May 5, 2005 WADE ROBSON



3 (The following proceedings were held in

4 open court in the presence and hearing of the

5 jury:)

6

7 THE COURT: Good afternoon.

8 THE JURY: (In unison) Good afternoon.

9 THE COURT: You may proceed.

10 THE CLERK: Judge, we need to swear the

11 witness.

12 THE COURT: All right. Please raise your

13 right hand and face the clerk.

14

15 WADE J. ROBSON

16 Having been sworn, testified as follows:

17

18 THE WITNESS: I do.

19 THE CLERK: Please be seated. State and

20 spell your name for the record.

21 THE WITNESS: My name is Wade J. Robson,

22 spelled W-a-d-e, initial J., R-o-b-s-o-n.

23 THE CLERK: Thank you.

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

25 THE COURT: You may.

28 // 9090

1 DIRECT EXAMINATION

- 2 BY MR. MESEREAU:
- 3 Q. Good afternoon, Mr. Robson.
- 4 A. How you doing.
- 5 Q. How old are you?
- 6 A. I am 22.
- 7 Q. And would you please give the -- please just
- 8 summarize your employment history.
- 9 A. My employment history.
- 10 I started dancing when I was two,
- 11 professionally when I was five. In Australia
- 12 originally. And moved to America when I was eight.
- 13 Became a professional dancer. Started teaching
- 14 dance classes when I was 12. I was in a rap duo
- 15 when I was 11 and 12. Started choreographing for
- 16 different artists when I was 14, and now I'm
- 17 directing film.
- 18 Q. And where do you live at the moment?
- 19 A. I live in Tarzana, California.
- 20 Q. Okay. And you say you're directing films?
- 21 A. Yeah.
- 22 Q. And can you summarize what you're doing in
- 23 that regard?
- 24 A. The main focus right now, I did a short film
- 25 that I wrote and produced and directed last year,
- 26 and that's doing the whole film festival circuit
- 27 right now. And I have a three-picture deal with
- 28 Disney as a film director, and we're developing an 9091

- 1 original musical.
- 2 Q. Do you know the fellow seated at counsel
- 3 table to my right?
- 4 A. Yes.
- 5 Q. And who is that?
- 6 A. That's Michael Jackson.
- 7 Q. How do you know him?
- 8 A. I met him first when I was five years old.
- 9 I think it was '87. And Michael was touring, he was
- 10 doing the "Bad" tour. And I was imitating him as a
- 11 dancer at that point. And he was holding these --
- 12 it was in connection with Target or something like
- 13 that, holding these dance, like, contests all around
- 14 wherever he traveled. So I entered one of the dance
- 15 contests and ended up winning it, went on to the
- 16 finals and won that, and then the prize was to meet
- 17 Michael.
- 18 So I met him after one of his concerts in
- 19 Brisbane, Australia. And it was just like in a
- 20 meet-and-greet sort of room. And we met, and I was
- 21 in my whole, you know, "Bad" outfit and everything.
- 22 He was sort of laughing and tripping out on my
- 23 outfit and asked if I danced. I said, "Yeah." And
- 24 he asked me to perform with him in the show the next
- 25 night.
- 26 So after -- it was like the end of the
- 27 concert, I pulled up, performed in the show with
- 28 him. The next -- the next -- I think within the 9092
- 1 next couple of days, my mother and I went to visit
- 2 him at his hotel room, and we stayed for a couple of
- 3 hours. It was in Brisbane, Australia. Just talking

- 4 about what I want to do. And then that was kind of
- 5 it at first.
- 6 And then for the next two years, we didn't
- 7 have any contact at all. And I continued pursuing
- 8 my dance career in Australia. And then the company
- 9 that I was with, the dance company, was traveling to
- 10 America to do a performance at Disneyland.
- 11 So we all went. Came out, did that
- 12 performance. As I said, we'd had no contact with
- 13 Michael or anything. Somehow my mother got in
- 14 contact with Michael's secretary at that time, who
- 15 was Norma Stokes.
- 16 MR. ZONEN: Your Honor, I'm going to object
- 17 to the narrative form of the answer.
- 18 THE COURT: Sustained.
- 19 Q. BY MR. MESEREAU: After your mother got in
- 20 contact with Norma Stakos, what happened next?
- 21 A. She talked to Michael about -- we wanted to
- 22 see if we could hook up with him again and meet him
- 23 again. She talked to Michael. Michael remembered
- 24 me from when I met him when I was five years old,
- 25 wanted to meet me again.
- 26 So I was out there with my mother, sister,
- 27 my father, and grandparents. We all went to meet
- 28 him at Record One Recording Studios. And this 9093
- 1 was -- this was '89.
- 2 Q. Where is Record One Recording Studios?
- 3 A. I don't remember exactly. It's somewhere in
- 4 the valley, yeah. In California. Yeah.
- 5 Q. And what happened next?
- 6 A. We met up with him. He was in between, you
- 7 know, working on music and that sort of thing. He

- 8 was doing a photo shoot at the time at the studio.
- 9 We took some photos with him. My family and I all
- 10 went into his -- sort of like the green room, and
- 11 played him some videotapes of all the dancing stuff
- 12 that I've been doing over the last two years. And,
- 13 you know, he was just really excited, checking out
- 14 everything I had done. And then by the end of the
- 15 time, he invited my family and I up to the ranch
- 16 that weekend.
- 17 Q. And did you begin a friendship with Mr.
- 18 Jackson?
- 19 A. Yes.
- 20 Q. Did you spend much time at Neverland?
- 21 A. Yeah. Spent a lot of time, yeah.
- 22 Q. When do you think you first went to
- 23 Neverland?
- 24 A. It was right after that visit. I'm pretty
- 25 sure it was that night that we went, my whole family
- 26 went to the ranch. And, you know, we stayed for, I
- 27 don't know, about a week or something like that.
- 28 Q. And approximately what year do you think you 9094
- 1 first went to Neverland, Mr. Robson?
- 2 A. That was 1989.
- 3 Q. Okay. And who did you go to Neverland with
- 4 the first time?
- 5 A. Went with my mother, my sister, my father,
- 6 and my grandfather, grandmother.
- 7 Q. And how long did you stay during that first
- 8 visit?
- 9 A. I think it was about a week.
- 10 Q. And after you spent a week at Neverland,

- 11 what did you do?
- 12 A. Went back to Australia.
- 13 Q. Okay. Did you see Mr. Jackson again?
- 14 A. Yeah. We would -- I don't remember exact
- 15 dates, but over the next two years, my mother and I
- 16 would come out, I don't know, maybe twice a year,
- 17 something like that, and spend a couple of weeks
- 18 with Michael.
- 19 Q. Would you spend the night at Neverland?
- 20 A. Some of it was at Neverland. Sometimes it
- 21 would be at the -- he had an apartment in I think it
- 22 was Westwood at that point that we would stay at
- 23 sometimes, too.
- 24 Q. That's your mother and you would stay at the
- 25 apartment in Westwood?
- 26 A. Yeah. That first time, I think a couple
- 27 times, sometimes I would stay by myself. Always --
- $28\ I\ think$ -- sometimes -- most of the time my mother 9095
- 1 and I went to the ranch together. I think once I
- 2 was there by myself without my mother. There was
- 3 other people there.
- 4 Q. And did you stay in contact Mr. Jackson
- 5 through those years?
- 6 A. Yes.
- 7 Q. And how would you communicate with Mr.
- 8 Jackson?
- 9 A. When we weren't there, you know, we'd talk
- $10\ \mbox{on}$ the phone or we'd send faxes back and forth.
- 11 Q. At some point did you move to the United
- 12 States permanently?
- 13 A. Yeah. We moved in September of 1991. My
- 14 mother and sister and I.

15 Q. Have you lived here ever since? 16 A. Yes. 17 Q. Have you lived in Los Angeles ever since? 18 A. Yes. 19 Q. Now, your mother's name is? 20 A. Joy Robson. 21 Q. And how about your sister? 22 A. Chantel Robson. 23 Q. Okay. How many times do you think you've 24 stayed at Neverland? 25 A. Um, it's got to be somewhere in the twenties 26 or something like that. Mid-twenties. 27 Q. And have you stayed there for varying 28 periods of time? 9096 1 A. Yeah. Most of the time it's usually like a 2 weekend, you know. Friday, Saturday, Sunday. 3 Q. What's the longest amount of time, do you 4 think, you've ever stayed at Neverland? 5 A. You know, I would say a week to a week and a 6 half. 7 Q. Do you consider Michael Jackson your friend? 8 A. Yes. 9 Q. Do you consider him a close friend? 10 A. Yes. 11 Q. You're aware of the allegations in this 12 case, are you not? 13 A. Yes. 14 Q. And are you aware, as you sit here today, 15 that there's been allegations that Mr. Jackson 16 molested you? 17 A. Yes.

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18 Q. Mr. Robson, did Michael Jackson ever molest
19 you at any time?
20 A. Absolutely not.
21 Q. Mr. Robson, did Michael Jackson ever touch
22 you in a sexual way?
23 A. Never, no.
24 Q. Mr. Robson, has Mr. Jackson ever
25 inappropriately touched any part of your body at any
26 time?
27 A. No.
28 Q. When you first visited Neverland -- and I 9097
1 think you said it was about a week you and your mom
2 stayed there?
3 A. Yeah.
4 Q. Where did you stay?
5 A. I stayed in Michael's room.
6 Q. And could you please describe the room for
7 the jury?
8 A. When you walk in, there's -- there's a bed,
9 sort of like the main bed, diagonally to your left.
10 Wood floors. There's a second floor that you go
11 around to the right and up, which also has another
12 bed. There's a bathroom to the left. There's
13 bathrooms on both sides of the main bed on the first
14 floor.
15 Q. And you stayed in Mr. Jackson's room?
16 A. Yes.
17 Q. The first time you were there?
18 A. Yes.
19 Q. To your knowledge, has your mother ever
20 stayed in Mr. Jackson's room?
21 A. In the room? No.
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- 22 Q. How about your sister?
- 23 A. Yes.
- 24 Q. And when do you recall your sister staying
- 25 in the room?
- 26 A. On that first trip, the first time we went
- 27 to Neverland.
- 28 Q. Okay. What do you recall doing at Neverland 9098
- 1 during that first visit when you spent approximately
- 2 a week?
- 3 A. Well, at that point he didn't have many of
- 4 the rides. We would watch movies in the theater.
- 5 You know, we'd play video games. We'd drive around
- 6 on the golf carts, look at the animals. Those sort
- 7 of things.
- 8 Q. Has Mr. Jackson ever helped you with your
- 9 career?
- 10 A. Yes.
- 11 Q. What has he done?
- 12 A. When I first moved out here, when I was
- 13 nine, he put me in a couple of his music videos. I
- 14 was in the "Jam" music video, "Black or White" music
- 15 video, and "Heal the World." And that sort of
- 16 helped me get a dance agent, dance agency, and --
- 17 and, yeah.
- 18 And then the next thing, when I said I was
- 19 in a rap duo when I was 11 and 12, that was on
- 20 Michael Jackson's label under Sony.
- 21 Q. Do you recall the second time you ever
- 22 visited Neverland?
- 23 A. No, I don't.
- 24 Q. Do you recall staying in Mr. Jackson's room

- 25 on other occasions?
- 26 A. Yes.
- 27 Q. And typically when you'd stay in Mr.
- 28 Jackson's room, what would you do? 9099
- 1 A. What would we do as far as just --
- 2 Q. Sure. Anything.
- 3 A. Yeah. We'd watch -- same thing. We'd watch
- 4 movies, we'd play video games, you know, we'd have a
- 5 pillow fight every now and then. We'd talk. Hang
- 6 out.
- 7 Q. How many times do you think you've stayed in
- 8 Mr. Jackson's room at Neverland?
- 9 A. Same amount of times as I've been there.
- 10 Well, no, that's not true, I'm sorry. I've been
- 11 there a bunch of times without Michael, just with
- 12 other friends and family traveling there. But, I
- 13 don't know, maybe 15 to 20.
- 14 Q. And at no time has any sexual contact ever
- 15 occurred between you and Mr. Jackson, right?
- 16 A. Never.
- 17 Q. Have you ever taken a shower with Mr.
- 18 Jackson?
- 19 A. No.
- 20 Q. Have you ever gone swimming with Mr.
- 21 Jackson?
- 22 A. Yes.
- 23 Q. And please explain what you mean.
- 24 A. One time with my sister and I, my sister and
- 25 I and Michael, we went in the Jacuzzi at Neverland
- 26 Ranch.
- 27 Q. And do you know approximately when that was?
- $28\ A.\ I$ don't. I can't say for sure. I have a 9100

- 1 feeling that it was within that first trip in '89
- 2 when I went there.
- 3 Q. Do you recall what Mr. Jackson was wearing
- 4 in the Jacuzzi?
- 5 A. From my recollection, he was wearing shorts.
- 6 You know, like swimming shorts. And that was it.
- 7 Q. Did anything inappropriate ever happen in
- 8 that Jacuzzi?
- 9 A. No.
- 10 Q. Has anything inappropriate ever happened in
- 11 any shower with you and Mr. Jackson?
- 12 A. No. Never been in a shower with him.
- 13 Q. Did you get to know any of the employees at
- 14 Neverland when you were there?
- 15 A. I wouldn't say "get to know." You know, I
- 16 knew of them and we'd know each other's names, but
- 17 it never went beyond that.
- 18 Q. Do you recall someone named Blanca Francia?
- 19 A. Yes, I remember her name. And I remember
- 20 her presence. I can't place her. I can't remember
- 21 what she looks like or anything like that.
- 22 Q. Do you know whether or not Blanca Francia
- 23 ever was in a room when you were with Mr. Jackson?
- 24 A. Not that I can remember.
- 25 Q. Okay. Did you ever meet anyone named Ralph
- 26 Chacon?
- 27 A. No.
- 28 Q. How about Kassim Abdool? 9101
- 1 A. No.
- 2 Q. Do you recall anyone named Adrian McManus?

- 3 A. No.
- 4 Q. Did you have much interaction with the
- 5 security people when you were visiting and staying
- 6 at Neverland?
- 7 A. No. The only interaction would be is, I
- 8 don't know, if -- if they were trying -- if we were
- 9 out, you know, watching a movie or something like
- 10 that, they'd come tell us that dinner was ready or
- 11 something like that.
- 12 In later years, when I would go there and
- 13 just visit with my family and that sort of thing,
- 14 sometimes we'd have water fights and get the
- 15 security involved. But other than that, no.
- 16 Q. Did you come across anyone named Mrs.
- 17 Chandler when you were at Neverland?
- 18 A. Yes.
- 19 Q. And when do you think this was?
- 20 A. I think I was about 13. But I can't
- 21 pinpoint any more -- anything more definitive than
- 22 that. Around that time.
- 23 Q. Do you recall ever seeing someone at
- 24 Neverland talking to Mrs. Chandler?
- 25 A. Sorry? Can you repeat that?
- 26 Q. Did you ever see Mrs. Chandler talking to
- 27 anyone at Neverland?
- 28 A. Yeah, I mean, maybe chefs or -- you know, or 9102
- 1 maids or something like that.
- 2 Q. What do you recall Mrs. Chandler doing at
- 3 Neverland?
- 4 A. I think I mainly saw her if we'd sit down to
- 5 eat dinner or something like that. That's the only
- 6 time I saw her.

7 Q. Did you ever see her ordering people around

8 at Neverland?

9 A. Yeah, well --

10 MR. ZONEN: I'm going to object as leading.

11 THE COURT: Sustained.

12 Q. BY MR. MESEREAU: When you saw Mrs. Chandler

13 talking to these people at Neverland, what do you

14 recall her doing?

15 MR. ZONEN: I'll object as irrelevant and

16 vague.

17 MR. MESEREAU: There's been testimony by

18 her, Your Honor, about what she saw.

19 THE COURT: I'll allow the question.

20 You may answer. Do you want it read back?

21 THE WITNESS: Yes, please.

22 (Record read.)

23 THE WITNESS: I remember her, you know,

24 ordering food, that sort of thing, from maids or

25 chefs, or whatever.

26 And, you know, the thing I sort of noticed

27 was she was always sort of -- you know, she would

28 sort of act like the place was hers, you know. Sort 9103

1 of order people around a bit.

2 And, you know, I guess I noticed it because

3 my mother, when we went there, she always made it

4 really clear that this was Michael Jackson's house.

5 This was somebody's house and --

6 MR. ZONEN: I'm going to object as

7 nonresponsive to the question and narrative.

8 THE COURT: All right. The last sentence is

9 stricken.

10 Q. BY MR. MESEREAU: Mr. Robson, has anyone 11 told you what to say in this courtroom today? 12 A. No. 13 Q. Is everything you've said the complete and 14 honest truth? 15 A. Yes. 16 Q. Did Mr. Jackson ever do anything wrong with 17 you? 18 A. No. 19 MR. MESEREAU: No further questions. 20 THE COURT: Cross-examine? 21 22 CROSS-EXAMINATION 23 BY MR. ZONEN: 24 Q. Mr. Robson, good afternoon. 25 A. Good afternoon. 26 Q. Have you been living in the United States 27 continuously since you were eight years old? 28 A. Yes. 9104 1 Q. Was Mr. Jackson instrumental in your being 2 able to move to the United States to pursue your 3 career? 4 A. Yes. 5 Q. Are you grateful for Mr. Jackson's help and 6 assistance in the development of your career? 7 A. Yes. 8 Q. Did you go to high school or college at all? 9 A. No. 10 Q. Not either one? 11 A. I didn't go to a public high school. I did 12 home studies.

13 Q. You did home studies all through high

14 school? 15 A. Yeah. 16 Q. And no college at all? 17 A. No. 18 Q. So you began your dance career early on and 19 continued through to today; is that correct? 20 A. Yes. 21 Q. All right. Now, the first time that you 22 slept with Mr. Jackson you were seven years old; is 23 that correct? 24 A. I slept in the same bed with him. But, yes, 25 I was seven. 26 Q. Did you understand my question to mean 27 something other than that? 28 A. Sounded like it. 9105 1 Q. All right. But you slept in the same bed 2 with him when you were seven years old; is that 3 correct? 4 A. Yes. 5 Q. Was anybody else in that bed with you? 6 A. My sister, Chantel Robson. 7 Q. She was ten years old; is that right? 8 A. Yes. 9 Q. Is it true that there was not another adult 10 anywhere in that room at the time you crawled into 11 bed with Mr. Jackson? 12 A. True. 13 Q. And in fact, you continued to sleep with Mr. 14 Jackson through the balance of that week during your 15 seventh year; is that right? 16 A. Yes.

- 17 Q. Was your sister there the entire time during
- 18 that week as well?
- 19 A. Yes.
- 20 Q. Was she in that bed with you as well?
- 21 A. Yes.
- 22 Q. Did she continue to share a bed with you and
- 23 Mr. Jackson thereafter, or did you sleep only with
- 24 Mr. Jackson thereafter?
- 25 A. What do you mean by "thereafter"?
- 26 Q. Well, on all the occasions that you returned
- 27 to visit Mr. Jackson's ranch, did you stay in his
- 28 room, by yourself, with him? 9106
- 1 A. Yes. But my sister wasn't in -- wasn't with
- 2 us at all in America.
- 3 Q. All right. So when you moved here -- and
- 4 incidentally, your father was there during that
- 5 first week when you were seven years old; is that
- 6 right?
- 7 A. Yes.
- 8 Q. But your father did not return to visit
- 9 thereafter?
- 10 A. No.
- 11 Q. All right. So you stayed in the United
- 12 States. Your father stayed in Australia.
- 13 A. Yes.
- 14 Q. Did your mother stay in the United States?
- 15 A. Yes.
- 16 Q. For the balance of the next number of years,
- 17 your father was simply not in the picture while you
- 18 were in the United States; is that right?
- 19 A. He wasn't there with us, no.
- 20 Q. And Mr. Jackson understood that as well, did

- 21 he not, that your father was not in the picture
- 22 while you were at Neverland?
- 23 A. Well, he understood that he wasn't there,
- 24 yes.
- 25 Q. Okay. And did you have any contact with
- 26 your father at all?
- 27 A. Yes. We talked on the phone.
- 28 Q. By telephone? 9107
- 1 A. Yeah.
- 2 Q. Did you visit him?
- 3 A. I'm sorry, are we talking about once I moved
- 4 to America?
- 5 Q. Yes.
- 6 A. Oh, yes, we would go back at least every two
- 7 years for Christmas.
- 8 Q. Did he ever come to the United States to
- 9 visit you?
- 10 A. Yes.
- 11 Q. Did he have any other visits with you at
- 12 Neverland?
- 13 A. No.
- 14 Q. Did you talk with your mother, prior to that
- 15 first week that you slept with Mr. Jackson with your
- 16 sister, about the sleeping arrangements at all?
- 17 A. Well, yeah, the first day that we got there,
- 18 to Neverland Ranch -- you know, I think we got there
- 19 in about the afternoon. We hung out a bit.
- 20 When it was time to go bed, I asked Michael
- 21 if I could stay with him in his room. And then
- 22 Michael and I went to -- mom was staying in a guest
- 23 room. We went to her room and I asked her. Michael

- 24 asked her if that was okay. And she said yes.
- 25 Q. All right. Now, you asked Michael Jackson
- 26 if you could share his room with him. Now, what
- 27 caused you to do that? You were seven years old.
- 28 What caused you to ask him if you could stay with 9108
- 1 him in his room?
- 2 A. Well, it's the same way with any child.
- 3 When you -- you know, when you have a best friend or
- 4 a new friend that you found, you always want to stay
- 5 in the same room with them.
- 6 Q. He was in his mid 30s; is that right?
- 7 A. Yes, I guess so.
- 8 Q. Had you ever crawled into bed with a
- 9 30-year-old man prior to that day?
- 10 A. My father.
- 11 Q. Okay.
- 12 A. But other than that, no.
- 13 Q. Any person who you had just met?
- 14 A. No.
- 15 Q. All right. And in fact, throughout your
- 16 entire adolescent years, you had never slept with
- 17 any other man other than Michael Jackson and your
- 18 father; is that correct?
- 19 A. Never slept in a bed with any other man, no.
- 20 Q. Now, you had a conversation with your mother
- 21 about where you would sleep that night, that first
- 22 time. Again, you're seven years old; is that right?
- 23 A. Yeah.
- 24 Q. Did your mother talk to you about perhaps
- 25 you should stay with her in the guest cottage?
- 26 A. No.
- 27 Q. Was she the one who suggested that your

- 1 Mr. Jackson?
- 2 A. I don't remember that. I remember Chantel,
- 3 my sister, wanted to as well.
- 4 Q. Had your mother actually seen the room
- 5 that -- or the rooms that constitute Mr. Jackson's
- 6 bedroom suite?
- 7 A. Yeah. When we first got to the ranch, he
- 8 took us around, a tour around everywhere, in his
- 9 room.
- 10 Q. So she understood at the time that the
- 11 bedroom suite was composed of a number of different
- 12 rooms with actually beds in at least two of them; is
- 13 that right?
- 14 A. Yes.
- 15 Q. And there were bathrooms on both levels; is
- 16 that right?
- 17 A. I don't think there's a bathroom on the
- 18 second level. There's two on the first level.
- 19 Q. Was your mother under the impression that
- 20 you would be sleeping in a different location from
- 21 Michael Jackson when you first went to his room at
- 22 age seven?
- 23 A. Not that I know of.
- 24 Q. All right. Had you talked with her the next
- 25 day about where you actually slept that prior night?
- 26 A. No, not that I remember.
- 27 Q. At any time during that first week when you
- 28 were there at age seven, did you ever tell your 9110

1 mother that you actually shared the bed with Michael

2 Jackson? 3 A. I'm sure. 4 Q. You think you did? 5 A. Yeah. 6 Q. Do you remember your mother's response to 7 hearing that? 8 A. No. 9 Q. Did your sister, in your presence, tell your 10 mother that she was also sleeping in the same bed 11 with Michael Jackson at age ten? 12 A. I can't say for sure. I don't remember, 13 but --14 Q. At any time during that first week that you 15 were there, did you have any conversation with your 16 mother wherein your mother expressed concern about 17 where you were sleeping? 18 A. No. 19 Q. Were you seeing your mother during the day? 20 A. Yes. 21 Q. All right. After that first week, did you 22 go back to Australia? 23 A. Yeah. 24 Q. You were in Australia for what, about a 25 year? 26 A. I think so. I don't remember. 27 Q. And then you returned to the United States 28 for good at that point? 9111 1 A. Well, we had a couple of visits back to 2 America before we returned in '91 for good. 3 Q. With what rate of frequency did you continue 4 to visit with Michael Jackson after returning at age 5 eight?

- 6 A. I would say twice a year.
- 7 Q. All right. And during those periods of
- 8 time, you would stay for up to a week at a time, no?
- 9 A. Yeah.
- 10 Q. Were there times that you actually stayed at
- 11 Neverland for many weeks at a time?
- 12 A. Not that I can remember. Like I said, a
- 13 week to a week and a half. Maybe it was two weeks,
- 14 but I don't remember any more than that.
- 15 Q. Were there periods of time when you were at
- 16 Neverland and working with Mr. Jackson on dance
- 17 routines?
- 18 A. No. I mean, we would mess around and dance
- 19 a little bit in the studio every now and then, yes.
- 20 Q. Was there ever an occasion where you were on
- 21 the dance floor with Mr. Jackson and he was showing
- 22 you a routine and he grabbed your crotch in a manner
- 23 similar to how he would grab his own crotch while
- 24 doing those performances?
- 25 A. No, that's not true.
- 26 Q. You have no recollection of that?
- 27 A. No.
- 28 Q. That didn't happen? 9112
- 1 A. No.
- 2 Q. During the period of time from age eight on,
- 3 did you stay in Mr. Jackson's room virtually the
- 4 entire time?
- 5 A. I'm sorry?
- 6 Q. The times that you would come and visit Mr.
- 7 Jackson from age eight on --
- 8 A. Uh-huh.

- 9 Q. -- did you stay in Mr. Jackson's room?
- 10 A. Yes.
- 11 Q. All right. By age 11, you were asked to
- 12 give a deposition, were you not?
- 13 A. Yes.
- 14 Q. And you actually did give testimony under
- 15 oath in the presence of two prosecutors from Los
- 16 Angeles; is that right?
- 17 A. Yes.
- 18 Q. There was also an attorney present who
- 19 represented you; is that correct?
- 20 A. Yes.
- 21 Q. All right. After that deposition, did you
- 22 continue to sleep in Mr. Jackson's room?
- 23 A. Yes.
- 24 Q. Did you continue to sleep in Mr. Jackson's
- 25 bed?
- 26 A. Yes.
- 27 Q. All right. Now, during that period of time
- 28 from age eight until age 11, did you frequently 9113
- 1 visit Mr. Jackson?
- 2 A. From -- I'm sorry, from eight to 11?
- 3 Q. Age eight to age 11, did you frequently
- 4 visit Mr. Jackson?
- 5 A. Yeah. Same amount of time. Maybe twice a
- 6 year, or every couple of months, something like
- 7 that.
- 8 Q. Is it safe to say that during each of those
- 9 visits, you stayed in Mr. Jackson's room?
- 10 A. Yes.
- 11 Q. All right. Were there ever occasions where
- 12 you went to visit Mr. Jackson when your mother

- 13 wasn't there?
- 14 A. Yes. I think a couple of times he had an
- 15 apartment in Century City that my mother would drop
- 16 me off and I'd stay for, you know, a night or so by
- 17 myself with Michael there.
- 18 Q. Was that a place called "The Hideout"?
- 19 A. I remember a place called "The Hideout."
- 20 I don't remember if it was that place.
- 21 Q. Were there more places where you visited and
- 22 stayed overnight in Century City?
- 23 A. Yeah, there was a hotel that was -- I mean,
- 24 I'm sorry, an apartment that was in Westwood and
- 25 then one that was in Century City.
- 26 Q. Was there a place where Mr. Jackson was
- 27 living in, either Westwood or Century City, where
- 28 there was a hotel across the street? 9114
- 1 A. Yes.
- 2 Q. And would it be the case that periodically
- 3 you would visit him there, your mother would stay in
- 4 the hotel, but you would stay with him in his room?
- 5 A. One time when we came over, we stayed -- I
- 6 think it was the Westwood apartment, his Westwood
- 7 apartment. There was a Holiday Inn that was across
- 8 and we stayed there most of the time. And then
- 9 certain nights I would go over to Michael and stay
- 10 with him.
- 11 Q. Mr. Robson, were there ever occasions where
- 12 you stayed with Michael Jackson where you didn't
- 13 sleep with him in his bed?
- 14 A. Yes.
- 15 Q. How often did that happen?

- 16 A. I don't know. Maybe three, four times.
- 17 Q. Three or four times over years we're talking
- 18 about; is that right?
- 19 A. Yes.
- 20 Q. So, for the most part, the overwhelming
- 21 majority of times you shared his bed with him?
- 22 A. Yes.
- 23 Q. Now, at any time did you start to develop
- 24 conversations with your mother about the propriety
- 25 of sleeping with this man who's now well into his
- 26 30s?
- 27 A. No.
- 28 Q. Did you consider it unusual at all? 9115
- 1 A. No.
- 2 Q. Did your mother consider it unusual?
- 3 A. No.
- 4 Q. Did you ever talk to your father about it?
- 5 A. Yeah.
- 6 Q. You talked to your father about your
- 7 sleeping with Michael Jackson?
- 8 A. No, I mean, you know, everybody knew, and
- 9 nobody ever said that it was -- we never talked
- 10 about it being unusual or anything like that.
- 11 Q. Did your mother ever ask you if anything
- 12 inappropriate happened in bed with him?
- 13 A. No.
- 14 Q. Did she simply assume nothing happened?
- 15 A. Yes.
- 16 Q. You're telling us nothing happened; is that
- 17 right?
- 18 A. Yes.
- 19 Q. All right. What you're really telling us is

- 20 nothing happened while you were awake; isn't that 21 true?
- 22 A. I'm telling you that nothing ever happened.
- 23 Q. Mr. Robson, when you were asleep, you
- 24 wouldn't have known what had happened, particularly
- 25 at age seven, would you have?
- 26 A. I would think something like that would wake
- 27 me up.
- 28 Q. On those occasions that you were at 9116
- 1 Neverland, you used to play very actively, did you
- 2 not?
- 3 A. Yes.
- 4 Q. All right. There was a lot to do at
- 5 Neverland; is that right?
- 6 A. Yes.
- 7 Q. And on some days you were actually working
- 8 out heavily with the defendant, engaged in dance
- 9 routines, weren't you?
- 10 A. Yeah.
- 11 Q. And on other occasions you would be playing
- 12 very actively. There's just a host of things that a
- 13 seven-year-old can do and have fun with; is that
- 14 right?
- 15 A. Yes.
- 16 Q. And you can play -- all manner of video
- 17 games that exist anywhere in the world can be found
- 18 at Neverland; is that right?
- 19 A. Yeah.
- 20 Q. And there's video games, there's movies,
- 21 there's a zoo, there's all kinds of parks, and the
- 22 trains. You're very active during the entire day;

23 is that right? 24 A. Yes. 25 Q. And at night you'd go back to his room and 26 you'd play more video games or you'd watch 27 television; is that right? 28 A. Yes. 9117 1 Q. And there's movies of any kind that you can 2 see with Mr. Jackson? 3 A. Yes. 4 Q. Did your mother ever complain to you that 5 you were losing contact with her and that she was 6 losing her contact with you? Did she ever say that? 7 A. No. 8 Q. In fact, she was very upset over the fact 9 that she was losing her ability to have access to 10 her son, wasn't she? 11 A. No. 12 Q. Was there, in fact, a shower at Neverland in 13 the suite, the bedroom suite? 14 A. Yes. 15 Q. But you didn't use it? 16 A. I used it by myself. 17 Q. Was he in the room while you were using it? 18 A. In the bedroom, not in the shower room, 19 which had its own door. 20 Q. You were seven years old when you started 21 using that shower; is that correct? 22 A. Yes. 23 Q. When did you stop sleeping with Mr. Jackson?

24 A. I guess when I was about, I don't know,

25 maybe 13, 14, something like that.

26 Q. Why did you stop?

- 27 A. I didn't stop sleeping with him. I just
- 28 haven't spent the night with him, I mean, in his 9118
- 1 room or anything like that since then, I don't
- 2 think.
- 3 Q. You haven't gone back to Neverland since you
- 4 were 13?
- 5 A. I have. Not with him.
- 6 Q. Have you gone back to Neverland since you
- 7 were 13 and actually stayed overnight?
- 8 A. Yes.
- 9 Q. On how many occasions since you were 13?
- 10 A. A lot. Same thing. 20, 25. Something like
- 11 that.
- 12 Q. Did he take you to other locations such as
- 13 Las Vegas?
- 14 A. Yes.
- 15 Q. And while you were at Las Vegas, you went to
- 16 see Siegfried & Roy?
- 17 A. Yes.
- 18 Q. And being with Mr. Jackson back then was a
- 19 very exciting experience, wasn't it?
- 20 A. Yes.
- 21 Q. He was able to go anywhere he wanted in Las
- 22 Vegas and take you with him?
- 23 A. Yeah.
- 24 Q. Did you start to dress like him?
- 25 A. I always did before I met him.
- 26 Q. All right. And during the time that you
- 27 were with him, he enjoyed you wearing clothing
- 28 similar to what he wore; is that correct? 9119

- 1 MR. MESEREAU: Objection; calls for
- 2 speculation.
- 3 THE COURT: Sustained.
- 4 Q. BY MR. ZONEN: Did he ever tell you that he
- 5 wanted you to dress like him?
- 6 A. No.
- 7 Q. Did he ever give you hats similar to the
- 8 type of hats that he wears?
- 9 A. Because I would ask for them.
- 10 Q. And did you, in fact, wear those types of
- 11 hats when you were out with him?
- 12 A. Yes.
- 13 Q. And when you were in Las Vegas, did you wear
- 14 those hats as you wandered around Las Vegas with
- 15 him?
- 16 A. Yes.
- 17 Q. When you were in Las Vegas, where did you
- 18 stay?
- 19 A. We stayed at The Mirage Hotel.
- 20 Q. Who went to Las Vegas with you?
- 21 A. My mother.
- 22 Q. Just your mother?
- 23 A. Yeah.
- 24 Q. Was your sister with you at all?
- 25 A. No.
- 26 Q. Did your sister move to the United States
- 27 with you?
- 28 A. Yes. 9120
- 1 Q. But she didn't go to Las Vegas with you?
- 2 A. Well, we weren't -- we didn't live in the
- 3 United States at that point. We still lived in
- 4 Australia. We were out on a visit.

- 5 Q. When you were in the hotel in Las Vegas, it
- 6 is true that you stayed with Mr. Jackson in his bed?
- 7 A. Yes.
- 8 Q. And your mother stayed in a separate room;
- 9 is that right?
- 10 A. Yes.
- 11 Q. Now, were there other boys that you knew
- 12 about who were sleeping with Michael Jackson during
- 13 that time?
- 14 A. No, not that I knew of. I mean, the only
- 15 other time I was around other boys, other kids at
- 16 the ranch, I think once or twice, and, you know,
- 17 we'd all stay in the room and we'd kind of fall
- 18 asleep on couches, beds, cots, wherever they were.
- 19 Q. Did you know Jordie Chandler?
- 20 A. Yeah.
- 21 Q. You just described -- you just told the jury
- 22 that -- that you knew Jordie Chandler's mother; is
- 23 that right?
- 24 A. Yes.
- 25 Q. What's her name?
- 26 A. I know her -- June. June Chandler.
- 27 Q. All right. Describe her for us. What does
- 28 she look like? 9121
- 1 A. She has dark, almost black hair. Sort of --
- 2 sort of brown eyes. I think some -- kind of like
- 3 a -- a little bit of a darker complexion.
- 4 Q. Slim woman? Heavy woman?
- 5 A. Slim woman.
- 6 Q. Now, do you remember her son Jordie?
- 7 A. Yes.

8 Q. On how many occasions did you meet Jordie? 9 A. Once. 10 Q. Only one time? 11 A. That's all I can remember, yes. 12 Q. And did you spend the night with Jordie? 13 A. Yeah, we all stayed in Michael's room. 14 Q. You say "we all stayed." Were there other 15 people there besides Jordie? 16 A. Yeah, Macaulay Culkin was there and his 17 brother Kieran Culkin. 18 Q. Now, Macaulay Culkin has sisters, does he 19 not? 20 A. I don't know. 21 Q. Were there any girls that were staying with 22 you that night? 23 A. Not that I remember. 24 Q. Were there ever any girls, other than your 25 sister, at age seven, who actually spent the night 26 in Mr. Jackson's room with you during the years that 27 you knew him and spent the night in his room? 28 A. Yes. 9122 1 Q. Who? 2 A. There was Brandy Jackson. 3 Q. I'm sorry? 4 A. Brandy Jackson, who is Michael's niece. 5 Q. And she spent the night on how many 6 occasions with you? 7 A. Only one that I can remember. 8 Q. One night? 9 A. Yeah. 10 Q. All right. So we're talking about a period 11 of about five years; is that right?

- 12 A. Yeah.
- 13 Q. In the five years, you can remember Brandy.
- 14 Who else do you recall?
- 15 A. As far as females?
- 16 Q. Yes.
- 17 A. My sister. Brandy. That's all I remember.
- 18 Q. Now, your sister actually never went back
- 19 into that room and spent the night with you after
- 20 that first week when you were seven; is that
- 21 correct?
- 22 A. Yeah, not that I can remember.
- 23 Q. Is it an accurate statement to say that the
- 24 boys who stayed there for long periods of time
- 25 started getting pretty rowdy?
- 26 A. Rowdy?
- 27 Q. Yeah.
- 28 A. What do you mean? 9123
- 1 Q. Well, goof off, and simply kids who weren't
- 2 under a lot of supervision?
- 3 A. Oh, yeah. I mean, you know, boys will be
- 4 boys. We'd go around and have fun.
- 5 Q. Loud and boisterous?
- 6 A. Yes.
- 7 Q. And on occasions break things?
- 8 A. Accidentally, yeah.
- 9 Q. And be somewhat disobedient?
- 10 A. Some of them maybe.
- 11 Q. Were there ever occasions where you and Mr.
- 12 Jackson were throwing stones at the lion in the zoo?
- 13 A. Stones at the lion. Yeah, I think so.
- 14 Q. That did happen, didn't it?

15 A. Yeah. 16 Q. Mr. Jackson was throwing stones at the lion 17 in your presence; is that right? 18 A. Yes. 19 Q. Was he encouraging you to do the same thing? 20 A. Yeah. Little pebbles, but, yeah. 21 Q. They weren't exactly pebbles. They were 22 good-sized stones, weren't they? 23 A. No, I remember small stones. 24 Q. It was designed to irritate the lion, wasn't 25 it? 26 A. Yeah, we were trying get him to make some 27 noise. 28 Q. Because it was entertaining to Mr. Jackson 9124 1 and to you? 2 A. Yeah. 3 Q. How old were you at the time? 4 A. I think I would have been seven or eight. 5 Q. Were there any other kids around at that 6 time? 7 A. No. Maybe my sister. 8 Q. Now, you said that you spent one night that 9 you can recall with Jordie Chandler. Do you know 10 Brett Barnes? 11 A. Yes. 12 Q. Did you ever spend a night with Brett 13 Barnes? 14 A. No. 15 Q. Did you ever meet Brett Barnes? 16 A. Yes. 17 Q. How old were you when you met Brett Barnes? 18 A. I think I would have been nine. It was soon

- 19 after we moved to America.
- 20 Q. On that occasion when you spent the night
- 21 with Jordie Chandler, Macaulay, and his brother, was
- 22 Brett Barnes there as well?
- 23 A. No.
- 24 Q. Do you know if Brett Barnes spent nights
- 25 with Michael Jackson?
- 26 A. I don't know.
- 27 Q. Do you know if they ever shared a bed?
- 28 A. I don't know. 9125
- 1 Q. Did Michael Jackson ever talk to you about
- 2 the propriety of sleeping with him?
- 3 A. Could you rephrase that?
- 4 Q. Did Michael Jackson ever have a conversation
- 5 with you wherein the subject of the conversation was
- 6 that it was okay for you to sleep with a
- 7 30-something-year-old man?
- 8 A. Yeah.
- 9 Q. He did?
- 10 A. We would both talk about it.
- 11 Q. Really. From what age? When did that first
- 12 conversation happen?
- 13 A. I don't remember.
- 14 Q. Were you seven?
- 15 A. I don't remember.
- 16 Q. Was it the first week that you were there?
- 17 A. No.
- 18 Q. Do you think it was soon after you moved to
- 19 the United States?
- 20 A. I really don't remember.
- 21 Q. What was the nature of that conversation?

- 22 A. I don't remember an exact conversation. I'm
- 23 sure it's just something, you know, we talked about
- 24 at some point; that -- you know, that it's fine.
- 25 Q. Did Mr. Jackson ever tell you that you were
- 26 family to him?
- 27 A. Yes.
- 28 Q. Did he tell you that often? 9126
- 1 A. Yes.
- 2 Q. Did he tell you that he would take care of
- 3 you?
- 4 A. No.
- 5 Q. Did he tell you he would protect you?
- 6 A. Yes.
- 7 Q. All right. Did he ever tell your mother in
- 8 your presence that you were family?
- 9 A. Yes.
- 10 Q. And that your mother could trust him?
- 11 A. Yes.
- 12 Q. In fact, the word "trust" came up in many
- 13 conversations with Michael Jackson, did it not?
- 14 A. Yeah, we'd talk about trust in, you know,
- 15 other people, and that sort of thing.
- 16 Q. But he encouraged you particularly to trust
- 17 in him, did he not?
- 18 A. No, there was no particular emphasis on it.
- 19 Q. How much time did you spend with Macaulay
- 20 Culkin?
- 21 A. Um, there was that -- the trip that we spoke
- 22 of, that I think was a couple of days. I think I
- 23 was with him one other time at the Century City
- 24 apartment, which was a night. I think that was
- 25 about it.

- 26 Q. Now, the trip you described, that trip was
- 27 where now?
- 28 A. Which trip? 9127
- 1 Q. Maybe I misheard you. Did you say "the trip
- 2 I just spoke of"?
- 3 A. Oh, the one I spoke of. That was the one
- 4 where I said where Jordie Chandler was there at
- 5 Neverland.
- 6 Q. That was Neverland?
- 7 A. Yeah.
- 8 Q. He was there and you were there for what
- 9 period of time together? Just one night?
- 10 A. No, it was a couple days.
- 11 Q. Did it go over more than one night?
- 12 A. Yes.
- 13 Q. On both of those nights, did both of you
- 14 spend that time in Mr. Jackson's room?
- 15 A. Yes.
- 16 Q. Now, did either one of you actually spend
- 17 the night in Mr. Jackson's bed with Mr. Jackson?
- 18 A. No. I think -- from I can remember -- I can
- 19 only remember one night in particular, and I
- 20 remember myself and Kieran Culkin, I think, slept on
- 21 Michael's bed, and Michael slept on a cot, or
- 22 something, on the side of us, and I don't know,
- 23 Macaulay fell asleep on a couch or something.
- 24 Q. I'm sorry.
- 25 A. Go ahead, no.
- 26 Q. The Century City apartment, I believe you
- 27 said you spent some time there with Macaulay Culkin
- 28 as well? 9128

1 A. Yeah. I think it was one night there, yeah. 2 Q. Was his brother there? 3 A. I don't remember for sure. I don't remember 4 him being there. 5 Q. Mr. Jackson would periodically kiss you, 6 would he not? 7 A. No. 8 Q. Periodically hug you? 9 A. Yes. 10 Q. Touch you? 11 A. Hug me. That would be --12 Q. Put his hands through your hair? 13 A. No. 14 Q. Touch you about the head and the face? 15 A. Yeah. 16 Q. Did he ever kiss you on the cheek? 17 A. Yeah. 18 Q. Did he ever kiss you on the lips? 19 A. No. 20 Q. Do you remember any other children being 21 there about that time? 22 A. Which time? 23 Q. From the time that you were seven until the 24 time you stopped sleeping there at age 13. 25 A. Being at the ranch? 26 Q. Yes. 27 A. Other than we spoke of, no. 28 Q. Did you know Blanca Francia's son? 9129 1 A. No. I knew of him. But I don't think I

2 ever met him.

3 Q. What was his name?

- 4 A. I don't know.
- 5 Q. Does "Jason" sound familiar?
- 6 A. Yes, but I think because I've heard it

7 recently. But, yeah.

- 8 Q. Now, were there ever occasions after you
- 9 were 14 years old that you came and stayed at
- 10 Neverland Ranch and Michael Jackson was, in fact,
- 11 there?
- 12 A. Yes.
- 13 Q. And you did not stay with him in his room?
- 14 A. The only time I can remember was a time I
- 15 went up there with a few family members and friends,
- 16 and we didn't know he was going to be there. And,
- 17 you know, we sort of ran into him and hung out a
- 18 bit, and, no, I didn't sleep in his room.
- 19 Q. Did you ever talk to Michael Jackson about
- 20 the fact that at some age it was too late for you to
- 21 be sleeping with him?
- 22 A. No.
- 23 Q. Did you ever have a conversation with him
- 24 about whether or not you should continue to sleep in
- 25 his bed?
- 26 A. No.
- 27 Q. Remember the last time you slept in his bed?
- 28 A. The last -- I think it might have been when 9130
- 1 I was about 14. It was at a Sheraton Hotel in Los
- 2 Angeles.
- 3 Q. And how did you happen to be there with him?
- 4 A. I stayed with him for I think it was just
- 5 one night.
- 6 Q. Did you call or did he call you?

7 A. I don't remember. 8 Q. Was your mother there? 9 A. No. 10 Q. Do you remember how you got there? 11 A. No, I don't. 12 Q. Were there occasions that Mr. Jackson would 13 summon you to Neverland Ranch? 14 A. Summon me? 15 Q. Yes. Call you up and ask you to come and be 16 there; invite you to Neverland Ranch? 17 A. Invite us, yeah. 18 Q. All right. Without your mother? 19 A. Like ask if I could come without my mother, 20 do you mean? 21 Q. Or just ask you to come, and you came by 22 yourself. 23 A. The only time I remember being there --24 sorry. The only time I remember being there was 25 that -- that trip that we spoke of by myself with 26 Jordie Chandler and Macaulay. 27 Q. On the occasions that you stayed in bed with 28 Mr. Jackson, would you ever cuddle in bed? 9131 1 A. No. 2 Q. Would you lie next to one another? 3 A. No. 4 Q. Would you touch? 5 A. No. 6 Q. Would you consider it to have been

9 Q. Would you have considered it to be 10 inappropriate to have cuddled in bed?

7 inappropriate to have cuddled in bed?

8 A. Sorry?

- 11 A. No.
- 12 MR. ZONEN: I have no further questions.

13

- 14 REDIRECT EXAMINATION
- 15 BY MR. MESEREAU:
- 16 Q. Mr. Robson, the prosecutor for the
- 17 government asked you about your dressing like
- 18 Michael Jackson.
- 19 A. Uh-huh.
- 20 Q. And I believe you said something about you
- 21 dressed like him before you met him.
- 22 A. Yes.
- 23 Q. Would you please explain that?
- 24 A. Well, you know, I became a fan of Michael
- 25 Jackson when I was two years old, when I saw the
- 26 making of "Thriller," and started dancing like him
- 27 when I was, you know, three or four. So I think
- 28 when I was about five, I started, because I was 9132
- 1 imitating him. I got costumes made and that sort of
- 2 thing. So I would dress like him from that point,
- 3 before I met him.
- 4 Q. Did Mr. Jackson ever encourage you to dress
- 5 like him?
- 6 A. No.
- 7 Q. Did you dress like him because you were a
- 8 fan and friend of his?
- 9 A. Yes.
- 10 Q. Now, the prosecutor talked about your
- 11 throwing pebbles at a lion.
- 12 A. Uh-huh.
- 13 Q. Would you please explain what you were

- 14 describing.
- 15 A. Well, there's a lion that was in a cage.
- 16 And, you know, went to see the lion roar, and it's
- 17 pretty much just sitting there, you know, not doing
- 18 anything. So we picked up a couple little stones
- 19 and threw them at the cage, you know.
- 20 Q. And the prosecutor used the word "stones,"
- 21 and you said "pebbles." How big were these things?
- 22 A. Little, you know -- I don't know,
- 23 quarter-inch sort of things.
- 24 Q. Were you trying to hurt the lion?
- 25 A. No.
- 26 Q. To your knowledge, was Mr. Jackson trying to
- 27 hurt the lion?
- 28 A. No. 9133
- 1 Q. Okay. The prosecutor asked you questions
- 2 about whether or not you were considered family.
- 3 Did you consider yourself to be part of Mr.
- 4 Jackson's family?
- 5 A. Yeah, I mean, in a friendship sort of way.
- 6 Because we were that close. It was like family.
- 7 Q. And did you use the word "family" once in a
- 8 while --
- 9 A. Yes.
- 10 Q. -- when you spoke to him?
- 11 A. Yes.
- 12 Q. Did you hear your mother or sister using the
- 13 word "family"?
- 14 A. Yes.
- 15 Q. Did you think anything was strange about
- 16 that?
- 17 A. No.

- 18 Q. The prosecutor for the government asked
- 19 about Mr. Jackson giving you a kiss on the cheek.
- 20 A. Uh-huh.
- 21 Q. And you said that happened sometimes?
- 22 A. Yes.
- 23 Q. Did you think there was anything
- 24 inappropriate about that?
- 25 A. No.
- 26 Q. Did you do it in front of your mom?
- 27 A. Yes.
- 28 Q. Did you do it in front of your sister? 9134
- 1 A. Yes.
- 2 Q. Did your mother kiss him on the cheek?
- 3 A. Yes.
- 4 Q. Did your sister kiss him on the cheek?
- 5 A. Yes.
- 6 Q. Did you kiss Mr. Jackson on the cheek?
- 7 A. Yes.
- 8 Q. Did your mother used to hug Mr. Jackson?
- 9 A. Yes.
- 10 Q. Did Mr. Jackson used to hug your mother?
- 11 MR. ZONEN: I'll object as irrelevant what
- 12 happened with his mother.
- 13 THE COURT: Overruled. Go ahead.
- 14 Q. BY MR. MESEREAU: Did Mr. Jackson used to
- 15 hug your mother?
- 16 A. Yes.
- 17 Q. Did your sister used to hug Mr. Jackson?
- 18 MR. ZONEN: I'll object as leading as well.
- 19 THE COURT: Overruled.
- 20 Q. BY MR. MESEREAU: Did your sister used to

- 21 hug Mr. Jackson? 22 A. Yes. 23 Q. And would you see Mr. Jackson hug your 24 sister? 25 A. Yes. 26 Q. Did you ever think there was anything 27 inappropriate about Mr. Jackson hugging any member 28 of your family? 9135 1 A. No. 2 Q. Did you ever think it was inappropriate to 3 see any member of your family hug Mr. Jackson? 4 A. No. 5 Q. Now, you said your sister would sometimes 6 stay in Mr. Jackson's room, correct? 7 A. Yes. 8 Q. And how often do you recall that happening? 9 A. I remember it just within that first trip we 10 were there. So it was -- it was, you know, three or 11 four nights or something like that. 12 Q. And you mentioned Brandy. Is that who you 13 mentioned? 14 A. Yes. 15 Q. Who was Brandy again? 16 A. She was Michael Jackson's niece. 17 Q. You saw Brandy staying in his room? 18 A. Yeah. 19 Q. What's the largest number of kids you ever 20 saw stay in Mr. Jackson's room, if you remember? 21 A. Yeah, probably four to five. 22 Q. And what do you recall the children doing in
- 24 A. Well, before we went to sleep, same sort of

23 his room?

- 25 things. We'd play video games, watch movies. Have
- 26 pillow fights. You know, yeah.
- 27 Q. Did you ever see anything of a sexual nature
- 28 between Mr. Jackson and any of those children? 9136
- 1 A. Never.
- 2 Q. Now, the prosecutor mentioned Macaulay
- 3 Culkin. Did you get to know Macaulay Culkin at
- 4 Neverland?
- 5 A. Yeah. I mean, we hung out a little bit,
- 6 yes.
- 7 Q. Was that where you first met him?
- 8 A. I think I might have met him on a -- on a
- 9 set of a commercial or one of his videos or -- or,
- 10 no, I think I met him on "Black or White" the first
- 11 time, the music video.
- 12 Q. Did you stay in contact with Mr. Culkin?
- 13 A. No.
- 14 Q. Is he someone you communicate with on a
- 15 regular basis?
- 16 A. No.
- 17 Q. Okay. Now, would you see Mr. Culkin's
- 18 family at Neverland?
- 19 A. Other than his brother Kieran, I don't
- 20 remember.
- 21 Q. And approximately how old was his brother,
- 22 do you think?
- 23 A. At that time, he would have been, I guess,
- 24 nine or ten, or something like that.
- 25 Q. Have you seen Mr. Jackson hug other children
- 26 at Neverland?
- 27 A. Yes.

- 1 at Neverland?2 A. Yes.
- 3 Q. Have you ever thought any of this was
- 4 inappropriate?
- 5 A. No.
- 6 Q. Have you seen Mr. Jackson kiss children at
- 7 Neverland?
- 8 A. On the cheek, yes. Or on the head, or on
- 9 the top of the head, something like that.
- 10 Q. Ever seen kids kiss Mr. Jackson?
- 11 A. Yes.
- 12 Q. Any of that ever look inappropriate to you?
- 13 A. No.
- 14 Q. Have you seen lots of children visit
- 15 Neverland on occasion?
- 16 A. Yes.
- 17 Q. And what do you mean?
- 18 A. I think we were there once when he had one
- 19 of his gatherings, like a Heal the World Foundation
- 20 thing where he had a bunch of kids come up there
- 21 and -- you know, and have the day there.
- 22 Q. And how many kids are you talking about, do
- 23 you think?
- 24 A. Probably about 100 or 50. 75 to 100,
- 25 something like that.
- 26 Q. Were there adults with those children?
- 27 A. Yes.
- 28 Q. And you said, "Heal the World." What did 9138
- 1 that mean to you?
- 2 MR. ZONEN: I'm going to object as exceeding

- 3 the scope of the direct examination, and irrelevant,
- 4 and beyond the scope of his knowledge.
- 5 THE COURT: Overruled.
- 6 You may answer.
- 7 THE WITNESS: Could you repeat the question?
- 8 Q. BY MR. MESEREAU: Yeah. What was "Heal the
- 9 World," as far as you remember?
- 10 A. As far as I knew, it was a foundation or a
- 11 charity that Michael had created that, you know,
- 12 raised money for kids with illnesses. I don't know
- 13 exactly what kind, but --
- 14 Q. Did you interact with any of these kids that
- 15 visited that day?
- 16 A. I may have, yeah, I mean, waved at them or
- 17 met a couple of them or something like that.
- 18 Q. Did you see Mr. Jackson hugging other
- 19 children?
- 20 A. Yes.
- 21 Q. Did you see them hugging him?
- 22 A. Yes.
- 23 Q. Did you see Mr. Jackson kiss children?
- 24 A. Yeah.
- 25 Q. Have you seen them kiss him?
- 26 A. Yes.
- 27 Q. Ever seen anything inappropriate?
- 28 A. No. 9139
- 1 Q. Did you see Mr. Jackson hug adults who were
- 2 with those children?
- 3 A. Yes.
- 4 Q. Did you see adults hug Mr. Jackson who were
- 5 with those children?

- 6 A. Yes.
- 7 Q. Ever think any of that was inappropriate?
- 8 A. No.
- 9 Q. Now, the prosecutor for the government asked
- 10 you questions about whether he touched your hair.
- 11 A. Uh-huh.
- 12 Q. Do you recall Mr. Jackson ever touching your
- 13 hair?
- 14 A. I can't recall an exact thing, but it seems
- 15 like something he might have done at some point.
- 16 Q. Do you ever recall Mr. Jackson doing
- 17 anything inappropriate with your hair?
- 18 A. No.
- 19 Q. Ever seen Mr. Jackson touch another child on
- 20 the head?
- 21 A. Yes.
- 22 Q. Have you seen that many times?
- 23 A. Many times.
- 24 Q. Did it ever seem like anything inappropriate
- 25 was going on when you saw that?
- 26 A. No.
- 27 Q. The prosecutor asked about disobedience at
- 28 Neverland, and you said you did see kids act up 9140
- 1 sometimes?
- 2 A. Yeah, I mean, act up as far as kids go. I
- 3 mean, you know, driving golf carts around and
- 4 throwing water balloons at each other, and things
- 5 that, I guess, I don't know, maybe parents would get
- 6 upset about at some point, but that was the extent
- 7 of it.
- 8 Q. And did you engage in some of that, too?
- 9 A. Yes.

11 balloon fight with kids? 12 A. Yes. 13 Q. Ever see kids throw water balloons at 14 Michael? 15 A. Yes. 16 Q. Ever see Michael throw water balloons at 17 kids? 18 A. Yes. 19 Q. Did you ever see Michael in golf carts with 20 kids? 21 A. Yes. 22 Q. When you used to play at Neverland during 23 the day, would Michael often be with you? 24 A. Yes. 25 Q. And what would Michael do with you? 26 A. We'd go on rides together, you know, where 27 we'd drive around in the golf cart together, look at 28 animals together, watch movies together. 9141 1 Q. Did you see Mr. Jackson act in a similar way 2 with other children? 3 A. Yes. 4 Q. Ever see anything inappropriate go on when 5 he was doing any of these things? 6 A. No. 7 Q. Now, how often do you recall your mother 8 going to Neverland with you? 9 A. It's been every time except for that one 10 time that I spoke of when I was there with Jordie 11 Chandler and Macaulay and I. 12 Q. What do you recall seeing your mother do at

10 Q. Did you ever see Michael Jackson in a water

- 13 Neverland?
- 14 A. A lot of the same things with us.
- 15 Q. Would she sometimes be with Mr. Jackson when
- 16 all the kids were playing?
- 17 A. Oh, yes. She was playing along with us.
- 18 Q. Now, you mentioned visiting an apartment in
- 19 Century City with Mr. Jackson, right?
- 20 A. Yes.
- 21 Q. And what do you recall doing in the
- 22 apartment with Mr. Jackson?
- 23 A. Same sort of things. He had arcade games
- 24 there. You know, candy. We'd eat, we'd watch, you
- 25 know, T.V. shows, Stooges. Hang around, play games,
- 26 you know.
- 27 Q. Did you ever see Mr. Jackson do anything
- 28 inappropriate with any child at that apartment? 9142
- 1 A. No.
- 2 Q. Where else have you been with Mr. Jackson?
- 3 A. Like I said, we covered Las Vegas. Westwood
- 4 apartment, Century City apartment. Sheraton Hotel.
- 5 He came and stayed at my place once.
- 6 Q. Where was that?
- 7 A. That was in Hollywood. It was -- my mother
- 8 and I had a condo, and my sister.
- 9 Q. Did you see Mr. Jackson do anything
- 10 inappropriate at any of these locations?
- 11 A. No.
- 12 Q. Ever seen Mr. Jackson touch any child in a
- 13 sexual way at any of these locations?
- 14 A. Never.
- 15 Q. Did Mr. Jackson ever touch you
- 16 inappropriately in any of these locations?

- 17 A. No.
- 18 Q. Now, have you been following media reporting
- 19 in this case?
- 20 A. Yeah. On and off.
- 21 Q. You're aware of allegations that were made
- 22 that Mr. Jackson --
- 23 MR. ZONEN: I'm going to object as leading
- 24 and exceeding the scope of the direct -- cross.
- 25 THE COURT: I don't know what the question is
- 26 yet.
- 27 Q. BY MR. MESEREAU: Okay. You've been
- 28 following these reports that somehow Mr. Jackson was 9143
- 1 seen inappropriately touching you?
- 2 A. Yes.
- 3 Q. What do you think of them?
- 4 A. I think it's --
- 5 MR. ZONEN: I'll object.
- 6 I'll withdraw the objection.
- 7 THE WITNESS: I think it's ridiculous.
- 8 MR. MESEREAU: No further questions.
- g
- 10 RECROSS-EXAMINATION
- 11 BY MR. ZONEN:
- 12 Q. When Mr. Jackson stayed with you at your
- 13 Hollywood apartment, how old were you?
- 14 A. I would say 11 or 12.
- 15 Q. Did he share your bed with you at that time?
- 16 A. Yes.
- 17 Q. All right. There was one bed that you had
- 18 in your room; is that correct?
- 19 A. No, it was actually -- it was a -- like a

- 20 futon that was our couch down in the living room.
- 21 Q. So both of you stayed on the couch in the
- 22 living room?
- 23 A. Yes.
- 24 Q. Was that couch your normal residence? Was
- 25 that where you normally slept?
- 26 A. I think that's where I was sleeping at that
- 27 point, yeah.
- 28 Q. You think that's where you were sleeping? 9144
- 1 A. Yes.
- 2 Q. You slept in other rooms at different times?
- 3 A. Yeah.
- 4 Q. Now, all those places that you mentioned are
- 5 all places that you mentioned, a series of places,
- 6 you had been with Michael Jackson. On all of those
- 7 occasions you slept in the same bed with him; is
- 8 that correct?
- 9 A. Yes.
- 10 Q. Do you think that's appropriate, for a
- 11 35-year-old man to be sleeping with an
- 12 eight-year-old boy?
- 13 A. I don't see any problem with it.
- 14 Q. Suppose the 35-year-old man has an obsession
- 15 for sexually explicit material. Would that change
- 16 your view?
- 17 MR. MESEREAU: Objection; 352.
- 18 MR. ZONEN: It's in evidence.
- 19 MR. MESEREAU: Calls for speculation;
- 20 assumes facts not in evidence.
- 21 THE COURT: I'm going to sustain the
- 22 objection because of the use of the term
- 23 "obsession."

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24 Q. BY MR. ZONEN: If you knew that the person,
25 the 35-year-old man who was sleeping with an
26 eight-year-old boy, possessed a great quantity of
27 sexually explicit material, would that cause you
28 concern about that person's motivations while he was 9145
1 in bed with the boy?
2 A. Yes.
3 MR. ZONEN: No further questions.
5 FURTHER REDIRECT EXAMINATION
6 BY MR. MESEREAU:
7 Q. If you had known Michael Jackson, as a grown
8 man, was reading Playboy, Hustler, Penthouse,
9 magazines like that showing naked women, would that
10 have concerned you?
11 A. No. That's what I was going to say
12 afterward. Depends on what kind of material, what
13 kind of pornographic material you were talking
14 about.
15 Q. Would that have concerned you?
16 A. No.
17 MR. MESEREAU: No further questions.
18 MR. ZONEN: May I approach the witness?
19 THE COURT: Yes.
20
21 FURTHER RECROSS-EXAMINATION
22 BY MR. ZONEN:
23 Q. I'd like to show you a couple exhibits, 841
24 and 842, that have been shown previously in this
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25 court to this jury.

26 Let's start with one titled "Boys Will Be

- 27 Boys." I'd like you to take a look at a few of the 28 pages. Just go ahead and start turning pages, 9146
- 1 please.
- 2 Stop there for a moment.
- 3 Would you describe the picture on the right
- 4 side?
- 5 A. There's a young boy with his legs open and
- 6 he's naked.
- 7 Q. All right. The picture prominently displays
- 8 his genitalia, does it not?
- 9 A. Yes.
- 10 Q. That boy looks, to you, to be approximately
- 11 how old?
- 12 A. Maybe 11 or 12.
- 13 Q. That's how old you were when you were
- 14 sleeping with Michael Jackson; is that right?
- 15 A. Yes.
- 16 Q. Go ahead and flip a couple of more pages, if
- 17 you would.
- 18 You can stop right there, the next page.
- 19 What's the picture on the left show?
- 20 A. Just a young boy who's naked standing on a
- 21 rock.
- 22 Q. His genitalia is prominently displayed in
- 23 that picture; is that correct?
- 24 A. Yes.
- 25 Q. Appears that that child is about the same as
- 26 the other one?
- 27 A. Yes.
- 28 Q. Flip a couple more pages. Please keep 9147

1 going.

- 2 Okay. Stop right there. 3 What's in that two pages, series of two 4 pages? 5 A. There's a boy, about the same age, 11 or 12, 6 who's naked. 7 Q. All right. And in those pictures his 8 genitalia is prominently displayed as well; is that 9 correct? 10 A. Yes.
 - 11 Q. In fact, if you'll take just a second and 12 strum through the balance of that book -- you can do 13 it fairly rapidly, if you would. You don't have to 14 go page by page, but as you wish. 15 Is it true, Mr. Robson, that all of the
- 16 pictures in that book are of boys about the same 17 age?
- 18 A. Yes.
- 19 Q. 10, 11, 12 years old?
- 20 A. Yes.
- 21 Q. And that many of the photographs, if not
- 22 most of the photographs, depicted in that book are
- 23 of boys nude; is that correct?
- 24 A. Yes.
- 25 Q. And in fact, in most of those pictures, the
- 26 genitalia is prominently displayed; is that right?
- 27 A. Yes.
- 28 Q. Would you be concerned with a person who 9148
- 1 possesses a book like that?
- 2 A. No.
- 3 Q. Would you be concerned about having your
- 4 12-year-old child in bed with a person who possesses

5 a book like that? 6 A. No. 7 Q. You would have no such concern? 8 A. No. It's -- to me, it doesn't -- it's not a 9 pornographic book. It's sort of, you know -- I 10 don't know, just a book. 11 Q. I'd like -- and I'd like to show you 12 Exhibit 596, please. Take a moment and look at that 13 book. 14 Let's stop there for a moment. 15 That's the first, in fact, picture in that 16 book; is that correct? 17 A. I didn't notice, no. 18 Do you want me to go to the first picture? 19 Q. You know, no, you can pick any picture, 20 actually. Just go ahead and open the book at 21 random. 22 Right there. 23 A. Oh, sorry. 24 Q. Is it a fact, as you look through that book, 25 what is depicted in that book throughout that book 26 are a series of photographs of two men engaged in 27 sex acts with one another? 28 A. Yes. 9149 1 Q. And in fact, the sex acts are all acts of 2 either masturbation, oral sex or sodomy; is that 3 right? 4 A. From what I saw, yes. 5 Q. And sodomy, as you understand, is an act of 6 anal sex; is that correct? 7 A. Yes.

8 Q. Would you be concerned about a person who

9 possesses that book crawling into bed with a

10 ten-year-old boy?

11 A. Yes, I guess so.

12 MR. ZONEN: No further questions.

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

14 THE COURT: Yes.

15

16 FURTHER RECROSS-EXAMINATION

17 BY MR. MESEREAU:

18 Q. Mr. Robson, I want to show you Exhibit

19 No. 841. It says, "Boys Will Be Boys." Do you see

20 this?

21 A. Yes.

22 Q. Okay. Now, I'd like you to read the

23 inscription on that book, okay? Read it out loud,

24 if you would.

25 A. Okay. "Look at the true spirit of happiness

26 and joy in these boys' faces. This is the spirit of

27 boyhood, a life I never had and will always dream

28 of. This is the life I want for my children. MJ." 9150

1 Q. Having read that inscription and having

2 looked at this book, would you have any concern

3 being in bed with Michael Jackson if you knew this

4 book was found in his home?

5 A. No.

6 Q. Let me show you Exhibit No. 842. Please

7 read out loud the inscription on that book.

8 A. Is that, "To Michael"? Yeah. "To Michael,

9 from your fan. Kiss, kiss, kiss, hug, hug, hug.

10 Rhonda. 1983."

11 Q. You've looked through that book - okay? -

- 12 and it says, "The Boy; A photographic Essay," right?
- 13 A. I didn't look through that book.
- 14 Q. Okay. Why don't you look through this book
- 15 the prosecutor showed you, and please say whether or
- 16 not you would have a problem being in the same
- 17 bedroom with Michael Jackson based upon what you see
- 18 in that book and the inscription.
- 19 A. No.
- 20 Q. Okay. Now, let me show you -- let me show
- 21 you Exhibit No. 596 that the prosecutor showed you.
- 22 Just read the cover, if you would.
- 23 A. "Man, A Sexual Study of Man. Illustrated
- 24 With Photographs and Art Prints."
- 25 Q. Okay. Now, you've seen those photographs,
- 26 and you've said you were somewhat disturbed by the
- 27 pictures, right?
- 28 A. Well, I wasn't disturbed by the pictures. 9151
- 1 Q. Well, if you -- if you read this book, and
- 2 it appeared to be a book dealing with male sexuality
- 3 in all different areas, and you knew that this book
- 4 existed with hundreds of editions of Hustler,
- 5 Playboy, Penthouse --
- 6 MR. ZONEN: I'm going to object as leading.
- 7 Q. BY MR. MESEREAU: -- would that bother you?
- 8 MR. ZONEN: I'm going to object as leading.
- 9 THE COURT: Overruled.
- 10 You may answer.
- 11 THE WITNESS: Can you repeat it?
- 12 Q. BY MR. MESEREAU: Sure.
- 13 Let's assume that you learned that Michael
- 14 Jackson had ten years' worth of Hustler, Playboy,
- 15 Penthouse okay? magazines, heterosexual-type

16 magazines, and let's assume that -- have you ever

17 seen Mr. Jackson's library?

18 A. Yes.

19 Q. How many books do you think are in there?

20 A. Thousands.

21 Q. And let's suppose in the middle of all those

22 books you found, "A Sexual Study of Man, Illustrated

23 With Photographs and Art Prints," okay?

24 A. Yes.

25 Q. Putting all this together, would being in

26 bed with Mr. Jackson concern you?

27 A. No.

28 MR. MESEREAU: No further questions. 9152

1 FURTHER RECROSS-EXAMINATION

2 BY MR. ZONEN:

3 Q. Of course nobody's told you where this book

4 comes from, did they?

5 A. No.

6 MR. SNEDDON: Ron?

7 THE COURT: It's time for the break.

8 MR. ZONEN: It's not quarter to.

9 THE COURT: My bailiff told me.

10 (Recess taken.)

11 MR. MESEREAU: Your Honor?

12 MR. ZONEN: Thank you.

13 MR. MESEREAU: I'm going to object that the

14 questions have become cumulative and there's no

15 foundation for it to go any further.

16 BAILIFF CORTEZ: Your microphone is off,

17 sir.

18 MR. MESEREAU: It's beyond the scope. And

- 19 this is not a character witness.
- 20 MR. ZONEN: I don't recall which question
- 21 he's referring to.
- 22 THE COURT: I'm looking for it myself.
- 23 I don't have a question.
- 24 THE REPORTER: Would you like me to read the
- 25 last question, Judge?
- 26 MR. ZONEN: I'm prepared to start with a new
- 27 question.
- 28 THE COURT: All right. 9153
- 1 Q. BY MR. ZONEN: Mr. Robson, the three books
- 2 that are in front of you that you've already taken a
- 3 look at, I'd like to go back over the inscription
- 4 that -- 842 is a book, and you were asked to read
- 5 that inscription out loud.
- 6 Take a look at that inscription again, would
- 7 you, please?
- 8 A. Do you want me to read it again?
- 9 Q. No, you don't need to read it again.
- 10 Go to the last word, which is the name.
- 11 What is the name on that?
- 12 A. Rhonda.
- 13 Q. Notice anything unusual about the name?
- 14 A. No.
- 15 Q. Do you notice it's written with quotations
- 16 on both sides of it?
- 17 A. Yes.
- 18 Q. Doesn't that usually mean that that's not
- 19 the name when somebody writes it in quotation marks?
- 20 A. Not that I know of.
- 21 Q. Have you ever written your name in quotation
- 22 marks?

23 A. No.

24 Q. That's actually from somebody who's not

25 named Rhonda, right?

26 MR. MESEREAU: Objection; calls for

27 speculation.

28 THE COURT: Sustained. 9154

1 Q. BY MR. ZONEN: The three books I've given

2 you so far to take a look at, they all feature

3 either boys or adult men, predominantly nude, and

4 the one on adult men is engaged in sex acts; is that

5 correct?

6 MR. MESEREAU: I'm going to object; asked

7 and answered. This is cumulative.

8 THE COURT: Overruled.

9 Q. BY MR. ZONEN: I'm going to show you three

10 additional books now, if I could. Let's start with

11 Exhibit 578, if you'll take a look at that one,

12 please.

13 MR. MESEREAU: Same objection. Cumulative;

14 it's not character; it's beyond the scope.

15 THE COURT: Overruled.

16 Q. BY MR. ZONEN: I'll start with the first

17 picture. What do you see right there?

18 A. I see in the center of the picture, it's a

19 drawing. And there's a naked man with his genitalia

20 exposed, and there's kangaroos on either side.

21 Q. Okay. Go ahead and proceed.

22 You can keep going. Just keep going through

23 it.

24 You can stop.

25 What you've seen so far are all pictures of

26 naked men; is that right? 27 A. Yes. 28 Q. And pictures with their genitalia 9155 1 prominently displayed; is that correct? 2 A. Yes. 3 Q. Some of these are bondage pictures, are they 4 not? 5 MR. MESEREAU: Objection; leading. 6 MR. ZONEN: It's cross-examination, Your 7 Honor. 8 MR. MESEREAU: Assumes facts not in 9 evidence. 10 THE COURT: Overruled. 11 Q. BY MR. ZONEN: Is that correct? Like that 12 picture right there? 13 A. Yes. 14 Q. Would you consider this to be homoerotic 15 material? 16 A. Yes. 17 Q. Exhibit No. 590-B, take a look at that, 18 please. Tell us the title. 19 A. "Before the Hand of Man." 20 Q. Go ahead and take a look at the content of 21 that book. 22 That's enough. 23 Pictures of naked young men; is that 24 correct? 25 A. Yes. 26 Q. Would you consider that to be homoerotic 27 material?

28 A. No. 9156

- 1 Q. Why not?
- 2 A. I look at this more as sort of -- it's about
- 3 the photography and it's more of an art book, to me.
- 4 Q. Do you think it's the background setting
- 5 that makes it unique?
- 6 A. Unique?
- 7 Q. Well, they're all naked men in it; is that
- 8 right?
- 9 A. Yes.
- 10 Q. Look at No. 599, if you would.
- 11 You can stop.
- 12 Those are all pictures of boys and men, all
- 13 nude; is that correct?
- 14 A. I didn't see any boys. I saw men.
- 15 Q. How old do you think is the youngest person
- 16 you've seen in this book so far?
- 17 A. Maybe 19. 18, 19.
- 18 Q. Teenaged?
- 19 A. Yeah.
- 20 Q. Okay. They're all about that age or a
- 21 little bit older; is that right?
- 22 A. Yeah.
- 23 Q. Do you think this person is 19?
- 24 A. 18, 19, yeah.
- 25 Q. Okay. And in fact, in each one of them,
- 26 genitalia is prominently displayed; is that correct?
- 27 A. Yes.
- 28 Q. Take a look at this book, please, No. 590-A. 9157
- 1 You can stop here.
- 2 What are you taking a look at? Particularly
- 3 the page you're focused on at the moment, what do

- 4 you see?
- 5 A. There's two naked men and it looks like
- 6 they're about to kiss each another.
- 7 Q. In this book, in fact, each of the pictures
- 8 depict two naked men; is that right?
- 9 A. Yes.
- 10 Q. And in each instance, both of them are doing
- 11 something with one another of a sexual nature; is
- 12 that right?
- 13 A. No.
- 14 Q. They're hugging, they're touching, they're
- 15 caressing?
- 16 A. They're posing.
- 17 Q. They're posing. And they're all naked?
- 18 A. Yes.
- 19 Q. Would you consider this to be homoerotic
- 20 art?
- 21 A. Mind if I look a little more?
- 22 Q. Go ahead.
- 23 A. Yeah, it's -- I don't think it's so erotic.
- 24 It seems more loving in a way, like not so much
- 25 about sex.
- 26 Q. Well, how about the one you just turned to?
- 27 Where is his hand?
- 28 A. Down his pants. 9158
- 1 Q. Okay. You can go ahead and close that one
- 2 right now.
- 3 Mr. Robson, are you concerned about a man
- 4 possessing these seven books being in bed with a
- 5 12-year-old boy?
- 6 A. If it was a man I didn't know, maybe. But
- 7 not Michael.

- 8 Q. Is that because you view Mr. Jackson as
- 9 being, for the most part, asexual?
- 10 A. No.
- 11 Q. Because you believe that he doesn't really
- 12 have a sexual interest?
- 13 A. I believe that he has a sexual interest in
- 14 women.
- 15 Q. Did you know that he possessed these
- 16 magazines?
- 17 MR. MESEREAU: Objection, Your Honor, he
- 18 didn't let the witness complete his answer.
- 19 THE COURT: Sustained.
- 20 MR. MESEREAU: Could the witness complete
- 21 his answer, Your Honor?
- 22 THE COURT: Yes.
- 23 THE WITNESS: I believe that he has a sexual
- 24 interest in women.
- 25 Q. BY MR. ZONEN: In women?
- 26 A. Yes.
- 27 Q. These books don't suggest otherwise?
- 28 A. Not necessarily. 9159
- 1 Q. All right. Let's go to some other side of
- 2 the counter.
- 3 Exhibit No. 575, have you ever seen this
- 4 magazine before?
- 5 A. No.
- 6 Q. Not that specific one. A magazine of that
- 7 nature?
- 8 A. Of that nature, yes.
- 9 Q. Okay. And go ahead and turn through it.
- 10 You can stop there. You don't need to go

- 11 too much further.
- 12 This magazine depicts naked women, or a
- 13 woman in this case, inserting things inside of her;
- 14 is that right?
- 15 A. Yes.
- 16 Q. You would consider this to be very
- 17 graphic --
- 18 A. Yes.
- 19 Q. -- in terms of sexually explicit material?
- 20 A. Yes.
- 21 Q. Exhibit No. 520, tell us the title of that.
- 22 A. "Hard Rock Affair."
- 23 Q. Okay. Go ahead and turn through a few
- 24 pages.
- 25 You don't have to turn any further.
- 26 That magazine depicts graphic sexual
- 27 pictures of a man and a woman engaged in acts of
- 28 intercourse and oral sex; is that right? 9160
- 1 A. Yes.
- 2 Q. You would consider this to be pretty much as
- 3 hard-core as sexually graphic material goes; is that
- 4 right?
- 5 MR. MESEREAU: Objection. Misstates the
- 6 evidence; 352.
- 7 MR. ZONEN: I asked him what he considered.
- 8 THE COURT: Overruled.
- 9 You may answer.
- 10 THE WITNESS: That's as hard-core as it goes,
- 11 is that what you asked?
- 12 Q. BY MR. ZONEN: Yes.
- 13 A. No, not as hard-core as it goes.
- 14 Q. What could be more than that?

- 15 A. I've seen crazy things, crazy bondage
- 16 things, all sorts of stuff.
- 17 Q. You saw the bondage in the last publication;
- 18 is that right?
- 19 A. Yeah, but they weren't really doing
- 20 anything.
- 21 Q. All right. You would consider bondage to be
- 22 at the height?
- 23 A. Yeah. When it gets into, you know, really
- 24 unusual stuff.
- 25 Q. What's the title of this one? The magazine
- 26 that we have here is 522.
- 27 A. "Double Dicking Caroline."
- 28 Q. Go ahead and turn a couple pages. 9161
- 1 Okay. That's fine.
- 2 These are all photographs of a man and a
- 3 woman engaged in pretty much anything a man and a
- 4 woman can do; is that right?
- 5 A. Yes.
- 6 Q. Including acts of intercourse, acts of oral
- 7 sex, and the picture right in front of you, acts of
- 8 anal sex; is that right?
- 9 A. Yes.
- 10 Q. This you would consider to be fairly
- 11 hard-core, would you not?
- 12 A. Yes.
- 13 Q. The title of this one, please? No. 510.
- 14 A. "Stiff Dick Lynn." Or "for Lynn," sorry.
- 15 Q. "For Lynn"?
- 16 A. "Stiff Dick for Lynn."
- 17 Q. Let's get our prepositions right.

- 18 A. Get it right, yeah.
- 19 Q. Go ahead and turn the page, if you would.
- 20 A. I never thought I'd have a room of people
- 21 watching me do this.
- 22 Q. That's enough.
- 23 You would agree that this is a depiction of
- 24 a man and a woman engaged in virtually every
- 25 variation that a man and woman can do with one
- 26 another; is that right?
- 27 A. Yes.
- 28 Q. Sexually. 9162
- 1 The collective material that you have just
- 2 been shown does not cause you a moment of pause when
- 3 you think about the prospect of this person who
- 4 possesses all of this crawling into bed with a
- 5 ten-year-old boy?
- 6 A. No.
- 7 Q. And you would allow a child to crawl into
- 8 bed with such a person?
- 9 A. If I knew the person, yes.
- 10 Q. If you knew them?
- 11 A. Yes.
- 12 Q. Your own child, you'd have no problem
- 13 sleeping with a 35-, 40-year-old man?
- 14 A. If I knew the person well, no.
- 15 MR. ZONEN: No further questions.

16

- 17 FURTHER REDIRECT EXAMINATION
- 18 BY MR. MESEREAU:
- 19 Q. Mr. Robson?
- 20 A. Yes.
- 21 Q. That's your fiancee right there, correct?

- 22 A. Yes.
- 23 Q. You are heterosexual, correct?
- 24 A. Yes.
- 25 Q. You are a close friend of Michael, correct?
- 26 A. Yes.
- 27 Q. By the way, did Michael Jackson ever -- oh,
- 28 I'll ask from there. 9163
- 1 When you were a young child, did Michael
- 2 Jackson ever show you any sexually explicit
- 3 material?
- 4 A. No.
- 5 Q. Did you ever see Michael Jackson show
- 6 sexually explicit material to any child?
- 7 A. No.
- 8 MR. MESEREAU: May I approach, Your Honor?
- 9 THE COURT: Yes.
- 10 Q. BY MR. MESEREAU: Now, let me show you again
- 11 Exhibit No. 841. Do you see that?
- 12 A. Yes.
- 13 Q. And have you had a chance to flip through
- 14 that book?
- 15 A. Yes.
- 16 Q. Okay. Let me show you again Exhibit No.
- 17 596. It says, "A Sexual Study of Man." Do you see
- 18 that?
- 19 A. Yes.
- 20 Q. Have you had a chance to flip through that
- 21 book?
- 22 A. Yes.
- 23 Q. Okay. And let me show you again Exhibit No.
- 24 842, "A boy; A Photographic Essay," okay? And

- 25 that's the one with the inscription, "To Michael,
- 26 from your loving fan, Rhonda," okay?
- 27 A. Yes.
- 28 Q. And have you had a chance to flip through 9164
- 1 that book?
- 2 A. Yes.
- 3 Q. In fact, you see young children with rather
- 4 innocent photographs of young boys, correct?
- 5 MR. ZONEN: I'm going to object as leading,
- 6 Your Honor.
- 7 THE COURT: Overruled.
- 8 Q. BY MR. MESEREAU: Innocent photographs of
- 9 young boys in various situations, right?
- 10 A. Yes.
- 11 Q. Okay. You see a young boy hanging from a
- 12 tree, right?
- 13 A. Yes.
- 14 Q. You see a young boy sitting outside a door,
- 15 right?
- 16 A. Yes.
- 17 Q. See young boys on a beach, right?
- 18 A. Yes.
- 19 Q. Okay. Now, let's go to -- quickly, to the
- 20 material the prosecutor for the government showed
- 21 you, okay? He showed you some magazines with
- 22 heterosexual activity, correct?
- 23 A. Yes.
- 24 Q. Okay. Have you seen one book that depicts
- 25 child pornography in that group?
- 26 A. No.
- 27 MR. ZONEN: I believe there was a Court
- 28 restriction on the use of that word, Your Honor, one 9165

- 1 initiated by the defense. Unless that reservation
- 2 is finished.
- 3 MR. MESEREAU: He's correct. And I made a
- 4 mistake using the word. I'll withdraw it, and I
- 5 apologize.
- 6 THE COURT: All right. The problem is that
- 7 sometimes it's an appropriate word to use and
- 8 sometimes it's not. But the jury's been instructed
- 9 on it. And so if you want to rephrase it, that's
- 10 fine.
- 11 MR. MESEREAU: Okay.
- 12 Q. In those books that the prosecutor for the
- 13 government showed you, you see books about men,
- 14 right?
- 15 A. Yes.
- 16 Q. You see one book that says, "A Study of Male
- 17 Sexuality" and shows some sexual acts between men,
- 18 correct?
- 19 A. Yes.
- 20 Q. And he showed you a number of magazines
- 21 involving sexual activity between men and women,
- 22 correct?
- 23 A. Yes.
- 24 Q. Okay. Has he shown you one book involving
- 25 children having sex?
- 26 A. No.
- 27 Q. Has he shown you one book where a man is
- 28 having sex with a child? 9166
- 1 A. No.
- 2 Q. The prosecutor tried to suggest that Mr.

4 A. Yes. 5 Q. Do you believe he's asexual? 6 A. No. 7 Q. Have you seen Mr. Jackson with women in your 8 lifetime? 9 A. With what kind of woman? A woman that he's 10 in a relationship with? 11 Q. That he's been married to. 12 A. Yeah, with Lisa Marie. 13 Q. When you were at Neverland, did you ever see 14 anything that suggested pedophilia? 15 A. No. 16 Q. Ever see any magazine or poster that 17 suggested pedophilia? 18 A. Never. 19 MR. MESEREAU: No further questions. 20 21 FURTHER RECROSS-EXAMINATION 22 BY MR. ZONEN: 23 Q. Mr. Robson, when did you first learn that 24 Michael Jackson possessed material of the nature 25 that's before you right now? 26 A. Right now I did. 27 Q. All the years that you have known Michael --28 A. Actually, no one's told me where this came 9167 1 from. 2 Q. Assuming this comes from Michael Jackson's 3 residence. 4 A. Assuming it does, this is the first I know. 5 Q. All right. And you had never, ever known 6 that Mr. Jackson collected sexually explicit

3 Jackson is asexual. Do you remember that question?

7 material? 8 A. No. 9 Q. This is something new that you're learning 10 just today; is that right? 11 A. Yes. 12 Q. You're telling us that this would have no 13 effect at all on your belief that this bears on some 14 suitability for him sleeping with ten-year-old boys? 15 A. No. 16 Q. You knew that there were a succession of 17 ten-year-old boys that he slept with, didn't you? 18 MR. MESEREAU: Objection. Misstates the 19 evidence; the Court ruling. 20 THE COURT: Sustained. 21 Q. BY MR. ZONEN: Did you know about other 22 children that he had slept with? 23 A. No. 24 Q. Never? 25 A. No. 26 Q. Did you know that he was sleeping with Brett 27 Barnes? 28 A. No. 9168 1 Q. Did you know that he was sleeping with 2 Macaulay Culkin? 3 A. No. 4 Q. Did you know that he was sleeping with 5 Jordie Chandler? 6 A. No. 7 MR. ZONEN: No further questions. 8

9 FURTHER REDIRECT EXAMINATION

10 BY MR. MESEREAU:

- 11 Q. You actually saw kids sleeping in his room
- 12 from time to time, correct?
- 13 A. Yeah. When he was present as well, yeah.
- 14 Q. And Macaulay Culkin was there as well,
- 15 correct?
- 16 A. Yeah.
- 17 Q. Never saw anything inappropriate happen,
- 18 right?
- 19 A. No.
- 20 Q. Has anything this prosecutor for the
- 21 government has said to you changed your opinion of
- 22 Michael Jackson?
- 23 A. Not at all.
- 24 Q. Does it change your opinion as to whether or
- 25 not he ever did anything inappropriate with a child?
- 26 A. Not at all.
- 27 MR. MESEREAU: No further questions.
- 28 MR. ZONEN: I have no questions. 9169
- 1 THE COURT: Thank you. You may step down.
- 2 Call your next witness.
- 3 MR. MESEREAU: Your Honor, may I remove the
- 4 materials from the witness box?
- 5 THE COURT: Yes.
- 6 THE BAILIFF: Oh, I'll get it for you.