleeping bag, too.

14 Q. He was in the sleeping bag.

15 How were they positioned relative to each
16 other? Do you know what I mean? Were they facing
17 each other? Were they facing away from each other?
18 Do you recall?
19 A. I remember this time he was this -- on this
20 side, and my son was on this side. And I got there
21 about three or four times, and one time he was -- my
22 son was --
23 MR. MESEREAU: Objection; nonresponsive.
24 THE COURT: It's kind of hard to tell. Maybe
25 you could start with another question.
26 MR. ZONEN: Yes, I can.
27 Q. I asked you initially how they were
28 positioned. In other words, were they facing each 5018
1 other? Were they facing away from each other? Do
2 you recall? When you saw them the first time.
3 A. The first time, my son was just laying
4 there.
5 Q. Okay.
6 A. But on one time, because I was cooking for
7 Mr. Jackson, I was doing some lunch, or snacks, or
8 something --
9 Q. I'm sorry?
10 A. I was cooking some snacks.
11 Q. Snacks. Okay.
12 A. Popcorn.
13 Q. Okay.
14 A. I don't remember.
15 Q. Are we still talking about the same event,
16 the same day?
17 A. Yes.
18 Q. Okay. So when --
19 A. Hmm?
20 Q. When you first saw your son in the sleeping
21 bag with Mr. Jackson, did you say anything to your
22 son at all when you first saw him in the sleeping
23 bag?
24 A. I told him to come up, outside, and eat,
25 because I wanted to feed him.
26 Q. Okay. And did he?
27 A. No.
28 Q. All right. What did you do? 5019
1 A. He say, "I want to stay here."
2 Q. Okay. What did you do?
3 A. And -- well, I got mad. And I said, you
4 know, "You got to get out to the kitchen," and he
5 didn't wanted to.
6 Q. All right. Were you speaking with him in
7 English or in Spanish at that time; do you recall?
8 A. No, I don't remember.
9 Q. Do you know what language -- what language
10 do you speak with your son now?

11 A. Spanish.
12 Q. You speak Spanish?
13 A. Yeah.
14 Q. You've always spoke Spanish with him?
15 A. Yeah.
16 Q. His wife does or does not speak Spanish?
17 A. No.
18 Q. In her presence, what do you speak?
19 A. English.
20 Q. Okay. But he grew up speaking Spanish?
21 A. Yes.
22 Q. And he's very fluent in Spanish?
23 A. Yes.
24 Q. When you asked him to come out to go eat, in
25 what language was that?
26 A. I think I said it in Spanish. But then I
27 want Mr. Jackson to understand what I was telling
28 him to do, and so I guess I said it in Spanish and 5020
1 English. I don't remember.
2 Q. So you're not certain at this point?
3 A. No.
4 Q. All right. Did he get out of the sleeping
5 bag?
6 A. No.
7 Q. What did you then do? Did you leave the
8 room or --
9 A. I left the room and I proceed to do my stuff
10 and --
11 Q. Okay. And what happened then?
12 A. Then I went back and -- and then he was
13 eating, but he was -- oh, I took something to eat to
14 him.
15 Q. Okay. When you came back out, was he still
16 in the sleeping bag with Mr. Jackson?
17 A. Yeah.
18 Q. What were they doing in the sleeping bag? I
19 don't mean in the sleeping bag, but what were they
20 doing in the room?
21 A. They were watching T.V.
22 MR. MESEREAU: Objection; foundation.
23 THE COURT: A time frame?
24 MR. MESEREAU: Yes.
25 THE COURT: Sustained.
26 Q. BY MR. ZONEN: At the time that you first
27 came into that room, was the television on?
28 A. On, yes. 5021
1 Q. Do you remember approximately what time of
2 the day it was?
3 A. Probably was about 2:00, 1:00 or 2:00 in the
4 afternoon.
5 Q. Was the room light or was the room dark?
6 A. It was dark. It gets really dark.

7 Q. But this was about 1:00 or 2:00 in the
8 afternoon?
9 A. Yeah.
10 Q. Were there shades on the windows?
11 A. Draperies, curtains.
12 Q. Draperies. And were they drawn? Were they
13 closed?
14 A. Closed.
15 Q. So the light was not in?
16 A. No.
17 Q. Do you remember what they were watching on
18 television?
19 A. No.
20 Q. Do you know what Jason used to like to watch
21 at that time?
22 MR. MESEREAU: Objection; relevance.
23 THE WITNESS: At that time --
24 MR. ZONEN: I'll withdraw the question.
25 THE COURT: All right.
26 Q. BY MR. ZONEN: How old was Jason, to your
27 recollection, at that time, as best you can recall?
28 A. Probably like eight. Probably eight. That 5022
1 was --
2 Q. I'm sorry, go ahead.
3 A. -- before we move here to Santa -- to --
4 before he moved here to Neverland.
5 Q. It was before he moved to Neverland?
6 A. Yeah.
7 Q. And Jason was born on, if I'm not mistaken,
8 May 30, 1980?
9 A. Yes.
10 Q. Is that his birth date?
11 A. Yes.
12 Q. When you moved to Neverland in 1988, he
13 would have been about eight years old?
14 A. Yeah.
15 Q. And you believe this was before?
16 A. Oh, yeah. Yeah.
17 Q. Okay. Do you know if Mr. Jackson ever gave
18 Jason money?
19 A. Yeah.
20 Q. Do you know on how many occasions?
21 A. That I remember, because it was -- to me, it
22 was a lot of money for a little kid. At the hideout
23 he gave him some money.
24 Q. Do you know how much money he gave him?
25 A. From what I remember, it was two
26 hundred-dollar bills.
27 Q. Two 100-dollar bills?
28 A. Two 100-dollar bills, yes. 5023
1 Q. When did you first see that money?
2 A. After -- what happened was that I left the

3 key at his apartment. And we were walking to get --
4 take the bus home, back home. My car key, I left it
5 there. And we were going to walk to -- to the bus
6 stop.

7 Q. Okay. Were you taking the bus back and
8 forth?

9 A. No, I was driving. But I left the key, my
10 car key there, and I didn't want to go back and
11 knock at the door, because --

12 Q. You didn't have your key?

13 A. Yeah, Mr. Jackson wouldn't open the door.

14 Q. Okay.

15 A. So I remember we were walking to the bus
16 stop, and he say -- my son told me he has money --

17 MR. MESEREAU: Objection.

18 THE WITNESS: -- in his pocket.

19 MR. MESEREAU: Nonresponsive.

20 THE COURT: Just a moment.

21 True, there's no question pending. It's

22 nonresponsive.

23 MR. ZONEN: All right.

24 Q. Where were you when you first saw the money?

25 A. At the bus stop.

26 Q. Okay. Did he give you the money, your son?

27 A. No.

28 Q. All right. How did you see the money? 5024

1 A. Well, he say he had lots of money and that
2 it was a secret.

3 Q. Okay. What did you say?

4 A. And I say, "What do you mean, a secret? How
5 much money?" But I thought it was maybe two
6 dollars.

7 MR. MESEREAU: Objection; hearsay.

8 MR. ZONEN: Spontaneous declaration, Your
9 Honor.

10 THE COURT: I'm going to allow the answer to
11 the question of, "What did you say?" which I think
12 is the objection you were making.

13 MR. MESEREAU: Has to do with third-party
14 statements, Your Honor.

15 MR. ZONEN: I'm sorry.

16 THE COURT: I'm going to ask you to rephrase
17 the question. The question you last asked where the
18 objection came was, "And what did you say?" And she
19 did say what she said. But then she was going to
20 say something else.

21 MR. ZONEN: Yes. Thank you.

22 Q. What did your son say to you in response to
23 your statement?

24 MR. MESEREAU: Objection; hearsay.

25 MR. ZONEN: That's a spontaneous
26 declaration.

27 THE COURT: Okay.

28 MR. ZONEN: That's what I originally meant. 5025

1 THE COURT: I will allow it on that basis.

2 MR. ZONEN: Thank you, Your Honor.

3 Q. What did your son say?

4 A. That he has the money; that it was a secret;

5 he wasn't going to tell me.

6 Q. Okay.

7 A. But at this point I thought it was maybe two

8 dollars or a dollar.

9 Q. Did you ask to see it?

10 A. And I say, "I want to see it." And he say,

11 "No, because Michael told me that it's for me and

12 not to tell you." But like I say, I thought it was

13 two dollars. I say, "How much is it?"

14 And I pull it out of his pocket.

15 Q. It was in his pocket?

16 A. It was in his pocket. He said he put --

17 Q. Do you remember what he was wearing?

18 A. Pants.

19 Q. You believe it was pants?

20 A. Yeah. He says, "He put it in my pocket.

21 Don't take it out."

22 So I pull it out, and I said, "\$200?"

23 MR. MESEREAU: Objection; nonresponsive.

24 THE COURT: Sustained.

25 Q. BY MR. ZONEN: Did you reach into his

26 pocket?

27 A. Yeah.

28 Q. Did you retrieve it? 5026

1 A. Yeah.

2 Q. What was it?

3 A. It was two 100-dollar bills.

4 Q. Were there ever other occasions that you

5 were aware of where Mr. Jackson gave your son money?

6 A. No.

7 Q. Was that the only occasion that you recall?

8 MR. MESEREAU: Objection; asked and

9 answered.

10 THE COURT: Sustained.

11 Q. BY MR. ZONEN: Did you ever see your son

12 with money on other occasions?

13 A. I'll give him allowances. And, you know,

14 he'll keep it -- you know, a dollar or two.

15 Q. Do you know who Macaulay Culkin is?

16 A. Yes.

17 Q. Who is Macaulay Culkin?

18 A. The little kid from the movies.

19 Q. Yes. Did you ever see Macaulay Culkin --

20 A. Yes.

21 Q. -- personally?

22 Where did you see him?

23 A. At the Neverland. At the ranch.
24 Q. Did he visit Neverland?
25 A. Yes.
26 Q. How often did he visit Neverland?
27 A. I don't remember. But it was a few times
28 when I was there. 5027
1 Q. More than once?
2 A. Yes.
3 Q. Over what period of time, from the first
4 time to the last time?
5 A. Probably six months.
6 Q. Were you working that entire time?
7 A. Yes.
8 Q. Were you working in the same job you've
9 already described for us, as Mr. Jackson's personal
10 maid?
11 A. Yes.
12 Q. Were you cleaning his room?
13 A. Uh-huh. Yes.
14 Q. And doing his laundry?
15 A. Yes.
16 Q. When Mr. Culkin came -- well, it was
17 Macaulay Culkin. How old was he when you first saw
18 him, approximately?
19 A. I think about eight or nine. Probably
20 eight.
21 Q. Was this before or after Wade Robeson was
22 visiting?
23 A. After.
24 Q. Did they ever visit at the same time?
25 A. No. Not that I can remember.
26 Q. Did Wade Robeson continue to visit during
27 the time that Macaulay Culkin was coming?
28 A. I don't remember. 5028
1 Q. Do you know where Macaulay Culkin stayed
2 when he came to Neverland?
3 A. With Mr. Jackson.
4 Q. Did Macaulay Culkin come with any other
5 family members that you recall?
6 A. Yeah, I remember him with his father and
7 mother.
8 Q. Father and mother?
9 A. And the other kids.
10 Q. Other --
11 A. Brothers and sisters.
12 Q. Other siblings?
13 A. Yes.
14 Q. Do you know how many siblings he had,
15 whether they were boys or girls?
16 A. No, I don't remember.
17 Q. Do you know if it was more than one other
18 sibling?

19 A. Yeah. More than one.
20 Q. Did he have at least one brother and one
21 sister at least?
22 A. Yes.
23 Q. Do you know the total number of brothers and
24 sisters?
25 A. No. No. Probably five. I don't remember.
26 Q. I asked you where Macaulay Culkin stayed,
27 and you said with Mr. Jackson. How do you know
28 that? 5029
1 A. Because I'll go to his bedroom and clean up
2 after.
3 Q. Did you ever see Macaulay Culkin in Mr.
4 Jackson's bedroom?
5 A. Yes.
6 Q. Were his possessions there in the bedroom?
7 A. Yeah. I don't remember.
8 Q. That you don't recall?
9 A. No.
10 Q. Do you recall if you ever washed his
11 clothing as you did Wade Robeson's?
12 A. Yeah.
13 Q. Would you have washed his clothing if his
14 clothing was someplace other than his bedroom?
15 MR. MESEREAU: Objection; calls for
16 speculation.
17 THE COURT: Sustained.
18 Q. BY MR. ZONEN: Was it your responsibility to
19 wash clothing from rooms other than Mr. Jackson's
20 bedroom?
21 A. No.
22 Q. If guests did not stay with Mr. Jackson,
23 where would they have stayed?
24 A. In the guest rooms. They call them the
25 outside guest rooms. You know, they're like four --
26 four guest rooms outside.
27 MR. ZONEN: Could I have those photographs,
28 please? Oh. Thank you. 5030
1 I'm sorry, did you say something?
2 MR. MESEREAU: I'm going to object as
3 cumulative.
4 MR. ZONEN: Oh, okay. All right.
5 Q. And I think that you said it was for a
6 number of months that Macaulay Culkin stayed?
7 A. Yeah. Weeks.
8 Q. I don't mean continuously. But what do you
9 think was the longest period that you ever saw him
10 there during that few-month period of time?
11 A. About a week.
12 Q. Okay. Do you know if he always came with
13 his family?
14 A. Not always.

15 Q. How else did he come?
16 A. How often?
17 Q. How else, if he was not with his family?
18 Was he with other people?
19 A. No.
20 Q. Did he come by himself?
21 A. Yes.
22 Q. Do you have a recollection of how many times
23 Macaulay Culkin came to visit Neverland by himself?
24 A. Maybe I remember about two times.
25 Q. All right. How old was Jason during the
26 time that Macaulay Culkin was there?
27 A. At that time he was probably already ten.
28 Q. Jason was older than Macaulay Culkin? 5031
1 A. Yeah.
2 Q. About how much older?
3 A. Probably a year or two. I don't know.
4 Q. During the time that Macaulay Culkin stayed
5 in Mr. Jackson's bedroom, do you know if other
6 members of his family also stayed in the bedroom
7 with them?
8 A. Yeah, I think they did.
9 Q. On every occasion?
10 A. Not all the time.
11 Q. Are you aware --
12 A. When --
13 Q. I'm sorry, go ahead.
14 A. When he was by himself, he was there by
15 himself with Mr. Jackson.
16 Q. Do you know of any occasions when Macaulay
17 Culkin came to visit when he did not stay in Mr.
18 Jackson's room?
19 A. No.
20 Q. And on those occasions when Macaulay Culkin
21 stayed in Mr. Jackson's room, do you know if there
22 was ever a separate sleeping arrangement, in other
23 words, a separate bed or a separate sleeping bag
24 that you would have to clean up?
25 A. No.
26 Q. Excuse me, I'm sorry.
27 Why did you leave Neverland, your employment
28 at Neverland? 5032
1 MR. MESEREAU: Objection; relevance.
2 THE COURT: Sustained.
3 Q. BY MR. ZONEN: Did you leave your employment
4 at Neverland?
5 A. Yes.
6 Q. Okay. Did you leave of your own volition?
7 A. Yes.
8 Q. Do you remember when it was you left
9 Neverland?
10 A. May, I think.

11 Q. Of what year?

12 A. '91. '90 or '91. '91, I think.

13 Q. May of '91?

14 A. '91.

15 Q. All right. So you would have been employed
16 by Mr. Jackson for a period of about five years?

17 A. Five years, yeah.

18 Q. Now, May of '91 your son would be turning
19 11; is that right?

20 A. Yes.

21 Q. Do you know if you left before his 11th
22 birthday?

23 A. Uh-huh. About.

24 Q. Did your son have any more association with
25 Michael Jackson after you?

26 A. After?

27 Q. Yes, after you left.

28 A. No. 5033

1 Q. Did you ever go back to Neverland after you
2 left?

3 A. No.

4 Q. Did you ever visit with Mr. Jackson after
5 you left?

6 A. No.

7 Q. Were you contacted by law enforcement at
8 some time after you left Neverland, your employment
9 at Neverland, for an interview?

10 A. Yeah. 1994 or '93. I don't remember.

11 Q. '93 or '94? So it was already some time
12 after you left Neverland; is that right?

13 A. Yes.

14 Q. At least a year, and probably two?

15 MR. MESEREAU: Objection; leading.

16 MR. ZONEN: Let me withdraw the question.

17 Q. How long after you left your employment at
18 Neverland was it that law enforcement contacted you?

19 A. About two and a half years.

20 Q. Did you contact them or did they contact
21 you?

22 A. They came to me.

23 Q. At the time they contacted you, did you know
24 whether or not there was an investigation going on
25 involving Mr. Jackson?

26 A. Yeah. Yes. I was -- kind of.

27 Q. Were you expecting to be contacted?

28 MR. MESEREAU: Objection. Calls for 5034
1 speculation; relevance; foundation.

2 MR. ZONEN: Goes to her state of mind.

3 THE COURT: Sustained.

4 Q. BY MR. ZONEN: All right. Did it come as a
5 surprise to you when you were contacted?

6 MR. MESEREAU: Objection. Relevance;

7 foundation; leading.

8 THE COURT: And I'm going to back up a minute
9 and change my ruling on the question, "Were you
10 expecting to be contacted?" She may answer that
11 "yes" or "no." I'll overrule the last objection.

12 Q. BY MR. ZONEN: Did you understand that? You
13 may answer the question, "Were you expecting to be
14 contacted?"

15 A. Yes and no.

16 Q. Did you ultimately give an interview with
17 the sheriff's office?

18 A. Yes.

19 Q. At some point in time were you called to
20 give a deposition? Were you subpoenaed to give a
21 deposition?

22 A. I was subpoenaed, yeah.

23 Q. All right. Now, do you know who it was who
24 subpoenaed you to give a deposition?

25 A. Mr. Feldman.

26 Q. Was that Larry Feldman?

27 A. Yes.

28 Q. Do you know who Larry Feldman represented at 5035
1 that time?

2 A. Yeah. Another little boy.

3 Q. I'm sorry?

4 A. Another little boy.

5 Q. Do you know that person's name?

6 A. The -- the little boy?

7 Q. Yes, that he represented.

8 A. At that time I didn't know. Now -- now I
9 hear --

10 Q. What do you know the name to be?

11 A. Chandler. Chandler. Something like that.

12 But I don't know. I don't know the first name.

13 Q. Did you know that child, Mr. Chandler?

14 A. No. No.

15 Q. "Mr." You don't know how old he was? You
16 don't know how old he was?

17 A. No.

18 Q. Did you know his first name?

19 A. No.

20 Q. Was this a child you were ever introduced to
21 during the time that you were at Neverland?

22 A. No.

23 Q. And tell us what a deposition is. Having
24 gone through one, what is it?

25 MR. MESEREAU: Objection; foundation.

26 MR. ZONEN: Well, let me withdraw that.

27 Q. Did you, in fact, go through a deposition?

28 A. Did I went through -- 5036

1 Q. Did you have a deposition? Did they take
2 your deposition?

3 A. Yeah. Yes.

4 Q. Okay. And did you, in fact, give testimony
5 in that deposition?

6 A. Yes.

7 Q. Now, I asked you who it was who subpoenaed
8 you, and you said it was Larry Feldman.

9 A. Uh-huh.

10 Q. Were there other lawyers in the room asking
11 you questions as well?

12 A. Yes.

13 Q. Who were the other lawyers? Do you remember
14 any of their names?

15 A. I remember Johnnie Cochran, and there were
16 about five or six.

17 Q. About five or six lawyers?

18 A. Yeah.

19 Q. All in the room at one time?

20 A. Yeah.

21 Q. And was Johnnie Cochran asking you
22 questions?

23 A. Yes.

24 Q. Were other lawyers asking you questions as
25 well?

26 A. I don't remember. But I think there was one
27 "Waysman" or "Wiseman."

28 Q. Weitzman? Perhaps Howard Weitzman? 5037

1 A. I don't remember his last name. I mean --

2 Q. Do you know on which side Mr. Weitzman was?

3 A. With Mr. Cochran.

4 Q. He was with Mr. Cochran?

5 A. They were the two together, yeah.

6 Q. Who did Mr. Cochran and Mr. Weitzman
7 represent?

8 A. Mr. Jackson.

9 Q. Okay. Was Mr. Jackson present during that
10 deposition?

11 A. No.

12 Q. Was he ever there during the deposition at
13 any time?

14 A. No.

15 Q. Did that deposition go longer than one day?

16 A. Yeah.

17 Q. How many days did it go?

18 A. Two days.

19 Q. Do you know how many hours each day you were
20 deposed?

21 A. No.

22 Q. Do you know if there were other lawyers
23 sitting with Mr. Feldman, Larry Feldman, in other
24 words, on his side, other than Mr. Feldman?

25 A. No.

26 Q. Was Mr. Feldman the only one asking you

27 questions from that side?
28 A. Yes. 5038
1 Q. Have you ever reviewed the transcript of
2 that deposition?
3 A. No.
4 Q. Even back then?
5 A. Not that I remember.
6 Q. Do you remember what year it was, of that
7 deposition?
8 A. '94, I think. Or '95.
9 Q. Was it before or after you had your first
10 interview with law enforcement? Do you recall?
11 A. After.
12 Q. It was after? Do you remember approximately
13 how long after?
14 A. No, I don't remember the date or --
15 Q. Miss Francia, when you had this deposition
16 that went on for two days, and you say that there
17 were lawyers, a number of them in the room, did you
18 have a lawyer with you?
19 A. No.
20 Q. Had you retained a lawyer at that time?
21 A. Not at that time, no.
22 Q. Did you give answers to questions that were
23 put to you at that time.
24 A. Did I answer?
25 Q. Yes.
26 A. Yes.
27 Q. Did you -- did they explain to you that a
28 deposition is the same thing as testifying? 5039
1 MR. MESEREAU: Objection; leading.
2 THE COURT: Just a moment.
3 MR. ZONEN: I'll withdraw the question.
4 THE COURT: Overruled.
5 MR. ZONEN: I won't withdraw the question.
6 THE COURT: You may answer.
7 Q. BY MR. ZONEN: Did they explain to you that
8 a deposition was the same thing as testifying?
9 A. No.
10 Q. Did you have to raise your hand to take an
11 oath to tell the truth?
12 A. Oh, yeah.
13 Q. And you did do that?
14 A. Yeah.
15 Q. All right. Did they ask you questions
16 about -- questions similar to the questions I've
17 asked you so far since you've been on the witness
18 stand?
19 A. (Nods head up and down.)
20 Q. You have to answer out loud, if you would,
21 please.
22 A. Yes.

23 Q. All right. Did they ask you about Wade

24 Robeson?

25 A. Yes.

26 Q. Did they ask you if in fact you had seen

27 them in the shower together?

28 A. Yes. 5040

1 Q. Do you remember the answers that you gave to

2 those questions?

3 A. Kind of.

4 Q. Did you tell one of the attorneys that you

5 did not see Wade Robeson in the shower?

6 A. Yeah, I probably did.

7 Q. All right. Was that accurate?

8 A. Well, at that time I guess I was tired and

9 nervous, I guess.

10 Q. Did you tell them that you believed Wade

11 Robeson was in the shower?

12 A. Yes, I told them that.

13 Q. Did you tell them about the underwear?

14 A. Yeah.

15 Q. Did you tell them about hearing the voices?

16 A. Yes.

17 Q. Did you tell them about the music?

18 A. Yes.

19 Q. Did you do an interview for Hard Copy?

20 A. Yes.

21 Q. What is Hard Copy?

22 A. A program.

23 Q. A program?

24 A. Yeah.

25 Q. A program on what? On television?

26 A. On television, yeah.

27 Q. Was that a program that you had seen before

28 that interview? 5041

1 A. No.

2 Q. Had you ever watched Hard Copy before?

3 A. No.

4 Q. Do you know what kind of -- did you know --

5 before you were on it, did you know what kind of a

6 program it was?

7 A. No.

8 Q. Were you -- did somebody contact you from

9 Hard Copy?

10 A. Yeah.

11 Q. And do you remember who that was who

12 contacted you?

13 A. That -- the lady who interview me.

14 Q. Okay. Do you happen to remember her name?

15 A. Yeah.

16 Q. What was her name?

17 A. Diane Dimond.

18 Q. Diane Dimond. Did you discuss with Miss

19 Dimond what it was she wanted to talk with you
20 about?
21 A. Yeah, we kind of talk about it.
22 Q. Okay. Did you agree to go on television?
23 A. Yeah.
24 Q. Was there some discussion with Miss Dimond
25 about whether or not you would be paid or
26 compensated for appearing on television?
27 A. Yeah. My friend and I went together.
28 Q. You went with a friend? 5042
1 A. Yeah.
2 Q. Who was your friend?
3 A. One of -- one of the workers at Neverland.
4 Q. One of the workers at Neverland?
5 A. Yeah.
6 Q. What was her name?
7 A. Evangeline.
8 Q. Evangeline?
9 A. Yes.
10 Q. And what did she do at Neverland?
11 A. She was a housekeeper and a cook.
12 Q. A housekeeper and a cook?
13 A. And a cook, yeah. And she helped the cook.
14 Q. Okay. And you were talking with Diane
15 Dimond with Evangeline?
16 A. Yeah.
17 Q. All right. Why is that? Why was Evangeline
18 there, or Vangie, was why she there?
19 MR. MESEREAU: Objection; foundation.
20 THE COURT: I'm not sure what you're
21 looking for, foundation.
22 MR. MESEREAU: And speculation.
23 THE COURT: Okay.
24 MR. ZONEN: I'll withdraw that, then. I
25 understand that objection.
26 Q. Did you ask Evangeline to be there with you?
27 A. She was the one who contact, I believe,
28 Diane Dimond. 5043
1 Q. Did she -- she's the one who introduced you
2 to Diane Dimond?
3 A. Yeah, she was the one who told me, you know,
4 that she can get everything arranged.
5 Q. Okay. That she could arrange the interview?
6 A. The interview, yeah.
7 Q. And payment as well?
8 A. Yeah. She say, "I'll help you."
9 Q. What did you understand the interview to be
10 about? What did they want to ask you about?
11 MR. MESEREAU: Objection. Calls for
12 speculation.
13 MR. ZONEN: Withdraw the question.
14 Q. What was your belief that you were going to

15 be telling them?
16 MR. MESEREAU: Objection. Leading.
17 THE WITNESS: About --
18 THE COURT: Overruled. You may answer.
19 Q. BY MR. ZONEN: What was your belief that you
20 would be telling them?
21 A. About me working there.
22 Q. Working where?
23 A. At Neverland.
24 Q. Okay. Did you think they would be asking
25 you questions about Michael Jackson?
26 A. No. I mean, that -- not the way they were
27 asking me.
28 Q. How much money did they represent from Hard 5044
1 Copy -- how much money did they represent that they
2 would give you for an interview?
3 A. How much money they gave me?
4 Q. Yes.
5 A. \$20,000.
6 Q. \$20,000.
7 A. Yes.
8 Q. And what were you going to do for \$20,000?
9 What were you going to say in this interview for
10 \$20,000?
11 A. Well, I -- I thought that it was going to be
12 just talking about, you know, how it was working for
13 him and how he was.
14 Q. Did that seem, to you, an unusually large
15 amount of money?
16 MR. MESEREAU: Objection; leading.
17 THE COURT: Sustained.
18 Q. BY MR. ZONEN: How much money were you
19 making a year at that time?
20 A. Less than \$20,000.
21 Q. Less than \$20,000?
22 A. Yeah, probably around 20.
23 THE COURT: All right. We'll take our break.
24 (Recess taken.)
25 THE COURT: Go ahead.
26 Q. BY MR. ZONEN: When we left off, I was
27 asking some questions about the interview with Hard
28 Copy. Did that interview finally take place? 5045
1 A. Yes.
2 Q. Did you actually watch it on television when
3 it was screened?
4 A. No.
5 THE BAILIFF: Can you turn your microphone
6 on?
7 Q. BY MR. ZONEN: I asked you about the
8 interview with Hard Copy. You finally did that
9 interview, did you not?
10 A. Yes.

11 Q. Did you watch it on television when it was
12 screened?

13 A. No.

14 Q. Have you ever watched it?

15 A. No. I watch a little bit, you know, when
16 I --

17 Q. Did you receive \$20,000?

18 A. Yes.

19 Q. Okay. Do you know if your friend Evangeline
20 got any money?

21 A. She didn't get any money from them, no. I
22 gave her some money.

23 Q. Was that interview -- was that interview
24 with Hard Copy before or after your interview with
25 the sheriff's detectives?

26 A. After.

27 Q. Was it before or after your deposition with
28 Larry Feldman and Johnnie Cochran? 5046

1 A. Oh, before.

2 Q. It was before the deposition?

3 A. Yes.

4 Q. Do you remember being asked some questions
5 about the Hard Copy --

6 A. Yes.

7 Q. -- interview during that deposition?

8 A. Yes.

9 Q. Did Mr. Jackson ever have a nickname for
10 your son, for Jason, that he used?

11 MR. MESEREAU: Objection; foundation.

12 THE COURT: Sustained.

13 Q. BY MR. ZONEN: Did you ever hear Mr. Jackson
14 call your son by a name other than Jason, his real
15 name?

16 A. Yes.

17 Q. What name was that?

18 A. "Rubba."

19 Q. "Rubba," R-u-b-b-a, do you think?

20 A. I think.

21 Q. Is that what it sounds like?

22 A. Yeah.

23 Q. Did you ever hear him call other kids

24 "Rubba"?

25 A. Yes.

26 Q. Did he call Wade Robeson "Rubba"?

27 A. Yes.

28 Q. Did he call Macaulay Culkin "Rubba"? 5047

1 A. Yeah.

2 Q. Did you ever receive any gifts from Mr.
3 Jackson?

4 A. Yes.

5 Q. What kind of gifts did you receive from him?

6 A. I don't remember. They were a lot.

7 Q. Do you remember any of them?
8 A. He told me to get whatever I want, you know,
9 like promotional things that he'll get from the
10 companies, or toys for my son.
11 Q. Do you mean if he had them in his
12 possession?
13 A. Yeah. He will buy little stuff for me, too.
14 Q. And he would give them to you?
15 A. Yeah.
16 Q. Did he ever give you any furniture?
17 A. Yeah.
18 Q. What kind of furniture?
19 A. I remember one time he -- he had a table in
20 the attic, and he say he doesn't want it there. And
21 I asked him if I could take it, and he said, "Yeah,
22 sure. Take it."
23 Q. The attic where?
24 A. The attic at Havenhurst.
25 Q. At Havenhurst?
26 A. Yeah.
27 Q. How long ago was that?
28 A. When I first started there, to work there. 5048
1 Q. So '86?
2 A. Yeah.
3 Q. All right. Any other things that you can
4 remember that he gave you over the years?
5 A. Toys for my son.
6 Q. Toys for your son? Did he ever give you
7 money?
8 A. I don't remember.
9 Q. You don't remember if he gave you money, or
10 how much, or how often?
11 A. How often? No, I don't remember.
12 Q. All right. When you had the deposition with
13 Johnnie Cochran, did he ask you if you ever took
14 something from --
15 MR. MESEREAU: Objection; misstates the
16 evidence. There were other lawyers involved.
17 THE COURT: Overruled.
18 You may --
19 Q. BY MR. ZONEN: When you had the
20 deposition --
21 It was overruled, Your Honor?
22 THE COURT: It was overruled. Yes.
23 Q. BY MR. ZONEN: When you had the deposition
24 with Johnnie Cochran, did he or any other lawyer
25 representing Michael Jackson ask you if you took
26 something from Michael Jackson's room?
27 A. I don't remember.
28 Q. Did they ask you about a watch? 5049
1 A. Yeah.
2 Q. Do you remember the watch?

3 A. Yes.

4 Q. Did you have a watch from Michael Jackson?

5 A. Did he have it?

6 Q. No. Did he ever give you a watch?

7 A. I got it from his room.

8 Q. What kind of a watch are we talking about?

9 A. It was a toy watch. You know, like I think

10 it was from one of his commercials or something.

11 Q. Did you --

12 A. That I had it, and he look at it, and he

13 say, "Oh, that's nice." And I say, "Yeah, I got it

14 from your room." And he didn't -- I told one of the

15 housekeepers that I -- "Oh, look what I got from his

16 room." But I guess I used to get stuff from his

17 room and --

18 Q. Are you talking about promotional things?

19 A. Yeah. Things like that.

20 Q. What is a promotional item? What do you

21 mean by that?

22 A. Like when he make a commercial. I think

23 this watch was from Captain Eo.

24 Q. I'm sorry?

25 A. I think it was from one of his videos.

26 Q. Did he have his name on it?

27 A. Yeah.

28 Q. Did it have his picture on it? 5050

1 A. Yes.

2 Q. What was that watch worth, do you think?

3 A. About \$10, probably.

4 Q. At some time were you contacted by an

5 attorney or did you retain an attorney?

6 MR. MESEREAU: Objection; compound.

7 MR. ZONEN: I'll withdraw the question.

8 Q. Did you ever retain an attorney?

9 A. I don't understand.

10 Q. Oh. Did you ever hire a lawyer?

11 A. Oh. Did I personally went to a lawyer and

12 say -- no.

13 Q. Okay. Do you know Terry Cannon?

14 A. Yes.

15 Q. Do you know Kris Kallman?

16 A. Yes.

17 Q. Do you know them to be lawyers?

18 A. Yes.

19 Q. All right. Did either of those two lawyers

20 represent you?

21 A. Yes, at one time.

22 Q. Did they represent Jason?

23 A. Yes.

24 Q. How did that happen? How did you come into

25 contact with these two lawyers?

26 A. Well, since I -- I was felt like --

27 MR. MESEREAU: Objection. Relevance; 352.

28 THE COURT: Sustained. 5051

1 Q. BY MR. ZONEN: Did Jason get subpoenaed to
2 appear at a deposition?

3 A. Yes.

4 Q. How old was Jason at that time?

5 MR. ZONEN: We forgot the tags. Would you

6 mark the next two exhibits in order, please?

7 THE WITNESS: Probably about 12.

8 Q. BY MR. ZONEN: Did he actually get a
9 subpoena to appear at a deposition?

10 A. No, they told me that they were going to
11 subpoena him.

12 Q. Was that at the end of your deposition?

13 A. Yes, they told me they want him and myself

14 at another office. Not there, but another office.

15 Mr. Cochran told me.

16 Q. All right. Were you concerned about Jason

17 giving a deposition?

18 A. At that time, yeah.

19 Q. Did you think he --

20 MR. MESEREAU: Objection. Leading; move to
21 strike.

22 THE COURT: Overruled. Next question.

23 Q. BY MR. ZONEN: What were your concerns about
24 Jason giving a deposition?

25 MR. MESEREAU: Objection. 352; foundation.

26 THE COURT: Overruled.

27 Q. BY MR. ZONEN: You can answer the question.

28 What was your concern? 5052

1 A. That he -- being so young, that he was going

2 to be embarrassed and teased by other kids.

3 Q. All right. At some point in time, did you
4 talk with -- let me change that. At some point in
5 time, did you agree to file a lawsuit against
6 Michael Jackson?

7 A. Not at that time.

8 Q. Do you know if there was some kind of a
9 settlement with Michael Jackson's attorneys?

10 A. Yes.

11 Q. Did you receive -- and I'm not asking you
12 how much, but did you receive compensation?

13 A. Yes.

14 Q. Did you receive payment?

15 A. Yes.

16 Q. Did Jason also receive payment?

17 A. Yeah. Yes.

18 Q. When did he receive his payment?

19 A. I believe it was his 18th birthday.

20 Q. His 18th birthday?

21 I had asked you a question about the watch

22 from his room. Did Mr. Jackson ever talk to you

23 about being able to take things if you wanted to?

24 A. He never told me that.

25 Q. Did he say anything like that?

26 A. Oh. No.

27 Q. There was no conversation about that?

28 A. He told me that sometimes people gave him 5053

1 things, and that he'd display it, and then -- you

2 know, and then he would like to get rid of it.

3 Q. Did you show him the watch?

4 A. Yeah. At one time I was wearing it, one of

5 his jackets, and he say -- and he told me that it

6 was his jacket. And I say, "Yeah, I was cold." And

7 he say, "Oh, that's okay."

8 MR. ZONEN: May I approach the witness, Your

9 Honor?

10 THE COURT: Yes.

11 Q. BY MR. ZONEN: I have two photographs

12 previously shown to counsel. I'd like to show you

13 these two exhibits, if I can. Exhibit No. 781 and

14 Exhibit No. 782.

15 And do you see the numbers here? This is

16 781 and that's 782. I'm going to put them both in

17 front of you.

18 A. Uh-huh.

19 Q. And then I'll go back.

20 781, would you pick that one up, please, and

21 tell us what that photograph is? Take a look at it.

22 A. That was one of his school pictures.

23 Q. And who is "he"?

24 A. My son.

25 Q. Your son Jason. How old was Jason in that

26 photograph?

27 A. I would say about ten.

28 Q. About ten years old? Do you remember that 5054

1 photograph being taken?

2 A. No.

3 Q. But you do recognize him?

4 A. Yes.

5 Q. Is that an accurate photograph of Jason when

6 he was about ten years old?

7 A. Yes.

8 Q. All right. Look at the another one now,

9 please, I think 782. And what is that a photo of?

10 A. My son and I.

11 Q. All right. The two of you together?

12 A. Yes.

13 Q. All right. Is that photograph dated?

14 A. Yes.

15 Q. Whose handwriting is that?

16 A. Mine.

17 Q. Okay. And what is the date on that?

18 A. 1994.

19 Q. And your son was -- what was the month on
20 that?

21 A. The month is March.

22 Q. March? It's written in Spanish, is it not?

23 A. Yes.

24 Q. But it's March 19 --

25 A. '94.

26 Q. '94. And how old was he at that time?

27 A. About 14.

28 Q. All right. He would turn 14 in May of '94? 5055

1 A. Uh-huh.

2 Q. So he was 13 at the time; is that right?

3 A. 13.

4 Q. Is that photograph an accurate photograph of
5 your son at that time?

6 A. Yes.

7 MR. ZONEN: Your Honor, I would move both of
8 those exhibits into evidence.

9 MR. MESEREAU: No objection.

10 THE COURT: They're admitted.

11 MR. ZONEN: I'd ask to publish them at this
12 time.

13 THE COURT: All right.

14 Q. BY MR. ZONEN: We'll start with 781.

15 Could we dim the lights, if we could?

16 And could you take a look over your shoulder
17 and tell us, is that the photograph that you
18 identified?

19 A. Yes.

20 Q. And how old was he at that time again?

21 A. About ten.

22 Q. About ten. And then the second photograph,

23 782. And he was at that point 13?

24 A. Yes.

25 Q. All right. Was that about the time that he
26 was being interviewed by law enforcement?

27 A. Yes, I think.

28 MR. ZONEN: Thank you. I have no further 5056
1 questions.

2 THE COURT: Cross-examine?

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

4 If I may take a second, Your Honor, just to
5 set up.

6 THE COURT: Yes, you may.

7 MR. MESEREAU: Thank you.

8

9 CROSS-EXAMINATION

10 BY MR. MESEREAU:

11 Q. Ma'am, I'll say good morning, but I think
12 it's afternoon. Okay?

13 My name is Tom Mesereau and I speak for Mr.
14 Jackson, okay? We met for the first time at the

15 break, right? We've never spoken before that,

16 right?

17 A. No.

18 Q. All right. Now, if anything -- if anything

19 I ask you is unclear, please don't answer it, okay?

20 Just say you don't understand. Okay?

21 A. Okay.

22 Q. And if you don't understand, I'll try and

23 rephrase it --

24 A. Uh-huh.

25 Q. -- to make it more understandable, okay?

26 If you're not sure about what I'm asking,

27 just don't answer. Just make sure it's clear in

28 your mind what I'm asking for, okay? 5057

1 You know I'm on his side, okay?

2 A. Okay.

3 Q. Mr. Jackson, all right?

4 Now, you began working for Mr. Jackson in

5 1986; is that correct?

6 A. Yes.

7 Q. And do you know approximately what month

8 that was?

9 A. No.

10 Q. Okay. And you stopped working for Mr.

11 Jackson in approximately 1991, right?

12 A. Yes.

13 Q. And you never worked for him since you

14 stopped working in 1991, right?

15 A. No. I never went back.

16 Q. Okay. Now, you testified that in the

17 apartment owned by Mr. Jackson that you referred to

18 as "The Hideout," there was no furniture, right?

19 A. Uh-huh.

20 Q. Was there any bed in there at all?

21 A. No.

22 Q. Okay. And approximately when were you

23 cleaning that apartment as part of your work?

24 A. Do you mean how long would it take me to

25 clean or --

26 Q. No, no, let me rephrase it.

27 During what period of time do you remember

28 you were going to that apartment and cleaning it? 5058

1 A. Probably a year. I don't remember.

2 Q. And would you go to clean that apartment

3 when Mr. Jackson was not there?

4 A. Yes.

5 Q. Do you remember Mr. Jackson going on what

6 was called a "Bad" tour; do you remember that?

7 A. Yes.

8 Q. Do you remember Mr. Jackson produced an

9 album and a videotape called "Bad"?

10 A. Yeah. Yes.

11 Q. And do you remember he was traveling on that
12 tour from approximately September of 1987 to January
13 of 1989?

14 A. Yes.

15 Q. And during that period of time he was often
16 out of the country, wasn't he?

17 A. Yes.

18 Q. And he told you about where he was going,
19 didn't he?

20 A. Yes.

21 Q. He told you he was going to Japan, right?

22 A. Yes.

23 Q. Australia, right?

24 A. Yeah.

25 Q. And a lot of cities in America, right?

26 A. Yes.

27 Q. New York, right?

28 A. Yes. 5059

1 Q. Indianapolis? Went to Texas? Georgia?

2 MR. ZONEN: I'll object as beyond the scope
3 of her knowledge; lack of foundation.

4 THE WITNESS: I don't know.

5 MR. MESEREAU: I think she's answering she
6 did know, Your Honor.

7 THE WITNESS: He told me he was on tour,
8 but --

9 MR. ZONEN: There's an objection.

10 THE WITNESS: You know --

11 THE COURT: The only one she said she didn't
12 know were the last two, so I'll overrule the
13 objection.

14 Q. BY MR. MESEREAU: So you knew he traveled to
15 Italy on that tour, correct?

16 MR. ZONEN: I'm going to object on lack of
17 foundation or based on hearsay.

18 MR. MESEREAU: State of mind, Your Honor.

19 I'll be happy to rephrase it if the Court wants.

20 THE COURT: The objection is overruled.

21 Q. BY MR. MESEREAU: Did you know that he
22 traveled to Italy on that tour as well?

23 A. No.

24 Q. How about Austria?

25 A. I don't remember.

26 Q. And England?

27 A. I don't remember.

28 Q. Do you remember he went to a lot of 5060
1 countries --

2 A. Yes.

3 Q. -- on that tour? And he told you that,
4 didn't he?

5 A. Yes.

6 Q. And that tour lasted almost a year and a

7 half, didn't it?

8 A. Not really. I didn't stop seeing him for a
9 year and a half.

10 Q. But he was out of the country much of the
11 time, wasn't he?

12 A. Yeah.

13 Q. And he was out of Los Angeles much of the
14 time?

15 A. Out of -- yes.

16 Q. Now, you didn't often see him -- excuse me.
17 Let me rephrase that.

18 Do you remember him staying overnight at the
19 hideout apartment?

20 A. Yeah.

21 Q. Okay. And he didn't like to invite other
22 people to that apartment, right?

23 MR. ZONEN: I'll object as speculative; lack
24 of foundation.

25 MR. MESEREAU: I'll rephrase.

26 Q. Do you know whether or not Mr. Jackson liked
27 to keep his presence at that apartment private?

28 MR. ZONEN: Objection; speculative. 5061

1 THE COURT: Overruled.

2 You may answer.

3 THE WITNESS: I don't know.

4 Q. BY MR. MESEREAU: Okay. Okay. But you
5 didn't see him invite lots of people to that
6 apartment, did he?

7 A. No, I didn't see many people.

8 Q. Okay. And you were the only one that would
9 clean that apartment, right?

10 A. Yeah.

11 Q. And did you used to help Mr. Jackson prepare
12 when he was leaving town for the "Bad" tour?

13 A. Yes.

14 Q. And what did you used to do for Mr. Jackson
15 to help him?

16 A. Pack his stuff, his makeup, his clothes, and
17 shine his shoes.

18 Q. And he went on approximately 123 concerts
19 during that period, didn't he?

20 A. I don't know.

21 MR. ZONEN: I'm going to object as lack of
22 foundation.

23 Q. BY MR. MESEREAU: Do you know how many --

24 THE COURT: She said, "I don't know," so next
25 question.

26 Q. BY MR. MESEREAU: Okay. When you used to
27 clean the home at Havenhurst in Encino -- okay?

28 Havenhurst is a street, right? 5062

1 A. Yes.

2 Q. And that was where Michael Jackson's parents

3 lived --

4 A. Yes.

5 Q. -- right?

6 Did other family members live there at the
7 time you were cleaning that house?

8 A. I think Janet was still there. And LaToya.

9 Q. Okay. So to your knowledge, at the time you
10 cleaned that house, his parents, Janet, LaToya and
11 Michael were living there, right?

12 A. Yeah.

13 Q. And would you go there every day?

14 A. Yes.

15 Q. Okay. And were there other people besides
16 you that cleaned the house?

17 A. Not at that time. They didn't have a
18 housekeeper. I mean, they have one, but it quit
19 after about two months.

20 Q. Did you appear to be the primary
21 housecleaner?

22 A. Well, while Mr. Jackson was on tour, I end
23 up staying, cleaning the house too.

24 Q. Okay. So when he was out of town, you would
25 still go there to work, right?

26 A. Yeah.

27 Q. Now, would you bring Jason there when --

28 A. Yes. 5063

1 Q. -- when Mr. Jackson was out of town?

2 A. Yeah.

3 Q. And where would Jason typically be when you
4 worked at the house while Mr. Jackson was out of
5 town; do you know?

6 A. Outside in the arcade room. At the house.

7 Q. Okay. And would you see Mr. Jackson's
8 parents when you used to clean the house?

9 A. Yes.

10 Q. Okay. Would you see Janet?

11 A. Sometimes.

12 Q. And how about LaToya?

13 A. Yeah, sometimes.

14 Q. Okay. And what areas of the house did you
15 used to clean?

16 A. The whole house.

17 Q. Okay. Every day?

18 A. Yeah. If there was nothing else to do.

19 Q. Now, how long did you work -- excuse me.

20 Let me rephrase that.

21 For how long a period of time did you clean
22 the house at Havenhurst?

23 A. While he was on tour, I guess. I don't
24 remember. But it was many months, because Bill Bray
25 told me that at least it's going to be about six
26 months that he was going to be out of -- out of the

27 country, and either I be laid off or work at the
28 house. 5064

1 Q. Okay. And did there come a point in time
2 when you stopped cleaning the house on Havenhurst?

3 A. Yes.

4 Q. And approximately when was that, if you
5 remember?

6 A. No.

7 Q. Okay. Was it 1986, do you think?

8 A. No.

9 Q. 1987?

10 A. 1987, yeah.

11 Q. Do you think it was 1987?

12 A. Yeah.

13 Q. Okay. When you stopped cleaning the house
14 at Havenhurst, you kept working for Mr. Jackson,
15 right?

16 A. Yes.

17 Q. And what did you do for Mr. Jackson after
18 you stopped cleaning the house on Havenhurst?

19 A. Well, went back to my same routine.

20 Cleaning his room and mainly being there. Even if I
21 didn't have anything to do, he wanted me in his
22 room.

23 Q. Okay. And which room are you talking about
24 now?

25 A. His bedroom.

26 Q. Okay. His bedroom now?

27 A. In Encino.

28 Q. In Encino, okay. Okay. So Mr. Jackson 5065
1 would leave town, but always wanted you to still
2 come to the house and do your work, right?

3 A. Yes.

4 Q. And you said that Mr. Bray told you
5 something about you might lose your work?

6 A. No, no, no. He told me that I either be
7 laid off or -- well, probably it's the same thing,
8 or work at the house.

9 Q. Okay. Okay. When you stopped working at
10 the house on Havenhurst, what were you doing then
11 for Mr. Jackson?

12 A. When I stopped working at the Havenhurst --
13 do you mean at the house?

14 Q. Yes. You kept working for Mr. Jackson,
15 right?

16 A. Yes.

17 Q. And what were you doing then?

18 A. The same thing I was hired to do for him.
19 Pick up his clothes.

20 Q. And where were you doing that?

21 A. Cleaning his room. At the Havenhurst.

22 Q. No, no, after you stopped working at

23 Havenhurst.
24 A. Oh.
25 Q. Okay?
26 A. Uh-huh.
27 Q. You worked at Havenhurst for a while, right?
28 A. Yeah. 5066
1 Q. And then at some point you stopped cleaning
2 Havenhurst, didn't you; is that right?
3 A. Yeah, but we still live there -- I mean, he
4 still live there at the Havenhurst.
5 Q. Okay. I'm sorry. Maybe I'm confusing you.
6 There was a point in time when you didn't
7 clean Havenhurst anymore; is that right?
8 A. Uh-huh.
9 Q. And approximately when was that, do you
10 think?
11 A. No, I don't remember.
12 Q. Okay. You did work at Neverland at one
13 point, right?
14 A. Yeah, that was back after about three years.
15 Q. And when you worked at Neverland, were you
16 still working at Havenhurst?
17 A. When I still working --
18 Q. I'm sorry?
19 A. -- at Neverland?
20 Q. Yes. Let me rephrase the question.
21 When you were working for Mr. Jackson at
22 Neverland - okay? - were you still doing work at the
23 home on Havenhurst?
24 A. No.
25 Q. You were working full time at Neverland
26 then, right?
27 A. No.
28 Q. No? 5067
1 A. I would go to the hideout.
2 Q. Okay.
3 A. And sometime he will tell me to go to
4 Havenhurst to get stuff, or retrieve something,
5 or --
6 Q. So when you were living at Neverland and
7 working at Neverland, you still would sometimes go
8 to Havenhurst, right?
9 A. Yes. Sometimes.
10 Q. But most of the time you did your work at
11 Neverland, right?
12 A. Neverland and the hideout.
13 Q. Okay. Okay. Now, Mr. Jackson was very
14 generous to you, wasn't he?
15 A. Yes.
16 Q. He gave you a couple of televisions; is that
17 right?
18 A. Yes.

19 Q. And you would also ask him from time to time
20 if you could take something, and he would often say
21 "Yes," right?
22 A. (Nods head up and down.)
23 Q. What are some of the things that you asked
24 him that you'd like to have?
25 A. Knickknacks. And clothes. He gave me a
26 couple of jackets from his tour, I think. I don't
27 remember. It was -- there were a lot of stuff.
28 Q. And did he give you any cash himself? 5068
1 A. I don't remember.
2 Q. Didn't he give you approximately \$5,000
3 total at one point?
4 A. I don't remember.
5 Q. Wouldn't he give you 500 or 300 or \$200 at a
6 time?
7 A. I don't remember.
8 Q. Do you remember saying that in your
9 deposition with Mr. Feldman?
10 A. Yeah. I probably did, yeah.
11 Q. So let me ask you what you remember.
12 A. Uh-huh.
13 Q. Do you remember Mr. Jackson giving you 500
14 or 300 or \$200 at a time?
15 A. He probably did, but at this time I don't
16 remember.
17 Q. Okay. Do you remember saying in your
18 deposition that, in total, he may have given you
19 \$5,000?
20 A. I probably did.
21 Q. Okay. Does that sound accurate to you?
22 A. Yeah, probably, I did. It wasn't that much,
23 probably, but I don't remember how much he gave me.
24 Q. Okay. But would you ask him for cash
25 sometimes?
26 A. No.
27 Q. Would he just volunteer and give it to you?
28 A. I don't remember that, you know. I don't -- 5069
1 I don't -- I think so, but I don't remember.
2 Q. Okay. I'm probably not being clear. I'm
3 asking why Mr. Jackson gave you money. Would you
4 ask him for money once in a while?
5 A. I think I did -- I don't remember.
6 Q. Okay. But you do remember him giving you
7 money from time to time, right?
8 A. Yeah.
9 Q. Okay. And you're not sure of the total,
10 right?
11 A. No.
12 Q. Okay. And did he give you money from time
13 to time during the entire period that you worked for
14 him?

15 A. Someone -- yeah.

16 Q. Okay. And you don't recall him ever saying

17 "No" if you ever told him you needed some money, did

18 he?

19 A. No.

20 Q. Okay. He always was generous with you with

21 money, wasn't he?

22 A. Yeah. Yes.

23 Q. Okay. All right. Now, your deposition was

24 taken in 1993, right? Do you remember that?

25 A. I don't remember.

26 Q. Okay.

27 A. But I think it was '94. I don't remember.

28 Q. Would it refresh your recollection if I just 5070

1 show you the transcript with a date on it? Would

2 that help you remember?

3 A. I mean, I'll read it and -- I know that it

4 was that, but I don't remember.

5 Q. If you saw the transcript, might that help

6 you remember? Would you like to see it?

7 A. Yeah. I mean, you can put whatever that you

8 want to and I will say probably.

9 Q. No, I don't want to do that. Would it help

10 refresh your recollection --

11 A. No.

12 Q. -- if I just show you the date on the

13 deposition?

14 MR. ZONEN: Your Honor, I'd be prepared to

15 stipulate to the two dates of the transcript.

16 MR. MESEREAU: Okay. Sure.

17 MR. ZONEN: And the first date is December

18 15, 1993.

19 MR. SNEDDON: Can't hear you.

20 MR. ZONEN: The first date --

21 MR. SNEDDON: Turn it on.

22 MR. ZONEN: We make this complicated, don't

23 we?

24 The first date is December 15, 1993. The

25 date of the second day of the deposition was January

26 11, 1994. I would so stipulate.

27 MR. MESEREAU: So stipulated.

28 THE COURT: All right. I'll approve that 5071

1 stipulation.

2 THE WITNESS: I do remember '94. But I

3 don't remember the dates.

4 Q. BY MR. MESEREAU: Okay. Okay. Do you

5 remember in your deposition saying you had never

6 seen Mr. Jackson touch anyone improperly?

7 A. Yeah, I --

8 Q. Do you remember saying you never saw him

9 touch anyone?

10 A. Yeah.

11 Q. You did say that, didn't you?

12 A. Yes.

13 Q. Okay. And in that deposition, you told the
14 truth, right?

15 A. As -- as I recall it at that time, yeah.

16 Q. You told the truth at that time, right?

17 A. As I remember it.

18 Q. Yes. And you were under oath, right?

19 A. Yes.

20 Q. Okay. And you said that you had never seen
21 Michael Jackson touch anyone in a sexual way, right?

22 A. Yeah.

23 Q. Okay. And you said at no time while you
24 worked for Michael Jackson did you ever see him have
25 sexual contact with anyone, right?

26 A. When I say "sexual," I mean sexual.

27 Q. But you did say under oath that you had
28 never saw Mr. Jackson have sexual contact with 5072
1 anyone, right?

2 A. No. No.

3 Q. Isn't that what you said?

4 A. Yeah, yeah, that's what I said.

5 Q. Okay. Now, you mentioned that Mr. Jackson
6 has a Jacuzzi, right?

7 A. Where at? At the Havenhurst?

8 Q. Well, let's start with Havenhurst.

9 A. Uh-huh.

10 Q. Did Mr. Jackson have a Jacuzzi at
11 Havenhurst?

12 A. Yes.

13 Q. And just tell the jury where the Jacuzzi
14 was, please.

15 A. It's outside his patio.

16 Q. Okay.

17 A. Outside of his bedroom.

18 Q. And did various family members use that
19 Jacuzzi?

20 A. No.

21 Q. Did you ever see anyone use that Jacuzzi at
22 Havenhurst?

23 A. Only Mr. Jackson.

24 Q. And it was outside?

25 A. Yes.

26 Q. Okay. Can you see that Jacuzzi from the
27 house?

28 A. No. 5073

1 Q. Can you see it from any windows?

2 A. Not from the house. From a separate -- from
3 a separate -- from -- I think from up on the garage,
4 you can see it, but it's not a bedroom.

5 Q. Did you ever see Mr. Jackson in that Jacuzzi
6 at Havenhurst?

7 A. I remember one time.

8 Q. One time seeing Mr. Jackson use the Jacuzzi
9 at Havenhurst?

10 A. Yeah.

11 Q. Okay. But you didn't see anyone else ever
12 use it?

13 A. There was a little -- a boy there.

14 Q. Did you ever see his parents use the
15 Jacuzzi?

16 A. Whose parents? Michael?

17 Q. Yeah.

18 A. No.

19 Q. Did you ever see Janet use it?

20 A. No.

21 Q. Ever see LaToya use it?

22 A. No.

23 Q. Ever see anyone use it besides Mr. Jackson?

24 A. No.

25 Q. All right. Was there a Jacuzzi at
26 Neverland?

27 A. Well, inside his bedroom there is a bathroom
28 with a Jacuzzi in it. 5074

1 Q. Okay. And you saw Mr. Jackson use that
2 Jacuzzi, didn't you?

3 A. Yeah.

4 Q. Is it downstairs or upstairs in his bedroom
5 area?

6 A. Downstairs.

7 Q. It's downstairs; is that right?

8 A. His bedroom, yeah.

9 Q. Okay. Now, the prosecutor asked you
10 questions about Mr. Robeson, okay?

11 A. Uh-huh.

12 Q. And did you say that Mr. Jackson was
13 sleeping on a bed in the lower level of his bedroom?

14 A. Yes.

15 Q. Okay. You didn't see him sleeping in the
16 bedroom on the upper level?

17 A. No.

18 Q. And was it your belief that during the time
19 you worked at Neverland, that Mr. Jackson only slept
20 on the bed on the lower level?

21 A. Yes. There were times that the other bed
22 was used.

23 Q. Okay.

24 A. But I never saw him in that bedroom.

25 Q. So you would see the bed upstairs used, but
26 you didn't know who had used it, right?

27 A. No.

28 Q. You would see the bed downstairs used, but 5075
1 you didn't know who used it, right?

2 A. It was time when it was just one -- one bed

3 was undone.
4 Q. Sometimes, right?
5 A. Sometimes.
6 Q. And sometimes there was a bed upstairs that
7 seemed undone, right?
8 A. Yeah.
9 Q. And you were responsible for making both
10 beds, right?
11 A. Yes.
12 Q. Okay. Have you ever seen Mr. Jackson lying
13 on his bed watching television?
14 A. Yeah. A couple of times.
15 Q. How many times did you see Mr. Jackson lying
16 on his bed watching television?
17 A. Probably a couple of times.
18 Q. And you would see him watch videos also,
19 right?
20 A. Yeah.
21 Q. Were you often in Mr. Jackson's room when he
22 was watching television?
23 A. No.
24 Q. You typically cleaned his room when he
25 wasn't there, right?
26 A. Yeah.
27 Q. Is that true?
28 A. Yes. 5076
1 Q. And it was your understanding that you were
2 supposed to clean his room when he wasn't in there,
3 right?
4 A. No.
5 Q. Was it your understanding that you weren't
6 supposed to go in when Mr. Jackson was in the room?
7 A. Yeah. Sometimes I'll unlock his room and
8 he'll be there, and he tell me that it was okay to
9 come in.
10 Q. Okay. And sometimes you would unlock his
11 door, he'd ask you not to come in, right?
12 A. Yeah.
13 Q. Most of the time when you cleaned his room
14 at Neverland, he wasn't in it, right?
15 A. Most of the time when he wasn't in?
16 Q. Let me rephrase. Let me rephrase.
17 During the time you worked at Neverland,
18 most of the time when you cleaned his room, he
19 wasn't in there, right?
20 A. Yeah.
21 Q. You okay?
22 Do you want some water?
23 A. Huh?
24 Q. Do you want some water?
25 A. No, that's okay.
26 Q. Was it your understanding that when you

27 cleaned Mr. Jackson's room you were usually supposed

28 to do it when he wasn't around? 5077

1 A. Yeah.

2 Q. Okay. Okay. And if you opened the door and

3 he was in there, you would ask for permission to

4 come in, right?

5 A. Yes.

6 Q. Okay. Now, his bedroom is a very big area,

7 isn't it?

8 A. Yes.

9 Q. How would you describe it?

10 A. Big.

11 Q. Very big, isn't it?

12 A. Uh-huh. Yeah.

13 Q. And how do you get into his bedroom? If

14 you're going -- let me rephrase it. If you're going

15 into Mr. Jackson's room, what do you have to do to

16 get in?

17 A. Open the door with a key.

18 Q. Okay. And is that what you would typically

19 do?

20 A. Yes.

21 Q. Was there any kind of a bell that would

22 ring?

23 A. Yes.

24 Q. And would the bell always ring when you

25 entered?

26 A. Yeah. But it -- it doesn't have a -- you

27 know, it would ring just once.

28 Q. Right. Just one ring? 5078

1 A. And then close, yeah.

2 Q. Would you then stop it? Would you shut the

3 bell off?

4 A. I used to unplug it.

5 Q. You unplugged it. Okay. So you'd hear a

6 ring, and then you would unplug it; is that right?

7 A. Well, you have to unplug it from the inside

8 of the bedroom.

9 Q. So you'd open the door, right, with a key?

10 A. Yeah.

11 Q. The bell would go off, and then you would

12 unplug it, right?

13 A. When I was there by myself, I used to unplug

14 it.

15 Q. Okay. Okay. And then it would stop

16 ringing, right?

17 A. And it would stop ringing, yeah.

18 Q. And then you would do your cleaning, right?

19 Is that right?

20 A. No.

21 Q. Tell me what --

22 A. I'll get there --

23 Q. Yes.
24 A. -- and then -- once I get there, I unplug
25 it, because when people get close to it, it rings.
26 But it rings, and then it rings one time, it
27 doesn't ring anymore.
28 Q. Okay. Okay. To stop it from ringing, you 5079
1 would unplug it?
2 A. Yeah.
3 Q. Okay. Okay. All right. Now, do you know
4 who Quincy Jones is?
5 A. Yes.
6 Q. And who's Quincy Jones?
7 A. A writer, I think.
8 Q. Okay. And his daughter used to visit
9 Michael, right?
10 A. At Havenhurst.
11 MR. ZONEN: Beyond the scope of the direct,
12 and irrelevant.
13 THE COURT: Overruled. Go ahead.
14 THE WITNESS: At Havenhurst?
15 Q. BY MR. MESEREAU: Yes.
16 A. I think she was there a couple of times.
17 Q. Her name was Kidada, right?
18 A. I don't know.
19 Q. But you saw her visit Michael, correct?
20 A. Yes.
21 Q. Did you ever see -- do you know who Lionel
22 Ritchie is?
23 A. Yes.
24 Q. Did you ever see his daughter visit the
25 Jacksons?
26 A. Not at Havenhurst.
27 Q. Okay. Did you see her visit Michael?
28 A. Him I remember visiting. 5080
1 Q. You remember him visiting Michael. You
2 don't remember his daughter?
3 A. No.
4 Q. Okay. Before you testified today, did you
5 meet with any prosecutor to discuss what you were
6 going to be asked?
7 A. Yeah.
8 Q. And when did that meeting take place?
9 A. Saturday.
10 Q. And who did you meet with?
11 A. I don't remember his name.
12 Q. Pardon me?
13 A. Ron, I think.
14 Q. Prosecutor Zonen?
15 A. And another one.
16 Q. Okay. And how long did the meeting take
17 place?
18 A. Couple of hours.

19 Q. And how many people were there meeting with
20 you?

21 A. Just the two of them.

22 Q. Did they tell you what they were going to
23 ask you in court?

24 A. They -- they went to what I say before.

25 Q. Did they discuss the questions they were
26 going to ask you today?

27 A. Kinda.

28 Q. And did they discuss your answers with you? 5081

1 A. No. They told me about, you know, what I
2 say in my deposition before, and if I remember, and
3 there was stuff that I didn't remember.

4 Q. Did they give you a copy of your deposition
5 to look at?

6 A. No.

7 Q. Did they appear to be reading from your
8 deposition?

9 A. No.

10 Q. Okay. Did they have any documents they
11 showed you?

12 A. Yeah. They gave me a paper of things that I
13 say when I talk to another detective.

14 Q. Okay.

15 A. Not -- not at my deposition.

16 Q. Okay. So it was a paper that they gave you
17 to look at?

18 A. Yeah.

19 Q. And what was on that paper, if you remember?

20 A. When I talked to the other detectives, they
21 came, you know, at the beginning.

22 Q. Okay.

23 A. The first time.

24 Q. Do you remember meeting with a lawyer named
25 Larry Feldman?

26 A. Yes.

27 Q. And you met with Larry Feldman before your
28 deposition was taken, right? 5082

1 A. Yes.

2 Q. And he came out to see you, didn't he? Let
3 me rephrase it. Maybe you don't understand.

4 A. Yeah, I understand.

5 Q. You do?

6 A. But I don't remember. Yeah, I think he did.

7 He came to my house, I think.

8 Q. He came to your house, didn't he?

9 A. (Nods head up and down.)

10 Q. And he wanted to speak to you before your
11 deposition was taken by him, right?

12 A. Yes. Yes.

13 Q. Okay. And obviously that was quite a while
14 ago, right? Was that around 1993 sometime?

15 A. Yes.

16 Q. Okay. Do you remember how much time Larry
17 Feldman spent with you?

18 A. No.

19 Q. Do you remember if it was a long time?

20 A. I don't remember.

21 Q. Okay. Was that the only time you met with

22 Attorney Larry Feldman?

23 A. No. Then I was taken to L.A., and I --

24 Q. Did you meet with him again?

25 A. Yeah, for the deposition.

26 Q. Okay. And he was giving you some advice

27 during the deposition, wasn't he?

28 A. I don't remember. I don't think so. 5083

1 Q. Didn't he advise you from time to time

2 during that deposition?

3 A. I don't remember. There were a lot of

4 people talking to me at that one.

5 Q. And he was one of them talking to you,

6 wasn't he?

7 A. Yes.

8 Q. And you said that deposition went more than

9 a day, right?

10 A. Yeah. It was twice.

11 Q. Okay. And was it after that deposition that

12 you first spoke to an attorney named Terry Cannon?

13 A. That was -- that was after. After when Mr.

14 Cochran told me that my son was going to be

15 subpoenaed and I would have to bring him.

16 Q. Okay. And then you went to hire an

17 attorney, correct?

18 A. Then I -- yeah, then I talked to Terry.

19 Q. Okay. And has he been your lawyer ever

20 since?

21 A. Yes.

22 Q. Okay. Has he been your son's lawyer ever

23 since?

24 A. Yes.

25 Q. Okay. When did you last talk to Terry

26 Cannon?

27 A. I think it was December or November. I

28 don't remember. It was in December. 5084

1 Q. Last December?

2 A. Last December.

3 Q. Okay. Okay. And do you remember having a

4 meeting with Prosecutor Zonen and Terry Cannon last

5 year?

6 A. On December? It was -- Zonen? I don't know

7 his last name. He was a tall guy.

8 Q. Prosecutor Zonen, who you see right here --

9 A. Oh.

10 Q. -- do you remember meeting with him?

11 A. Oh. Yeah, I think he was -- he was there,
12 too. That's when they gave me that deposition.

13 Q. Okay. Okay. In your deposition, you said
14 that you had never seen Mr. Jackson molest a child,
15 right?

16 MR. ZONEN: Objection; asked and answered.

17 THE COURT: Overruled.

18 Q. BY MR. MESEREAU: In your deposition, you
19 said under oath you had never seen Mr. Jackson
20 molest a child, right?

21 A. Molest a child? No. Yeah, I say that.

22 Q. Okay. Was it after that deposition that you
23 were interviewed by Hard Copy?

24 A. No.

25 Q. It was before?

26 A. Oh, before I met with him, with -- at my
27 deposition? No, that interview was before.

28 Q. So the interview with Hard Copy was before 5085
1 the deposition --

2 A. Yes.

3 Q. -- right?

4 And that's the interview you were paid
5 \$20,000 --

6 A. Yes.

7 Q. -- to do, right?

8 A. Yes.

9 Q. And that's the interview that you had your
10 friend Evangeline help you arrange, right?

11 A. Yes.

12 Q. And then after you were paid, you said you
13 paid her some money, right?

14 A. Yeah.

15 Q. Okay. Okay. Did you ever talk to anyone
16 from The National Enquirer?

17 A. No.

18 Q. Is Hard Copy the only media --

19 A. Yeah.

20 Q. -- group that you ever met with?

21 A. Yeah. I guess someone tried to -- someone
22 contacted me from National Enquirer, I think, and
23 from Los Angeles Time.

24 Q. In your deposition, you said the people from
25 Hard Copy are not honest, right?

26 A. Yeah.

27 Q. When did you last talk to anyone from Hard
28 Copy? 5086

1 A. When did I -- recently?

2 Q. Let me rephrase it.

3 A. Uh-huh.

4 Q. After your interview with Hard Copy, did you
5 ever talk to them again?

6 A. No.

7 Q. Okay. Did you tell Attorney Larry Feldman
8 that you were going to be interviewed by Hard Copy?
9 A. No.

10 Q. And Evangeline worked at Neverland, right?

11 A. Yes.

12 Q. Did you tell anyone else who worked at
13 Neverland, besides Evangeline, that you were going
14 to be paid to interview with Hard Copy?

15 A. No. Not that I remember.

16 Q. Now, at some point you learned -- let me
17 rephrase that, excuse me. Let me start again.

18 After your interview with Hard Copy appeared
19 on television - okay? - at some point you learned
20 that other employees at Neverland now wanted to be
21 paid to go on television to talk about Mr. Jackson,
22 right?

23 A. Did I know that?

24 Q. Yes.

25 A. No.

26 Q. After you hired a lawyer --

27 A. Uh-huh.

28 Q. -- you learned that other employees at 5087
1 Neverland started hiring lawyers, right?

2 MR. ZONEN: I'll object. Lack of
3 foundation; speculative.

4 THE WITNESS: I don't remember that.

5 THE COURT: Wait.

6 The objection's overruled.

7 Q. BY MR. MESEREAU: Did you learn at some
8 point after your Hard Copy interview was on
9 television, that now other people who worked for
10 Michael Jackson were hoping they could make money
11 doing media interviews like you did?

12 MR. ZONEN: Objection; speculative.

13 THE WITNESS: No, I didn't know that.

14 THE COURT: Overruled.

15 Q. BY MR. MESEREAU: Did you discuss your Hard
16 Copy interview with anyone besides Evangeline at
17 Neverland?

18 A. I don't remember, no.

19 Q. Okay.

20 A. No.

21 Q. Okay. Who did you work for at Neverland?

22 A. Did I work for?

23 Q. Besides Mr. Jackson. I mean, who did you
24 work -- let me rephrase it.

25 Obviously you worked for Mr. Jackson, but
26 did you report to other people?

27 A. Did I report to other people? Oh.

28 Q. As part of your job. 5088

1 A. I was working as part of the household,
2 housekeepers.

3 Q. And who did you work with; do you remember?

4 A. The workers? I don't remember their names.

5 But I -- I --

6 Q. Okay. Now, the Hard Copy interview was in

7 1993, right?

8 A. Yes.

9 Q. It was in December of 1993, right?

10 A. Yes.

11 Q. And you stopped working in 1991, right?

12 A. (Nods head up and down.)

13 Q. So after you left -- after you stopped

14 working for Mr. Jackson, you stayed in touch with

15 some people who worked for Mr. Jackson, right?

16 A. No.

17 Q. What about Evangeline?

18 A. But she wasn't working there no more.

19 Q. When did she stop?

20 A. Before me.

21 Q. Was she in touch with people at Neverland?

22 MR. ZONEN: Objection; speculation.

23 MR. MESEREAU: To your knowledge.

24 THE WITNESS: Not that I know.

25 MR. ZONEN: There's an objection.

26 THE COURT: To her knowledge. I'll limit it.

27 She answered no, not that she knows.

28 Q. BY MR. MESEREAU: Did you talk to any 5089

1 representative of the media before you had your

2 deposition taken?

3 A. Did I -- did I talk --

4 Q. I'm -- yes, let me rephrase it.

5 A. Uh-huh.

6 Q. And if I'm unclear, just tell me, and I'll

7 try and say it again.

8 You said your interview with Hard Copy was

9 after the deposition, right?

10 A. No. It was before.

11 Q. It was before. Okay. How long before it,

12 if you know?

13 A. About a month.

14 Q. Okay. Did you discuss the fact that you

15 were going to be interviewed by Hard Copy with any

16 attorney?

17 A. No.

18 Q. Okay. Do you remember Evangeline saying to

19 you, "Would you like to go to The National

20 Enquirer"?

21 A. I don't remember.

22 Q. Pardon me?

23 A. I don't remember. I remember a guy called

24 me, but he never told me that someone refer me or --

25 Q. But didn't Evangeline suggest that you call

26 The National Enquirer?

27 A. No.

28 Q. She didn't? She didn't ask you, "Do you 5090
1 want me to find The Enquirer?"

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

3 Q. Would it refresh your memory if I just show
4 you a transcript --

5 A. Uh-huh.

6 Q. -- of your deposition?

7 A. Oh, okay.

8 Q. Can I do that?

9 A. Yeah.

10 MR. MESEREAU: May I approach?

11 THE COURT: Yes.

12 MR. ZONEN: What page, Counsel?

13 MR. MESEREAU: 208.

14 Q. Have you had a chance to look at that page?

15 A. No. Oh.

16 (Laughter.)

17 Q. You've had a chance to look at the page,
18 right?

19 A. Did I what?

20 Q. Have you had a chance to read that page
21 of your deposition?

22 A. Before today?

23 Q. No, no, today.

24 A. Oh, yeah.

25 Q. Okay. I just showed you the page, right?

26 A. Yeah.

27 Q. Have you had a chance to look at it?

28 A. Yeah. 5091

1 Q. And does it refresh your memory about what
2 Evangeline said to you?

3 A. You know, tell you the truth, I probably did
4 at that time. And I remember at the time, but this
5 time I don't remember.

6 Q. Okay.

7 BAILIFF CORTEZ: Ma'am, speak into the mike.

8 THE WITNESS: Oops.

9 Q. BY MR. MESEREAU: Didn't you tell Evangeline
10 that you were willing to talk to The Enquirer?

11 A. I don't remember.

12 Q. Okay. Would it refresh your recollection
13 just to look at the page?

14 A. No.

15 Q. It wouldn't? So even if you read the page,
16 it won't help, do you think?

17 A. It won't help me.

18 Q. Okay. Okay. But you don't remember what
19 you said to Evangeline about talking to The
20 Enquirer?

21 A. I don't even remember the whole sit -- I
22 don't remember.

23 Q. Okay.

24 A. It was a lot -- at that time, you know, it

25 was --

26 Q. Evangeline called Hard Copy for you, right?

27 A. Uh-huh. Yeah, I think so.

28 Q. And she did it for you, right? 5092

1 A. Yeah, I think she did.

2 Q. You wanted her to find a way to communicate
3 with Hard Copy, right?

4 A. Yeah.

5 Q. Okay. And you wanted to talk to either Hard
6 Copy or The Enquirer, right?

7 A. I don't remember if it was either of them,
8 but I remember that I say yeah.

9 Q. Okay. Okay.

10 A. Because I think they approach her first,
11 someone approach her. And she said, "Well, they
12 want to talk to you, too." That's what I got.

13 Q. Did you have an understanding with
14 Evangeline that if she arranged these interviews for
15 you, that you would pay her?

16 A. That I would pay her?

17 Q. Yes.

18 A. No.

19 Q. Did you believe she was just doing it as a
20 friend?

21 A. Yeah.

22 Q. Okay. So you didn't have any arrangement
23 with her that you would split the money, right?

24 A. No.

25 Q. You gave her some money later on because you
26 appreciated what she had done for you, right?

27 A. Yeah. Yeah, because of the trouble that she
28 was going -- you know, she did, yeah. 5093

1 Q. Okay. So you gave her money as a friend,
2 right?

3 A. Yeah.

4 Q. Okay. There was no understanding before the
5 interview with her how much she would get?

6 A. No.

7 Q. Okay. Okay. Now, Evangeline told you that
8 she had reached Diane Dimond of Hard Copy, right; is
9 that right?

10 A. Yes.

11 Q. And Evangeline arranged for you to meet with
12 Diane Dimond, right?

13 A. Yes.

14 Q. How many meetings did you have with Diane
15 Dimond with Hard Copy?

16 A. I think it was just one.

17 Q. Do you remember going to the Hilton Hotel?

18 A. My -- yes.

19 Q. Is that where you saw Diane Dimond during a
20 meeting?

21 A. Yes.

22 Q. And that's the meeting Evangeline went with
23 you to, right?

24 A. Yes.

25 Q. You told Diane Dimond during that interview
26 that you never told anyone that you had ever seen
27 Michael Jackson molesting boys, right?

28 A. Yes, I believe so. 5094

1 Q. And it was Evangeline that negotiated how
2 much money you were going to get, right?

3 A. Yes.

4 Q. You learned that you were going to get
5 \$20,000 from Evangeline, right?

6 A. From Hard Copy.

7 Q. Yeah.

8 A. Not from Evangeline.

9 Q. Let me rephrase it to make sure you
10 understand.

11 A. Yeah.

12 Q. You learned from Evangeline that you were
13 going to get \$20,000 for the interview with Hard
14 Copy, right?

15 A. Yeah.

16 Q. Is that correct?

17 A. Yes.

18 Q. Evangeline was supposed to speak to Hard
19 Copy about the money you were going to get, right?

20 A. Yes.

21 Q. So she was really your assistant, wasn't
22 she?

23 A. Yeah.

24 Q. Okay. If you remember, how long was the
25 meeting at the Hilton Hotel with Diane Dimond?

26 A. About three hours, probably.

27 Q. Okay. Were there other people at that
28 meeting as well? 5095

1 A. I don't remember. I don't think so.

2 Q. Do you know if you were given a contract to
3 sign?

4 A. I signed it, but I don't remember at what
5 time I did, if it was during that time or after the
6 interview.

7 Q. But you did sign the contract with Hard
8 Copy --

9 A. Yeah.

10 Q. -- right?

11 A. Yes.

12 Q. How did you get that contract?

13 A. How did I what?

14 Q. How did you get a copy of that contract?

15 A. I guess they give it to me.
16 Q. Okay. Did Miss Dimond give it to you
17 directly or did Evangeline give it to you?
18 A. No.
19 Q. Pardon me?
20 A. Miss Dimond gave it to me, I think.
21 Q. At the meeting?
22 A. I don't remember. It was during the -- in
23 the room.
24 Q. Okay. And you were asked to sign that
25 contract in that room before you left, right?
26 A. Yeah, I guess so.
27 Q. Is that what you remember?
28 A. That's what I remember. I don't know. 5096
1 Q. Okay. Okay. The day after you were
2 interviewed by Hard Copy, Miss Dimond called you
3 again, right?
4 A. The day after?
5 Q. Yes. The day after your interview with Hard
6 Copy, Ms. Dimond called you again, right?
7 A. I don't remember.
8 Q. Okay.
9 A. I don't remember her calling me, but I don't
10 remember if it was the next day or --
11 Q. Do you remember her wanting pictures of
12 Michael Jackson?
13 A. Yeah.
14 Q. Ms. Dimond wanted you to get her pictures of
15 Mr. Jackson, right?
16 A. I don't remember.
17 Q. Do you remember that?
18 A. I think I give it to her, but I don't
19 remember.
20 Q. Okay. Do you remember saying to Ms. Dimond
21 you don't have pictures of Michael Jackson?
22 A. I don't -- ask that --
23 Q. I'm sorry, I may not be explaining it
24 properly. Let me just rephrase the question. I'll
25 withdraw the question.
26 A. Uh-huh.
27 Q. The day after you interviewed with Hard
28 Copy, Miss Dimond called you on the phone, right? 5097
1 A. I don't remember.
2 Q. Well, after the interview with Hard Copy, do
3 you remember at some point in time Miss Dimond
4 called you?
5 A. I don't remember.
6 Q. Okay. Do you remember Miss Dimond ever
7 asking you to get her pictures of Michael Jackson?
8 A. I don't remember, but I give it to her
9 sometimes. Or one time, I guess, she got some
10 pictures of him.

11 Q. And was that part of your contract with the
12 show Hard Copy, that you would give them pictures?

13 A. Yeah -- yes.

14 Q. Okay. And when they paid you \$20,000, was
15 part of what you had to do to give them pictures?

16 A. Yes. I guess.

17 Q. Do you remember sending any pictures of Mr.
18 Jackson's animals to Hard Copy?

19 A. I think all the pictures I got, I give her,
20 it was me with animals, probably. But it was me
21 mostly. Not of animals.

22 Q. Did you send pictures of Mr. Jackson's lion?

23 A. No.

24 Q. How about his tiger?

25 A. Not -- I was in the picture, but it wasn't
26 by itself of the --

27 Q. Okay.

28 A. -- tiger. 5098

1 Q. You gave Ms. Dimond a picture of your son
2 with Mr. Jackson, right?

3 A. With Mr. Jackson? I don't remember, but
4 I -- no, I don't remember.

5 Q. Would it refresh if I just show you the
6 transcript of your deposition?

7 A. Uh-huh.

8 MR. MESEREAU: Okay. May I approach, Your
9 Honor?

10 THE COURT: Yes.

11 MR. ZONEN: Page number, Counsel?

12 MR. MESEREAU: 231.

13 MR. ZONEN: 231?

14 Q. BY MR. MESEREAU: Have you had a chance to
15 review that page of your deposition?

16 A. Yes.

17 Q. And you said under oath during the
18 deposition that you gave Ms. Dimond a picture of
19 your son and Mr. Jackson, right?

20 A. Yes.

21 Q. Okay. And you could -- you didn't think
22 people would notice your son on the show, right?

23 A. Yeah. Probably. Probably, yes.

24 Q. You said in the deposition you didn't think
25 anybody would recognize who your son was on the Hard
26 Copy show, right?

27 A. Yeah. Probably I said that.

28 Q. That's what you said, right? 5099

1 A. I probably -- yes.

2 Q. Okay. Now, at some point, you called Diane
3 Dimond and she didn't return your calls, right?

4 A. Yeah.

5 Q. You called her because you thought she had
6 lied, right?

7 A. She had lied?

8 Q. Yes.

9 A. I didn't like -- I thought that -- that Hard

10 Copy interview thing was going to be shown on Hard

11 Copy, and then I see my pictures everywhere, and

12 even in The National Enquirer, and that's what I

13 thought that it was. You know, I didn't know that

14 they can sell the story to someone else. That's how

15 I felt.

16 Q. Do you remember telling Ms. Dimond that you

17 had other pictures from Neverland Ranch --

18 A. I don't remember.

19 Q. -- that you could get? Do you remember

20 that?

21 A. No, I don't remember.

22 Q. Do you remember Miss Dimond telling you she

23 could send a messenger to get other pictures that

24 you had of Mr. Jackson?

25 A. I don't remember that.

26 Q. Okay. You gave Ms. Dimond pictures of Mr.

27 Jackson after your interview, right?

28 A. I don't remember. 5100

1 Q. You don't remember if you gave the pictures

2 before or after the interview?

3 A. No, no, no. After -- of Mr. Jackson? No.

4 Q. Okay. I'm asking you when you gave pictures

5 to Miss Dimond. Was it before the interview or

6 after it?

7 A. Oh. I think it was after.

8 Q. The prosecutor asked you questions about

9 Wade Robeson. Okay?

10 A. Uh-huh. Yes.

11 Q. Do you remember saying in your deposition

12 that you saw Mr. Robeson sleeping in Mr. Jackson's

13 bed?

14 A. Yes.

15 Q. Do you remember you were asked how many

16 times you saw that, and you said, "Maybe twice"?

17 A. I don't remember that I say that, but I

18 think that's what it was.

19 Q. Maybe twice?

20 A. I remember -- I don't remember what I say at

21 the time, but I think that was the time -- I mean,

22 that was the times.

23 Q. So you think you saw Mr. Robeson in Mr.

24 Jackson's bed maybe twice?

25 A. Yeah.

26 Q. And you think you saw Mr. Jackson in a

27 shower with Mr. Robeson one time, right?

28 A. Yes. 5101

1 Q. But you said the shower was fogged up and

2 you couldn't really see, right?

3 A. I saw the figure.
4 Q. You saw the figure. And you heard a lot of
5 laughing, right?
6 A. Yeah.
7 Q. And you thought they were playing, right?
8 A. Yes.
9 Q. In your deposition, you said under oath you
10 couldn't tell whether they were touching each other
11 or not, right?
12 A. Yeah.
13 Q. Do you remember meeting Joy Robeson, who is
14 Mr. Robeson's mother?
15 A. Yes.
16 Q. When did you first meet Joy Robeson?
17 A. I don't remember.
18 Q. Do you know about when it was, what year?
19 A. No.
20 Q. Okay. You told the jury that you walked
21 into the door at the hideout apartment and saw your
22 son on Mr. Jackson's lap one time, right?
23 A. Not at the hideout.
24 Q. Where was it?
25 A. Havenhurst.
26 Q. Okay. And you said your son was reading a
27 book?
28 A. (Nods head up and down.) 5102
1 Q. Is that right?
2 A. Yeah.
3 Q. Okay. The prosecutor asked you questions
4 about finding money in your son's pants, right?
5 A. Uh-huh.
6 Q. You found the money in his pockets, correct?
7 A. Yes.
8 Q. Have you ever seen that Hard Copy interview
9 that you did?
10 A. No.
11 Q. Okay. Has anyone from the prosecution tried
12 to show it to you?
13 A. No.
14 Q. No? Okay.
15 A. I saw little hints. One day I got home and
16 they were showing, you know, like little parts, what
17 they going to show the next day. That's what I saw.
18 Q. Okay. Do you remember stating that you
19 thought Michael Jackson was very childlike?
20 A. Yeah. Yes.
21 Q. He very often acted like a child, in your
22 mind, right?
23 A. Yes.
24 Q. Do you remember saying that he would let his
25 chimpanzee sleep in his room?
26 A. Yes.

27 Q. Do you remember that?
28 A. Yeah. 5103
1 Q. The chimpanzee's name was "Bubbles," right?
2 A. Yes.
3 Q. And Bubbles would sometimes stay in Mr.
4 Jackson's room, right?
5 A. Yes.
6 Q. You talked about Bubbles wearing a diaper,
7 right?
8 A. Yes.
9 Q. You said the monkey didn't like the diaper,
10 right?
11 A. Yeah.
12 Q. And you would often clean after the monkey
13 was in Mr. Jackson's room, right?
14 A. Yes.
15 Q. You said at one time Bubbles got too old and
16 then there was another monkey, right? Right?
17 A. I remember -- I don't remember about the
18 other monkey, but it was Bubbles.
19 Q. Mr. Jackson and a lot of children used to
20 play with the monkey, didn't they?
21 A. At Havenhurst he only had Bubbles.
22 Q. Okay. But children would come and play with
23 the monkey, wouldn't they?
24 A. Not at Havenhurst. Just one time.
25 Q. Where would you see Bubbles?
26 A. At Havenhurst, I think.
27 Q. Okay. Did you ever see Bubbles at
28 Neverland? 5104
1 A. I don't remember. I think it was bigger at
2 that time.
3 Q. Okay. But he was at Neverland, right?
4 A. He was at Neverland? I don't remember.
5 Q. Okay. Okay. But you would often at
6 Neverland see Mr. Jackson playing with kids, right?
7 A. Yes.
8 Q. He would play with kids all the time,
9 wouldn't he?
10 A. Yes.
11 Q. And kids would often visit Neverland, right?
12 Is that true?
13 A. Yes.
14 Q. Did you -- excuse me, let me rephrase that.
15 Do you remember a dance room where Mr.
16 Jackson used to do dance routines?
17 A. A what?
18 Q. I'm sorry. Let me rephrase it.
19 Do you remember a dance room --
20 A. Oh, a dance room, yeah.
21 Q. -- where Mr. Jackson used to practice dance
22 routines?

23 A. Where at? Neverland?
24 Q. Anywhere.
25 A. Yes.
26 Q. Where was the dance room?
27 A. Behind the theater.
28 Q. At Neverland, right? 5105
1 A. Yes.
2 Q. And you used to see Mr. Jackson go there and
3 practice dance, right?
4 A. Uh-huh.
5 Q. You also saw Mr. Jackson teaching children
6 to dance, right?
7 A. Playing with the kids.
8 Q. Yes.
9 A. Yeah.
10 Q. And he used to teach children how he dances,
11 right?
12 A. I don't know if it was the children, but I
13 see him with the kids.
14 Q. Okay. In the dance room, right?
15 A. In the dance room, yeah.
16 Q. Okay. Have you ever discussed your son's
17 claim that Mr. Jackson improperly touched him with
18 your son? Have you ever had a discussion about
19 that?
20 A. At one time, back in '94.
21 Q. Okay. You talked to your son about what he
22 said --
23 A. I'm --
24 Q. I'm sorry, go ahead.
25 A. I say, "What's going on?" And he say, "I
26 just don't want to talk about it."
27 Q. This was in 1994?
28 A. '94, I think so. 5106
1 Q. Have you ever discussed with your son his
2 claims about Mr. Jackson?
3 A. No.
4 Q. Never?
5 A. No. I -- I ask him that I was going to ask
6 his counselor.
7 Q. Okay.
8 A. And he say no.
9 Q. Okay. So you've never discussed --
10 A. No.
11 Q. -- your son's claims with him?
12 A. No.
13 Q. Okay. Have you had a meeting with
14 Prosecutor Sneddon?
15 A. Yeah, one time.
16 Q. And approximately when was that?
17 A. '93, I think.
18 Q. Okay. Have you met with Mr. Sneddon since

19 1993?

20 A. No.

21 Q. Okay. Have you had any meetings with any
22 sheriffs to discuss your testimony?

23 A. Other than -- no.

24 Q. Okay. Have you ever had a meeting with any
25 sheriff about what you're going to say today?

26 A. Other than Saturday, that, you know, they
27 told me that I was going to come here.

28 Q. Okay. Okay. Was any lawyer at that 5107
1 meeting?

2 A. No.

3 Q. Okay.

4 THE COURT: Shall we take our break?

5 MR. MESEREAU: Okay.

6 (Recess taken.)

7 THE COURT: Go ahead.

8 MR. MESEREAU: Thank you, Your Honor.

9 Q. Miss Francia, I'd like to ask you some
10 questions about the deposition you gave on January
11 11th, 1994, okay?

12 A. Uh-huh.

13 Q. Before you attended that deposition, you had
14 been asked to bring the contract you had with Hard
15 Copy with you to the deposition, right?

16 MR. ZONEN: I'm going to object as
17 irrelevant.

18 MR. MESEREAU: Your Honor, I believe the
19 prosecutor introduced the subject of Hard Copy.

20 MR. ZONEN: Not a contract.

21 THE COURT: The objection's overruled.

22 You may answer.

23 Q. BY MR. MESEREAU: Do you remember that? Let
24 me rephrase it.

25 A. Okay.

26 Q. Before you appeared at a sworn deposition on
27 January 11th, 1994, you had been asked to bring a
28 copy of the contract you had with Hard Copy to the 5108
1 deposition, right?

2 A. I don't remember.

3 Q. Do you remember at that deposition, you said
4 you had destroyed the contract?

5 A. I don't remember what I said or --

6 Q. Do you remember saying you'd gotten rid of
7 it?

8 A. I don't remember.

9 Q. Would it refresh your recollection if I just
10 show you the transcript?

11 A. Yeah.

12 MR. MESEREAU: May I approach, Your Honor?

13 THE COURT: Yes.

14 Q. BY MR. MESEREAU: Miss Francia, have you had

15 a chance to review those deposition pages?

16 A. Did I have a -- had I had a chance? No.

17 Q. I'm sorry, no. I just showed you some pages

18 from the deposition, right?

19 A. Yes.

20 Q. Did you have a chance to review that portion

21 of the page that I showed you?

22 A. I haven't read any of the deposition paper.

23 Q. Okay. Did you just read it when I showed it

24 to you?

25 A. Yes.

26 Q. And does it remind you that you said you had

27 gotten rid of the contract?

28 A. Yeah, I probably did. 5109

1 Q. Okay. Do you remember saying that in the

2 deposition?

3 A. No, I don't.

4 Q. Okay. Did you get rid of that contract at

5 some point?

6 A. Yeah, I don't have it anymore. Yeah, I

7 don't have it.

8 Q. Did you throw it out?

9 A. I think I -- yeah, I think I threw it away,

10 or --

11 Q. Did you throw it out before the deposition

12 of January 1994?

13 A. Yeah, I think I destroy -- I destroyed it.

14 Q. Okay. Do you remember stating in that
15 deposition that you showed the contract to Larry

16 Feldman?

17 A. No.

18 Q. Do you remember showing that contract to

19 Attorney Larry Feldman?

20 A. No, I don't remember.

21 Q. Would it refresh your recollection if I show

22 you the deposition page?

23 A. Yeah.

24 MR. MESEREAU: May I approach, Your Honor?

25 THE COURT: Yes.

26 Q. BY MR. MESEREAU: Miss Francia, have you had

27 a chance to look at that page of your deposition?

28 A. No. 5110

1 Q. Okay. I just showed you a page of your

2 deposition --

3 A. Oh, just now, yeah.

4 Q. Did you have a chance to read that page?

5 A. Yes.

6 Q. Does it refresh your recollection about your
7 saying you let Larry Feldman see the contract?

8 A. I don't remember.

9 Q. Okay. You don't remember showing it to

10 Larry Feldman?

11 A. No.
12 Q. Okay. And you met with Larry Feldman, what,
13 twice?
14 A. Well, first it was here in Santa Maria. He
15 came down.
16 Q. Okay.
17 A. And then I met with him when I went there
18 twice.
19 Q. So is that three meetings you had with
20 Attorney Larry Feldman?
21 A. Yes.
22 Q. And that would be in the early 1990s, right?
23 A. Yes.
24 Q. Okay. Did you go to him to get some advice?
25 A. No.
26 Q. Did you talk to him about what you were
27 going to say on television?
28 A. No. 5111
1 Q. You've talked to Santa Barbara Sheriff Russ
2 Birchim a number of times, haven't you?
3 A. Russ Bir -- it was from Santa Barbara, but I
4 don't remember the name.
5 Q. Do you know a Santa Barbara sheriff named
6 Russ Birchim?
7 A. Russ --
8 Q. Do you know a Santa Barbara sheriff named
9 Russ Birchim?
10 A. I don't remember the name of it, but it was
11 a detective or sheriff.
12 Q. Do you remember when your son Jason first
13 spoke to any police officer about what he claims
14 happened with Michael Jackson?
15 A. I remember one of the times, but I don't
16 know which time it was.
17 Q. At your deposition, you said that you went
18 on Hard Copy after your son spoke to the police,
19 right?
20 A. I don't remember if it was before or after.
21 Q. Okay. Would it refresh your recollection to
22 just show you --
23 A. Uh-huh.
24 Q. -- the deposition?
25 May I approach, Your Honor?
26 THE COURT: Yes.
27 Q. BY MR. MESEREAU: Have you had a chance to
28 look at that page from your sworn deposition? 5112
1 A. Yes.
2 Q. Does it remind you that your son had talked
3 to the police before you went on Hard Copy?
4 A. It doesn't -- I don't remember.
5 Q. Okay. Did you know your son was going to
6 speak to any police officer about Mr. Jackson?

7 A. No.

8 Q. It happened without you knowing about it?

9 A. I didn't know he was -- they were going to
10 talk to him.

11 Q. Do you have any idea why the police wanted
12 to talk to your son at that point in time?

13 A. No, I don't remember. I think when they
14 first talked to him, they came to the house and
15 asked me if they could talk to him, but I don't
16 remember when was this.

17 Q. Do you know who told the police anything
18 about your son?

19 A. I think they -- someone told me that they
20 needed to talk to my son, or they need to talk to me
21 about my son.

22 Q. Do you know if Larry Feldman, the attorney,
23 contacted the police about your son?

24 A. No, I don't know.

25 Q. Now, you worked approximately five years at
26 the Havenhurst address, right?

27 A. Altogether --

28 MR. ZONEN: Misstatement of evidence; 5113
1 objection.

2 THE WITNESS: Altogether --

3 THE COURT: Just a moment.

4 I sustain the objection, Counsel.

5 MR. MESEREAU: Okay.

6 Q. You worked for approximately two years at
7 Neverland, right?

8 A. Yeah.

9 MR. ZONEN: Objection; misstatement of
10 evidence.

11 THE COURT: Overruled.

12 Q. BY MR. MESEREAU: Is that true?

13 THE COURT: She answered "Yes" before.

14 THE WITNESS: Yes.

15 MR. MESEREAU: Oh, I didn't hear her. Thank
16 you.

17 Q. Now, while you were at Neverland, you
18 reported to someone named Norma Stakos, right?

19 A. Yes.

20 Q. And who was Norma Stakos?

21 A. One of the secretaries. She was a
22 secretary.

23 Q. A secretary to who?

24 A. Mr. Jackson.

25 Q. Okay. And you would speak to her from time
26 to time, correct?

27 A. Yeah.

28 Q. And do you remember she talked to you in 5114
1 1991 about the fact that for the third time your
2 wages had been garnished by a creditor?

3 MR. ZONEN: Objection; irrelevant.

4 THE COURT: Sustained.

5 MR. ZONEN: And hearsay.

6 Q. BY MR. MESEREAU: Did you ask Miss Stakos on
7 behalf of Mr. Jackson to help you with any bills you
8 couldn't pay?

9 A. No.

10 MR. ZONEN: Objection; irrelevant.

11 THE COURT: Overruled. The answer was, "No."

12 Q. BY MR. MESEREAU: Did you have a discussion
13 with Miss Stakos about the fact that she couldn't
14 pay you?

15 A. No, never did.

16 Q. You don't know anything about a wage
17 garnishment?

18 A. Yes.

19 Q. What do you know about that?

20 A. That --

21 MR. ZONEN: I'm going to object as
22 irrelevant.

23 MR. MESEREAU: I don't think so, Your Honor.

24 THE COURT: I thought it was initially, but I
25 changed my mind. So I'll overrule the objection.

26 Q. BY MR. MESEREAU: What do you remember
27 telling Miss Stakos about a wage garnishment?

28 A. About my taxes, not paying in time, and I 5115
1 need -- you know, they needed to wage - how do you
2 call that? - take money out of my paycheck.

3 Q. Did Miss Stakos help you with that?

4 A. Well, she was the payroll, so she's the one
5 who took it off of my paycheck. But she never gave
6 me money, or anybody gave me money to pay that.

7 Q. Do you remember you owed money to a store
8 called Dearden's?

9 A. Yes.

10 Q. Okay. And they were trying to garnish your
11 wages, right?

12 A. Uh-huh. Yeah.

13 Q. And did you -- you asked Miss Stakos to help
14 you straighten that out, right?

15 A. Not to straighten it, but to -- you know,
16 just to pay off of my check.

17 Q. Okay. And did she work with you on that?

18 A. Yes.

19 Q. Okay. And she did that for you on a couple
20 of other occasions, right?

21 A. I remember two times. And I don't remember
22 more than that.

23 Q. Okay. And she had a problem at one point
24 because you had a phony Social Security number,
25 right?

26 A. Yes.

27 Q. Okay. And she helped you straighten that
28 out, right? 5116

1 A. No.

2 Q. You eventually got a proper Social Security
3 number?

4 A. Yes. Yes.

5 Q. But you did discuss that with Miss Stakos,
6 right?

7 A. I don't remember. But they knew that I was
8 illegal, and Mr. Bray wanted to help me to get my
9 papers.

10 Q. Okay. And that got straightened out, didn't
11 it?

12 A. Yeah.

13 Q. Okay. Did you know someone named Gayle
14 Goforth?

15 A. Yeah.

16 Q. And who was Gayle Goforth?

17 A. The housekeeper. One of the housekeepers.

18 The head housekeeper of the house.

19 Q. And did you work with her?

20 A. Yes.

21 Q. For how long did you work with her?

22 A. Probably a year, a year and a half. Maybe a
23 year.

24 Q. And at one point you admitted going into her
25 purse, right?

26 A. Uh-huh.

27 Q. And you went into her purse to see how much
28 she was being paid, right? 5117

1 A. Her purse was on top of the -- our desk, and
2 she have her check on top of it.

3 Q. And you admitted going into her purse,
4 right?

5 A. Yes.

6 Q. The purpose was to see what she was being
7 paid, wasn't it?

8 A. Yes.

9 Q. Okay.

10 A. I admitted to Mr. Jackson.

11 Q. Excuse me?

12 A. I told Mr. Jackson about it.

13 Q. Yes. And he -- he didn't get you in any
14 trouble or anything, did he?

15 A. No.

16 Q. Okay. Now, you got a coffee table from Mr.
17 Jackson, didn't you?

18 A. Yes.

19 Q. And that was a beautiful oak table, right?

20 A. (Nods head up and down.)

21 Q. And where did that come from?

22 A. From Havenhurst.

23 Q. Okay. Did you ask for that?

24 A. Yes.

25 Q. And he said you could have it, didn't he?

26 A. Yeah.

27 Q. Did you ask him for the watch that you

28 described before? 5118

1 A. No.

2 Q. How did you end up with the watch?

3 A. I think it was one of the boxes that he

4 get -- he get stuff from the companies, and I got it

5 from there.

6 Q. Okay. And at some point did you tell Mr.

7 Jackson you had taken a watch?

8 A. No, he saw it on me. I show it to him.

9 Q. And he had no problem with that, right?

10 A. Yeah.

11 Q. And you indicated that he used to let you

12 take lots of things from time to time, right?

13 A. Yeah.

14 Q. And a lot of those things, I think you

15 described as samples; is that correct?

16 A. Samples, and gifts, and things that he get

17 from -- for himself.

18 Q. The oak coffee table had a signature on it,

19 didn't it?

20 A. A signature? Of him?

21 Q. Yes.

22 A. No.

23 Q. Didn't it have a signature of him?

24 A. No.

25 Q. You tried to sell that at one point, right?

26 A. No.

27 Q. Still have it?

28 A. Yeah, it's in the garage somewhere. 5119

1 Q. Okay. When you left Neverland, who did you

2 report to to tell them that you were leaving?

3 A. Who did I report?

4 Q. Yes.

5 A. I mean, I quit. I just --

6 Q. Yeah. When you quit, who did you go to and

7 say, "I quit"?

8 A. I told that lady who was working there at

9 that time. Gayle.

10 Q. And did you give her one day's notice?

11 A. No.

12 Q. How much notice did you give?

13 A. No notice.

14 Q. Okay. You just left, right?

15 A. I just left.

16 Q. Okay. Now, on a couple of occasions you got

17 in trouble for not doing your time card properly,

18 correct?

19 A. A lot of occasions.
20 Q. Huh?
21 A. A lot of occasions for being late.
22 Q. Yes, you got in trouble for being late,
23 right?
24 A. Yeah.
25 Q. And you got in trouble for not properly
26 doing your time card, right?
27 A. Yeah.
28 Q. Okay. But Mr. Jackson never yelled at you 5120
1 or did anything mean to you, did he?
2 A. No. No.
3 Q. But you didn't get along with some of the
4 help, right?
5 A. Yeah.
6 Q. You didn't get along with Gayle Goforth,
7 right?
8 A. Yeah.
9 Q. She's the one whose purse you went into,
10 right?
11 A. Yes.
12 Q. You and she just didn't get along, right?
13 A. In the beginning we got along very nice.
14 Q. Do you remember complaints that you wouldn't
15 let anybody get near Mr. Jackson?
16 A. That I would get --
17 Q. Do you remember --
18 MR. ZONEN: I'll object as hearsay --
19 THE WITNESS: That I would get --
20 MR. ZONEN: -- and vague.
21 THE COURT: Just a moment.
22 The objection's overruled.
23 Do you want the question read back? Do you
24 want me to repeat the question for you?
25 THE WITNESS: Yes, please.
26 THE COURT: I'll have the court reporter do
27 it.
28 (Record read.) 5121
1 THE WITNESS: No.
2 Q. BY MR. MESEREAU: Never heard of that?
3 A. Complaints that I wouldn't let anybody?
4 Q. Yes.
5 A. No.
6 Q. On the staff at Neverland?
7 A. Probably that I was the one allowed in his
8 room, that I was -- I just wanted to do that --
9 Q. Okay.
10 A. -- myself.
11 Q. So you basically wouldn't let other people
12 on the staff get near his room?
13 A. Yeah.
14 MR. ZONEN: Objection; misstatement of

15 evidence.

16 THE COURT: Overruled. The answer was,
17 "Yeah."

18 THE WITNESS: Because he told me that. He
19 told me not to let anyone in his room.

20 Q. BY MR. MESEREAU: Okay. Now, the prosecutor
21 asked you about the nickname "Rubba," okay?

22 A. Yes.

23 Q. "Rubba" is short for "Rubber Head," right?

24 A. I don't know.

25 Q. You never heard that?

26 A. I don't know.

27 Q. Okay.

28 A. I never hear that before. 5122

1 Q. And Mr. Jackson used to call his cousins,

2 Levon and Elijah, "Rubba," right?

3 A. He call the kids "Rubba," yeah.

4 Q. He also called kids "Rubber Head," or

5 "Rubba," right?

6 A. Yeah.

7 Q. He'd also use "Apple Head," right?

8 A. I don't know.

9 Q. He'd use "Doo-Doo Head," right?

10 A. Yeah. I think I hear that one time.

11 Q. Okay. But it's certainly a term that he

12 used quite often, isn't it?

13 A. "Rubba," yeah.

14 Q. He used it on lots -- he used it for lots of
15 children, including his own cousins, didn't he?

16 A. Yeah.

17 Q. Okay. When is the last time you talked to

18 Larry Feldman?

19 A. After the -- I mean, the last time I went
20 over there and testified, or for the subpoena.

21 Q. So that was quite a while ago?

22 A. Yeah.

23 Q. Okay. Okay. Now, the prosecutor asked you
24 questions about what you said in the deposition
25 about what you could see in the shower, right?

26 A. Yeah.

27 Q. And in the deposition you said under oath
28 that all you could see was a shadow, right? 5123

1 A. Yeah.

2 Q. Was that the truth?

3 A. A shadow, an image, yeah.

4 Q. That's all you could see --

5 A. Yeah.

6 Q. -- in the shower, correct?

7 A. I hear two voices.

8 Q. You heard giggling and laughing, right?

9 A. Yeah.

10 Q. And all you could see was a shadow through

11 the glass?
12 A. The glass, yes.
13 Q. And that's because the glass was fogged up,
14 right?
15 A. Yeah.
16 Q. Okay. You only saw one person in the
17 shower, right?
18 A. I saw him in the shower and the little kid.
19 Q. But in your deposition you said you could
20 only see one person, but you heard giggling, right?
21 A. Yeah, but I hear two people --
22 Q. You heard two people. You could only see
23 one through the glass, right?
24 A. Mostly, yeah. Mostly.
25 Q. Do you remember you were asked in your
26 deposition, "Did you hear anything else other than
27 Michael laughing?" And you said, "No"?
28 A. Yeah. 5124
1 Q. Was that the truth?
2 A. Yes.
3 Q. Do you remember in the deposition saying you
4 never saw anyone else in the shower but Mr. Jackson?
5 A. I don't think I say that.
6 Q. Would it refresh your recollection if I show
7 you the transcript?
8 A. Okay.
9 MR. MESEREAU: May I approach, Your Honor?
10 THE COURT: Yes.
11 MR. ZONEN: Page?
12 MR. MESEREAU: 401.
13 Q. Have you had a chance to look at that page
14 of the deposition?
15 A. Yes.
16 Q. Does it refresh your memory about what you
17 said about the shower?
18 A. Yeah.
19 Q. You saw one person, Mr. Jackson, right?
20 A. Yes.
21 Q. Or it looked like him through the glass,
22 right?
23 A. Yes.
24 Q. And the only voice you really heard was Mr.
25 Jackson, correct?
26 A. No.
27 Q. That wasn't correct?
28 A. I hear two -- two. 5125
1 Q. You heard laughter?
2 A. Laughing and --
3 Q. And that was at Neverland, right?
4 A. Yes.
5 Q. Okay. You've seen Mr. Jackson in his
6 Jacuzzi, correct?

7 A. Correct.
8 Q. You've seen him playing in his Jacuzzi,
9 correct?
10 A. Yeah.
11 Q. You've never seen him molesting anyone in
12 his Jacuzzi, right?
13 A. No.
14 Q. Let me just make sure that's phrased
15 properly. You've never seen Mr. Jackson improperly
16 touch anyone in his Jacuzzi?
17 A. No.
18 Q. Never saw that, right?
19 A. No.
20 Q. Okay. Have you seen Mr. Jackson at
21 Neverland tickling and playing with children?
22 A. Yes.
23 Q. You've seen him do that often, haven't you?
24 A. Playing, yeah. Playing a lot with the kids.
25 MR. ZONEN: I'll object to the compound
26 nature of the question, "tickling and playing."
27 THE COURT: Sustained.
28 Q. BY MR. MESEREAU: You've seen Mr. -- 5126
1 MR. ZONEN: Move --
2 MR. MESEREAU: Oh.
3 MR. ZONEN: Move to strike the answer.
4 THE COURT: I think she clarified it in her
5 answer.
6 MR. ZONEN: Okay. That's fine.
7 THE COURT: Go ahead, Counsel.
8 Q. BY MR. MESEREAU: You've seen Mr. Jackson
9 tickling children at Neverland, haven't you?
10 A. Not that I remember, no.
11 Q. You never saw him playing in the yard?
12 A. Playing in the yard, yeah. Not tickling --
13 MR. ZONEN: Objection to the use of
14 "playing" and "tickling" interchangeably as
15 compound.
16 THE COURT: Sustained.
17 MR. MESEREAU: All right. I'll move on.
18 Q. You've seen children at Neverland from an
19 organization called Make-A-Wish Foundation, correct?
20 A. Yes.
21 Q. And children from Make-A-Wish Foundation
22 often used to visit Neverland, right?
23 A. Yes.
24 Q. And they would crowd and climb all over
25 Michael Jackson, right?
26 A. Play with him, yeah.
27 Q. Well, they would all just surround him,
28 wouldn't they? 5127
1 A. Yes.
2 Q. And you would see him play with them often,

3 didn't you?

4 A. Yes.

5 Q. You would see those children running around

6 Neverland a lot, correct?

7 A. Yes.

8 Q. And Mr. Jackson used to run around with

9 them, didn't he?

10 A. Yes.

11 Q. He used to take them to the theater to watch

12 movies, didn't he?

13 A. Yes.

14 Q. And children would sometimes sit in his lap

15 in the theater watching the movies, didn't they?

16 A. I --

17 Q. Did you ever see that?

18 A. I never see that. Because I --

19 Q. I'm sorry.

20 A. I was never there when he was there with

21 kids.

22 Q. Okay. Okay. Now, have you participated in

23 any event -- excuse me, during the time you worked

24 at Neverland, did you participate in any large

25 events when guests would come to Neverland?

26 A. In any events, like --

27 Q. Guests, parties, things of that sort?

28 A. Yeah, we used to have an employee barbecue 5128

1 or -- then we all would come.

2 Q. Do you remember any other big events at

3 Neverland while you worked there?

4 A. No.

5 Q. Do you remember helping set up for guests

6 who would visit?

7 A. Yes.

8 Q. That would happen a lot, wouldn't it?

9 A. Yes.

10 Q. And when guests were going to visit

11 Neverland, what would you do?

12 A. What do you mean?

13 Q. Yeah. What were your responsibilities when

14 guests would visit Neverland? What kind of work

15 would you do?

16 A. Help in the house, help the cooks, help to

17 clean their bedrooms.

18 Q. Would you clean bedrooms other than Mr.

19 Jackson's?

20 A. Yeah, the guest rooms.

21 Q. And you used to see guests stay in the guest

22 quarters from time to time, right?

23 A. Yes.

24 Q. Would you see Mr. Jackson's children in the

25 main house when you worked there?

26 A. If I see who?

27 Q. Did you ever see any children --

28 A. Oh. 5129

1 Q. -- staying in the guest main house when you
2 were there?

3 MR. ZONEN: Objection. "Guest main house"?

4 MR. MESEREAU: That didn't come out too
5 well. I withdraw that.

6 Q. When you worked at Neverland, did you see
7 any children who used to stay there, besides what
8 you've described?

9 MR. ZONEN: Stay where? Objection; vague.

10 MR. MESEREAU: Neverland.

11 THE WITNESS: Stay where, at the guest
12 rooms?

13 Q. BY MR. MESEREAU: Yes.

14 A. No. They will stay in the house, in the
15 main house.

16 Q. Children usually stayed in the main house,
17 right?

18 A. Yeah.

19 Q. And do you know someone named Frank Cascio?

20 A. Frank Cascio. No, I don't remember.

21 Q. Do you know a family named "Cascio"?

22 A. No. I don't remember.

23 Q. Do you know someone named Tyson?

24 A. No.

25 MR. MESEREAU: Okay. No further questions
26 at this time.

27

28 REDIRECT EXAMINATION 5130

1 BY MR. ZONEN:

2 Q. Miss Francia, you told us that Mr. Jackson
3 had mentioned to you about not letting people in his
4 room. What exactly was it that Mr. Jackson told you
5 in that regard?

6 A. Not to let people in; that people want to
7 know about his business all the time, and not to let
8 anybody get in there.

9 Q. Did he tell you people in particular?

10 A. No. Just everybody. Anybody.

11 Q. Was that something he said to you often?

12 A. Yeah.

13 Q. Did you have a key to that room?

14 A. Yes.

15 Q. Did he tell you he wanted the room kept
16 locked?

17 A. Yeah.

18 Q. During the time that you worked for him at
19 Neverland, did you see people coming and going into
20 his room?

21 A. No.

22 Q. During the time that you worked at

23 Neverland, did that door stay locked fairly

24 regularly?

25 A. Closed all the time.

26 Q. Were there ever people coming and going into
27 his room that he did not give permission to come and
28 go into the room? 5131

1 A. No.

2 Q. Did Wade Robeson come and go into his room
3 at will?

4 A. Yeah. Kids were allowed to go there.

5 Q. Other kids were allowed to come into his
6 room?

7 A. Yeah.

8 Q. If he was there -- if he was not there, or
9 only when he was there?

10 A. Kids were there when he was there.

11 Q. If he wasn't there, they didn't stay in his
12 room?

13 A. They -- they never came when he wasn't
14 there.

15 Q. On those occasions that he was traveling,
16 the "Bad" tour -- Mr. Mesereau was asking you about
17 his travels during the "Bad" tour.

18 A. Uh-huh.

19 Q. And he mentioned a period of time that
20 exceeded a year and a half that he was on tour. Was
21 he continuously away from California for a full year
22 and a half, or would he come and go?

23 A. He'd come and go.

24 Q. There were times that he would return?

25 A. Yeah.

26 Q. And stay?

27 A. Yeah.

28 Q. Do you know the longest period of time that 5132
1 he would be away from his residence during that
2 time?

3 A. Probably about three months.

4 Q. Three months? Was the residence both the
5 Encino home and the hideout in L.A.?

6 A. It was mostly the hideout.

7 Q. Did that tour extend to the period of time
8 after which he moved to Neverland Ranch, or was he
9 completed with his tour by then; do you recall?

10 A. I don't remember.

11 Q. You told Mr. Mesereau that you had answered
12 a question in the deposition about seeing a shadow
13 in the shower. What did you mean by that? What is
14 a shadow? Tell me, what is a shadow?

15 A. An image.

16 Q. An image. All right. What did you see when
17 you looked into that shower?

18 A. Mr. Jackson.

19 Q. All right. Did you see the shadow of Mr.
20 Jackson, or did you see a person that looked like a
21 shadow?

22 A. Through the glass.

23 Q. What did you see through the glass?

24 A. Mr. Jackson.

25 Q. The actual person?

26 A. Yeah.

27 Q. Okay. You didn't see his shadow cast
28 against a wall, or against the floor? 5133

1 A. Huh-uh. No.

2 Q. All right. So what did you mean by the word
3 "shadow"?

4 A. His image.

5 Q. His image. That's what he looked like?

6 A. Yeah.

7 Q. All right. And was the door blurred during
8 that time?

9 A. Yeah.

10 MR. ZONEN: Excuse me. These are all next
11 in order, please.

12 Q. At the time that you looked through the
13 glass into the shower, were you able to see a second
14 person in there?

15 A. I want to say yeah, but I don't -- you know,
16 I hear the laughing and the talking and, you know,
17 playing, and I -- I didn't see the actual person,
18 but it was moving, you know, with him.

19 Q. Do you believe that you saw the image of a
20 second person?

21 A. Yeah.

22 Q. But not as clearly as Mr. Jackson?

23 A. Not as clearly, no.

24 Q. Did you hear one voice or two?

25 A. Two.

26 Q. And were you clear about that?

27 A. Yes.

28 Q. And did you tell that to Mr. Feldman in the 5134
1 deposition?

2 A. Oh.

3 Q. I'm sorry?

4 A. I don't remember.

5 Q. You don't remember what you said?

6 A. No.

7 Q. The deposition was how many years ago?

8 A. More than ten years, I think.

9 Q. Okay. The portion that Mr. Mesereau asked
10 you, when he showed you that transcript about one or
11 two people, do you recall when in the deposition

12 that question was asked of you? Was it the first
13 day or the second day of the deposition?

14 A. I don't know.

15 Q. Was it toward the end of the deposition?

16 A. I don't know. I think so. I don't

17 remember.

18 Q. Before the deposition began, did they ask
19 you if you wanted to testify in either English or
20 Spanish?

21 A. I don't think so.

22 Q. Did they simply assume that you would
23 testify in English?

24 A. Yeah.

25 Q. All right. This was 11 years ago?

26 A. Yes.

27 Q. Is your English as good as it is now?

28 A. A little better, I think. 5135

1 Q. A little better now?

2 A. Yeah.

3 Q. Would you have preferred to have testified
4 in Spanish at that time?

5 MR. MESEREAU: Objection. Relevance; calls
6 for speculation.

7 THE COURT: Sustained.

8 Q. BY MR. ZONEN: Were you comfortable in
9 English at this time?

10 A. I wish it would have been in Spanish.

11 Q. Did you understand all of the questions that
12 were asked of you during that deposition?

13 A. I was very confused.

14 Q. Were you confused as to some of the
15 questions?

16 A. Yeah, and all the lawyers and --

17 Q. There were a lot of lawyers there, weren't
18 there?

19 A. Yeah.

20 MR. MESEREAU: Objection. Leading; move to
21 strike.

22 THE COURT: Overruled. Next question.

23 Q. BY MR. ZONEN: Were you intimidated during
24 that deposition?

25 MR. MESEREAU: Objection; leading.

26 THE COURT: Sustained.

27 Q. BY MR. ZONEN: How did you feel during that
28 deposition? 5136

1 MR. MESEREAU: Objection --

2 THE WITNESS: I was uncomfortable.

3 MR. MESEREAU: -- knowledge; foundation.

4 THE COURT: Overruled. She said,
5 "Uncomfortable."

6 Q. BY MR. ZONEN: You remembered the monkey
7 Bubbles -- excuse me, the chimp, the chimpanzee; is
8 that right?

9 A. Bubbles, yes.

10 Q. Was Bubbles at more than one location?

11 A. I don't remember that. I think I remember
12 that other little monkey. I think it was a
13 different one. But I remember Bubbles at
14 Havenhurst. And then he was taken to some kind of
15 farm or trainer.
16 Q. Did Bubbles get a little too big?
17 A. Yeah.
18 Q. Did Bubbles get rambunctious, wild?
19 A. Wild.
20 Q. Did Bubbles ever bite you?
21 A. Yeah.
22 Q. On more than one occasion?
23 A. Twice.
24 Q. Twice?
25 At some time did you become a legal
26 resident?
27 A. Yes.
28 Q. And you had told them at Neverland about 5137
1 your status?
2 A. Yeah.
3 Q. Is that correct?
4 A. It was at that time. At that time that I --
5 Q. While you were working at Neverland; is that
6 correct?
7 A. Yeah.
8 Q. You mentioned about the coffee table. Where
9 was the coffee table at the time that Mr. Jackson
10 gave it to you?
11 A. Havenhurst.
12 Q. It was at Havenhurst. And where at
13 Havenhurst?
14 A. It was at his dance floor.
15 Q. Uh-huh.
16 A. And on top, in the attic.
17 Q. In the attic?
18 A. Yeah.
19 Q. Was it being used as a coffee table or was
20 it being stored?
21 A. No, it was being used. It just -- I guess
22 the room was too small, and, you know, it was just
23 in the way for everybody to -- I mean, for -- I
24 guess for people to be there, and --
25 Q. How did the coffee table end up going to
26 you?
27 A. Because he wanted it to move out. He wanted
28 it to be moved out, out of there. 5138
1 Q. He was getting rid of it?
2 A. Yes.
3 Q. And you knew that?
4 A. Well, he said, "Move it out of here," and I
5 asked him if I can take it.
6 Q. And what did he say?

7 A. And he said, "Yeah, take it."
8 Q. Mr. Mesereau asked you questions about your
9 interview with Hard Copy.
10 A. Yes.
11 Q. All right. Were you interviewed by more
12 than one person with Hard Copy?
13 A. No.
14 Q. Was that one person Diane Dimond?
15 A. Yes.
16 Q. Did you have more than one conversation with
17 her?
18 A. Do you mean personally?
19 Q. Yes.
20 A. Yes, just one.
21 Q. Was there a conversation, like an interview,
22 and then the interview on television?
23 A. No, that -- the same day we did everything.
24 She came to the lobby of the hotel, and then we went
25 upstairs and did it.
26 Q. She came to the lobby. So it was all on the
27 same day?
28 A. Uh-huh. 5139
1 Q. Was the interview done at the hotel?
2 A. Yeah.
3 Q. Were there a number of questions that were
4 asked of you during that interview?
5 A. There were many questions asking about who?
6 Me?
7 Q. Were there a lot of questions that they
8 asked?
9 A. Oh. Yeah.
10 Q. I say "they," but actually, was it just
11 Diane Dimond who asked you questions?
12 A. Yes.
13 Q. Yes?
14 A. Yes.
15 Q. Was anyone else asking you questions?
16 A. No, I don't remember. I don't think so.
17 Q. Did you know in advance what the questions
18 were going to be?
19 A. No.
20 Q. Were you surprised by what the questions
21 were?
22 A. Yeah. Yes.
23 Q. Did you know it was going to be about
24 Michael Jackson?
25 A. No. I thought it was going to be about me
26 working there.
27 Q. All right. That was the part that surprised
28 you? 5140
1 A. Yeah.
2 Q. Were you upset about it?

3 A. Yeah, because then I start to answer, and I
4 felt like I was just there, you know, answering
5 questions that I didn't know they were going to ask
6 me.

7 Q. Okay. Did it upset you?

8 A. Yeah.

9 Q. Did you tell them you were upset about that?

10 A. No.

11 Q. Were you truthful in your answers?

12 A. Yeah.

13 Q. Mr. Mesereau asked you if it was true that
14 you told Diane Dimond in this interview that you
15 never saw Michael Jackson molest a child; is that
16 correct?

17 A. Yeah.

18 Q. What else did you tell Diane Dimond in the
19 interview?

20 A. I don't remember.

21 Q. Did you tell Diane Dimond about seeing him
22 sleeping with boys?

23 A. Yeah.

24 Q. Did you tell her that that concerned you?

25 MR. MESEREAU: Objection. These are leading
26 questions.

27 THE COURT: Sustained.

28 Q. BY MR. ZONEN: Was there any conversation 5141
1 with Diane Dimond regarding any of the boys that you
2 testified to so far today?

3 A. I'm sorry, repeat?

4 Q. Was there any conversation with Diane Dimond
5 regarding the testimony you've given today about any
6 of those boys? You testified about Wade Robeson.

7 You testified about Macaulay Culkin. Did you
8 discuss either of those boys with Diane Dimond?

9 A. No, I said -- I think the only -- that I say
10 that I see him is sleeping with the kids and being
11 in the bathtub with them, playing.

12 Q. And you told Diane Dimond that?

13 A. Yeah, I think I did.

14 Q. Now, this is the bathtub or this is the
15 shower?

16 A. I don't remember if I told her about the
17 shower. But I remember that I told him about the
18 bathtub and the Jacuzzi, I think.

19 Q. I'm sorry?

20 A. I told her about the Jacuzzi and the
21 bathtub, I think.

22 Q. And being there with boys?

23 A. Being with boys. Yeah, that I will clean up
24 their -- you know, their toys in the bathtub.

25 Q. Mr. Mesereau asked you on cross-examination
26 if you ever saw Michael Jackson in the Jacuzzi at

27 the Havenhurst residence; is that correct?
28 A. Excuse me? Mr. -- 5142
1 Q. Mr. Mesereau asked you if you saw Mr.
2 Jackson in the Jacuzzi at the Havenhurst residence.
3 A. Uh-huh. Yeah.
4 Q. And you said, "Yes"?
5 A. Yeah.
6 Q. With a boy; is that true?
7 A. It wasn't -- yeah.
8 Q. Mr. Mesereau asked you if you had seen
9 Michael Jackson in bed with Wade Robeson twice, and
10 you said, "Yes"?
11 A. Yeah.
12 Q. Did you actually see Wade Robeson in bed
13 with Michael Jackson?
14 A. Yeah. Yes.
15 Q. And that was on two different occasions?
16 A. Yes.
17 Q. That doesn't include the times that you
18 didn't see them in bed, but you cleaned up after
19 them?
20 A. Yeah.
21 Q. When were the two times that you actually
22 saw him in bed with Wade Robeson?
23 A. When was the two times? Do you mean the
24 dates?
25 Q. Well, I doubt you could do that, but --
26 could you do that? Do you know the dates?
27 A. No. No.
28 Q. Can you give me -- do you remember the two 5143
1 occasions when you saw them? Do you remember either
2 of the two occasions?
3 A. Just simply be in bed with him.
4 Q. How did that happen, that you were there and
5 they were in bed together? How did it happen that
6 you saw them?
7 A. Watching T.V.
8 Q. They were watching T.V. Were they inside
9 the bed or on top of the bed?
10 A. Inside the bed.
11 Q. Do you remember what they were wearing?
12 A. No.
13 Q. Do you remember if they were wearing
14 anything?
15 MR. MESEREAU: Objection; no foundation.
16 THE WITNESS: No.
17 THE COURT: Just a moment.
18 Sustained.
19 Q. BY MR. ZONEN: Could you see any clothing on
20 either one of them?
21 MR. MESEREAU: Objection; foundation.
22 THE COURT: Overruled.

23 You may answer.
24 Q. BY MR. ZONEN: Could you see any clothing on
25 either one of them?
26 A. I saw from the waist up, so -- I don't know
27 if they had pajamas or --
28 Q. But from the waist up, were either one of 5144
1 them wearing anything?
2 A. No.
3 Q. They were both nude from the waist up?
4 A. Yeah.
5 Q. On both occasions?
6 A. On one occasion I remember.
7 Q. On one occasion?
8 A. On one occasion.
9 MR. ZONEN: May I have those photographs,
10 Counsel? Oh, thank you.
11 Q. I'd like to show you a series of
12 photographs, if I may. These photographs are
13 numbered consecutively 783 through 789.
14 May I approach the witness, Your Honor?
15 THE COURT: Yes.
16 Q. BY MR. ZONEN: Let me begin with Photograph
17 No. 783. Could you take a look at that photograph?
18 A. Uh-huh.
19 Q. Do you recognize the content of that
20 photograph?
21 A. Yeah.
22 Q. And what is that of?
23 A. This is Mr. Jackson.
24 Q. Oh, you need to use the microphone. I don't
25 think anybody can hear you.
26 783, then, is what, please?
27 A. Mr. Jackson's bed.
28 Q. That's his bedroom? 5145
1 A. His bedroom, yeah.
2 Q. Is that upstairs or downstairs?
3 A. Downstairs.
4 Q. Does this show the bed?
5 A. Yes.
6 Q. 784, please, what is that?
7 A. That's his bedroom.
8 Q. Upstairs or downstairs?
9 A. Downstairs.
10 Q. 785, what is that, please?
11 A. His bedroom.
12 Q. Upstairs or downstairs?
13 A. Downstairs.
14 Q. 786, what is that?
15 A. That's the Jacuzzi.
16 Q. I'm sorry?
17 A. The Jacuzzi.
18 Q. First floor?

19 A. In the bathroom.
20 Q. Okay. And can you see where the shower is
21 in that photograph?
22 A. I can just see the -- right here, the frame,
23 the door frame.
24 Q. If I were to give you a pen and ask you to
25 draw an arrow to where the shower goes, would you do
26 that?
27 A. Yeah. I mean, the --
28 Q. Yes, go ahead. 5146
1 Okay. And for the record, an arrow has been
2 drawn to the far right side of this exhibit,
3 No. 786.
4 No. 777, can you tell me what that is?
5 A. That's the bathroom.
6 Q. The shower?
7 A. The shower.
8 Q. On the first floor?
9 A. Yes.
10 Q. No. 788, what is that, please?
11 A. That's the shower, that's the security -- I
12 mean, the bedroom -- I mean, the closet.
13 Q. And that's the garden?
14 A. And that's the Jacuzzi.
15 Q. Okay. Now, we were looking at a few
16 different things that you -- we're going to go
17 through this when we present it.
18 But in this photograph, which is No. 788,
19 can you see both the Jacuzzi and the room that has
20 the shower in it?
21 A. Yes. Right across from each other.
22 Q. Okay. And then finally, 789, if you'd look
23 at that, please.
24 A. Yeah, this is the room upstairs.
25 Q. That's the bedroom upstairs?
26 A. The bedroom upstairs, yes.
27 Q. And that has a bed as well?
28 A. Yeah. 5147
1 Q. The photographs that I've just asked you to
2 look at, which are No. 783 through 789, do each of
3 these photographs accurately depict the subject
4 matter contained in the photograph, which means are
5 they accurate? Are the photographs accurate of
6 those rooms and those locations?
7 A. Yes.
8 Q. Okay. Now, are these accurate as of 1993?
9 A. Do you mean --
10 Q. As of the time that you were there, last
11 there, is it how it looked around the time when you
12 were there?
13 A. No.
14 Q. Okay. Tell me what's different.

15 A. Well, the T.V. -- like, the bed is the same
16 thing. And the television is the same. It's just
17 more stuff in it.

18 Q. Just more stuff in it?

19 A. Yeah.

20 Q. Okay. And the one that you're looking at,
21 as you say that, is 783.

22 All right. And 784, does that appear the
23 same as you last saw it?

24 A. No.

25 Q. What's different?

26 A. There's more stuff in it.

27 Q. More stuff?

28 A. Yeah. 5148

1 Q. But the furniture is in the same place?

2 A. Yes.

3 Q. 785?

4 A. Yeah. This wasn't here when I was there.

5 Q. I'm sorry?

6 A. It wasn't -- it wasn't like when I used to
7 clean it.

8 Q. How was it different?

9 A. The paintings and this mannequin.

10 Q. All right. I'm going to withdraw this one.

11 I'm going to withdraw 785.

12 786. Take a look at 786.

13 A. Yeah, that's the same. I mean, that's the
14 same, the same as far as the furniture, and even the
15 towels and --

16 Q. Okay.

17 A. -- the toys.

18 Q. 787?

19 A. It's the same.

20 Q. Okay.

21 A. It's just crowded.

22 Q. 788?

23 A. Yeah, it's the same.

24 Q. And seven -- let me see that again. All
25 right. This was 789 that I showed you and
26 originally called it 787.

27 Back to 789. So this is the same?

28 A. Yes. 5149

1 Q. All right. Here is the real 787, with the
2 shower. Is that the same?

3 A. Yes.

4 Q. Okay. And then 787 is the same?

5 A. Yes.

6 MR. ZONEN: Okay. Your Honor, I'm going to
7 move into evidence 783, 784, 786, 787 and 788 and
8 789, and withdraw 785.

9 MR. MESEREAU: No objection.

10 THE COURT: They're admitted.

11 MR. ZONEN: May I publish these at this
12 time?
13 THE COURT: Yes.
14 Q. BY MR. ZONEN: Mrs. Francia, this is a laser
15 pen, and it sheds a laser beam. And you just go
16 like that. Don't show it in anybody's eyes.
17 The first one is 783. And would you tell us
18 what that is, please?
19 A. 783, this?
20 Q. Yes, that room.
21 A. Mr. Jackson's bed and --
22 Q. Oh, we have a problem. Unfortunately,
23 you're going to have to turn back to use the
24 microphone. Take a look at it, and then turn back
25 to use the microphone so we can hear you.
26 A. That's Mr. Jackson's bed, and television.
27 And that's the entrance, the stair that goes to the
28 stairs, three. And then you go around to the 5150
1 bathroom.
2 Q. Okay. 784. And tell us what that is,
3 please.
4 A. That's the same. This will be the
5 television cabinet.
6 Q. And this is the first floor again; is that
7 right?
8 A. Yes.
9 Q. All right. Now, did you say that there was
10 some things that weren't there --
11 A. Yes.
12 Q. -- at the time that you last worked for Mr.
13 Jackson.
14 Show us what that is.
15 A. These pictures here.
16 Q. Those pictures right there. Anything else?
17 A. This horse.
18 Q. Okay. Now, Mr. Jackson did not have
19 children of his own at that time, did he?
20 A. No.
21 Q. Okay. 786, please.
22 Now, here's the one where I asked you to put
23 an arrow. Do you recognize the arrow where you put
24 it?
25 A. Yes.
26 Q. Show it.
27 A. Right there.
28 Q. What does that point to? 5151
1 A. The shower.
2 Q. And where is the shower?
3 A. Right here. About right here.
4 Q. And you had told us earlier in your -- this
5 is the first-floor bathroom; is that right?
6 A. Yes.

7 Q. And you told us earlier in your testimony,
8 that you had to come closer to be able to see into
9 that room?
10 A. Yes.
11 Q. Can you show us in this picture where you
12 were standing at the time that you actually looked
13 into that room?
14 A. Probably about right here. So I can see in.
15 Q. All right. And then you said that there was
16 also a Jacuzzi outside?
17 A. It's a shower. Right there.
18 Q. A shower. So is that on the other side of
19 that wall, the back wall?
20 A. Yes.
21 Q. All right. Next picture, please.
22 And this, I think, is 787. And what is
23 that?
24 A. That's the shower.
25 Q. All right. Is that the same door that you
26 recall?
27 A. Yes.
28 Q. All right. And that's the shower that you 5152
1 gave testimony to.
2 And the last one, please. Two more.
3 788. And this is 788. Is that the same
4 bathroom downstairs?
5 A. Yes.
6 Q. All right. Do you have a better view of the
7 room that has the shower?
8 A. Yes.
9 Q. Show us where that is, with the laser.
10 A. Right here.
11 Q. Okay. That's the toilet that you can see?
12 A. Yes.
13 Q. And on the other side of the toilet is the
14 shower?
15 A. Uh-huh. Right next to it.
16 Q. All right. Can you show us now where you
17 were standing? Can you put the laser on where your
18 feet were at the time you were standing?
19 A. Probably right here. Right here on this
20 corner.
21 Q. Okay. And then finally, 789.
22 And what is that, please?
23 A. That's his -- that's another room.
24 Q. That was the bed upstairs?
25 A. Uh-huh. Second floor.
26 Q. Now, Mr. Mesereau asked you about that bed.
27 Sometimes it is slept in and sometimes it is not.
28 A. Yeah. 5153
1 Q. During that period of time that Wade Robeson
2 was coming and visiting, was that bed slept in a

3 lot?
4 A. No.
5 Q. Was it slept in infrequently?
6 A. No, I always -- just only when a lot of kids
7 were there.
8 Q. Okay. If it was just Wade Robeson, he
9 didn't sleep in that bed?
10 A. No.
11 Q. How about Macaulay Culkin?
12 A. No.
13 Q. He didn't either?
14 A. No.
15 MR. ZONEN: Thank you.
16 I have no further questions, Your Honor.
17 And these exhibits are in evidence. Yes,
18 they are. Thank you. No further questions.
19
20 RE-CROSS-EXAMINATION
21 BY MR. MESEREAU:
22 Q. Just very briefly.
23 When -- during the time you worked at
24 Neverland, Mr. Jackson would often have guests in
25 his room, right?
26 A. Yes.
27 Q. And people would often hang out on his bed
28 and watch television, correct? 5154
1 A. Yes.
2 Q. You would often serve them food, right?
3 A. Yes.
4 Q. And you would serve them drinks, right?
5 A. Yes.
6 Q. That went on at all hours of the day,
7 correct?
8 A. Yes.
9 MR. MESEREAU: No further questions.
10 THE COURT: All right. Thank you.
11 MR. ZONEN: And I have no further questions,
12 Your Honor.
13 THE COURT: All right. You may step down.
14 And we'll recess for the day. And there's
15 no court tomorrow. I'll see you Thursday morning.
16 (The proceedings adjourned at 2:30 p.m.)
17 --o0o--
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28 5155

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 4965 through 5155

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 5, 2005, and thereafter

20 reduced to typewriting by computer-aided

21 transcription under my direction.

22 DATED: Santa Maria, California,

23 April 5, 2005.

24

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26

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

28 5156