



9 PLAINTIFF'S

10 WITNESSES DIRECT CROSS REDIRECT RECROSS

11 **CHACON, Ralph** 5161-SN 5202-M

1 E X H I B I T S

2 FOR IN

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

4 790 Photograph 5177 5180

5 791 Photograph 5177 5180

6 792 Photograph 5177 5180

7 793 Photograph 5184 5186

8 794 Photograph 5184 5186

9 795 Photograph 5184 5186

10 796 Photograph 5196 5197

1 Santa Maria, California

2 **Thursday, April 7, 2005**

3 8:30 a.m.

5 THE COURT: Good morning.

6 THE JURY: (In unison) Good morning.

7 COUNSEL AT COUNSEL TABLE: (In unison)

8 Good morning, Your Honor.

9 THE COURT: Counsel, you may proceed.

10 MR. SNEDDON: Mr. Chacon, would you come

11 forward, please. Right up there.

12 THE COURT: When you get to the witness

13 stand, please remain standing. Face the clerk and

14 raise your right hand.

15

16 RALPH CHACON

17 Having been sworn, testified as follows:

18

19 THE WITNESS: Yes, ma'am.

20 THE CLERK: Please be seated. State and

21 spell your name for the record.

22 THE WITNESS: Ralph Chacon, C-h-a-c-o-n.

23

24 DIRECT EXAMINATION

25 BY MR. SNEDDON:

26 Q. Mr. Chacon, in order for everybody to hear

27 you, you're going to need to lean into that

28 microphone, okay? Would you do that for us? 5161

1 A. Yes, sir.

2 Q. Thank you.

3 Mr. Chacon, did you used to work at

4 Neverland Valley Ranch?

5 A. Yes, sir.

6 Q. During what period of time?

7 A. Between '91 and '94.

8 Q. And prior to working at Neverland Valley

9 Ranch, where -- what employment did you have?

10 A. I used to repo vehicles in Thousand Oaks.

11 Q. Is that where you're from, Thousand Oaks?

12 A. Born and raised, yes, sir.

13 Q. And during the time that you were at

14 Neverland Valley Ranch, what was your position?

15 A. Security.

16 Q. And could you describe to the ladies and

17 gentlemen of the jury generally what your

18 responsibilities were as a security officer?

19 A. Secure Neverland property, front gate, fence
20 lines, around the main house, keeping intruders out,
21 and also taking care of the temperatures in the
22 animal areas.

23 Q. What shift did you work at the ranch?

24 A. Graveyard.

25 Q. Would you tell us what "graveyard," what
26 that entails? What are the hours?

27 A. From 10:00 till 6:00 in the morning.

28 Q. Now, do you recall a time when you were 5162
1 working at the Neverland Valley Ranch in which Mr.
2 Jackson was the subject of an investigation?

3 A. Yes, sir.

4 Q. And what years was that; do you recall?

5 A. I really don't. I don't recall.

6 Q. During the time that you were at the ranch,
7 did you get subpoenaed to appear before the Santa
8 Barbara County Grand Jury?

9 A. Yes, sir, I did.

10 Q. Do you recall when that was?

11 A. I believe it was in '94.

12 Q. Do you recall the month?

13 A. I'm guessing, could be probably May or
14 something around there. I'm not sure.

15 Q. And do you know an individual by the name of
16 Kassim Abdool?

17 A. Yes, sir.

18 Q. Who is Kassim Abdool?

19 A. He was at that time chief of security at
20 Neverland.

21 Q. And at the time that you were subpoenaed

22 before the grand jury, were you and Mr. Abdool

23 carpooling back and forth to work?

24 A. Yes, sir, we were.

25 Q. And how long had you known Mr. Abdool?

26 A. Probably the duration of our employment at

27 Neverland. Probably about three years. Three, four

28 years. Something like that. 5163

1 Q. And to your knowledge, did Mr. Abdool also

2 get subpoenaed to appear before the grand jury?

3 A. Yes, sir, he did.

4 Q. And do you recall where you were directed to

5 appear, which county?

6 A. Supposed to be in Los Angeles County. But I

7 didn't go to Los Angeles County.

8 Q. At some time prior to appearing before the

9 grand jury, pursuant to subpoena, were you contacted

10 by attorneys representing Mr. Jackson?

11 A. Yes, sir.

12 Q. On how many occasions?

13 A. I can remember two occasions that I was

14 called to come before them.

15 Q. And do you recall who those attorneys were?

16 A. Mr. Steve Cochran, I believe, and I remember

17 an Eric Mason. Mr. Sanger.

18 Q. Do you recall where the first meeting

19 occurred?

20 A. It happened in Mr. Jackson's outside office

21 at Neverland.

22 Q. And do you recall when the second meeting

23 occurred?

24 A. It happened in Santa Barbara at Mr. Sanger's

25 office.

26 Q. And were both of these meetings prior to the
27 time you were to appear before the grand jury, your
28 subpoena date? 5164

1 A. Yes, sir.

2 Q. Now, as a result of the receiving a subpoena
3 to the grand jury, did you make contact with law
4 enforcement?

5 A. Yes, I did.

6 Q. And do you recall who it was you contacted?

7 A. I believe it was Mr. Birchim.

8 Q. And do you recall what agency Mr. Birchim
9 worked for?

10 A. I believe it was the sheriff -- Santa
11 Barbara Sheriff's Department.

12 Q. And when you -- I'm sorry. When you
13 contacted Mr. Birchim, did you have a conversation
14 with him?

15 A. Yes, sir.

16 Q. And did you relay to him certain
17 information?

18 A. I did.

19 Q. And after that, did you have contact with
20 any other -- was there more than one meeting with
21 Mr. Birchim?

22 A. I'm sure there was, but I don't remember.

23 But I know there was more than two meetings with
24 him.

25 Q. Now, you told the ladies and gentlemen of
26 the jury that you did not appear before the Los
27 Angeles County Grand Jury. Did you at some time
28 make a statement under oath with regard to what you 5165
1 observed?

2 A. Yes, sir, I did.

3 Q. And do you recall when that was?

4 A. I believe it was '94. I'm not for certain.

5 It's been a while.

6 Q. Do you recall whether it was at or about the

7 time when you were supposed to appear before the

8 grand jury?

9 A. Oh. Yes, sir. It was probably the day

10 after.

11 Q. And do you recall where it was that you were

12 interviewed?

13 A. In Santa Barbara.

14 Q. And do you recall who was present during the

15 time that you were interviewed?

16 A. Well, the only ones that I remember is

17 yourself and Mr. Birchim.

18 Q. And was that statement given under oath?

19 A. Yes, sir.

20 Q. Now, during the time that you were employed

21 at Neverland Ranch, did you personally observe

22 anything that you felt was inappropriate with regard

23 to Mr. Jackson's behavior --

24 A. Yes, sir.

25 Q. -- or conduct?

26 And do you recall approximately what year

27 that was?

28 A. I want to say latter '92 or early '93. I am 5166

1 not -- I'm not positive.

2 Q. Do you recall what time of day or night it

3 was?

4 A. It was -- well, I had come on graveyard

5 shift, so it had to have been about probably

6 midnight, or before midnight.

7 Q. And do you recall what the weather was like

8 that night?

9 A. It was very nice. Very nice weather.

10 Q. Now, when you first came to work that

11 evening, what were the first things that you did; do

12 you recall?

13 A. I would come in and check out the radio. We

14 carried radios and a flashlight. I would check my

15 box for any memos that were generated. Then I

16 would -- we had -- there was electric golf carts

17 that we had to put on chargers for the night.

18 Q. At some time that evening, did you see Mr.

19 Jackson?

20 A. Yes, sir.

21 Q. And do you recall where Mr. Jackson was the

22 first time that you saw him that evening?

23 A. He was headed for the Jacuzzi.

24 Q. And do you know whether or not he was alone

25 or with someone?

26 A. He was with someone.

27 Q. And when you say he was with someone, do you

28 know who that was? 5167

1 A. Yes, sir.

2 Q. Who was that?

3 A. That was Jordie.

4 Q. And could you approximate the age of Jordie?

5 A. I want to say nine, ten years old.

6 Q. So he was with a child?

7 A. Yes, sir.

8 Q. Not an adult?

9 A. No.

10 MR. MESEREAU: Objection; leading.

11 THE COURT: Overruled. Next question.

12 Q. BY MR. SNEDDON: Now, I may have missed this
13 or I may have asked this. When you say you saw Mr.
14 Jackson in the company of this child, Jordie, what
15 direction were they headed?

16 A. Towards the Jacuzzi.

17 Q. Is that an area near where you were putting
18 things away?

19 A. It was close by. But from the area where I
20 was at, the garage area, I had -- I had gone to the
21 barbecue area, which was close, maybe ten feet, to
22 the Jacuzzi.

23 Q. And did you -- were you able to see Mr.
24 Jackson and the child in the Jacuzzi?

25 A. I couldn't see them from where I was
26 standing, but I could hear them in the water.

27 Q. Now, at some point, did you hear Mr. Jackson
28 speak out? 5168

1 A. Yes, sir.

2 Q. And what --

3 Your Honor, this is not offered for the
4 truth of the matter, but simply to explain the
5 conduct that occurs thereafter?

6 THE COURT: All right.

7 Q. BY MR. SNEDDON: What did you hear Mr.
8 Jackson say?

9 A. While in the Jacuzzi?

10 Q. Yes.

11 A. They were just -- just laughing, playing. I
12 don't remember what they were saying, but I know
13 that they were talking and having fun.

14 Q. At some time did Mr. Jackson request

15 something from the house?

16 MR. MESEREAU: Objection; leading.

17 THE WITNESS: That was before --

18 THE COURT: Just a moment.

19 MR. SNEDDON: You have to wait for the Judge

20 to rule, I'm sorry.

21 THE WITNESS: I'm sorry.

22 THE COURT: Overruled.

23 You may answer.

24 Q. BY MR. SNEDDON: Okay. Now you can answer.

25 THE COURT: Do you want the question read

26 back?

27 THE WITNESS: No, sir.

28 Well, actually, that was -- I heard them -- 5169

1 I heard him when I was still hooking up the golf

2 carts. He had called for security.

3 MR. MESEREAU: Objection; nonresponsive.

4 THE COURT: Sustained.

5 Q. BY MR. SNEDDON: Okay. So at some point you

6 heard Mr. Jackson yell for security?

7 A. Yes, sir.

8 Q. And where were you when that occurred?

9 A. I was in the garage area.

10 Q. Now, at some point that evening, did you see

11 Mr. Jackson and the child, Jordie, leave the

12 Jacuzzi?

13 A. Yes, sir, I did.

14 Q. Could you tell the ladies and gentlemen of

15 the jury, were you able to observe where they went?

16 A. Yes, sir.

17 Q. And where did they go?

18 A. They were going to the outside rest room

19 area by the rec room.

20 Q. And is the rec room near another building or

21 attached to a building on the premises?

22 A. Well, it's on its -- the rest room's

23 attached to the rec room. So it sits by itself.

24 It's two stories.

25 Q. All right. Are there other facilities

26 inside of that building itself?

27 A. Just a game room, that's all it was.

28 Q. Do you know what the game room is called? 5170

1 A. Just -- no, I don't.

2 Q. Describe the game room, if you would.

3 A. They had, like, probably maybe 20 different

4 type of computer games, the first floor, and also

5 with the top, the top floor had different type of

6 games.

7 Q. Have you been in that building before?

8 A. Yes, sir.

9 Q. And do you know whether or not that building

10 has a cellar?

11 A. A what, sir?

12 Q. A cellar?

13 A. Um, I want to say that had a wine cellar,

14 yes, sir.

15 Q. All right. In any event, you saw Mr.

16 Jackson and the child heading towards the rest room

17 area; is that correct?

18 A. Yes, sir.

19 Q. Did you watch them the entire time?

20 A. Yes, sir.

21 Q. And did you see where they went?

22 A. They went inside the rest room.

23 Q. Now, where were you located when you

24 observed this?

25 A. I was in the barbecue area, where I usually

26 normally observe everything.

27 Q. That's a security position you're assigned?

28 A. Yes, sir. 5171

1 Q. Now, at the time that you saw Mr. Jackson

2 and the boy go into the rest room area, did you at

3 some point in time approach the rest room?

4 A. Yes, I did.

5 Q. Do you recall from the time that you saw

6 Mr. Jackson and the child go into the rest room

7 area, how long it was before you approached the

8 area?

9 A. Probably a half an hour, maybe 35, 40

10 minutes.

11 Q. And then could you describe to the ladies

12 and gentlemen of the jury where you went?

13 A. I went around the rec room that leads right

14 behind the rest rooms. That's where I went.

15 Q. And what did you do when you got there?

16 Well, when you got in that area, did you hear or see

17 anything?

18 A. Yes, sir.

19 Q. And which?

20 A. Well, I heard first that Mr. Jackson and the

21 boy were inside a shower, the shower room in there.

22 Q. How many showers are there in the rest room?

23 A. There was only one shower.

24 Q. Let's just stop right there for just a

25 second, before we go any further. Could you explain

26 to the ladies and gentlemen of the jury the interior

27 of the rest room area?

28 A. As you go in from the rec room, the women's 5172

1 rest room is on the left and the men's room is on

2 the right. And as you go in, there's a dressing

3 area, and it's open, and it leads into where the

4 wash basins are at, pretty large area. And then it

5 goes into another smaller room where there's a

6 toilet and the showers.

7 Q. And you said "showers."

8 A. Shower. Excuse me, shower.

9 Q. All right. Now, you've indicated that you

10 heard some people in the shower. Did you recognize

11 the voices?

12 A. Yes, sir, I did.

13 Q. Whose voices did you recognize?

14 A. Mr. Jackson's and Jordie's.

15 Q. And did you look into the shower area?

16 A. Not right away. Not the first time that I

17 came around, because I couldn't see anything. But I

18 started to leave the area when I -- I was thinking,

19 I said, "What's going on here?" You know, "There's

20 a grown man in a shower with a boy."

21 MR. MESEREAU: Objection; move to strike.

22 THE COURT: Stricken.

23 Q. BY MR. SNEDDON: All right. So you left?

24 A. Right.

25 Q. How far did you go?

26 A. I didn't go too far, probably halfway around

27 the rec room.

28 Q. All right. And did you decide to go back? 5173

1 A. Yes, sir, I did.

2 Q. Why did you decide to go back?

3 A. I wanted to know what was going on in there.

4 Q. Why?

5 A. Because it wasn't -- it wasn't right.

6 MR. MESEREAU: Objection. Relevance; move

7 to strike.

8 THE COURT: I'll strike the question, "Why?"

9 And the answer.

10 Q. BY MR. SNEDDON: Okay. So you went back.

11 When you went back, where did you go to?

12 A. I went back to the same area where the
13 shower was located. There was a window, and I was
14 able to see and they were no longer in the shower.

15 Q. So you looked into the window?

16 A. Yes, sir.

17 Q. All right. And what did you see -- where
18 did you see Mr. Jackson and the child at this point?

19 A. I saw them standing in the nude in the
20 middle area, and Jordie was on the right, and he was
21 on the left side. Standing, facing each other.

22 Q. Now, at the time that you saw that, what
23 were the lighting conditions inside of the rest
24 room?

25 A. Oh, it was lit up, just that area there.

26 Not where the shower's at, but that area, it was --
27 the lights were on.

28 Q. Did you have any difficulty seeing in there? 5174

1 A. Not at all, sir.

2 Q. Now, from the point outside looking down
3 inside, what did you see go on between the
4 defendant, Mr. Jackson, and Jordan Chandler?

5 A. I saw that Mr. Jackson was caressing the

6 boy's hair, he was kissing him on his head, and his
7 face, his lips. He started kissing him on the
8 shoulders and started going down to his nipples.
9 Started sucking his nipples. Started going down to
10 his penis and putting it in his mouth. And about
11 that time I just -- I left.

12 Q. Okay. You say you saw him go down and do
13 what?

14 A. He put the little boy's penis in his mouth.

15 Q. Did you actually see that?

16 A. Yes, sir.

17 Q. And then you left?

18 A. Yes, sir.

19 Q. Where did you go?

20 A. I went back to the barbecue area.

21 Q. Do you recall, after you left that area and
22 observed the things you've just related to the jury,
23 did you see Mr. Jackson with the child again that
24 evening?

25 A. Yes, sir, I did.

26 Q. And where were you when you saw them?

27 A. I was in the barbecue area.

28 Q. And where -- where were they when you saw 5175
1 them again?

2 A. They were coming out of the rest room.

3 Q. Now, from the time that you had left, when
4 you had made your observations --

5 A. Yes, sir.

6 Q. -- and you left, till the time that they
7 came out of the rest room, how much time had elapsed
8 during that period of time?

9 A. Probably 20 minutes or 30 minutes.

10 Q. Now, when they came out of the rest room,

11 could you describe what was going on?

12 A. Jordie was mounted on Michael's back,

13 piggybacked, and they were headed for the back of

14 the -- the kitchen door to the main house.

15 Q. Did the child, Jordan, have any clothing on?

16 A. He had -- I believe it was like -- it was a

17 towel. I believe it was a towel. It's the type --

18 like it's a rope, but it's a towel.

19 Q. So a cloth robe or towel of some kind?

20 A. Yes, sir.

21 Q. Okay. And what was Mr. Jackson wearing, if

22 you recall?

23 A. Same.

24 Q. Could you see whether or not the child,

25 Jordan, had any other clothing on or not?

26 A. No, sir. I didn't observe.

27 Q. And where did they go?

28 A. They went inside the house, the main house. 5176

1 Q. And when they went inside the main house,

2 did you hear or observe anything happen that you

3 felt was unusual?

4 A. Yes, Mr. Jackson double-locked the door, the

5 back door, which he normally never did. Security

6 always went inside to secure the house inside and

7 out.

8 Q. Now, you say -- you described to the jury

9 that Mr. Jackson was kissing the boy --

10 A. Yes, sir.

11 Q. -- that you observed.

12 How would you describe the kissing?

13 A. Well, it was very passionate. Very

14 passionately he was kissing him.

15 Q. And did you see his hands during the time he
16 was kissing him?

17 A. Yes, sir.

18 Q. Where were they?

19 A. They were all over his body.

20 Q. All right. I want to show you a couple of
21 photographs, if we might, Mr. Chacon.

22 I've shown these to counsel, Your Honor.

23 The photographs are 790, 791, and 792.

24 All right. Mr. Chacon, let's look at the
25 photographs. First of all, let's start with 790.

26 Do you recognize that?

27 A. 790?

28 Q. Yeah. I'm sorry, you have to turn it over 5177
1 on the back.

2 A. Oh, yes, sir.

3 Q. All right. Let's start with that. Do you
4 recognize what's depicted in the photograph, 790?

5 A. Yes, sir.

6 Q. And what is that?

7 A. That's where the swimming pool's at, and
8 it's -- you're facing at the rec room in front of
9 you, and to the left is the garage area where the
10 carts -- where I was hooking up the carts.

11 Q. Does that photograph depict a portion or
12 some of the route that you took where you walked to
13 the area that you observed Mr. Jackson and the
14 child, Jordan?

15 A. Yes, sir.

16 Q. Now, what I'd like you to do is to please
17 take that black felt tip pen that I've given you

18 there, and would you please just draw the path that
19 you took that's covered by that photograph, that
20 portion of it.

21 And does that photograph accurately depict
22 the area of what you call the rec room at the time
23 that you made the observations of Mr. Jackson and
24 the child, Jordan?

25 A. Yes, sir.

26 Q. All right. Let's turn that one over and go
27 to the next one that has "791" on it, okay? Do you
28 recognize that? 5178

1 A. Yes, sir.

2 Q. All right. What is 791?

3 A. It's the pool area, and directly in front is
4 the rec room and the rest room. The rest rooms.

5 Q. Does the photograph, 791, show the area of
6 the entrance into the bathroom area?

7 A. Yes, sir.

8 Q. And does it show the Jacuzzi?

9 A. Yes, sir.

10 Q. And does it show the approximate area of
11 the -- where you made your observations?

12 A. Well, it's behind the -- just the other side
13 of the Jacuzzi, yes, sir.

14 Q. Okay. With regard to that particular
15 photograph -- and I'm going to ask you, does it
16 accurately depict the area as you recall it in 1992
17 or '93 when you made your observations?

18 A. Yes, sir.

19 Q. All right. I'm going to ask you, please,
20 take that black marker, please, and if you would
21 just circle the area that depicts the entrance into

22 the rest room area?

23 And would you please put an "X" in the

24 approximate area where it was that you made the

25 observations of Mr. Jackson and the child?

26 Now, let's take the last photograph, which

27 is 792 for identification purposes. Do you

28 recognize that photograph? 5179

1 A. Yes, sir.

2 Q. And can you tell the jury what that is,

3 please?

4 A. It's the barbecue area.

5 Q. Okay. Now, is that the area that you have

6 made reference to in your testimony?

7 A. Yes, sir.

8 Q. And does that photograph accurately depict

9 that area as it was back when you were working at

10 Neverland Valley Ranch?

11 A. Yes, sir.

12 MR. SNEDDON: Your Honor, I move that 790,

13 791, and 792 be admitted into evidence.

14 MR. MESEREAU: No objection.

15 THE COURT: They're admitted.

16 MR. SNEDDON: And, Your Honor, could we have

17 the input for the Elmo, please?

18 Q. BY MR. SNEDDON: This is a laser and I'm

19 going to ask you to point to some things.

20 A. Okay.

21 Q. All right. This is the exhibit that's been

22 marked as Exhibit 790 for identification purposes,

23 all right? Do you recognize that, Mr. Chacon?

24 A. Yes, sir.

25 Q. Would you show the jury the black line that

26 you placed on this particular exhibit?

27 Okay. It starts at the left-hand side of

28 the photograph; is that correct? 5180

1 A. Yes, sir.

2 Q. And moves - go ahead, just trace it - all

3 the way to almost the right-hand side -- or the

4 left-hand side of the building, correct?

5 A. Yes, sir.

6 Q. Would you tell the ladies and gentlemen of

7 the jury, as you walk down past the side of that

8 building that's depicted in the far right-hand side

9 of the photograph, People's 790, what is down there?

10 A. There is a tennis court. It's a sunken

11 tennis court.

12 Q. And what are the lighting conditions? Is

13 there a path that goes along there?

14 A. Yes, sir, there is.

15 Q. What are the lighting conditions along that

16 path?

17 A. Around the back, there wasn't.

18 Q. How about along the path itself?

19 A. Towards the -- behind the rest rooms, there

20 was a path where there was just small little lights

21 on the ground.

22 Q. Now, did you have a flashlight with you that

23 night?

24 A. Yes sir.

25 Q. Is that part of your standard equipment --

26 A. Yes.

27 Q. -- that you carry on the graveyard shift?

28 A. Yes, sir. 5181

1 Q. The building that's depicted on the far

2 right-hand side of the photograph - yes, sir, the
3 one you're showing the jury there - what is that
4 building there?

5 A. That's the rec room.

6 Q. And let's go to 791, if we could.

7 All right. Would you show the ladies and
8 gentlemen of the jury, first of all, what you
9 referred to as a Jacuzzi?

10 A. Right here.

11 Q. So that's in the lower left-hand corner of
12 the exhibit, 791?

13 A. Yes, sir.

14 Q. Now, where is the entrance to the rest room?

15 A. Right in there.

16 Q. And it's hard to see, but you drew a circle
17 around that in black?

18 A. Yes, sir. Right there.

19 Q. And now, where -- on this photograph, if you
20 can, can you show the approximate area of where it
21 was that you have made the observations you
22 described to the jury?

23 A. Well, this is the rest room in front, and on
24 the side, about right in there. The path is right
25 on the other side on the building there.

26 Q. On the back side of the building?

27 A. Yes, sir.

28 Q. Okay. Now, let's show the next photograph 5182
1 and then I'll come back to this.

2 This is 792 in evidence. Do you recognize
3 that?

4 A. Yes, sir.

5 Q. And what is that?

6 A. That's the barbecue area.

7 Q. Okay. Now, with regard to this particular
8 photograph, where were you located in your position
9 as a security officer on this evening when you
10 observed the defendant and the child, Jordan, walk
11 into the rest room?

12 A. I was about right in that area.

13 Q. So you're indicating to the right-hand side
14 of the barbecue area, just to the right of the post?

15 A. Right. Yes, sir.

16 Q. The post on the -- and were you behind the
17 barbecue itself or on the other side of it?

18 A. Well -- well, actually, I was like -- I was
19 moving up and down the side of it, on the other
20 side.

21 Q. On the outside of it?

22 A. Yes, sir.

23 Q. So not in the interior part, but --

24 A. Well, it was in the -- the interior is on
25 the other side also. Because this is in the center.

26 Q. Just so we can get it clarified, which side
27 of that were you on?

28 A. I was on -- I believe I was on that other 5183
1 side.

2 Q. Now, is the area of the -- let's go back to
3 791 for a second, if we could. You pointed out the
4 Jacuzzi, and obviously there's a swimming pool also
5 there.

6 A. Yes, sir.

7 Q. Now, with regard to that area, is that area
8 lit at night?

9 A. It is.

10 Q. Or was it then? Let's put it that way.

11 A. Yeah, just a bit. Because the sidewalks had
12 these lights, these small lights, as you went up
13 through the path. And if I remember correctly, I
14 guess there was some -- some lighting, but not that
15 much. But you could see where you were walking,
16 though.

17 MR. SNEDDON: Okay. All right. You can
18 take that down.

19 I have three more photographs, I've shown
20 them to counsel, that have been marked as 793, 794,
21 and 795 for identification purposes. I'd like to
22 show them to the witness.

23 THE COURT: All right.

24 Q. BY MR. SNEDDON: Mr. Chacon, I'm going to
25 show you the photograph marked as 793. You've seen
26 that photograph before?

27 A. Yes, sir.

28 Q. And do you recognize the person that you 5184
1 believe that that photograph depicts?

2 A. Yes, sir.

3 Q. Who is that?

4 A. Jordie.

5 Q. Is that a depiction of the child as you
6 recall him back in those days?

7 A. Yes, sir.

8 Q. And with regard to 794, it has two
9 photographs on it, one at the top and one at the
10 bottom. The one at the top is a singular photograph
11 of an individual, and the one at the bottom has four
12 people in that. Do you recognize the people in that
13 photograph?

14 A. Yes, sir.

15 Q. And again, who is that?

16 A. Jordie.

17 Q. And in the photograph at the bottom, there

18 are a number of people depicted. Which of them do

19 you recognize as Jordie?

20 A. This one here.

21 Q. Would you please take that black pen and

22 just put an arrow towards -- start on the white,

23 down below. Okay. Thank you.

24 And with regard to 795, do you recognize

25 that?

26 A. Yes, sir.

27 Q. And again, there are a number of people

28 depicted in that photograph, correct? 5185

1 A. Yes, sir.

2 Q. And do you recognize anybody in that

3 photograph?

4 A. Yes, sir, I do.

5 Q. Who would that be?

6 A. That's Jordie.

7 Q. By "that" you mean who, in terms of --

8 there's one, two, three, four, five people depicted.

9 A. The fifth one.

10 Q. All the way over to the left?

11 A. All the way over to the left.

12 Q. Are these accurate depictions of the child

13 as you recall him back in those days?

14 A. Yes, sir.

15 MR. SNEDDON: Move that they be admitted

16 into evidence, Your Honor.

17 MR. MESEREAU: No objection.

18 THE COURT: Admitted.

19 Q. BY MR. SNEDDON: Now, Mr. Chacon, are you
20 familiar with a child by the name -- a young boy by
21 the name of Brett Barnes?

22 A. Yes, sir.

23 Q. And have you seen Mr. Barnes before?

24 A. Yes, sir.

25 Q. Have you seen him at the ranch before?

26 A. Yes, sir.

27 Q. Have you seen him in the company of the
28 defendant before? 5186

1 A. Yes, sir.

2 Q. On how many occasions?

3 A. Numerous occasions. I couldn't give you a
4 figure.

5 Q. When Mr. Barnes was at the ranch, do you
6 recall whether or not his parents were with him?

7 A. At times they were; at other times they
8 weren't.

9 Q. Now, with regard to the child you've
10 described and identified as Jordan Chandler, and the
11 child that you also saw as Brett Barnes, can you
12 tell us what they look like?

13 A. Well, to me, I always got them confused,
14 because they looked the same, similar. I know one
15 was a little bit shorter than the other. But, you
16 know, I always got them confused, but they looked --
17 they looked alike. Maybe one had hair a little bit
18 shorter than the other.

19 MR. MESEREAU: Objection. Nonresponsive;
20 narrative.

21 THE COURT: Overruled.

22 Q. BY MR. SNEDDON: Go ahead.

23 A. But I would get them -- I would -- they just

24 looked the same to me.

25 MR. SNEDDON: All right. If we could have

26 the Elmo again.

27 Q. I'm going to start backwards at 795. Now,

28 would you use the -- thank you. 5187

1 That's the child you identified by the name

2 of what?

3 A. Jordie.

4 Q. All right. And now 794. Let's do the

5 bottom one for right now.

6 Now, the bottom one, you put an arrow; is

7 that correct?

8 A. Yes, sir.

9 Q. Which is the child that you were identifying

10 that you recognize as Jordie.

11 Okay. The one in the middle of the

12 photograph?

13 A. Yes.

14 Q. In the front --

15 A. Yes, sir.

16 Q. -- right?

17 And let's -- let me ask a question about the

18 top photograph. With regard to that photograph, do

19 you recognize that person?

20 A. Yes, sir.

21 Q. All right. Who's that?

22 A. That's Jordie.

23 Q. Okay. And lastly, that's 793 in evidence.

24 And you've identified that individual as also

25 Jordie, correct?

26 A. Yes, sir.

27 MR. SNEDDON: All right. Thank you. We

28 could have the lights again. 5188

1 Q. Now, during the time of your employment at

2 Neverland Valley Ranch -- let me go back a second,

3 okay?

4 A. Yes, sir.

5 Q. With regard to the incidents that you just

6 described to the ladies and gentlemen of the jury

7 here involving Mr. Jackson and the child you've

8 identified as Jordan, correct?

9 A. Yes, sir.

10 Q. Are those -- is that -- is that what you

11 told the grand jury when you were interviewed back

12 in 1994?

13 A. Yes, sir, I did.

14 Q. Now, let's go on for just a moment.

15 Did you see any other incidents involving

16 Mr. Jackson and the child you described as Jordan?

17 A. Yes, sir.

18 Q. With regard to the second -- and let's just

19 call it the second incident. With regard to the

20 second incident, do you recall how much time had

21 elapsed between the two incidents?

22 A. I don't recall, sir.

23 Q. Could you give us some idea whether it was

24 weeks, months, or years?

25 A. Could have been weeks. Could have been a

26 month. I'm not positive. It's been a while.

27 Q. Okay. And let me go back just for one

28 second before we move on to the second incident. 5189

1 Was there another thing that occurred on the

2 evening of the incident where you saw Mr. Jackson
3 and the child, Jordan, in the rest room together
4 that you had to actually make a report on?

5 A. Yes, sir.

6 Q. And what was -- what was that?

7 A. Well --

8 Q. What happened?

9 A. Well, Kassim Abdool and myself, we were
10 going around the house, the back side of the house,
11 checking for anything that was open, the normal
12 security checkup that we would do around the house.
13 And we observed that the two French doors in the
14 middle of the house were wide open.

15 Q. And so a note was made of that to your
16 supervisor?

17 A. Yes, sir.

18 Q. Who was your supervisor?

19 A. Lieutenant Wade. Kassim Abdool had written
20 a report in regards to the French doors being open
21 and we didn't close them.

22 MR. MESEREAU: Objection; nonresponsive.

23 THE COURT: Sustained.

24 MR. MESEREAU: Move to strike.

25 THE COURT: After "Lieutenant Wade" is
26 stricken.

27 MR. SNEDDON: Okay.

28 Q. So a report was prepared of that? 5190

1 A. Yes, sir.

2 Q. Now, the incident about the French doors
3 being open, was that before or after you had
4 observed Mr. Jackson?

5 A. After.

6 Q. It was later that evening?

7 A. Yes, sir.

8 Q. All right. Now we can move on.

9 On the second incident - we're going to call

10 it the second incident just for purposes of - what

11 was it -- were you working graveyard again?

12 A. Yes, sir.

13 Q. And do you recall approximately what time of

14 the night it was?

15 A. It was in the evening, after ten o'clock

16 when I come on.

17 Q. Where were you?

18 A. I was in the pool area. Barbecue area, pool

19 area.

20 Q. And did you see Mr. Jackson that evening?

21 Let me go back. Did you see Jordan that evening?

22 A. Yes, I did.

23 Q. And the child you've identified as Brett,

24 did you see him that evening?

25 A. Yes, sir.

26 Q. Where were they?

27 A. They were in the rec room, playing with the

28 machines. 5191

1 Q. Was there any other children in the rec

2 room?

3 A. Yes, I noticed a little girl, probably five,

4 six years old. I didn't know who she was, but I'm

5 sure she was probably a sister of one of the boys.

6 Q. And did you at some point become aware of

7 the fact -- let me ask you this. Prior -- when the

8 children were in the rec room playing, to your

9 knowledge, was Mr. Jackson on the premises?

10 A. No, sir.

11 Q. And did you become aware at some point in
12 time that Mr. Jackson was on the premises?

13 A. Yes, sir.

14 Q. And did you at some point see Mr. Jackson on
15 the premises?

16 A. Yes, sir.

17 Q. And where was Mr. Jackson the first time you
18 saw him?

19 A. He was coming out the back of his door --
20 the back door of his house, the main house.

21 Q. All right. And describe to the jury what
22 you observed Mr. Jackson to do.

23 A. He kind of ran up to the rec room, and he
24 was looking in from the outside, and he spotted
25 Jordie in one of those little -- it's like a car you
26 play, a racing car. And Mr. Jackson went around the
27 area where the rest rooms were at. There's a back
28 door that goes into the rec room, and he located 5192
1 Jordie back there, and he went to where Jordie was
2 at and --

3 Q. Let's just stop right there for just a
4 second, okay? You saw him go into the rec room
5 through a back door entrance?

6 A. Yes, sir.

7 Q. At the time you saw him go up to Jordan,
8 where were the other children? Could you see?

9 A. Yeah, they were upstairs playing games.

10 Q. Were the lights on inside of the rec room?

11 A. Yes, sir.

12 Q. Did you have any difficulty seeing in the
13 rec room?

14 A. Oh, no. No, sir.

15 Q. And where were you located at the time you
16 made these observations?

17 A. I was around the pool area, almost right
18 directly in front of the rec room.

19 Q. Now, at that point in time when you saw Mr.
20 Jackson go actually physically into the rec room,
21 describe to the jury what you saw occur.

22 A. Well, I saw him enter through the back door
23 of the rec room, and he went over to Jordie. He
24 bent over and said something to him, and then he
25 kissed him. And then they got out the back door and
26 they ran over to Mr. Jackson's Moon Rover, and --
27 that was a golf cart that he had specially made for
28 himself, and they took off. 5193

1 Q. When you say he kissed him, did you see
2 where he kissed him?

3 A. Not exactly, but I know he kissed him.

4 Q. Now, at some point that evening, did you see
5 Mr. Jackson again?

6 A. Yes, sir. When they came back.

7 Q. When they came back. And where were you
8 when they came back?

9 A. I was in the barbecue area.

10 Q. And when they came back, where did they --
11 physically, where did you see them when you --

12 A. They pulled up to what they called the
13 breezeway, which is between the main office and the
14 main house, the outside office and the main house.

15 Q. Okay.

16 A. Behind the back.

17 Q. And what did -- what -- was anybody else

18 present when they drove up?

19 A. Kassim Abdool was coming from the security

20 at that time also.

21 Q. So what did you see occur at that point in

22 time?

23 A. Well, I saw that Mr. Jackson and Brett --

24 I mean Jordie got off the cart. And Kassim noticed

25 that they were back, so he just headed back to the

26 security -- security office.

27 And Mr. Jackson and the boy were in front of

28 the -- they call it the Peter Pan display. It's a 5194

1 window where Peter Pan lights up.

2 Q. Can you describe that? Where is that

3 located, what building?

4 A. Well, it's the -- it's where the office is

5 at, behind the main house. It's connected. There's

6 a breezeway, but it's connected. And there's a

7 display window, or a window where this Peter Pan

8 display is at, where it lights up and you see

9 Tinkerbell flying around the window.

10 Q. Okay. Could you describe to the jury the

11 positions of the child and the defendant, Mr.

12 Jackson?

13 A. Well, they were looking at the display, the

14 Tinkerbell lighting up. And he was -- Jordie was in

15 front, Mr. Jackson was in back, and he had his hands

16 over like this, and --

17 Q. You're indicating over --

18 A. Over his back, towards the front.

19 Q. Okay.

20 A. And then he turned him around, kissed him.

21 It was passionate, but it didn't last that long.

22 And then his hands went down to his private areas.

23 And then they ran inside the house.

24 Q. All right. You say he kissed him, and it

25 was not very long but it was passionate. Where did

26 he kiss the child?

27 A. In the mouth.

28 Q. And when you say "his hands went down," 5195

1 where did they go -- whose hands went down where?

2 A. Mr. Jackson's hands went down to his crotch

3 area, the boy's.

4 Q. The boy's?

5 A. Yes, sir.

6 Q. And what -- how long -- how long do you

7 estimate that this incident took?

8 A. It was -- it didn't take very long.

9 Probably 10 seconds, 20 minutes. I'm not sure.

10 Q. And then at that point what did you see?

11 A. They went -- ran inside the back, the inside

12 of the house.

13 Q. Both the child and Mr. Jackson?

14 A. Yes, sir.

15 MR. SNEDDON: Just a moment, Your Honor.

16 Well, I must have misplaced it.

17 Your Honor, I have one other photograph I'd

18 like to have marked as 796 for identification

19 purposes. And I've shown it to counsel.

20 Q. With regard to the exhibit, 796, do you

21 recognize that?

22 A. Yes, sir.

23 Q. What is -- what is that?

24 A. This is behind the house. This is behind

25 the house. This is the office. And this is the

26 breezeway.

27 Q. So when you talk about a breezeway in your
28 testimony, this photograph depicts that breezeway? 5196

1 A. Yes, sir.

2 Q. And does it depict the office that you were
3 talking about?

4 A. Yes, sir.

5 Q. All right. What I want you to do is, on
6 that photograph, just draw a little arrow and an "O"
7 to the building that you indicated is the office,
8 okay?

9 A. Yes, sir.

10 Q. And then just put a big "B" in the area that
11 you call the breezeway.

12 All right. Is that photograph an accurate
13 depiction of the area as you recall it back when you
14 observed these incidents?

15 A. Yes, sir.

16 MR. SNEDDON: All right. Move that it be
17 admitted into evidence, Your Honor.

18 MR. MESEREAU: No objection.

19 THE COURT: It's admitted.

20 MR. SNEDDON: Could we have the lights just
21 briefly, Your Honor?

22 Q. All right. This is 796, the photograph we
23 were just talking about, okay?

24 A. Yes.

25 Q. Would you use that little red laser again,
26 and indicate -- there's the "B" that you put, and
27 that is the area that you consider the breezeway?

28 A. Yes, sir. 5197

1 Q. And you also put an "O" with an arrow.

2 Would you find that for the jury.

3 All right. And that's the area that you

4 described as what?

5 A. The outer office where the display is on the

6 window.

7 Q. Okay. All right. All right. That's good.

8 I just wanted to get those down so everybody can get

9 an idea of what it was like.

10 All right. We can have the lights again.

11 Now, prior to the time -- let me ask you

12 this: With regard to the testimony you've just

13 related to the ladies and gentlemen of the jury here

14 this morning, did you also describe those incidents

15 to the -- when you were asked to make a statement

16 under oath?

17 A. Yes, sir.

18 Q. When you were subpoenaed to the grand jury?

19 A. Yes, sir.

20 Q. Now, prior to the time that you appeared to

21 give a statement under oath as to the events that

22 you related here this morning, had you ever told

23 anyone about what you saw?

24 A. No, sir.

25 Q. Had you ever mentioned it to anybody?

26 A. No, sir.

27 Q. Why not?

28 MR. MESEREAU: Objection; relevance. 5198

1 THE COURT: Overruled.

2 You may answer.

3 THE WITNESS: Well, a lot of things went

4 through my mind, but one of the things was who would

5 believe me?

6 Q. BY MR. SNEDDON: Why?

7 A. Well --

8 MR. MESEREAU: Objection.

9 THE COURT: Sustained.

10 Q. BY MR. SNEDDON: What else went through your
11 mind?

12 MR. MESEREAU: Objection.

13 THE COURT: Sustained.

14 Q. BY MR. SNEDDON: Have you ever personally
15 met anybody by the name of Blanca Francia?

16 A. No, sir.

17 Q. Have you ever personally met anyone by the
18 name of Phillipe LeMarque?

19 A. No, sir.

20 Q. Have you met Wade Robeson?

21 A. Yes, sir.

22 Q. And how did you meet Wade Robeson?

23 A. Just by being on the property and -- and him
24 being on the property.

25 Q. How often was he on the property?

26 A. Numerous times, but I can't give you a
27 number of how many times.

28 Q. Mr. Chacon, when you left the ranch as an 5199
1 employee - okay? --

2 A. Yes, sir.

3 Q. Oh, I had another question before we get
4 there.

5 Were you armed?

6 A. No, sir.

7 Q. At the time that Mr. Jackson -- during the
8 time that you became aware of the fact that Mr.
9 Jackson was under investigation, were there any

10 guards on the ranch property that were armed?

11 A. Yes, sir.

12 Q. And how many?

13 A. There was about four or five of them.

14 Q. Were they people who had been employed by

15 the ranch as security officers for -- prior to that

16 time?

17 A. No, sir.

18 Q. Now, when you left the ranch, why did you

19 leave?

20 A. I was forced to leave --

21 MR. MESEREAU: Objection; relevance.

22 THE COURT: Overruled.

23 You may answer.

24 THE WITNESS: I was forced to leave because

25 of the OSS, the bodyguards that came on the property

26 that were armed, because we would not comply with

27 whatever they wanted us to do or say, because we

28 didn't -- we didn't -- we went to the grand jury, 5200

1 but they didn't know what we had said so they had

2 put pressure on us to quit.

3 Q. BY MR. SNEDDON: Did you ever tell anybody

4 after you went to the grand jury what you had

5 testified to in front of the grand jury?

6 A. After?

7 Q. Yeah. Anybody associated with Mr. Jackson.

8 A. Yes.

9 Q. Who was that?

10 A. Kassim Abdool.

11 Q. And that's the person you worked with?

12 A. Yes, sir.

13 Q. Other than that, anybody else?

14 A. No, sir.

15 Q. Did you at some point in time file a lawsuit
16 against Mr. Jackson, you and other members of the
17 staff?

18 A. Yes, sir, we did.

19 Q. And in that particular lawsuit, where was
20 that tried?

21 A. Santa Maria, right here, sir.

22 Q. And did you lose that lawsuit?

23 A. Yes, sir.

24 MR. SNEDDON: I have no further questions,
25 Your Honor.

26 THE COURT: Cross-examine?

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

28 // 5201

1 CROSS-EXAMINATION

2 BY MR. MESEREAU:

3 Q. Good morning, Mr. Chacon.

4 A. Good morning, sir.

5 Q. Mr. Chacon, my name is Tom Mesereau, and I
6 speak for Mr. Jackson.

7 A. Yes, sir.

8 Q. I'd like to ask you a few questions about
9 that lawsuit you lost. That was the longest civil
10 trial in the history of Santa Maria, right?

11 A. I don't know, sir.

12 Q. It went about six months, didn't it?

13 A. I believe so, yes, sir.

14 Q. You sued Mr. Jackson and you wanted \$16
15 million, right?

16 A. Well, I don't know about the 16 million.

17 Q. You wanted millions, true?

18 A. No, sir.

19 Q. Really?

20 A. Well, I don't know, sir. Whatever our

21 attorney was -- he's the one who was speaking for

22 us.

23 Q. Okay. We'll get into that.

24 You sued Mr. Jackson claiming you were

25 wrongfully terminated, right?

26 A. That's correct, sir.

27 Q. He sued you claiming you had stolen property

28 from him, true? 5202

1 A. That's correct, sir.

2 Q. The jury found you were not wrongfully

3 terminated by Mr. Jackson, correct?

4 A. But we were, sir.

5 Q. Answer my question, please. Did the Santa

6 Maria jury find you were not wrongfully terminated

7 by Mr. Jackson?

8 A. Yes, sir.

9 Q. And they also found you had stolen property

10 from Mr. Jackson, correct?

11 A. But I didn't, sir.

12 Q. Did the Santa Maria jury find you had stolen

13 property from Mr. Jackson?

14 A. Yes, sir.

15 Q. A judgment was entered against you, Mr.

16 Chacon, for \$25,000, the value of what you had

17 stolen, correct?

18 A. For candy bars, sir?

19 Q. A judgment was entered against you for

20 \$25,000, the value of what the Court found you had

21 stolen, correct?

22 A. Well, if a candy bar is worth that much,

23 yes, sir.

24 Q. That's not all you owe Mr. Jackson

25 currently, is it?

26 A. No, sir. I don't owe him.

27 Q. In fact, Judge Zel Canter of this court,

28 entered a judgment against you and your 5203

1 co-defendants for \$1,473,117.61, correct?

2 A. Yes, sir.

3 Q. He ordered you pay all of Mr. Jackson's

4 legal fees and costs, correct?

5 A. Yes, sir.

6 Q. Have you ever paid any of that judgment, Mr.

7 Chacon?

8 A. No, sir. I filed bankruptcy.

9 Q. Now, the jury found you not only stole from

10 Mr. Jackson, but you acted maliciously, correct?

11 A. No, sir.

12 Q. Did a judge find you had acted with malice?

13 A. No, sir.

14 Q. Is there a judgment against you for acting

15 with fraud against Mr. Jackson?

16 A. That I know of, no, sir.

17 Q. Would it refresh your recollection to look

18 at the judgment?

19 A. Yes, sir.

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

21 THE COURT: Yes.

22 THE WITNESS: Okay.

23 Oh, it's there, sir. I didn't know. Yes,

24 sir.

25 Q. BY MR. MESEREAU: Have you had a chance to

26 look at that judgment, Mr. Chacon?

27 A. Do you mean right now?

28 Q. Yes. 5204

1 A. Yes, sir.

2 Q. There is not only a judgment against you in

3 favor of Mr. Jackson --

4 MR. SNEDDON: Wait a minute. I'm going to

5 object. He asked to refresh his recollection. He

6 should ask him if it did.

7 MR. MESEREAU: Sure.

8 THE COURT: That's correct.

9 Q. BY MR. MESEREAU: Have you had a chance to

10 look at the judgment against you, Mr. Chacon?

11 A. I looked at that, yes, sir. But I don't

12 remember it.

13 Q. Does it refresh your recollection that

14 there's a judgment against you for fraud and

15 malice --

16 A. No, sir.

17 Q. -- in favor of Mr. Jackson?

18 A. Yes, sir.

19 Q. You never heard of that before?

20 A. Well, probably, but I don't remember.

21 Q. After a six-month trial, you don't remember?

22 A. Well, it's been 12 years also, sir, or so. (other details he does remember!)

23 Q. Do you remember stipulating and agreeing

24 that you had personally acted with fraud, oppression

25 and malice against Mr. Jackson?

26 A. Probably so, sir.

27 Q. You did that, didn't you?

28 A. No, sir. 5205

1 Q. You didn't stipulate that you had acted with

2 fraud, oppression, and malice against Mr. Jackson in

3 that case?

4 A. Well, yes, sir.

5 Q. After a six-month trial, this is a good way

6 to get even with him, isn't it?

7 MR. SNEDDON: Argumentative. Object, Your

8 Honor. Move to strike.

9 THE COURT: Sustained.

10 Q. BY MR. MESEREAU: Do you have any motive

11 today, sir, to get even with Mr. Jackson?

12 A. No, sir.

13 Q. Do you remember telling a therapist you'd

14 rather get a million dollars from Mr. Jackson than

15 work?

16 A. No, sir.

17 Q. Do you remember being evaluated by a Ph.D.

18 named Dr. Scott Gorsuch?

19 A. I don't recall, sir.

20 Q. Do you recall being evaluated by a therapist

21 in that lawsuit?

22 A. Probably at one point, but I don't recall

23 it, sir.

24 Q. Who was your lawyer in that case?

25 A. Mr. Ring from Santa Barbara.

26 Q. Do you remember, in response to being called

27 a malinger, you said, "I'd like just a million from ma·lin·ger·ing, ma·lin·gers. To feign illness or other
incapacity in order to avoid duty or work.

28 Mr. Jackson"? 5206

1 A. That's not true, sir.

2 Q. Never happened?

3 A. No, sir.

4 Q. Do you recall making statements you didn't

5 want to work again?

6 A. No, sir.

7 Q. Okay. After you left Mr. Jackson, you filed

8 for disability, didn't you?

9 A. Yes, sir.

10 Q. You weren't disabled, were you?

11 A. I think it was just unemployment, wasn't it?

12 Q. Did you file for disability, Mr. Chacon,

13 after you left Mr. Jackson's employment?

14 A. It was unemployment, I believe it was.

15 Q. Okay. You had a deposition taken in that

16 case under oath, correct?

17 A. Yes, sir.

18 Q. And that was not the first time you had ever

19 been deposed, correct?

20 A. I don't understand, sir, what you're saying.

21 Q. You had had your deposition taken in

22 lawsuits before that one, true?

23 A. No, sir. Not that I recall.

24 Q. That was the first deposition you'd ever had

25 taken that you recall?

26 A. In my life?

27 Q. Yes.

28 A. Yes, sir. 5207

1 Q. Okay. Do you remember being asked if you

2 were aware that your attorney wanted \$16 million for

3 you from Mr. Jackson and you said you understood

4 that?

5 A. No, sir.

6 Q. Would it refresh your recollection to show

7 you a page from your deposition?

8 A. Yes, sir.

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

10 THE COURT: Yes.

11 THE WITNESS: Where does it say 16 million?

12 Oh, okay, I see that.

13 Q. BY MR. MESEREAU: Have you had a chance to

14 look at that page of your deposition?

15 A. Yes, sir.

16 Q. Remember you said you were aware that your

17 lawyer had asked for 16 million?

18 MR. SNEDDON: I'm going to ask that counsel

19 be directed to ask whether it refreshes his

20 recollection before he reads.

21 MR. MESEREAU: I'm sorry. I will withdraw

22 the question.

23 Q. Have you looked at that deposition?

24 A. Yes, sir.

25 Q. You were under oath at the time, correct?

26 A. Yes, sir.

27 Q. Does it refresh your recollection that you

28 admitted you knew your lawyer had asked for \$16 5208

1 million?

2 A. No, sir.

3 Q. In fact, you said you didn't think 16

4 million was enough, correct?

5 A. No, sir.

6 Q. Would it refresh your recollection if I just

7 show you your deposition?

8 A. Yes, sir.

9 MR. MESEREAU: May I approach?

10 THE COURT: Yes.

11 THE WITNESS: That's on there.

12 Q. BY MR. MESEREAU: Have you had a chance to

13 look at that page?

14 A. Yes, sir.

15 Q. Does it refresh your recollection that you

16 didn't think \$16 million was enough to you?

17 A. No, sir, I don't.

18 Q. You didn't say that?

19 A. No, I mean, I don't -- now I see it's

20 written down there, yes, sir.

21 Q. Well, how much did you want in the lawsuit,

22 sir?

23 MR. SNEDDON: Object as argumentative, Your

24 Honor.

25 THE COURT: Sustained.

26 Q. BY MR. MESEREAU: In that lawsuit, you tried

27 to extort Mr. Jackson, didn't you?

28 A. No, sir. 5209

1 MR. SNEDDON: Object; argumentative, Your

2 Honor.

3 THE COURT: Sustained.

4 Q. BY MR. MESEREAU: Do you remember being

5 asked at the beginning of your deposition, "Have you

6 ever been deposed before?" And you said, "Yes"?

7 A. No, I don't recall, sir.

8 Q. Might it refresh your recollection to see

9 that page?

10 A. Yes, sir.

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

12 THE COURT: Yes.

13 THE WITNESS: Okay, sir.

14 Q. BY MR. MESEREAU: Have you had a chance to

15 look at that?

16 A. Yes, sir.

17 Q. Does it remind you that you admitted you had
18 been deposed before?

19 A. I -- I don't remember. But it's down there,
20 yes, sir.

21 Q. Well, you'd been in other lawsuits before
22 this, hadn't --

23 THE COURT: Counsel, I believe it's time for
24 our break.

25 MR. MESEREAU: Oh.

26 (Recess taken.)

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

28 BY: Official Court Reporter 5212

1 APPEARANCES OF COUNSEL:

2

3 For Plaintiff: THOMAS W. SNEDDON, JR.,

4 District Attorney -and-

5 RONALD J. ZONEN, Sr. Deputy District Attorney

6 -and- GORDON AUCHINCLOSS,

7 Sr. Deputy District Attorney 1112 Santa Barbara Street

8 Santa Barbara, California 93101

9

10

11 For Defendant: COLLINS, MESEREAU, REDDOCK & YU BY: THOMAS A.

MESEREAU, JR., ESQ.

12 -and- SUSAN C. YU, ESQ.

13 1875 Century Park East, Suite 700 Los Angeles, California 90067

14 -and-

15 SANGER & SWYSEN

16 BY: ROBERT M. SANGER, ESQ. 233 East Carrillo Street, Suite C

17 Santa Barbara, California 93101

18 -and-

19 OXMAN and JAROSCAK BY: R. BRIAN OXMAN, ESQ.

20 14126 East Rosecrans Boulevard Santa Fe Springs, California 90670

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

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

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

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

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

1 E X H I B I T S

2 FOR IN

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

4 797 Photocopy of note 5342 5348

5 798 Photocopy of half of three

6 \$100 bills 5342 5348

7 797 Photocopy of note 5352 5354

1 THE COURT: Counsel?

2 MR. MESEREAU: Thank you, Your Honor.

3 Q. Mr. Chacon, you mentioned to the jury

4 someone named Kassim Abdool, right?

5 A. Yes, sir.

6 Q. And was Kassim Abdool someone you worked

7 with at Neverland?

8 A. Yes.

9 Q. And I believe you told the jury that he was

10 the first person you talked to about your claim that

11 Mr. Jackson was molesting young men, correct?

12 A. I believe so, yes, sir.

13 Q. Kassim Abdool joined you in that lawsuit

14 against Mr. Jackson, correct?

15 A. Yes, sir.

16 Q. Kassim Abdool also had a judgment against

17 him in favor of Mr. Jackson for \$1,473,117.61,

18 correct?

19 A. I believe so, sir, yes. (про себя не помнит, а про Абудал помнит!)

20 Q. Kassim Abdool joined you in trying to get

21 millions from Mr. Jackson, right?

22 MR. SNEDDON: Object as argumentative, Your

23 Honor.

24 THE COURT: Overruled.

25 You may answer.

26 Q. BY MR. MESEREAU: Is that correct?

27 A. No, sir. No, sir.

28 Q. Oh, he didn't? 5216

1 A. No, sir.

2 Q. He wasn't a plaintiff with you in that case?

3 A. Oh, he was, yes, sir.

4 Q. You're saying that Mr. Abdool was not

5 looking for millions like you?

6 A. No, sir.

7 Q. How much did he want, Mr. Chacon?

8 A. There wasn't an amount, sir.

9 Q. After a six-month trial, your lawyer didn't

10 ask the jury to award an amount for you, sir?

11 A. You'll have to ask Mr. Ring.

12 Q. You were sitting there, weren't you?

13 A. Yes, sir.

14 Q. Did you hear him give a closing argument to

15 the jury?

16 MR. SNEDDON: Your Honor, I'm going to

17 object; argumentative.

18 THE COURT: Sustained.

19 Q. BY MR. MESEREAU: Are you telling this jury

20 today, under oath, you don't know how much your

21 lawyer asked for in that six-month trial?

22 A. I saw it earlier when you showed --

23 MR. SNEDDON: Excuse me. I'm going to

24 object as argumentative and immaterial.

25 THE COURT: Sustained.

26 Q. BY MR. MESEREAU: There was also someone

27 named Adrian McManus who joined you in suing Mr.

28 Jackson, correct? 5217

1 A. Yes, sir.

2 Q. And Adrian McManus had worked at Neverland,

3 right?

4 A. That's correct, sir.

5 Q. And like you and Mr. Abdool, she lost the

6 case, correct?

7 A. Yes, sir.

8 Q. A Santa Maria jury ruled against her as

9 well, right?

10 A. That's correct.

11 Q. Now, Adrian McManus was also found to have

12 stolen property from Mr. Jackson, true?

13 A. No, sir.

14 Q. Would it refresh your recollection if I show

15 you the judgment?

16 A. Yes, sir.

17 MR. SNEDDON: Your Honor, I'm going to

18 object as immaterial with regard to this witness's

19 testimony; beyond his knowledge; no foundation.

20 THE COURT: Sustained.

21 Q. BY MR. MESEREAU: When did you last talk to

22 Adrian McManus?

23 A. Probably months; months ago.

24 Q. Did you talk about this case at all?

25 A. Only if I knew when I was coming down, and

26 how she was doing.

27 Q. Is that all you discussed about this case?

28 A. Yes, sir. 5218

1 Q. How long was the conversation?

2 A. Oh, couldn't have lasted more than five

3 minutes, because she was at work.

4 Q. When did you last talk to Kassim Abdool?

5 A. I have not, sir, at all.

6 Q. Not at all?

7 A. No.

8 Q. Okay. When's the last time you talked to

9 him?

10 A. Probably the time when we left court here.

11 Back then.

12 Q. Okay. All right. Now, when you sued Mr.

13 Jackson, you had judgments against you in other

14 cases, true?

15 MR. SNEDDON: Your Honor, I'm going to

16 object as immaterial.

17 THE COURT: Sustained.

18 Q. BY MR. MESEREAU: When you sued Mr. Jackson,

19 the wages you were getting from Mr. Jackson were

20 being partially garnished, correct?

21 MR. SNEDDON: Your Honor, I'm going to

22 object. Same objection.

23 MR. MESEREAU: Financial motive, Your Honor.

24 THE COURT: The objection is overruled.

25 You may answer.

26 Q. BY MR. MESEREAU: Correct?

27 A. Yes, sir.

28 Q. They were being garnished because you 5219

1 wouldn't pay child support, true?

2 A. I was paying child support, sir.

3 Q. Then why were they garnished?

4 A. I assume that's the procedure they do when

5 they want child support from you.

6 Q. You couldn't just send a check yourself?

7 MR. SNEDDON: I'm going to object to that --

8 THE COURT: Sustained; calls for a legal

9 conclusion.

10 Q. BY MR. MESEREAU: At one point, you asked a

11 Santa Barbara sheriff for money, true?

12 A. I don't recall, sir.

13 Q. Do you recall ever asking Mr. Birchim for

14 some money?

15 A. No, sir.

16 Q. Are you saying it never happened?

17 A. I don't recall, sir.

18 Q. Okay. When did you last talk to Russ

19 Birchim?

20 A. This morning.

21 Q. Where did you talk to him?

22 A. Here at the courthouse.

23 Q. Did you talk about your testimony?

24 A. No, sir.

25 Q. Okay. So you're not denying that you asked

26 him for money and you're not denying he gave it to

27 you; you just don't remember, right?

28 A. I don't recall, sir. 5220

1 Q. When did you first meet Russ Birchim?

2 A. I believe it was back in '93, I believe.

3 I'm not sure.

4 Q. Ever hear of a company called Commercial

5 Trade?

6 A. No, sir.

7 Q. You didn't have a lawsuit with Commercial

8 Trade in 1989?

9 MR. SNEDDON: Object as immaterial.

10 THE COURT: Sustained.

11 Q. BY MR. MESEREAU: Do you know someone named

12 Judge Byrd?

13 A. No, sir.

14 Q. Judge Byrd had a judgment against you for a

15 couple thousand dollars, didn't she?

16 MR. SNEDDON: Your Honor, I'm going to

17 object to this and ask the Court to admonish

18 counsel.

19 THE COURT: The --

20 MR. MESEREAU: It's all part of the

21 financial motive, Your Honor.

22 THE COURT: There's no time frame. The

23 problem you're asking about is when. I don't know

24 that. So I'll sustain the objection on vagueness.

25 Q. BY MR. MESEREAU: At the time you sued Mr.

26 Jackson for an amount you don't remember, isn't it

27 true you had a judgment against you for \$2600 by a

28 Ms. Judge Byrd? 5221

1 A. I don't recall, sir.

2 Q. Would it refresh your recollection if I show

3 you your deposition where you talked about it?

4 A. Yes, sir.

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

6 THE COURT: Yes.

7 THE WITNESS: Oh, yes, sir.

8 Q. BY MR. MESEREAU: Have you had a chance to

9 look at that deposition page?

10 A. Yes, sir.

11 Q. Did it refresh your recollection?

12 A. Yes, sir.

13 Q. Do you know who Judge Byrd is?

14 A. No, sir.

15 Q. Okay. Do you know anything about a judgment

16 she ever had against you?

17 A. No, sir.

18 Q. Okay. Now, when did you first tell Kassim

19 Abdool, your co-plaintiff against Mr. Jackson, about

20 this alleged molestation you witnessed?

21 A. Probably when -- when we -- when we knew

22 that we were going to be subpoenaed to the grand

23 jury.

24 Q. And approximately when was that?

25 A. I believe it was in '94 sometime.

26 Q. By the way, do you remember testifying that

27 Sheriff Russ Birchim delivered money to you?

28 A. I don't recall, sir. 5222

1 Q. Would it refresh your recollection if I show

2 you your deposition?

3 A. Yes, sir.

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

5 THE COURT: Yes.

6 THE WITNESS: It's down there, but I don't

7 recall that, sir, at all.

8 Q. BY MR. MESEREAU: Okay. Do you recall

9 saying it?

10 A. No, sir, I don't.

11 Q. Don't recall anything about it?

12 A. No, sir.

13 Q. Okay. It just is down there, right?

14 MR. SNEDDON: I'm going to object to the
15 comment as argumentative.

16 THE COURT: Sustained.

17 Q. BY MR. MESEREAU: Do you remember testifying
18 under oath you asked Mr. Birchim for money?

19 A. I don't recall, sir.

20 MR. SNEDDON: That's been asked and
21 answered.

22 THE COURT: Sustained.

23 Q. BY MR. MESEREAU: Do you remember asking for
24 money so your wife could relocate?

25 A. Probably -- probably so, sir. Yes, sir.

26 Q. Okay. Do you remember wanting other bills
27 paid?

28 A. No, sir. 5223

1 Q. Okay. How long after you told Kassim
2 Abdool, your co-plaintiff, about these alleged acts
3 of molestation did you speak to anyone from law
4 enforcement?

5 A. I don't recall, sir.

6 Q. Was it years?

7 A. Oh, no. No, not years.

8 Q. How long was it?

9 A. Could have been weeks, days. I'm not
10 certain, sir. It's been a while.

11 Q. Did you review any documents to get ready to
12 testify today?

13 A. No, sir.

14 Q. Anyone send you any documents to look at --

15 A. No.

16 Q. -- before you testified today?

17 A. No, sir.

18 Q. When did you last talk to Mr. Ring about
19 your suit against Mr. Jackson?

20 A. I haven't talked to Mr. Ring in years, sir.

21 Q. Okay. All right. Now, at the time you
22 filed your lawsuit against Mr. Jackson, you knew
23 that other former employees at Neverland had sold
24 stories to tabloids about Mr. Jackson, didn't you?

25 A. Could you rephrase that, sir?

26 Q. Sure. At the time you filed your lawsuit
27 against Mr. Jackson, you were aware that other
28 former employees at Neverland had sold stories to 5224
1 tabloids, correct?

2 A. I don't understand the "others," sir. Which
3 others?

4 Q. Blanca Francia?

5 A. No, sir.

6 Q. Never heard of it?

7 A. Oh, yes, I heard of it. But I didn't -- I
8 wasn't aware of that.

9 Q. Were you aware of anyone else at Neverland
10 who was employed at one point trying to go to a
11 tabloid to sell a story?

12 A. No, sir.

13 Q. Never heard anything about it?

14 A. No, sir.

15 Q. Okay. Did you ever hear anything about
16 Adrian McManus doing that?

17 A. Well, we went to a tabloid.

18 Q. Which one?

19 A. It was The Star.

20 Q. And who was "we"?

21 A. It was myself, Adrian McManus, Kassim

22 Abdool, and I guess that was it.

23 Q. And approximately when did you go to this
24 tabloid?

25 A. We had met at Mr. Ring's office in Santa
26 Barbara.

27 Q. And after you met with your attorney, who
28 represented you in the lawsuit, you went to a 5225
1 tabloid, correct?

2 A. Right. Yes, sir.

3 Q. And you wanted money for a story, true?

4 A. Yes, sir.

5 Q. Who did you meet with at the tabloid when
6 you requested money?

7 A. Can you rephrase that, sir?

8 Q. Yes, sir. Who did you meet with when you
9 went to a tabloid to request money?

10 A. Oh, there was myself, Kassim, Adrian, and
11 whoever the reporter was, and Mr. Ring.

12 Q. Your lawyer was there with you, right?

13 A. Yes, sir.

14 Q. You did it with your lawyer because you
15 thought that negative publicity would pressure Mr.
16 Jackson into paying all of you money, right?

17 A. No.

18 MR. SNEDDON: Object as argumentative, Your
19 Honor.

20 THE COURT: Overruled. The answer was, "No."
21 Next question.

22 Q. BY MR. MESEREAU: You went to the tabloid
23 before the case was tried to a jury, right?

24 A. I believe so, yes, sir.

25 Q. Had you filed a case before you went to the

26 tabloid?

27 A. I don't recall, but I believe so, sir.

28 Q. Did you sell a story to the tabloid? 5226

1 A. Yes, sir.

2 Q. Did you ever hire a broker to help you sell

3 other stories to other tabloids?

4 A. No, sir.

5 Q. Did you ever hear anything about McManus

6 doing that?

7 A. No, sir.

8 Q. Okay. What other tabloids did you speak to?

9 A. None, sir.

10 Q. Just one?

11 A. Yes, sir.

12 Q. Just Star?

13 A. Yes, sir.

14 Q. But you were aware that McManus went to

15 other tabloids, true?

16 A. No, sir.

17 Q. Just Star?

18 A. Yes, sir.

19 Q. Did you ever speak to anyone at Inside

20 Edition?

21 A. No, sir.

22 Q. Okay. How about any other newspaper?

23 A. No, sir.

24 Q. Now, you wanted to sell information about

25 Mr. Jackson allegedly acting wrongfully with young

26 men, correct?

27 A. Yes, sir. To The Star.

28 Q. And you also wanted to sell information 5227

1 about his relationship with Lisa Marie Presley,

2 correct?

3 A. No, sir.

4 Q. Never did that?

5 A. No, sir.

6 Q. Ever hear of any of your co-plaintiffs doing
7 that?

8 A. That I recall, I don't recall, sir.

9 Q. Don't recall it at all?

10 A. No, sir.

11 Q. Okay. Was your story printed, to your
12 knowledge?

13 A. Yes, sir.

14 Q. Approximately when did that happen?

15 A. I don't know the date, sir.

16 Q. Any idea at all?

17 A. No, sir.

18 Q. Okay. Can't even estimate, right?

19 A. No, sir.

20 Q. Okay. All right. How long after you told
21 your co-plaintiff against Mr. Jackson, Mr. Kassim
22 Abdool, about these alleged acts of molestation did
23 you both go to a tabloid?

24 A. Oh, I -- it wasn't -- it wasn't right away.

25 But I don't recall when it was.

26 Q. Okay. It was before you went to law
27 enforcement, wasn't it?

28 A. No, sir. 5228

1 Q. Was it after it?

2 A. I believe so, sir. I don't recall.

3 Q. Okay. Mr. Chacon, in late '93 and early
4 '94, you told other people that Michael Jackson was
5 innocent of molestation accusations, didn't you?

6 A. No, sir.

7 Q. Never told that to anyone at the ranch?

8 A. No, sir.

9 Q. Okay. Are you familiar with a tabloid

10 called Splash?

11 A. Yes, sir.

12 Q. What is Splash?

13 A. I believe it's a tabloid.

14 Q. Ever met with someone named Peter Burt from

15 Splash?

16 A. I don't recall, sir.

17 Q. Are you saying you don't recall, or you

18 don't -- you didn't?

19 A. I don't remember, sir, if I did or not.

20 Q. So you could have, but you don't remember?

21 A. Could have, but I don't remember.

22 Q. Okay. Do you know somebody named Sandy

23 Domz?

24 A. Yes, sir.

25 Q. Who was Sandy Domz?

26 A. She was one of the secretaries at Neverland

27 Ranch.

28 Q. Okay. Do you recall Sandy Domz ever 5229

1 approaching a tabloid?

2 A. No, sir.

3 Q. Don't know anything about it?

4 A. No, sir.

5 Q. All right. Do you recall speaking to a book

6 author named Gutierrez?

7 A. Yes, sir.

8 Q. And approximately when did you speak to a

9 book author named Gutierrez?

10 A. I believe that was before we went to Star,
11 and -- but I don't remember the -- I don't remember
12 the date or the time.

13 Q. Okay. Do you remember splitting money from
14 any tabloids with any other employees or former
15 employees of Neverland?

16 A. No, sir.

17 Q. You never split money for giving information
18 to a T.V. show called Inside Edition?

19 A. That I recall, no, sir.

20 Q. So you're not telling the jury you didn't do
21 it, you're just saying, "I don't recall"?

22 A. Well, I don't -- I don't think I did it or
23 we did it, no, sir.

24 Q. You don't know for sure?

25 A. I just don't recall if we did or not, sir.

26 Q. You might have, but you don't remember,
27 right?

28 A. I don't remember. 5230

1 Q. Did you ever complain at Neverland that you
2 should be paid more money than you were getting?

3 A. No, sir.

4 Q. Do you remember filing a claim for
5 disability with EDD after you left Neverland?

6 A. No, sir.

7 Q. Okay. Are you saying that didn't happen?

8 A. Well, I filed for unemployment.

9 Q. Not disability?

10 A. No, sir.

11 Q. All right. When is the last time you worked
12 at Neverland; do you know?

13 A. It's probably mid '94, I believe, or around

14 there.

15 Q. Now, when you sued Mr. Jackson in Santa

16 Maria, you also sued other people at Neverland,

17 right?

18 A. No, sir.

19 Q. You sued James Van Norman, didn't you?

20 A. Oh, yes, sir.

21 Q. You sued Tony Coleman?

22 A. Yes.

23 Q. You sued Marcus Johnson, correct?

24 A. Yes, sir.

25 Q. And you sued Bill Bray, right?

26 A. Yes, sir.

27 Q. And Betty Bailey, right?

28 A. Yes, sir. 5231

1 Q. And Andrew Merritt, right?

2 A. I believe so, yes, sir.

3 Q. And you were claiming that they had

4 wrongfully interfered with your employment, correct?

5 A. Yes, sir, they did.

6 Q. And are these some of the people that you

7 described as being bodyguards for Mr. Jackson?

8 A. Yes, sir, the OSS.

9 Q. Yes.

10 A. Yes.

11 Q. You didn't like the OSS being at Neverland,

12 did you?

13 A. No, sir.

14 Q. You wanted to handle all of the security

15 yourself, correct?

16 A. Well, there was a time that I was in charge,

17 and I knew what I was doing, sir.

18 Q. And you felt they didn't, right?

19 A. Well, they shouldn't have interfered with my
20 job.

21 Q. Okay. And obviously you lost that claim in
22 front of a Santa Maria jury, correct?

23 A. Yes.

24 MR. SNEDDON: Object as argumentative, Your
25 Honor.

26 THE COURT: Sustained.

27 Q. BY MR. MESEREAU: The claims against the
28 people in addition to Mr. Jackson who had worked at 5232
1 Neverland, you lost those claims, right?

2 A. Yes, sir.

3 Q. Now, at the time you sued Mr. Jackson, you
4 had complained that you couldn't pay your rent,
5 right?

6 A. No, sir.

7 Q. Did you ever complain to anyone you couldn't
8 pay your rent?

9 A. No, sir.

10 Q. Never complained to any sheriff, right?

11 A. I don't recall. I don't think so, sir.

12 Q. Okay. But you don't know for sure?

13 A. No, sir.

14 Q. All right. All right. Now, when Mr.

15 Jackson sued you for stealing his property, do you
16 recall what property he was accusing you of stealing
17 from him?

18 A. Yes, sir.

19 Q. What was the property?

20 A. It was candy bars from the theater. And the
21 other stuff I'm not sure of, but I believe they were

22 referring to my briefcase that had memos, my
23 personal memos from my box at the security office.

24 Q. Anything else?

25 A. No, sir.

26 Q. Now, the jury found that the material you

27 stole was worth \$25,000, correct?

28 A. No, sir. 5233

1 Q. Well, they entered a judgment against you

2 for \$25,000 for maliciously converting Mr. Jackson's

3 property, true?

4 MR. SNEDDON: Your Honor, I'm going to

5 object to this.

6 THE COURT: Sustained.

7 Q. BY MR. MESEREAU: Do you know what the

8 amount was, Mr. Chacon?

9 MR. SNEDDON: I'm going to object. It's the

10 same question, just asked a different way.

11 THE COURT: Sustained.

12 Q. BY MR. MESEREAU: You were found to have

13 stolen documents from Mr. Jackson, true?

14 MR. SNEDDON: Your Honor, I'm going to

15 object; asked and answered.

16 MR. MESEREAU: I don't think it is.

17 THE COURT: That question hasn't been asked,

18 but the ruling that I made is that the issues that

19 you can go into are not the issues of the lawsuit.

20 It's the same as the J.C. Penney case. You can go

21 into what he said, what he hasn't said, the same

22 exact ruling, and you're --

23 MR. MESEREAU: Okay.

24 THE COURT: The area you're in now has to do

25 with the issues in the lawsuit. So I want you --

26 that's the line we're trying to walk here.

27 MR. MESEREAU: Okay. I'll move on, Your

28 Honor. 5234

1 Q. Do you know someone named Linda Allen, Mr.

2 Chacon?

3 A. Yes, sir.

4 Q. Who is Linda Allen?

5 A. She was my landlady in Lompoc.

6 Q. For how long?

7 A. Probably about a year. I'm not for certain

8 of the length of time.

9 Q. When you were suing Mr. Jackson, you told

10 Linda Allen you would soon be able to pay her the

11 back rent you owed, right?

12 A. No, sir.

13 MR. SNEDDON: I'm going to object to that

14 question. The same 403 ruling.

15 THE COURT: Overruled.

16 Q. BY MR. MESEREAU: Did you do that, Mr.

17 Chacon?

18 A. No, sir.

19 Q. Did you ever tell Linda Allen, "I'm going to

20 be a star witness against Michael Jackson"?

21 A. No, sir.

22 Q. Okay. Ever tell Linda Allen you were going

23 to be on the T.V. show Hard Copy to talk about Mr.

24 Jackson?

25 A. No, sir.

26 Q. Did you ever tell Linda Allen you had a gun

27 permit because you were a star witness against

28 Michael Jackson? 5235

1 A. No, sir.

2 Q. Ever tell Ms. Allen you were going to make

3 two or three million dollars with your suit against

4 Mr. Jackson?

5 A. No, sir.

6 Q. Ever will tell Linda Allen you were going to

7 be driving a 450 Mercedes after you won your suit

8 against Mr. Jackson?

9 A. No, sir.

10 Q. All right. None of that rings a bell,

11 right?

12 A. No. No.

13 Q. Okay. Now, in your meeting with the first

14 tabloid that you talked to, okay, where Abdool was

15 present, who else was there?

16 A. I believe Adrian McManus, Abdool, myself,

17 Mr. Ring, and whoever represented that tabloid. I

18 don't know, sir.

19 Q. Who arranged the meeting?

20 A. Mr. Ring.

21 Q. Okay. Do you know someone named Gary

22 Morgan?

23 A. I've heard the name before, yes, sir.

24 Q. Where have you heard the name?

25 A. Probably -- maybe he's the one that

26 represented the tabloid. I'm not sure.

27 Q. Okay. Did you ever talk to Gary Morgan?

28 A. I probably did, but I don't recall. 5236

1 Q. Okay. Do you recall ever being interviewed

2 by someone who claimed to be a media broker, meaning

3 they could actually get you to various tabloids on

4 T.V. or in print?

5 A. No, sir.

6 Q. Never heard of anything about that, right?

7 A. No, sir.

8 Q. Did you draft a story for the tabloids at

9 Mr. Ring's office?

10 A. Probably, yes, sir. Probably did. I

11 don't -- I don't recall, but I probably did.

12 Q. Why do you say you probably did?

13 A. Because it's kind of vague. It's been a

14 long time, and I guess I did. I'm -- I would say I

15 did, yes, sir.

16 Q. Well, it hasn't been much longer than the

17 period of time you claim you remember these events

18 about Mr. Jackson, true?

19 A. Well, I probably did, sir, draft that --

20 Q. Probably did, or you did?

21 A. I did.

22 MR. SNEDDON: It's argumentative.

23 THE COURT: Overruled. The answer was he

24 did. Next question.

25 Q. BY MR. MESEREAU: Okay. And did you draft a

26 story for Splash?

27 A. I believe that was the tabloid, sir.

28 Q. Okay. And after you drafted it, did you 5237

1 meet with somebody from Splash?

2 A. Whoever it was. I don't recall, sir.

3 Q. Were you personally interviewed by somebody

4 from Splash?

5 A. We all were, sir.

6 Q. Jointly or individually?

7 A. Jointly.

8 Q. Okay. How long was the interview with

9 Splash?

10 A. Could have been an hour or so. I'm not for
11 certain how long.

12 Q. Do you recall telling anyone that you were
13 using the money from Splash to help fund your
14 lawsuit against Michael Jackson?

15 A. Yes, the money went directly to Mr. Ring.

16 Q. And that was approximately \$17,000, wasn't
17 it?

18 A. I don't know, sir. But whatever it was, he
19 did get it.

20 Q. So can you estimate what it was?

21 A. I can't, sir.

22 Q. Okay. Did you get any money yourself as --

23 A. No, sir.

24 Q. Do you remember telling people you gave most
25 of it to Mr. Ring, but you took about 500 bucks
26 yourself?

27 A. Well, we had taken 500 bucks, but we gave it
28 back to Mr. Ring, because he was our lawyer and he 5238
1 needed money.

2 Q. Okay. That was to fund the lawsuit where
3 you sought millions from Michael Jackson, correct?

4 A. Well, that was the lawsuit, sir.

5 Q. That was the lawsuit you were trying to fund
6 by selling stories to tabloids, true?

7 A. No, sir.

8 Q. No?

9 A. I really don't understand your question.

10 Q. Sure, I'll rephrase.

11 You were taking money from tabloids and
12 using it to fund costs of your lawsuit against Mr.
13 Jackson?

14 A. Oh. Yes, sir. I'm sorry.

15 Q. And before you went to Mr. Ring, you had
16 told various people that you never saw anything
17 inappropriate at Neverland, true?

18 A. No, sir.

19 Q. You told various people you'd never seen
20 Michael Jackson molest anybody, true?

21 A. No, sir.

22 Q. So if anybody comes into court and says
23 that, they're just not telling the truth, right?

24 A. That's correct, sir.

25 Q. Okay. When you first met with
26 representatives of the sheriff's department, did you
27 tell them everything that you have said today about
28 Mr. Jackson allegedly molesting young men? 5239

1 A. Um, when you mean a sheriff, a certain
2 sheriff, or at the sheriff's department, or -- I
3 don't understand.

4 Q. Let me rephrase.

5 When you first spoke to a sheriff from Santa
6 Barbara, did you tell that sheriff everything you've
7 said today in court?

8 A. No, sir.

9 Q. The story has changed considerably since
10 your first meeting with a sheriff, true?

11 MR. SNEDDON: Your Honor, I'm going to
12 object to the use of the word "considerably" as
13 argumentative.

14 THE COURT: Sustained.

15 Q. BY MR. MESEREAU: Would you agree that with
16 each interview you do, you add more lurid facts
17 about Mr. Jackson?

18 A. No, sir.

19 Q. You would agree your story about what you
20 claim he did has changed through the years, has it
21 not?

22 A. No, sir.

23 Q. Didn't you just meet with Mr. Sneddon the
24 other day?

25 A. Yes, sir.

26 Q. Didn't you tell Mr. Sneddon you had new
27 facts that you forgot in 1993?

28 MR. SNEDDON: Well, wait a minute. I'm 5240
1 going to object to that question. Your Honor,
2 that's not asked in good faith with regard to the --
3 I can't do it without a speaking objection, but if
4 we could approach the bench, because this is not
5 right.

6 THE COURT: Overruled.

7 The question was, "Did you tell Mr. Sneddon
8 you had new facts that you had forgot in 1993?"

9 THE WITNESS: Yes, I did.

10 Q. BY MR. MESEREAU: You told Mr. Sneddon that
11 you forgot to say certain things in 1993 about Mr.
12 Jackson allegedly molesting young men, true?

13 A. Yes, sir.

14 Q. But now you remembered them in 2005, right?

15 A. Vaguely, yes, sir.

16 Q. And you said the person that remembered them
17 with you is Kassim Abdool, true?

18 A. I haven't talked to Kassim in years.

19 Q. Okay. When did you first start work at
20 Neverland, Mr. Chacon?

21 A. I believe it was in '91, sir.

22 Q. Okay. You knew that in late '93 and early
23 '94, the media was devoting a lot of attention to
24 stories about Mr. Jackson at Neverland, correct?

25 A. Well, the media was always at Neverland at
26 some time or other, sir.

27 Q. Before you chose to go to a tabloid, you
28 knew that others were going to tabloids to try and 5241
1 tell stories about Mr. Jackson?

2 A. No, sir.

3 Q. You were the first, right?

4 A. That went to the media, to the tabloids?

5 Q. Yes.

6 A. Yes, sir.

7 Q. And when did you go?

8 A. It was probably '94 sometime.

9 Q. But you knew there was a lot of media
10 attention before that, correct?

11 A. There always has been, sir.

12 Q. And you knew people were making money doing
13 that, right?

14 A. No, sir.

15 Q. Weren't aware of that?

16 A. No, sir.

17 Q. Thought they were doing it all for free,
18 right, Mr. Chacon?

19 A. No, sir.

20 MR. SNEDDON: Object as argumentative, Your
21 Honor.

22 THE COURT: Sustained.

23 Q. BY MR. MESEREAU: Do you think Mr. Jackson
24 is an intimidating-looking individual?

25 A. No, sir.

26 Q. Do you remember in your deposition you said
27 you were entitled to damages because Mr. Jackson
28 stared at you? 5242

1 A. No, sir.

2 Q. Remember you said Mr. Jackson stared, and
3 you didn't know how to take it?

4 A. No, sir.

5 Q. Would it refresh your recollection if I show
6 you your deposition?

7 A. Yes, sir.

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

9 THE COURT: Yes.

10 THE WITNESS: Okay. Okay. I remember.

11 Q. BY MR. MESEREAU: As part of your damage
12 claim, do you remember saying that Mr. Jackson
13 stared at you continuously?

14 A. Not continuously, sir.

15 Q. Well, you said "all the time," right?

16 A. No, sir.

17 Q. You said no one else saw him staring at you,
18 right?

19 A. No, sir.

20 Q. But it bothered you, right?

21 A. No, sir.

22 Q. Okay. Why did you say it?

23 A. I guess just to say it.

24 Q. Okay. As part of your damage claim, you
25 claimed that employees were threatening you at
26 Neverland, right?

27 A. Yes, they were, sir.

28 Q. All right. And the jury didn't believe 5243
1 that, did they?

2 MR. SNEDDON: I'll object as argumentative.

3 THE COURT: Sustained.

4 Q. BY MR. MESEREAU: When did you start working

5 the graveyard shift at Neverland?

6 A. Immediately, sir, when I got hired on.

7 Q. Didn't you gradually work your way into

8 that?

9 A. Immediately I went to the graveyard. Then

10 they shifted me to swings for a while, probably a

11 month or so, and then I ended back on graveyard. As

12 a matter of fact, I preferred to work graveyard,

13 sir, because I had a second job.

14 Q. Where was the second job?

15 A. In Lompoc.

16 Q. What was that?

17 A. I worked for Wayne's Tires.

18 Q. Do you remember problems with intruders

19 while you worked at Neverland?

20 A. Yes, sir.

21 Q. And what problems with intruders do you

22 remember?

23 A. Them coming on property and -- and we turned

24 them over to the sheriff's department.

25 Q. And how often do you remember that

26 happening?

27 A. Probably several times, sir.

28 Q. Do you recall Mr. Jackson getting nervous 5244

1 about that?

2 A. No, sir.

3 Q. Did he seem to care about it, to you?

4 A. He wasn't even there when we apprehended the

5 people.

6 Q. He certainly learned about it, to your
7 knowledge, correct?

8 A. I don't know, sir.

9 Q. You never talked to him about it?

10 A. No, sir.

11 Q. And you were not aware of anyone else
12 telling Mr. Jackson about these problems with
13 intruders?

14 A. No, sir.

15 Q. All right. Sir, Mr. Jackson had some
16 personal security guards because he was worried
17 about these intruders being caught on the property,
18 right?

19 A. I don't believe so, sir.

20 Q. You and the other security people didn't
21 carry any weapons, right?

22 A. No, sir, we didn't.

23 Q. And at times, that was a concern of Mr.
24 Jackson's, wasn't it, that his security personnel
25 there didn't have any weapon to protect him?

26 A. I don't know, sir.

27 Q. He had a general policy of not wanting
28 people to carry weapons, true? 5245

1 A. I don't know, sir.

2 Q. You don't know at all?

3 A. No, sir.

4 Q. Did you ever see any of your security team
5 carrying a weapon?

6 A. No, sir.

7 Q. Did you know why?

8 A. No, sir.

9 Q. Had no idea at all?

10 A. No, sir.

11 Q. Never inquired?

12 A. No, sir.

13 Q. When you first joined up, did you ask

14 anybody, "Do security people carry weapons at

15 Neverland?"

16 A. No, sir.

17 Q. Were you given any manual to refer to when

18 you worked at Neverland?

19 A. Yes, sir.

20 Q. And what do you know about that manual?

21 MR. SNEDDON: I'm going to object; vague.

22 THE COURT: Sustained.

23 MR. MESEREAU: It's vague, I'll rephrase.

24 Q. Are you telling the jury that when you

25 started working security at Neverland, nobody told

26 you, "We have a general policy of having security

27 people not carry arms"?

28 A. Well, probably so, because nobody was 5246

1 carrying arms.

2 Q. Did you have a gun permit at the time?

3 A. No, sir.

4 Q. How many meetings did you have with

5 representatives of the sheriff's department before

6 you think you told all the facts about what you say

7 Mr. Jackson did with young men?

8 MR. SNEDDON: Your Honor, I'm going to

9 object as argumentative; assumes facts.

10 THE COURT: Calls for a narrative. You can

11 break that question down.

12 MR. MESEREAU: Sure.

13 Q. When was your first meeting with any

14 representative of the sheriff's department regarding

15 what you claim you saw at Neverland?

16 A. I don't recall, sir.

17 Q. Do you know approximately when it was?

18 A. No, sir, I don't.

19 Q. Was it after you saw the events you

20 described today?

21 A. I don't recall, sir.

22 Q. Well, you've given the jury a detailed

23 description of the events you claim you saw at

24 Neverland, right?

25 A. Yes, sir.

26 Q. But you've forgotten when you talked to the

27 sheriffs, correct?

28 A. Well, I know I talked to them, but I just 5247

1 don't recall exactly when it was at, sir.

2 Q. Do you know approximately when it was at?

3 A. It was in '94, I believe, sometime.

4 Q. Do you know how many meetings you've had

5 with the sheriffs to date where you have talked

6 about Mr. Jackson's inappropriate behavior?

7 A. Well, with the sheriffs, I didn't talk about

8 this, the allegations. But with the grand jury,

9 which I went to testify, that was the first time,

10 and there was sheriffs present there.

11 Q. You testified before a Santa Barbara Grand

12 Jury, right?

13 A. Yes, sir.

14 Q. And after you testified, no criminal charges

15 were brought, right?

16 A. Right, sir.

17 Q. You went to Los Angeles and talked to

18 prosecutors --

19 A. No, sir.

20 Q. -- about what you claim -- you never did

21 that?

22 A. No, sir.

23 Q. Didn't you tell Mr. Sneddon on direct

24 examination that you were subpoenaed to a grand jury

25 in Los Angeles?

26 A. Oh, yes, sir. But I didn't go.

27 Q. You didn't go. But you went down to be

28 interviewed under oath instead of going, true? 5248

1 A. Yes, sir.

2 Q. And as a result of your interview under

3 oath, no charges were ever brought in Los Angeles,

4 right?

5 A. No, sir.

6 Q. Do you remember testifying how upset you

7 were at Neverland when you learned that other

8 employees got raises and you didn't?

9 A. Yes, I believe there was one time.

10 Q. And tell the jury what that was all about.

11 A. Probably they had hired two or three

12 security, and they -- I believe they paid them \$12

13 an hour, and we were only getting \$9 an hour.

14 Q. And did you complain about it to somebody?

15 A. Oh, yes, I did.

16 Q. Who?

17 A. Probably the lieutenant.

18 Q. And what happened?

19 A. Nothing ever happened.

20 Q. Was Mr. Abdool upset about that also, to

21 your knowledge?

22 A. I believe so, yes, sir.

23 Q. And you and he met and talked about it,

24 right?

25 A. Pardon me?

26 Q. You and he met and talked about it, correct?

27 A. Well, we all talked about that in security.

28 Q. You lodged a complaint, didn't you? 5249

1 A. No, sir.

2 Q. Did you think Mr. Jackson's security guards

3 were being paid more than you?

4 A. The new ones, yes, sir.

5 Q. How did you know what they were getting

6 paid?

7 A. I don't remember. I don't recall, sir, how

8 we found out.

9 Q. When you told the jury you saw a young boy

10 on Mr. Jackson's back, was that in the shower?

11 A. No, it was coming out, going towards his

12 house.

13 Q. Was he on his shoulders?

14 A. You know, I don't recall if he was on his

15 shoulders or on his back, like piggybacked, yes,

16 sir.

17 Q. When you went to work at Neverland, you were

18 asked to sign a confidentiality agreement, right?

19 A. Yes, sir.

20 Q. And everybody who works at Neverland is

21 asked to sign one, right?

22 A. Yes, sir.

23 Q. And the purpose, as explained to you, was

24 that Mr. Jackson doesn't want employees just running

25 to tabloids and telling stories, right?

26 A. Yes, sir, I believe so.

27 Q. When you went to a tabloid, you violated the

28 agreement, correct? 5250

1 MR. SNEDDON: Object, Your Honor, calls for

2 a legal conclusion.

3 THE COURT: Overruled.

4 You may answer.

5 THE WITNESS: No, sir.

6 Q. BY MR. MESEREAU: You didn't violate it all?

7 A. No, sir.

8 Q. So you thought going to a tabloid after you

9 left your employment at Neverland was perfectly

10 consistent with your confidentiality obligations to

11 Mr. Jackson, right?

12 A. I don't think I ever signed a

13 confidentiality, sir.

14 Q. Sure about that?

15 A. I'm not for certain, but I don't recall that

16 I ever did.

17 Q. Weren't you asked to?

18 A. I probably was. But at that time they

19 didn't have one for me.

20 Q. At the time you and Mr. Abdool and Ms.

21 McManus and your lawyer went to the tabloid, your

22 lawyer was trying to negotiate to get money from Mr.

23 Jackson, wasn't he?

24 MR. SNEDDON: I'm going to object. Lack of

25 foundation and it assumes --

26 THE COURT: Foundation; sustained.

27 Q. BY MR. MESEREAU: At the time you and Mr.

28 Abdool and Ms. McManus and your lawyer went to a 5251

1 tabloid to give a story about Mr. Jackson, do you

2 know whether or not your lawyer was trying to

3 negotiate money from Mr. Jackson?

4 A. No, sir.

5 Q. Do you know whether or not your lawyer was

6 trying to pressure Mr. Jackson by threatening bad

7 publicity?

8 A. No, sir.

9 Q. Did you ever hear of anything like that

10 going on?

11 A. No, sir.

12 Q. Okay. So if that went on, you'd be shocked,

13 true?

14 A. Probably not, sir.

15 Q. Probably not?

16 A. I guess not, no.

17 Q. Did you ever explain to Mr. Jackson yourself

18 that you were having trouble making ends meet

19 financially?

20 A. No, sir.

21 Q. Did you explain to anyone at Neverland about

22 that before you left?

23 A. No, sir.

24 Q. All right. Without getting into any of your

25 discussions with your lawyer, who of your group

26 first went to that attorney?

27 A. Which attorney, sir?

28 Q. Ring. Mr. Ring. 5252

1 A. Who first went to Mr. Ring?

2 Q. Yes.

3 A. Of us?

4 Q. Of you. Excuse me, let me rephrase the

5 question. Make it clearer.

6 You, Mr. Abdool, Ms. McManus sued Mr.

7 Jackson, correct?

8 A. Yes, sir.

9 Q. You were represented by a lawyer in Santa

10 Barbara named Mr. Ring, correct?

11 A. Yes, sir.

12 Q. And he represented you throughout that

13 six-month trial that you lost, correct?

14 A. Yes, sir.

15 Q. Who first approached Mr. Ring about trying

16 to get money from Mr. Jackson?

17 A. We all did, sir.

18 Q. Together?

19 A. We hired him, yes, sir.

20 Q. Okay. Do you know how you found out about

21 him?

22 A. I don't recall, sir.

23 Q. Was he the only lawyer you talked to, or did

24 you talk to some others?

25 A. I believe he was the only one we talked to,

26 yes, sir.

27 Q. Do you recall whether you ever told anyone,

28 "Mr. Jackson promised me if I did a good job, I 5253

1 would have a job at Neverland forever"?

2 A. No, sir.

3 Q. Did he ever say anything like that to you?

4 A. No, sir.

5 Q. Did anyone who hired you at Neverland?

6 A. No, sir.

7 Q. Okay. You met with Prosecutor Sneddon on

8 April 6th, correct?

9 A. Yes, sir.

10 Q. Was anyone else at the meeting?

11 A. Yes, sir.

12 Q. Who?

13 A. Russ Birchim.

14 Q. Where did the meeting take place?

15 A. Here in Santa Maria.

16 Q. And who arranged the meeting?

17 A. I believe it was Mr. Sneddon.

18 Q. Did he call you on the phone?

19 A. Yes, sir.

20 Q. Did he tell you where to meet?

21 A. Yes, sir.

22 Q. How long was the meeting?

23 A. Probably less than an hour.

24 Q. Did you discuss anything you were going to

25 say today?

26 A. I believe so, yes, sir.

27 Q. Did Mr. Sneddon tell you what questions he

28 was going to ask you today? 5254

1 A. Yes, sir.

2 Q. Did you tell him what answers you were going

3 to give to those questions?

4 A. No, sir.

5 Q. Did you tell him anything about how you were

6 going to respond?

7 A. I just told him that I would speak the

8 truth.

9 Q. That's it?

10 A. Yes, sir.

11 Q. How long was the meeting?

12 A. Probably about -- less than an hour.

13 Q. So during the portion of that hour that you

14 spoke, all you ever said was, "I'll tell the truth,
15 I'll tell the truth, I'll tell the truth," or words
16 to that effect?

17 A. No, sir. No, sir.

18 Q. Okay. He told you what questions he was
19 going to ask you, correct?

20 A. I believe so, yes, sir.

21 Q. You told him what your responses were going
22 to be, right?

23 A. Yes, sir.

24 Q. When was the -- excuse me.

25 Before that meeting, when was the last time
26 you had met with anyone from the prosecuting office
27 here?

28 A. I didn't meet with anybody. 5255

1 Q. Did you talk with anyone on the phone?

2 A. Yes, sir. I was --

3 Q. Who was that?

4 A. I believe it was a secretary from Mr.

5 Sneddon's office.

6 Q. And what was that discussion about?

7 A. When I was supposed to be down here and how
8 to get -- how to get to Santa Maria.

9 Q. How many meetings have you had with any
10 representative of the sheriff's department in total
11 to talk about your testimony?

12 MR. SNEDDON: Your Honor, I'm going to
13 object as vague as to time, a time period.

14 MR. MESEREAU: I'll rephrase it.

15 THE COURT: All right.

16 Q. BY MR. MESEREAU: In the last year, how many
17 meetings have you had with anyone representing the

18 Santa Barbara Sheriff's Department to talk about

19 this case?

20 A. I haven't, sir.

21 Q. How about phone calls?

22 A. No, sir.

23 Q. All right. You're aware of Mr. Jackson

24 going on tour -- excuse me. Let me rephrase it.

25 You're aware that Mr. Jackson periodically

26 went on tour while you worked at Neverland, true?

27 A. Yes, sir.

28 Q. And it was your understanding he always had 5256

1 bodyguards with him, correct, on tour?

2 A. I understood that, yes, sir.

3 Q. Okay. You knew he was extremely concerned

4 about his security, right?

5 A. His bodyguard security or security on the

6 ranch?

7 Q. Well, Mr. Jackson was extremely concerned

8 about security on the ranch, wasn't he?

9 A. I don't know, sir.

10 Q. You don't know?

11 A. No, sir.

12 Q. Even with these intruders, you're not sure

13 if he was concerned?

14 A. Well, I'm sure he was concerned, but he was

15 never there when we did apprehend them.

16 Q. Okay. You knew he had concerns about his

17 personal security when he went on tour, right?

18 A. Oh, yes, sir. Yes, sir.

19 Q. And at all times that you worked on the

20 ranch, you knew he had personal bodyguards when he

21 went on tour, right?

22 A. When he went on tour, yes, sir.

23 Q. You knew he had personal protection when he
24 went other places for other reasons, true?

25 A. I assume so, sir. I don't know.

26 Q. Do you remember complaining that Mr. Abdool
27 got a raise when you didn't?

28 A. No, sir. 5257

1 Q. Never happened?

2 A. No.

3 Q. When you left Neverland, you just stopped
4 showing up for work, right?

5 A. Yes, sir.

6 Q. You stopped showing up for work after you
7 met with Attorney Ring, correct?

8 A. Probably so, yes, sir.

9 Q. You were disappointed that you weren't
10 getting more money from tabloids, weren't you?

11 A. No, sir.

12 Q. Never complained to anybody about that?

13 A. No, sir.

14 Q. The first incident you claim you saw Mr.
15 Jackson improperly touch a young man was when?

16 A. I don't recall. Between '92 and '93, I
17 believe. I'm not for certain.

18 Q. Do you recall ever telling any
19 representative of law enforcement the month or the
20 year?

21 A. No, sir. I don't -- no.

22 Q. And what shower are you claiming Mr. Jackson
23 used when you say you looked in a shower and saw him
24 acting inappropriately?

25 A. It was the outside rest rooms by the rec

26 room.

27 Q. There were two of them, right?

28 A. Two rest rooms? 5258

1 Q. Yes.

2 A. There was a women's and a men's room, I'm

3 sorry.

4 Q. And which one do you claim you saw Mr.

5 Jackson in?

6 A. In the men's room, sir.

7 Q. Had you seen him in that men's room before?

8 A. Yes, sir.

9 Q. Okay. By the way, when you went to the

10 Santa Barbara Grand Jury, you didn't tell them

11 everything you said today, did you?

12 A. Yes, sir.

13 Q. Everything?

14 A. Yes, sir.

15 Q. Did you tell them everything you've told Mr.

16 Sneddon?

17 A. Well, that one incident that I recalled I

18 didn't. I didn't bring that up, no, sir.

19 Q. How long were you in front of a Santa

20 Barbara Grand Jury?

21 A. Could have been a couple hours.

22 Q. And at some point, you called to see if

23 anybody had charged Mr. Jackson with anything,

24 didn't you?

25 A. No, sir.

26 Q. Never asked anyone?

27 A. No, sir.

28 Q. Never asked anyone in the sheriff's 5259

1 department?

2 A. No, sir.

3 Q. Never asked Mr. Sneddon?

4 A. No, sir.

5 Q. To this day you've never asked that

6 question, right?

7 A. No, sir.

8 Q. All right. When did you first learn Blanca

9 Francia had sold a story to Hard Copy?

10 MR. SNEDDON: Your Honor, I'm going to

11 object. That question has been asked and answered

12 and that assumes facts not in evidence.

13 MR. MESEREAU: I'll rephrase it.

14 THE COURT: All right.

15 Q. BY MR. MESEREAU: Did you ever learn that

16 Blanca Francia had told a story for \$20,000 to the

17 T.V. show Hard Copy?

18 A. No.

19 MR. SNEDDON: Object. Asked and answered.

20 THE COURT: All right. He answered it. It's

21 "No." Next question.

22 Q. BY MR. MESEREAU: Did you ever learn she had

23 sold a story to Hard Copy, without knowing the

24 amount she got?

25 A. Yes, sir.

26 Q. When did you learn that?

27 A. Probably on the news.

28 Q. On the news when? 5260

1 A. I don't recall, sir. It was -- it was

2 public knowledge.

3 Q. Did you see the show?

4 A. No, sir.

5 Q. Did you hear about it right after it

6 appeared on television?

7 A. No, sir.

8 Q. Were you employed when that was on

9 television?

10 A. No, sir.

11 Q. Where were you working at that point?

12 A. Where was I working? That's a good

13 question. I believe I was already in Nevada by that

14 time.

15 Q. And what were you doing there?

16 A. I was a substitute teacher at a high school

17 and junior high.

18 Q. What year was this?

19 A. '96, '7, '8.

20 Q. Do you remember learning that security

21 guards at the Jackson home in Encino had sold

22 stories for \$100,000?

23 A. No, sir, I didn't know anything about that

24 place.

25 Q. Never heard anything about that?

26 A. Well, I know they had security guards, but I

27 never heard anything.

28 Q. Did you hear anything about security guards 5261

1 at the Encino home selling a story for \$100,000?

2 A. No, sir.

3 Q. All right. Ever know someone named Quindoy?

4 A. I want to say that the Quindoys -- I believe

5 they were chefs, I believe, but I'm not positive.

6 Q. They were what?

7 A. I believe they were cooks or chefs there at

8 some property.

9 Q. Did you know them?

10 A. No, sir.

11 Q. Ever talk to them?

12 A. No, sir.

13 Q. Did you know they had tried to sell stories

14 to tabloids about Mr. Jackson?

15 A. No, sir.

16 Q. Had you ever heard anything about that as

17 you sit here today?

18 A. Probably have, but I don't recall.

19 Q. Okay. Now, at some point you claimed you

20 were improperly subjected to electronic surveillance

21 at Neverland, right?

22 A. Could you be a little bit more specific,

23 sir?

24 Q. Sure.

25 MR. SNEDDON: Your Honor, I'm going to

26 object. I'm going to object because of the 403

27 ruling, but more specifically because there are

28 multiple defendants in the causes of action. It may 5262

1 be different as to different individuals.

2 MR. MESEREAU: I'm only talking about him,

3 Your Honor. His claims against Mr. Jackson.

4 THE COURT: I'm going to allow the question,

5 but I'm going to do so assuming it's not related to

6 specific allegations in the Complaint, which I

7 already said you can't directly go into.

8 MR. MESEREAU: Okay. Well, there were

9 such -- there were such claims, Your Honor.

10 THE COURT: I know, but we're not

11 relitigating that issue. But he could have made a

12 claim or his attorney could have made a claim.

13 You're asking him not about claims his attorney

14 made, but claims that he made.

15 MR. MESEREAU: Yes, I am.

16 THE COURT: I'm going to allow the question

17 with that understanding.

18 MR. MESEREAU: Thank you, Your Honor.

19 THE COURT: But you probably have to read it

20 back to him.

21 Do you remember the question?

22 MR. MESEREAU: I can rephrase it.

23 THE WITNESS: No.

24 MR. MESEREAU: I'll withdraw it.

25 Q. Do you remember claiming that you were

26 emotionally distressed because you thought your

27 telephone conversations were listened in to at

28 Neverland? 5263

1 A. Yes, sir.

2 Q. And you never knew whether or not there was

3 a tap on any phone, correct?

4 A. Yes, I did, sir.

5 Q. Are you saying you did know there was a tap?

6 A. Yes, sir, I knew that they had equipment

7 where they were listening in.

8 Q. Do you remember testifying under oath you

9 didn't know if your phone was tapped?

10 A. At home or at the ranch, sir?

11 Q. Either place.

12 A. Yes, sir.

13 Q. Did you ever state under oath you didn't

14 know whether your phone was tapped?

15 MR. SNEDDON: Your Honor, I object to the

16 question as vague as to place.

17 THE COURT: Sustained.

18 Q. BY MR. MESEREAU: You claim you had been
19 emotionally damaged because someone listened in to
20 your calls at Neverland, right?

21 A. Emotionally damaged. Well, I probably --
22 probably didn't say that, but I was upset because
23 they were listening to my personal phone calls, sir.

24 Q. Okay. And your basis for saying that was
25 that somebody had told you that was going on, right?

26 A. No, sir, I knew it was going on.

27 Q. You had no knowledge of electronic
28 surveillance at the time, did you? 5264

1 A. Yes, sir, I did.

2 Q. Did you have a check done on the phones?

3 A. No, sir.

4 Q. When is the last time you talked to any
5 tabloid about this case?

6 A. I have not, sir.

7 Q. You haven't?

8 A. I haven't talked to anyone.

9 Q. Are you planning to go to a tabloid after
10 you testify?

11 A. No, sir. I just want to go home.

12 Q. Did you make a complaint that your employee
13 file was unfairly looked at at Neverland?

14 A. Yes, sir.

15 Q. And who did you think had unfairly looked at
16 your employee file?

17 A. The OSS, sir.

18 Q. That's Mr. Jackson's personal security
19 guards?

20 A. Yes, sir.

21 Q. Did you have any idea why they were

22 suspicious of you?

23 A. No, sir.

24 Q. They were, weren't they?

25 A. I don't know, sir.

26 Q. Did you ever talk to them about why they

27 wanted to see what was in your personnel file?

28 A. Yes, I approached them. 5265

1 Q. This was around the time you went to a

2 tabloid, wasn't it?

3 A. No, sir.

4 Q. This was around the time you went to Mr.

5 Ring, wasn't it?

6 A. No, sir.

7 Q. It was very close to the time you left

8 employment at Neverland, wasn't it?

9 A. I believe so, yes, sir.

10 Q. Do you remember saying you thought Mr.

11 Jackson should compensate you for the rest of your

12 life?

13 A. No, sir.

14 Q. Would it refresh your recollection to show

15 you your deposition transcript?

16 A. Yes, sir.

17 MR. MESEREAU: May I approach?

18 THE COURT: Yes.

19 THE WITNESS: Where is the beginning?

20 Oh, I must have, sir.

21 Q. BY MR. MESEREAU: Have you had a chance to

22 look at that page in your deposition?

23 A. Yes, sir.

24 Q. Does it refresh your recollection that you

25 testified under oath that you thought Mr. Jackson

26 should compensate you for the rest of your life?

27 A. I must have said that, yes, sir, because

28 it's on there. 5266

1 Q. Now, was it the policy at Neverland to

2 notify the local sheriffs if an intruder was caught

3 on the property?

4 A. Yes, sir, that's correct.

5 Q. Did you personally notify the sheriffs at

6 any time about an intruder being on the property?

7 A. No, sir.

8 Q. Do you recall you personally apprehending

9 any intruders?

10 A. Myself and Abdool, yes, sir.

11 Q. And what happened?

12 A. There was an intruder that came behind the

13 pool area. It was a reporter. And we just

14 apprehended him and took him down to the front gate

15 and probably the security at the gate called the

16 sheriffs.

17 Q. The pool area is right next to Mr. Jackson's

18 house, isn't it?

19 A. Around the area, yes, sir.

20 Q. And how many people did you apprehend on

21 that occasion?

22 A. One. One, sir.

23 Q. How far did that intruder have to travel to

24 get to the pool area?

25 A. I don't know which direction he came in,

26 sir. Could have been -- could have been a mile, two

27 miles, three miles. I don't know, sir.

28 Q. And you also were involved in some other 5267

1 situations where intruders tried to get to Mr.

2 Jackson, correct?

3 A. Yes, sir.

4 Q. And please describe those events.

5 A. Kind of vague, but I believe there was

6 two -- two young people, a male and a female, I

7 believe, and they were up by -- they were up by

8 the -- by the theater.

9 Q. The theater would be up near the zoo area?

10 A. Yes, sir.

11 Q. And who caught them?

12 A. I believe it was mobile. I don't know who

13 it was that was on mobile that evening, that night,

14 but it was mobile patrol.

15 Q. Did you ever steal a watch from Mr. Jackson?

16 A. No, sir.

17 Q. Were you ever accused of that?

18 A. No, sir.

19 Q. You mentioned candy bars earlier, remember?

20 A. Yes, sir.

21 Q. Do you think the jury awarded Mr. Jackson

22 \$25,000 against you because you took candy bars?

23 A. That's what --

24 MR. SNEDDON: I'm going to object as

25 argumentative.

26 MR. MESEREAU: I have no further questions,

27 Your Honor.

28 THE COURT: Redirect? 5268

1 MR. SNEDDON: Yes.

2

3 REDIRECT EXAMINATION

4 BY MR. SNEDDON:

5 Q. All right. Let's go back just for a second.

6 Mr. Chacon, were you subpoenaed to be here

7 this morning?

8 A. Yes, sir.

9 Q. You're under subpoena?

10 A. Yes, sir.

11 Q. Did you want to come testify?

12 A. No, sir.

13 Q. When you testified before the grand jury,

14 were you under subpoena?

15 A. Yes, sir.

16 Q. Did you want to testify?

17 A. No, sir.

18 Q. Prior to your appearance before the grand

19 jury, you told the ladies and gentlemen that you met

20 with attorneys for Mr. Jackson; is that correct?

21 A. Yes, sir.

22 Q. And with regard to that conversation, did

23 they want to know what you were going to say?

24 A. They did.

25 Q. And what did you tell them?

26 A. I said that I got subpoenaed, and if I got

27 subpoenaed, that I would just speak the truth, but I

28 didn't tell them what I knew, but they wanted to 5269

1 know.

2 Q. They wanted to know, but you wouldn't tell

3 them?

4 A. Yes, sir.

5 Q. But you told them you were going to tell the

6 grand jury the truth?

7 A. Yes, sir.

8 Q. And did you do that?

9 A. Yes, sir.

10 Q. Now, with regard to Mr. Mesereau saying that
11 you added something to the events that occurred
12 yesterday when you and I were talking, do you recall
13 him asking you that question?

14 A. Yes, sir.

15 Q. The new information you provided yesterday
16 had nothing to do with the two events you've
17 described to the jury, had they?

18 A. No, sir.

19 Q. There was nothing that changed about that,
20 was there?

21 A. No, sir.

22 Q. In fact, the event that you indicated --
23 there was -- something that you remembered was
24 something you were told by another person; wasn't
25 that correct?

26 A. Yes, sir.

27 Q. And who was that other person?

28 A. Abdool. 5270

1 Q. It was in no way connected to the testimony
2 you gave concerning the two incidents you observed?

3 A. No, sir.

4 Q. Now, with regard -- just so the jury has a
5 clear indication of the sequence here, you were
6 subpoenaed to appear before the Santa Barbara County
7 Grand Jury, correct?

8 A. Yes, sir.

9 Q. Now, when you actually gave your statement
10 under oath, was there a line of jurors like this in
11 the room?

12 A. Back in ninety --

13 Q. '94, when you came in.

14 A. Yes, sir.

15 Q. Now, how long after that was it that Mr.

16 Ring became involved in the civil lawsuit? Let me

17 put it this way: After you appeared before the

18 Santa Barbara Grand Jury and gave a statement under

19 oath, do you recall that?

20 A. Oh, yes, sir.

21 Q. And you went back to work at the ranch, did

22 you not?

23 A. Yes, sir.

24 Q. And you worked at the ranch, Neverland

25 Valley Ranch, for a while before you left there,

26 correct?

27 A. Probably a month or so, or two. I'm not

28 positive. 5271

1 Q. Was it at that point that you became

2 involved in the lawsuit with Mr. Ring?

3 A. Yes, sir.

4 Q. Whose idea was it to go to the tabloid for

5 the story?

6 A. Well, we probably talked about it, but we

7 talked to Mr. Ring about it. I guess it was all of

8 us in general.

9 Q. After you -- Mr. Mesereau asked you about

10 your salary at the ranch. Do you recall that?

11 A. Yes, sir.

12 Q. And you spoke about being dissatisfied with

13 the wages that you were getting --

14 A. Yes, sir.

15 Q. -- compared to some people that had been

16 hired afterward, correct?

17 A. Yes, sir.

18 Q. After your conversations with Mr. Sanger and
19 Steve Cochran about your grand jury appearance, were
20 you offered a raise?

21 A. Yes, sir, I was.

22 Q. And it was before your testimony actually
23 occurred before the grand jury, correct?

24 A. Yes, sir.

25 Q. So it was in between the time they found out
26 you were going and the time that you actually
27 appeared they offered you a raise?

28 A. Yes, sir. 5272

1 Q. And Mr. Kassim also, right?

2 A. Yes, sir.

3 Q. Actually, it's Mr. Abdool.

4 A. Yes, sir.

5 Q. Now, during the course of the -- let me ask
6 you this: After you testified before the grand jury
7 and gave your statement under oath about what you
8 saw happen on those two incidents - okay? - did you
9 receive threats?

10 A. Oh, yes, sir.

11 Q. In what form?

12 MR. MESEREAU: Objection; beyond the scope.

13 THE COURT: Sustained.

14 MR. SNEDDON: Judge, it's what led to the
15 lawsuit. And counsel was allowed to go into that.

16 THE COURT: All right. With that

17 representation, I'll change my ruling.

18 THE WITNESS: Could you --

19 MR. SNEDDON: Yes.

20 Q. You said you were threatened. In what form?

21 A. Verbally, and -- well, verbally, and

22 somewhat physically by someone touching their --

23 Tony Coleman touching his weapon.

24 Q. Tony Coleman was who?

25 A. He was OSS.

26 Q. All right. Would you describe to the

27 jury -- if you have to stand up, do it. Describe to

28 the jury what Mr. Coleman did. 5273

1 A. We were in the security office, and we were

2 arguing about an intruder that came in, and he

3 wanted to do it his way. And I said, "If you do it

4 that way, we're going to" -- "it's not the

5 procedure."

6 And then he says, "Well, I'm going to do it

7 my way because I'm here to oversee you." And he

8 touched -- he pulled his coat back and he touched

9 his weapon, and he says, "I'm in charge here." I

10 believe that's the words he used.

11 Q. Did he at any other time ever use his weapon

12 to indicate a threat towards you?

13 A. No, sir, that was about the first time.

14 Q. Did you ever receive any phone calls of any

15 kind that were threatening?

16 A. Yes, sir.

17 Q. Did you report those to law enforcement?

18 A. Yes, I did, sir.

19 Q. How many occasions did that occur?

20 A. Several times. One time when we first

21 started, somebody says --

22 MR. MESEREAU: Objection; nonresponsive

23 THE COURT: After "several times," sustained.

24 Q. BY MR. SNEDDON: All right. Tell us about

25 those threats that you received.

26 A. The first time I received it, they said,

27 "I'm going to kill you."

28 MR. MESEREAU: Objection; hearsay. 5274

1 MR. SNEDDON: Your Honor, goes to the state

2 of mind and to the reason for the lawsuit.

3 THE COURT: I'm going to overrule the

4 objection as to state of mind.

5 Q. BY MR. SNEDDON: Go ahead.

6 A. Someone called and said, "I'm going to kill

7 you," and hung up. And then other times we had

8 calls at the house where they would either laugh or

9 wouldn't say words, but we knew that someone was --

10 I believe it was OSS behind this.

11 Q. Did you as a result -- did you take these

12 things seriously?

13 A. Oh, yes, sir.

14 Q. Did you approach anyone with regard to

15 obtaining a gun permit?

16 A. Yes, sir.

17 Q. And who did you approach?

18 A. I asked Mr. Birchim and yourself for a gun

19 permit. So I carried a concealed weapon permit for

20 about two years, I believe it was.

21 Q. You indicated that you may have asked

22 Sergeant or now Commander Birchim for money for your

23 wife --

24 A. Yes, sir.

25 Q. -- do you recall?

26 Do you remember why that was?

27 A. Yes, sir.

28 Q. Why was that? 5275

1 A. Well, my wife's sister-in-law had just died,

2 and --

3 Q. That's all right, I'll withdraw the

4 question. That's okay. It's not important.

5 Mr. Mesereau asked you about - we'll turn to

6 a subject a little easier - about my conversation

7 with you yesterday --

8 A. Yes, sir.

9 Q. -- with Mr. Birchim being there.

10 A. Yes, sir.

11 Q. And you told Mr. Mesereau how long the

12 conversation lasted, correct?

13 A. Yes, sir.

14 Q. Was Mr. Birchim present during the entire

15 conversation?

16 A. Yes, he was.

17 Q. Were there portions of time before Mr.

18 Birchim got there that you and I talked a little

19 bit?

20 A. Yes, sir.

21 Q. Did we talk about anything about this case?

22 A. No, sir. We talked about my military

23 experience, and that you knew some people that I

24 knew where I was born and raised.

25 Q. Had nothing to do with the case during the

26 time Birchim wasn't there?

27 A. No, sir.

28 MR. MESEREAU: Objection; asked and 5276

1 answered.

2 THE WITNESS: No, sir.

3 Q. BY MR. SNEDDON: Now, when we were talking

4 yesterday --

5 THE COURT: Sustained. Go ahead.

6 (Laughter.)

7 Q. BY MR. SNEDDON: When we were talking
8 yesterday and Mr. Mesereau asked you did I tell you
9 what questions I was going to ask you today, do you
10 recall him asking you that question?

11 A. Yes, sir.

12 Q. What was the question that I actually asked
13 you; do you remember?

14 A. I believe it was the incidents that took
15 place, the two incidents that happened on the ranch.

16 Q. And I asked you just to describe them in
17 your own words to me?

18 A. Yes, sir.

19 Q. And Sergeant -- or Commander Birchim was
20 there during that entire time?

21 A. Yes, he was.

22 Q. Mr. Mesereau mentioned something about an
23 individual called Victor Gutierrez. Do you remember
24 that?

25 A. Yes, sir.

26 Q. Were you ever paid any money by Mr.
27 Gutierrez?

28 A. No, sir. 5277

1 Q. Did you ever give him a statement at all?

2 A. No, sir.

3 Q. You indicated that the individuals who were
4 on the ranch that were armed were called the OSS.
5 Was that their official name, or was that a name
6 that the security staff gave them?

7 A. I believe that's -- it was used for them as
8 a short title. Office of Special Services, but they
9 used it as -- just call them OSS.

10 Q. And with regard to -- you told the jury that
11 they interfered with you on how you did your job.
12 In what respect? I mean, what was the tension or
13 the friction between the two of you?

14 A. They just -- they just interfered in every
15 aspect of our duty as security there. They would
16 break the beams, the security beams, and they would
17 cause us to run out there thinking it was an
18 intruder. They would come by and laugh, and just
19 make jokes, and/or sit out in their vehicle and
20 stare at us inside the security office.

21 Q. With regard to the lawsuit itself that Mr.
22 Mesereau has asked you a number of questions about,
23 were you ever consulted about the amount of money
24 that was going to be sued for?

25 A. No, sir.

26 Q. Whose judgment did you leave that decision?

27 A. Mr. Ring.

28 Q. Did you legit -- did you feel, yourself, 5278
1 that you were entitled to some money from Mr.
2 Jackson because of the way you were treated on the
3 ranch?

4 A. Yes, sir.

5 Q. Do you still feel that way?

6 A. Yes, sir.

7 MR. MESEREAU: Objection. Move to strike;
8 relevance.

9 THE COURT: Sustained; stricken.

10 Q. BY MR. SNEDDON: You told the jury that you
11 knew that you were being -- your telephones on the
12 ranch were being monitored, correct?

13 A. Yes, sir.

14 Q. How did you know that?

15 A. It was common knowledge that -- in the main
16 office where Sandy Domz worked at, there was a
17 computer paper printout that -- you could hear, and
18 it printed out the phone calls as they were made,
19 either going out or coming in.

20 Q. Now, just a couple of more questions.

21 With regard to the lawsuit, the trial, the
22 civil lawsuit, were you -- or did you -- during that
23 lawsuit, were you allowed or permitted to testify
24 concerning the incidents you told this jury about
25 this morning in that lawsuit?

26 A. No, sir. As a matter of fact, the judge
27 said if I -- if we --

28 Q. You just weren't allowed to? 5279

1 A. No, sir.

2 Q. Okay. Mr. Chacon, is there anything that
3 you've told this jury this morning about what you
4 saw out there on those two incidents that is
5 anything but the truth?

6 A. It's the truth, sir.

7 MR. SNEDDON: No further questions.

8

9 RE-CROSS-EXAMINATION

10 BY MR. MESEREAU:

11 Q. Mr. Chacon, the prosecutor has just asked
12 you to talk about problems you had with the OSS,
13 right?

14 A. Yes, sir.

15 Q. And the OSS was a nickname someone developed
16 to call Mr. Jackson's personal bodyguards?

17 A. They themselves, sir.

18 Q. You wanted money to be awarded to you from a
19 Santa Maria jury because of your problems with the
20 personal security guards of Mr. Jackson, correct?

21 A. Yes, sir.

22 Q. Your claims were rejected, true?

23 A. Yes, sir.

24 Q. You also claimed at the time \$16 million

25 wasn't enough for you, right?

26 A. I probably did, sir. Yes, sir.

27 Q. The prosecutor just asked you if you knew

28 anything about the amounts you were seeking, and of 5280
1 course you did, right?

2 A. Yes, sir.

3 Q. You wanted money because you claim that

4 people were calling your home and hanging up,
5 correct?

6 A. That was part of it, sir, yes, sir.

7 Q. And a Santa Maria jury rejected that claim,
8 correct?

9 A. Yes, sir.

10 Q. You said that someone named Coleman had put

11 his hand on his gun because he didn't like the way
12 you wanted to handle an intruder; is that correct?

13 A. No, because he wanted to handle it.

14 Q. He was a personal security guard, correct?

15 A. OSS. Not a security guard.

16 Q. He was carrying a -- well, this group you

17 call the OSS, they're bodyguards for Mr. Jackson,
18 right?

19 A. Yes, sir, they are.

20 Q. And they were carrying weapons, correct?

21 A. Yes, sir.

22 Q. And he was concerned about the intruder,

23 correct?

24 A. No, sir.

25 Q. You sued also claiming you should get money

26 because of what Mr. Coleman did on that day,

27 correct?

28 A. He threatened me, yes, sir. 5281

1 Q. And that was rejected by a Santa Maria jury

2 as well, correct?

3 A. Yes, sir.

4 Q. And you wanted money because you said Mr.

5 Jackson stared at you on occasion, correct?

6 A. No, sir.

7 Q. Why did you say it?

8 A. Just to say it.

9 MR. MESEREAU: No further questions.

10 MR. SNEDDON: No questions, Your Honor.

11 THE COURT: All right. Thank you. You may

12 step down.