

STATEMENT OF PROBABLE CAUSE NOV 17 2003

GARY M. BLAIR, EXEC. OFFICER

By M. Hanson
M. HANSON

Identification and Expertise of Affiant:

Your Affiant, Paul Zelis, has been regularly employed as a law enforcement officer by Santa Barbara County for ten years. Your Affiant started his career with the Santa Barbara County Marshal's Office in May of 1993. He became a Sheriff's Deputy with the County of Santa Barbara in late 1996 when the Marshal's Office consolidated with the Sheriff's Department. During this time period, your Affiant has investigated numerous property crimes and crimes against persons, including burglary, child molest, theft, assault, domestic violence, narcotic and drug violations. As a result of these investigations, your Affiant has made hundreds of arrests for the various crimes.

Your Affiant has attended the basic law enforcement training academy and possesses the Basic and Intermediate P.O.S.T Certificates. Your Affiant has attended specialized courses, including Homicide Investigation (80 hrs.), and Sexual Assault Investigation (40 hrs.). Your Affiant attends regular in-service training.

Your Affiant has been a detective for the past two years with the Criminal Investigations Division, and has acted and received the information set forth in this affidavit in that capacity. The following is a synopsis of events, individuals and timeframes set forth in the more detailed account of the investigation, which your Affiant believes establishes probable cause for the issuance of the requested search warrants for several locations and the arrest warrant for Michael Joe Jackson.

Introduction

1 The individual referred to in the affidavit as "Michael" or "Michael Jackson" is the well-
2 known singer and dancer, whose residence in Santa Ynez, Santa Barbara County is
3 commonly known as the "Neverland Ranch."

4 The victims in this case are GAVIN ANTON ARVIZO, now almost 14 years old
5 ("Gavin"), STAR DAVID ARVIZO, his younger brother ("Star," now almost 13 years old),
6 DAVELLIN ARVIZO, his older sister, now 17 ½ years old, and their mother JANET
7 VENTURA-ARVIZO ("Mrs. Arvizo"), all residents of East Los Angeles.

8
9 In numerous instances, the victims' accounts set forth in this affidavit refer to several
10 individuals collectively as "Jackson's people." They are referred to individually as
11 "Vinnie," "Frank," "Deiter," and "Ronald." Vinnie's driver's license was provided to
12 affiant from Mrs. Arvizo, along with a forged letter authorizing boys' release from
13 Burroughs Middle School for their placement in an Arizona school, which she got from
14 the school. It reveals Vinnie to be Vincent Amen. Frank's last name is believed to be
15 Tyson. Deiter's last name is Wiesner. Ronald's last name is Konitzer.

16
17 The events that triggered the Santa Barbara Sheriff's Department's investigation that
18 led to the request for this search warrant began in the year 2000 when Gavin, then 10
19 years old, was diagnosed with cancer and hospitalized for an extended period of time
20 for several operations and follow-up treatment. While hospitalized, Gavin was
21 contacted by Michael Jackson. A friendship between Michael and Gavin was created
22 through numerous telephone calls.

23
24 After his release from the hospital and over the next two years, Gavin and his family
25 were invited and accepted invitations to stay at Michael Jackson's Neverland Ranch in
26 Santa Barbara County. Almost from the beginning of their several stays at Neverland
27 Ranch, Gavin consistently, and Star on many occasions, slept in Michael Jackson's
28 bedroom while the remainder of the family stayed in separate guest quarters on the
29 ranch.

30

1 In September 2002, a Jackson representative contacted them and Jackson then invited
2 the children to come to Neverland Ranch for a visit. When the children arrived they
3 were greeted by Michael Jackson and participated in the filming of a portion of the
4 "Living with Michael Jackson" video production later shown on both English and
5 American TV. Gavin was the main focus of that segment of the film.

6
7 What prompted the events that followed was the publicity and outrage created by the
8 British Broadcasting Company's broadcast of "Living with Michael Jackson," in which
9 Jackson admitted sleeping with children and, specifically, with Gavin. The show was
10 aired in England on February 3, 2003 and in the United States on February 6th.

11
12 Jackson's response to the public outrage it generated was to request the Arvizo family
13 fly to Miami, Florida to participate in a press conference to support him. The trip was
14 made. However, there was no press conference and the family was held virtual
15 prisoners in the Miami hotel for two and a half days until they were flown back to
16 California and taken to the Neverland Ranch. Thereafter the family, particularly the
17 children, was not allowed to leave the ranch without one of the Jackson people with
18 them.

19
20 It was during the Miami hotel stay that Michael Jackson first started providing alcoholic
21 beverages in Diet Coke cans to Gavin and, later, to Star and Davellin. He continued to
22 provide alcohol to the children on numerous instances until they left the Ranch in mid-
23 March of 2003.

24
25 Your Affiant believes that the more detailed investigative results set forth in this
26 affidavit provides reasonable and probable cause to believe that Gavin was molested
27 within the meaning of Penal Code section 288 by Michael Jackson. The molestations
28 involve multiple instances of Jackson's masturbating Gavin in his Neverland Ranch
29 bedroom. Gavin describes at least five instances of masturbation occurring between
30 February 7 and March 10, 2003. There are at least two other instances detailed in the

1 affidavit, occurring within that period, in which Star observed Jackson with his hand
2 down the front of Gavin's pants, in the area of his penis, while Jackson was
3 masturbating himself. On those two occasions, Star believes Gavin to have been
4 passed out on Jackson's bed in the upstairs bedroom. Almost all the instances of the
5 molestations occurred after Jackson had provided alcohol to Gavin.

6
7 Furthermore, during this same time period the investigation disclosed that several
8 Michael Jackson employees conspired to falsely imprison Mrs. Arvizo and her three
9 children at the Neverland Ranch, as "false imprisonment" is defined by Penal Code
10 section 236. Their repeated requests to leave were met with repeated denials, a
11 pattern of intimidation and threats, and a series of verbal confrontations. Mrs. Arvizo
12 was repeatedly told that she and her children could not leave until she agreed to allow
13 the children to participate in the making of a film saying what a great person Michael
14 Jackson was. Finally, on February 20th, she agreed. The children were taken to the
15 residence of Hamid Moslehi in West Hills, and around 2:00 a.m. in the early morning
16 hours of February 20, 2003, the film was made. But instead of allowing the family to go
17 free as promised, they were taken back to the Ranch and not allowed to leave.

18
19 Between February 20th and the eventual escape on March 10, 2003, employees and
20 representatives of Michael Jackson told Mrs. Arvizo and the children that they were
21 going to be moved to Brazil. They were taken by Jackson representatives to the
22 Federal Building in Los Angeles to procure passports and to the Brazilian Consulate to
23 get visas. Eventually, around March 10th, Mrs. Arvizo was able to create a ruse which
24 enabled her to obtain the release of her children from Neverland Ranch.

25
26 **Characteristics of persons involved in sex crimes against children:**

27
28 As a result of the training and experience outlined above, your Affiant has learned that the
29 following characteristics are generally found to exist in varying combinations and be true in
30 cases involving people who molest children – "pedophiles."

1
2 Pedophiles are persons whose sexual objects are children. They receive sexual
3 gratification and satisfaction from actual physical contact with children and from fantasy
4 involving use of pictures, other photographic or art mediums and writings on or about
5 sexual activity with children. Pedophiles may collect sexually explicit materials consisting of
6 photographs, magazines, motion pictures, video tapes, books and slides depicting juveniles
7 or youngish-looking adults, which they use for their own sexual gratification, fantasy and for
8 displaying to potential victims.

9
10 Sexually explicit materials, including those listed above, may be used by pedophiles to
11 lower the inhibitions of children, sexually stimulating children and themselves, and for
12 demonstrating the desired sexual acts before, during and after sexual activity with children.
13 Pedophiles rarely, if ever, dispose of their sexually explicit materials, especially if it is used
14 in the seduction of their victims. Pedophiles often correspond with or meet with one
15 another to share information and identities of their victims, and as a means of gaining
16 status, trust, acceptance and psychological support. Pedophiles rarely destroy
17 correspondence received from other people with similar interests unless they are
18 specifically requested to do so. The majority of pedophiles prefer contact with children of a
19 particular sex as well as a particular age or developmental range, the combination of which
20 is peculiar to each individual pedophile. The photos and/or videos described above are
21 kept to re-live fantasies or actual encounters with the depicted children. To reduce the
22 chance of discovery, pedophiles may maintain and run their own photographic production
23 and reproduction equipment. This may be as simple as the use of "instant" photo
24 equipment such as Polaroid cameras and home video equipment, or as complex as a
25 completely outfitted photo lab. Pedophiles often go to great lengths to conceal their
26 collections of erotic materials and protect them from discovery, theft and damage.

27
28 Pedophiles often collect, read, copy or maintain names, addresses, phone numbers or lists
29 of persons who have similar sexual interests. These may have been acquired by personal
30 contact or through advertisements in various publications. These contacts are maintained

1 as a means of personal referral, for exchange and for commercial profit. Pedophiles often
2 correspond with other pedophiles through the use of computerized bulletin boards and the
3 Internet. The names of such contacts may be maintained by preservation of the
4 publications in which they appeared, in phonebooks or notebooks, in computer hard or soft
5 ware, or merely on scraps of paper. Vast quantities of child pornography may also be
6 stored on electronic media such as computer hard drives, computer diskettes, magnetic or
7 digital tape, and computer CD-ROM disks.

8 Pedophiles often keep the names of children they are involved with or with whom they have
9 had sexual contact. They maintain these names in much the same manner as described in
10 the preceding paragraph, and for much the same reasons.

11
12 Pedophiles often maintain diaries of their sexual encounters with children. These accounts
13 of their sexual experiences are used as a means of reliving the encounter when the
14 offender has no children to molest. Such accounts may be set out in a notebook, or on
15 scraps of paper, or in a formal diary. Depending upon the resources available to the
16 offender, they may be contained on audio tape or electronic entries into a "home
17 computer".

18
19 Pedophiles often cut pictures of children out of magazines, newspapers, books, and other
20 publications, which they use to facilitate fantasy relationships. These pictures help the
21 investigator to identify the age and sexual preference of the person under investigation.

22
23 Pedophiles may use sexual aids such as dildos, fashioned after a man's penis and of
24 various sizes and shapes, in the seduction of their victims. They often utilize these as a
25 means of exciting their victims and of arousing the curiosity of the children.

26
27 Pedophiles may collect and maintain books, magazines, articles, and other writings on the
28 subject of sexual activity. These books and materials may be on the topics of human
29 sexuality and sexual education or consist of sex manuals discussing or showing various
30 sexual acts, positions, or sexual activities. These books and materials are used as a

1 means of seduction of the victim by arousing curiosity, demonstrating the seeming propriety
2 of the desired acts, explaining or demonstrating what the offender desires to be done, and
3 as a means of sexual arousal on the part of the offender, particularly when naked children
4 are shown or depicted in the materials.

5
6 Pedophiles often use drugs as a means of inducement to get a child to a particular location
7 such as the offender's home. Alcohol is also used in this fashion. Both drugs and alcohol
8 are also used as a means of seduction, reducing the child's inhibitions for sexual
9 excitement.

10
11 Pedophiles often collect and maintain artifacts, statues, paintings or other media which
12 depict children or young persons in nude poses or sexual acts. These are kept or "left" in
13 places where the victims can find or "discover" them.

14
15 Pedophiles may maintain and keep things of interest to their victims. They may consist of
16 magazines, books, and toys for the age level of the victims they desire to attract, and may
17 be as complicated as video games, toy train sets, and computers.

18
19 Pedophiles may keep mementos of their relationship with specific children as a means of
20 remembrance. The mementos may consist of underwear or other garments or things that
21 are unique to the relationship they had with the child.

22
23 Pedophiles may obtain, collect, and maintain photographs of the children they are or have
24 been involved with. These photos may depict children fully clothed, in various stages of
25 undress or totally nude, and in various activities, not necessarily sexually explicit. These
26 photos are rarely, if ever, disposed of and are so treasured that they are often kept upon
27 the individual's person, in wallets and like containers. If a picture of a child depicting the
28 child in the nude is taken by a pedophile, there is a high probability the child was molested
29 before, during, or after the photo-taking session because the act of posing the child is such
30 a great sexual stimulus for the pedophile.

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Narrative:

Your Affiant was assigned to investigate this case on June 13, 2003, when Lt. Jeff Klapakis informed me that he had just spoken with Larry Feldman, an attorney, who indicated that he had been retained by Mrs. Arvizo's family.

Lt. Klapakis explained to me that the Arvizo family had been interviewed by Los Angeles Child Protective Services (CPS) in February, 2003, regarding Michael Jackson's televised admission he allowed children to sleep in his bed. At that time, the family did not disclose any wrongdoing by Michael Jackson and the case was closed.

Your Affiant has read and reviewed the April 10, 2003 Santa Barbara County Sheriff's Department report of Detective Terry Flaa, documenting his March 10, 2003 conversation with Los Angeles County Child Protective Services worker Brenda Blackburn. In that interview, Ms. Blackburn read, word for word, a report summarizing the February 20, 2003 interview of the Arvizo family members by her colleagues, Social Workers Peters, Bowen and Walker in Los Angeles. Ms. Blackburn's rendition of the report was tape-recorded and transcribed.

The initial interview was with Mrs. Arvizo and focused on allegations of her general neglect of her children. During this portion of the interview Mrs. Arvizo recounted her abusive relationship with her ex-husband, her efforts to provide for the children, their extra-curricular activities and Gavin's cancer history and current status.

The conversation then focused on the Michael Jackson child abuse allegations. The following are verbatim excerpts from the transcribed report (with Davellin's name correctly spelled):

1 On 02-20-03, CSW Peters, CSW Bowen and SCSW Karen Walker responded to
2 an immediate referral with allegations of general neglect by mother, Janet
3 Ventura, and sexual abuse by Michael Jackson, 'a well known public figure.'
4 CSW went to the home of a family friend named Major Jackson, located at 450
5 S. St. Andrews Place in Los Angeles, California, zip code 90020. . . . [U]pon
6 arrival at the location of 450 St. Andrews Place, CSW Peters, CSW Bowen and
7 SCSW Walker were met and greeted by mother Janet Ventura and minor
8 children Gavin, Star and Davellin Arvizo. Also present at this time was one of
9 Michael Jackson's security guards, a family friend and her child. Mother Janet
10 Ventura appeared to be somewhat anxious and was eager to state that she
11 needed some support, therefore, she requested that her friends be present
12 during the interviews. Mother immediately went over to the VCR and started to
13 play a video. The video consisted of Michael Jackson and Gavin at Neverland.
14 The video pictured a walk around the grounds of Neverland with Michael
15 Jackson and Gavin. It showed Michael and Gavin riding on a train, sitting on a
16 blanket, watching the swans on the lake. After the video was played, SCSW
17 Walker requested that all parties who were not involved with the referral leave
18 the premises due to confidentiality of the [inaudible]. Mother Janet became
19 somewhat agitated, but she felt that the friends were part of the family. Mother
20 also stated that the security guard was there to protect the family because of all
21 the media hype and harassment that her family has had to endure since the
22 airing of the Michael Jackson's interview on 02-06-03. Mother continued to state
23 that she needed some support during this process. CSW Peters, CSW Bowen
24 insured that the family there [sic; assured the family there?] was no need to be
25 afraid and all of the information was confidential."

26
27 "[Mrs. Arvizo] [']Michael is like a father to my children. He's like family. Michael
28 gives advice to my children and that is something that they have never had with
29 their father. He loves them and I trust them with him.['] . . . Mother further
30 states Michael was an important part of Gavin's recovery from cancer. . . .

1 Question: [']Were you aware that Gavin and Star slept in bed with Michael
2 Jackson, according to the broadcast?['] Response: [']My children are never
3 solely alone with Michael Jackson. There's always someone around. When we
4 go to Neverland, we're always around people. Sometimes I stay in the visitor's
5 quarters, but mostly I am in the main house. Gavin, Star and Davellin have all
6 been in Michael's room. Yes, Gavin and Star have been with Michael on his bed
7 watching TV. As to the allegations that they share a bed, it is no. . . . I'm
8 usually up walking around the house all night long. The room is open and there
9 are no doors to shut. It makes me sick that someone accuses Michael of doing
10 harm to my son and other children, when he has never been anything but
11 wonderful. . . . I was not aware that the taping with Mr. [Brashir] would be aired.
12 We did not sign any consent to have my children on this interview.['] . . . She
13 also denied any knowledge of knowing that Michael Jackson slept in bed with
14 her children Gavin and Star. . . .

15
16 "Gavin is a 13 year old boy that appears to be within the normal range of
17 development. He is of average size and weight. . . . He was polite and
18 respectful and appeared to enjoy the attention. Question: [']What is your
19 relationship with Michael Jackson?['] [Answer:] [']Michael has been like a father
20 to me. He has been there for me. I met Michael about three years ago. . . .
21 Michael has been by my side through it all. I have gone to Neverland on several
22 occasions. I like it there. You could be free and feel like there is no care in the
23 world. When I go to Neverland, Star and Davellin are with me. . . . Michael
24 sends his staff to get my family and we have a ball. . . . Since the airing of the
25 Michael Jackson broadcast, I have not felt comfortable. I was in the gas station
26 and some kids came up to me and asked if I was the boy on TV that slept with
27 Michael Jackson. Everywhere we go there's always people staring at us. . . .
28 Mr. Bashir did not get my consent from my mother. My mother thought this
29 taping was private like the previous one.['] Question: [']What happens when you
30 spend the night at Neverland?['] [Answer:] [']Usually when I visit Neverland, we

1 eat, play video games, ride to the park and watch movies. Sometimes we have
2 slumber parties and everyone sleeps in the room.['] SCSW Karen Walker asked
3 Gavin if anyone has ever touched him in a way that was inappropriate. Gavin
4 became upset and said that [']people think that something's happened sexually
5 between Michael and I. That's not true. Michael's like a father to me and he has
6 never done anything to me sexually. My mother has been there at Neverland
7 with me and always comes in and out of the room to see how we are doing.
8 . . .['] Question: [']Have you ever slept in a bed with Michael Jackson?[']
9 [Answer:] [']No, I've never slept in a bed with Michael Jackson. Sometimes my
10 brother and I fall asleep in a bed with Michael Jackson. Sometimes my brother
11 and I fall asleep on the bed with our pajamas or our clothes on. Everybody
12 sleeps in Michael's room together because it's so big. Nothing has ever
13 happened. My mother is always aware of what goes on in Neverland.['] Child
14 Gavin denied all the allegations of sexual abuse of Michael Jackson. He denied
15 that he'd ever slept in bed with Michael."

16
17 "Star is a 12 year old boy who is somewhat large for his age. He appears
18 healthy and well cared for in both dress and hygiene. . . . Question: [']What is
19 your relationship with Michael Jackson?['] [Answer:] [']Michael is like a father to
20 me. He listens to me and gives me advice. . . . When we go to Neverland, it
21 makes me real happy. We have fun with Michael, we all give each other
22 nicknames. My name is Blow Hole, like the fish. . . .['] Question: [']What
23 happens when you spend the night at Neverland?['] [Answer:] [']When we go to
24 Neverland we usually ride to the park, play video games and watch movies.
25 There's always something to do. When we stay overnight at Neverland,
26 sometimes we are in Michael's room watching TV. . . . We fall asleep with our
27 pajamas or clothes on. My mother is there. When we are in Michael's room, we
28 are never left alone.['] Question: [']Have you ever slept in a bed with Michael
29 Jackson?['] [Answer:] [']I have slept in Michael's bed before, when I fell asleep
30 after watching TV. No, I've never slept in the bed with Michael Jackson. If

1 Michael is in the room, he will make a bed on the floor.['] Child Star denied all
2 allegations of sexual abuse on Michael Jackson. He denies that he has ever
3 slept in bed with Michael Jackson.”
4

5 “Davellin is a 16 year old girl that appears healthy and well cared for in both
6 dress and hygiene. She attends Roosevelt High School and is an honor
7 student. Davellin appears to be a happy child. Question: [']What is your
8 relationship with Michael Jackson?['] [Answer:] [']Teary eyed Michael is
9 like a father to all of us. He has provided us with guidance. He is so kind and
10 loving. . . . My mother has always been with us and I've never seen Michael do
11 anything sexually inappropriate with Gavin or Star.['] [Question:] [']What
12 happens when you spend the night at Neverland?['] [Answer:] [']When we go to
13 Neverland, we go and relax. There's so many things to do. We usually go to
14 the media room and watch movies and eat candy. Most of the time I take a
15 girlfriend with me to keep me company. We stay in the room down the hall in the
16 main house. My mother always knows what's going on when she is at Neverland
17 with us.[']”
18

19 Lt. Klapakis told me Attorney Feldman sent the Arvizo children to Dr. Stan Katz, a
20 psychologist, for an evaluation. During the evaluation, Dr. Katz obtained some
21 disclosures he was mandated to report to law enforcement. The disclosures included
22 the following:
23

- 24 • Michael Jackson provided alcohol to the children;
 - 25 • Jackson showed the boys pictures of nude women;
 - 26 • Jackson allowed the boys to sleep with him in his bed;
 - 27 • Jackson inappropriately touched the boys through their clothing.
- 28

1 Lt. Klapakis assigned this case to me and instructed me to telephone Dr. Katz so that
2 he could report the disclosures in greater detail. On Friday, June 13, 2003, I
3 telephoned Dr. Katz.

4
5 Dr. Katz explained to me that the children were referred to him by an attorney. Dr. Katz
6 told me that he is a forensic and clinical psychologist and that he specializes in child
7 sexual abuse. He said he was with Children's Hospital in Los Angeles and Children's
8 Institute for many years.

9
10 Dr. Katz told me that he interviewed the three Arvizo children and their mother. He
11 said the information was very complex and it includes allegations of sexual abuse,
12 endangering, threats, and sort of false imprisonment. Each was interviewed
13 separately.

14
15 Dr. Katz began by giving me the personal identifying information of the three Arvizo
16 children. He explained there are two boys and one girl, and he gave me their names.
17 Dr. Katz told me it is his professional opinion that the kids are credible, although he
18 said Davellin, the 17-year-old sister, doesn't know too much about what happened.

19
20 Dr. Katz explained that 13-year-old Gavin has a very rare form of cancer, but is
21 currently in remission. He has only one kidney and that kidney is at high risk. He said
22 alcohol is a very significant threat to his medical health.

23
24 Dr. Katz said the children had problems giving specific dates and times, but they placed
25 the events as occurring some time within a three- to six-week period after the airing of
26 the television show "Living with Michael Jackson." He said the family was taken to
27 Miami the day before the television show aired in the United States.

28
29 Dr. Katz stated that in his conversation with 12-year-old Star, they focused on what Star
30 was 100% sure of. Dr. Katz told me that both Star and Gavin reported that Michael

1 gave Gavin alcohol on one night in Miami and, on the private plane flight back from
2 Miami, Michael gave both Star and Gavin alcohol. Michael would usually pour red
3 wine in Diet Coke cans and give it to them. When Gavin would tell Michael he was not
4 supposed to have alcohol, Michael would tell him he would be fine and not to worry
5 about it. Star told Dr. Katz that Michael gave him a can of Diet Coke containing red
6 wine. He tasted it and he knows what red wine tastes like. Star disclosed that on the
7 same airplane flight back from Miami, Gavin had fallen asleep with his head on
8 Michael's chest. Star said he was sitting in a position to see Michael licking Gavin's
9 head. He said Michael was awake and Star knew that he (Michael) was drunk.

10

11 Star disclosed that upon returning from Miami, the children and the mother stayed at
12 the Neverland Ranch. During this three- to six-week period after the TV show while at
13 Neverland Ranch, he and Gavin continuously slept in Michael's room. Michael and
14 Gavin would always sleep in the bed and Star would usually sleep on the floor and
15 once in a while on the bed. Michael always wanted Gavin to sleep in his room, but
16 didn't really want Star around. Gavin, however, insisted that Star stay.

17

18 Star said Michael would offer them red wine, which Michael would call "Jesus juice,"
19 every night. Star also said that one of Jackson's guys by the name of Frank told him
20 that if he told anyone about the alcohol, they would kill them and their parents. Star
21 also disclosed that Michael Jackson often talked about sex. He talked about
22 masturbation and nudity. Michael talked about ejaculation and showed Star and Gavin
23 adult nude women on the computer and also in magazines. Michael asked if they
24 "jacked off" (masturbated) and if "white stuff" came out. Michael asked them if they
25 wanted to learn how to "jack off."

26

27 Star told Dr. Katz that Michael was naked one time in front of them. Michael walked
28 into the bedroom, then stopped to talk to them. He was completely nude.

29

1 Dr. Katz reported Star disclosed that on two occasions, he saw Michael place his hand
2 on Gavin's crotch on top of his clothes. Star said Gavin was passed out in bed from
3 drinking too much. He said Michael and Gavin were both on top of the covers. He
4 described Michael as wearing a T-shirt and briefs. Star said Michael was on his back,
5 with his legs open and right hand inside his briefs. He said Michael had an erection
6 and was rubbing himself while his left hand was on Gavin's crotch.

7
8 Star disclosed that on a different occasion he saw Michael get into bed and rub his
9 private part against Gavin's "butt." He said Michael kissed Gavin on the cheek and
10 touched Gavin's butt. Star did not say whether Michael or Gavin were clothed.

11
12 Star informed Dr. Katz that Michael has a girl mannequin in the bedroom. Star once
13 observed Michael "hump" the mannequin. He couldn't recall if Michael was clothed or
14 not.

15
16 Star told Dr. Katz that on one occasion while at the Ranch during their stay, he was in a
17 golf cart with Michael. Michael placed his hand on Star's penis, on top of his pants.
18 Star also said that Michael had touched his "butt," and he saw Michael touch Gavin's
19 "butt" a lot, on top of his clothes. He said Michael kissed Gavin a lot on the cheek and
20 also hugged him a lot.

21
22 Dr. Katz then discussed Gavin's interview. Gavin is 13 years old and Dr. Katz
23 described him as very emotional and scared. Dr. Katz said he purposefully did not
24 push Gavin too hard for more information, or more details. Gavin told Dr. Katz he was
25 scared that people would tease him if this comes out and he is very frightened that a
26 crazed fan of Michael's will try to kill him. Dr. Katz told me he thought Gavin was really
27 honest and forthcoming. He thought that Gavin may feel on some level that he is
28 betraying his friend.

29

1 Dr. Katz said Gavin told him of an airplane flight back from Miami, during which he was
2 given alcohol by Michael. Michael gave him a very expensive watch and told him not to
3 tell anybody about the drinking. Michael told him that the watch was worth \$75,000.

4
5 Gavin disclosed to Dr. Katz that during their stay at Neverland Ranch after the Miami
6 flight, he drank alcohol every night and got "buzzed." Gavin said he told Michael that
7 he was not supposed to drink, but Michael replied he would "be just fine." Michael
8 gave Gavin wine in Diet Coke cans. Gavin reported that his head would hurt afterward.
9 Michael would tell Gavin he (Gavin) was "stressed out" and told him to keep drinking.
10 The alcohol included whiskey, vodka and Bacardi rum. Gavin added that Michael also
11 would have Star drink.

12
13 Also, during a visit to Neverland Ranch, Michael gave him a laptop computer. They
14 connected the laptop to AOL and Michael started looking for naked women. Gavin
15 was shown pictures of naked women on the computer screen. Michael told him and
16 Star not to tell anyone and to say they were watching the Simpson's.

17
18 Gavin reported that Michael would hug him frequently, would stroke him, touch him,
19 kiss his head and kiss his cheek over and over again. Gavin said he saw Michael
20 naked one time. He explained that they (Gavin and Star) were watching TV and
21 Michael just stood there naked for a moment.

22
23 Gavin said that Michael Jackson talked to them a lot about masturbation. Michael
24 would tell them that he had to masturbate or he'd go crazy. Michael would ask if Gavin
25 touched himself and if white stuff came out of his penis. Michael told Gavin that he
26 would tell Gavin how to masturbate. Dr. Katz told me that he then asked Gavin if
27 Michael ever demonstrated it (masturbation), and Gavin started crying and didn't want
28 to talk about it.

1 Dr. Katz said his interview with Davellin Arvizo revealed that she was mostly excluded
2 from Michael Jackson's and they didn't want her around. She did say that on one
3 occasion while they were at the Neverland Ranch after the trip to Miami, she entered a
4 room in Michael's house and saw Michael pouring wine into a cup. He gave her some
5 wine. She also mentioned seeing Michael kissing Gavin on the cheek, hugging,
6 always rubbing him, and always readjusting his shirt.

7
8 Dr. Katz told your Affiant that based on his conversation with Janet Arvizo, there is also
9 reason to believe that the family may have been imprisoned at Neverland Ranch and
10 not allowed to leave. She related that the Jackson employees got them passports and
11 were moving them around. Dr. Katz explained that the mother has a lot of anxiety
12 about this and is really scared. He learned from the family that after the program
13 aired, Jackson's employees arranged for the production of a video tape in which they
14 were made to say, "He's a father figure to me. He's great. He's never done anything
15 bad."

16
17 Dr. Katz told me that in terms of his reporting duties, he thinks there is reasonable
18 suspicion to believe that the Arvizo boys were endangered and possibly fondled.

19
20 This concluded my conversation with Dr. Stan Katz.

21
22 On Sunday, July 6, 2003, your Affiant and Detective Sgt. Steve Robel met with Mrs.
23 Arvizo's family, who were staying at a local hotel in Goleta. The meeting had been
24 arranged by Sgt. Robel and Janet Arvizo. It had been agreed that we would interview
25 Mrs. Arvizo first to get background history for the investigation. We transported Mrs.
26 Arvizo to Sheriff's Headquarters in Santa Barbara. Gavin, Star and Davellin remained
27 at the hotel.

28
29 At approximately 1500 hours on Sunday, July 6, 2003, your Affiant and Sgt. Robel
30 interviewed Janet Arvizo. During the interview, Mrs. Arvizo was very detailed about

1 events but could not remember exact dates. Sometimes she could only recall that a
2 given event happened in a particular month. At other times she could recall only the
3 season in which the event occurred.
4

5 Mrs. Arvizo began by telling us that her son Gavin is in remission from an unknown
6 type of cancer. He lost his left kidney, his spleen, and multiple lymph nodes. The
7 doctors removed a 16-pound tumor from him. The cancer increased to Stage Four
8 terminal cancer in both of his lungs. Gavin received extensive chemotherapy for almost
9 a year and was not expected to live. His right kidney is currently malfunctioning and he
10 has to take medication.
11

12 Mrs. Arvizo said she is not exactly sure how Michael Jackson came to be in contact
13 with Gavin. She said either Carroll Lamir (unknown spelling) or Jamie Masada
14 arranged for Michael to call Gavin at the hospital. Mrs. Arvizo explained that Carroll
15 Lamir had taught her children tap dance, and that Jamie Masada is the owner of the
16 "Laugh Factory" in Hollywood. She said her children had previously attended a "Laugh
17 Camp" sponsored by the Laugh Factory where they met Jamie Masada. I subsequently
18 learned that Mrs. Arvizo said Gavin had wanted to meet Michael Jackson and other
19 stars. She believes he requested to meet Adam Sandler, Chris Tucker, Michael
20 Jackson and possibly Jim Carey.
21

22 Mrs. Arvizo was unsure of the exact date Michael first called Gavin at the hospital, but
23 said it was shortly after Gavin was diagnosed with cancer in June, 2000. Mrs. Arvizo
24 told us that Gavin and Michael Jackson had long phone conversations and that Michael
25 called him repeatedly at the hospital. When asked how many calls Michael had made
26 to Gavin, Mrs. Arvizo said he called almost daily.
27

28 Mrs. Arvizo said that sometime in August, 2000, Michael Jackson invited Gavin and the
29 whole family to Neverland Ranch. At that time she was still together with David Arvizo,
30 her husband. She, Mr. Arvizo, Gavin, Star and Davellin all stayed at the Neverland

1 Ranch for several days. Michael sent a car to pick the family up in Los Angeles.
2 During their stay at Neverland, Mr. and Mrs. Arvizo and Davellin stayed in a guest
3 house. Gavin and Star both stayed with Michael in his bedroom. She did not know if
4 Gavin and Star slept on the floor or in Michael's bed at that time. During the first visit
5 Michael gave Gavin a laptop computer as a gift. She also met Frank (later identified
6 as Frank Tyson), who was introduced to her as a long-time friend of Michael's. She
7 described Frank as Michael's personal assistant, who told her he conducted "damage
8 control" for Michael.

9
10 On November 17, 2003, your affiant met with District Attorney Tom Sneddon. Mr.
11 Sneddon related to your Affiant that on Saturday, November 15th, around 11:30 a.m.,
12 he talked to Mrs. Arvizo. She told Mr. Sneddon that the term "damage control" was
13 used by Frank, Deiter, Ronald and Vinnie at various times to describe their role with
14 Michael Jackson.

15
16 In the July interview, Mrs. Arvizo said that in October, 2000 Michael Jackson also gave
17 Gavin a white Ford Bronco as a gift. Since Gavin was too young to drive, she drove
18 the truck as a family vehicle. They had the Bronco until the summer of 2001 when it
19 began having mechanical problems. She called the Jackson organization and they
20 said they would take care of it. Gary (unknown last name), who is a driver for Jackson,
21 picked up the Bronco in Los Angeles and it was never returned. Mrs. Arvizo had
22 pictures of the Bronco and retained the DMV registration. She said the Bronco
23 pictures and registration were among items of their property later placed in a storage
24 unit obtained by Jackson's people under the name of "Brad Miller."

25
26 Mrs. Arvizo said that in the spring or summer of 2001, a key popped off the keyboard of
27 the laptop computer Michael Jackson had given to Gavin. When Gavin told Michael
28 about it, Michael said to send it back and it would be fixed. Mrs. Arvizo mailed the
29 laptop computer back to Michael Jackson. It was never returned.

30

1 Mrs. Arvizo told us that Michael Jackson was in phone contact with Gavin a lot during
2 this time period. She said they would talk on the phone for hours at a time.

3
4 Mrs. Arvizo explained that in the summer of 2001, Michael Jackson became upset with
5 her because Michael wanted Gavin to come to Neverland alone and Mrs. Arvizo would
6 not allow it. She said she had set the condition that all three of her children should go
7 to Neverland or none at all. Michael was also upset because she complained that his
8 phone conversations with Gavin were too long. Mrs. Arvizo believes this was
9 Michael's motivation for not returning the Bronco and laptop.

10
11 Sgt. Robel asked Mrs. Arvizo when her children next visited with Michael at Neverland
12 after the first visit in August, 2000. Mrs. Arvizo said Mr. Arvizo took the kids back to
13 Neverland Ranch sometime before December, 2000. She did not go with them at this
14 time. Mr. Arvizo also took Gavin to the Universal Studios Hotel to meet with Michael
15 shortly before Christmas, 2000, and again she did not go. Michael Jackson gave
16 Christmas gifts to Gavin. Only Gavin received gifts from him. The only gift she can
17 remember was a Play Station 2 or Nintendo 64 with video games.

18
19 Mrs. Arvizo said Gavin also got to meet Chris Tucker, the comedian and movie actor,
20 and his fiancée, Aja. Gavin first met Tucker soon after meeting Michael Jackson.
21 Mrs. Arvizo liked Chris Tucker because he would invite all three of her kids to
22 Nickelodeon and the theater. Mrs. Arvizo believes Chris Tucker and Michael Jackson
23 met each other through their shared relationship with Gavin.

24 Mrs. Arvizo told us that she separated from David Arvizo in May, 2001, because he
25 physically abused her and the children. She showed us a copy of a restraining order
26 filed in Los Angeles that prohibits Mr. Arvizo from contacting her and the children.

27
28 When asked, Mrs. Arvizo said there were no visits to Neverland Ranch in 2001.
29 Michael would only call and send gifts to Gavin. Mrs. Arvizo explained that Gavin was
30 going through progressive chemotherapy and was too sick to go to Neverland in 2001.

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Mrs. Arvizo said that In the spring of 2002, Gavin and Star spent a week with Chris Tucker at Neverland Ranch. She said Michael Jackson was not there during their visit. Soon after the visit to Neverland Ranch with Chris Tucker, Michael Jackson called her and asked to have Gavin and Star return to Neverland. Michael told her that he would not be there, so the kids would have the ranch to themselves. Gavin and Star visited the ranch for a few days.

In September of 2002, she received a call from Evie (believed to be Evelyn Joanna Tavasci), who is Michael Jackson's personal assistant. Evie left a message on the answering machine that Michael wanted to talk with Gavin. Shortly afterward, Michael spoke with Gavin and invited him, Star and Davellin to Neverland. Mrs. Arvizo said the kids stayed at Neverland for one night and they did not share any information with her about the stay. She added that she was unaware at that time that her children had been filmed for the "Living with Michael Jackson" film.

On February 4th or 5th, 2003, after "Living With Michael Jackson" aired in England on Monday, February 3, 2003, Mrs. Arvizo received a call from Michael Jackson. Michael had told her about death threats being made against Gavin as a result of his appearance in "Living with Michael Jackson." Michael wanted Gavin to fly to Miami for a press conference to "clear things up." Michael had arranged to have her and her three children to fly on a commercial flight to Miami the next day. The next day, when Jackson's driver arrived to take them to the airport, he told them that there was a change of plans. They were actually going to fly to Miami on Chris Tucker's private plane. Mrs. Arvizo told investigators that Chris Tucker actually flew with them to Miami.

Mrs. Arvizo said the Arvizo family stayed at the Turnberry Resort Hotel in Miami. Their room was almost directly below Michael's suite. There never was a press conference. The TV show "Living With Michael Jackson" was to air that night (Thursday, February

1 6th), but they were kept in Michael's suite and were not allowed to see the show. On
2 the day after "Living With Michael Jackson" aired in the United States on ABC, they
3 were flown to Neverland Ranch in Michael Jackson's private jet. On the plane were
4 Michael, his children, his children's two nannies and Michael's doctor. Mrs. Arvizo
5 said that at one point during the flight she got up to use the restroom. She noticed that
6 everyone was asleep. As she stood, she saw Michael licking Gavin face while Gavin
7 was asleep with his head on Michael's chest. I observed Mrs. Arvizo to be emotionally
8 upset as she described this incident. Mrs. Arvizo explained that she thought at the
9 moment that she was seeing things, but later her son Star told her he saw the same
10 thing. When Mrs. Arvizo was asked if she saw anything else on the plane, she
11 mentioned seeing soda pop drinks.

12

13 At this point, due to Mrs. Arvizo's emotional state and time restraints, the interview
14 ended. It was agreed that the interview would continue the next day.

15

16 On Monday, July 7, 2003, at about 1010 hours, your Affiant and Sgt. Robel resumed
17 our interview of Mrs. Arvizo at the CALM Cottage in Santa Barbara. The reason for the
18 change of location was to maintain confidentiality and our desire to continue the
19 interview in a non-police environment.

20

21 Mrs. Arvizo began telling us what Star and Gavin had disclosed to her.

22

23 Mrs. Arvizo related that Star disclosed to her the following information.

24

- 25 • Star and Gavin had both seen pornography on Gavin's laptop computer in Michael's
26 bedroom.
- 27 • Gavin and he saw Michael Jackson pretend to have sex with a female child
28 mannequin in Michael's bedroom. (When asked, Mrs. Arvizo did not know if
29 Michael was dressed or not.)
- 30 • Star and Gavin were both given alcohol to drink.

- 1 • Star and Gavin both saw Michael naked in Michael's bedroom. Michael was sitting
2 on the edge of his bed while Star and Gavin were on the bed watching TV.
- 3 • Michael wanted Star to take a sleeping pill. (Mrs. Arvizo said Star kept the pill and
4 that it is currently with their attorney.)
- 5 • Star saw Gavin and Michael in bed together. Gavin was passed out and Michael
6 was up against Gavin, with his leg over Gavin. Michael was moving his hips against
7 Gavin. (Mrs. Arvizo had no other detail on this incident.)
- 8 • Star and Gavin played an alcohol drinking game with Michael, in which they were
9 required to make prank telephone calls of a sexual nature or drink.
- 10 • Star saw a suitcase full of pornography.
- 11 • Michael touched Star's private area.

12

13 Mrs. Arvizo told us Gavin disclosed the following to her:

14

- 15 • Gavin told her "I saw Michael naked."
- 16 • Michael told Gavin a story about seeing a child having sex with an animal.
- 17 • Gavin drank alcohol given to him by Michael.
- 18 • Michael talked to Gavin about masturbation and said that "it's natural."
- 19 • Gavin and Michael were in bed together and Michael told Gavin, "I want to be your
20 father" while caressing Gavin's chest and stomach.
- 21 • Michael wanted Gavin to wear Michael's pajamas and sleep in bed with him.

22

23 Mrs. Arvizo did not have any further detail of the disclosures made to her by the boys.
24 These disclosures were made to her after February or March of this year. She
25 explained that she would interrupt and tell Star and Gavin to "forgive and forget." She
26 did this because she thought she was doing the right thing. She wanted Star and
27 Gavin to make the disclosures to a priest or someone else. She has since learned that
28 this was wrong of her to do. Mrs. Arvizo said Star is more outgoing and is more open
29 about talking with her, while Gavin has kept more to himself. I observed Mrs. Arvizo to
30 be emotional and crying during parts of the interview. On occasion she appeared

1 angry to what has been done to her and her children. She was upset that Michael
2 knew of Gavin's medical condition and still gave him alcohol.

3

4 Mrs. Arvizo went on to tell us that after returning from Miami, she and her children
5 stayed at Neverland Ranch. She was told that there were death threats on her
6 children's lives because of the show, and that they would be safe there. Mrs. Arvizo
7 said she was asked to have the children make a rebuttal show and she refused.

8

9 Mrs. Arvizo related that after a few days at the ranch she asked to take her children
10 home. She was told they could not leave Neverland Ranch. A person named Deiter
11 (later identified as Deiter Wiesner), who said he does "damage control" for Michael
12 Jackson, insisted that they could not leave because of the death threats to the kids.
13 Mrs. Arvizo was in fear that Deiter would harm her, so she did not argue with him.

14

15 Mrs. Arvizo said she was not able to watch news on TV while at Neverland. She was
16 intimidated and learned that her telephone conversations were being monitored. She
17 was threatened by Ronald Konitzer, who also works for Jackson. She was told that if
18 she went to the police or talked with anyone, he would make the kids disappear. Mrs.
19 Arvizo also described being kept away from the boys. When she asked to see her
20 children, she was told they were busy with Michael.

21

22 Mrs. Arvizo said she suspected that her personal telephone calls were being monitored
23 at Neverland Ranch because she mentioned something during a call to a friend and
24 she was later confronted by Jackson's people regarding the same subject. She asked
25 Frank if her phone conversations were being monitored and he said "no," but that they
26 had the capability to tap outside phone lines.

27

28 Your Affiant learned from Mrs. Arvizo that on one occasion she finally spoke with Jesus
29 (later identified as Jesus Salas), who she thought was head of security at Neverland.
30 It was late one night while Michael Jackson and the two Germans, Deiter and Ronald,

1 were meeting with Michael, that she was able to convince Jesus to take the family
2 home to Los Angeles. She described running in the dark through Neverland, being led
3 by Marie Nicole, to find their way to the car. Mrs. Arvizo was unable to recall exact
4 dates of events during this time period. She stated that there were no clocks or
5 calendars at Neverland and she would lose track of the date

6

7 Soon after leaving Neverland, she received a call from Frank Tyson. Frank told her
8 that they should return to Neverland because the children were not safe because of
9 death threats. Mrs. Arvizo told Frank about being threatened by Deiter and Ronald
10 and he told her that they had been fired. Mrs. Arvizo said Frank talked her into
11 returning to Neverland for safety reasons.

12

13 When she and her children returned to Neverland, Mrs. Arvizo saw that Deiter and
14 Ronald were still there. Mrs. Arvizo again asked to leave and was told that she could,
15 but her children could not leave. "Jackson's people" kept insisting the kids participate
16 in the making of a rebuttal film, but she would not allow it. By "Jackson" people, Mrs.
17 Arvizo said she means Frank, Vinnie, Deiter, and Ronald.

18

19 Mrs. Arvizo told us that when they returned to Neverland, Jesus was still there. When
20 she approached him, he said he was ordered not to talk to her. He said he got in a lot
21 of trouble and they were angry about what he had done. She pleaded with Jesus to
22 help her escape again, but he said he could not.

23

24 During our initial interview with Mrs. Arvizo, she provided us with a Neverland Ranch
25 letterhead which contained the name "Jesus Salas" typed on the document. The
26 letterhead paper had been given to her by Jesus. Using this information from the
27 letterhead, your Affiant conducted a Department of Motor Vehicles check for a Jesus
28 Salas. Your Affiant determined that a Jesus Salas resided in Santa Maria. On October
29 28, 2003, your Affiant placed a phone call to the Salas residence. A female answered.
30 She spoke Spanish. Your Affiant also speaks Spanish. From the conversation, your

1 Affiant learned that a Jesus Salas in fact lived there, but was not there at the time. The
2 female did say that Mr. Salas had indeed formerly been employed at Neverland Ranch.

3
4 On November 12, 2003, your Affiant met with District Attorney Tom Sneddon. Mr.
5 Sneddon related that on Saturday, November 8, he met with Mrs. Arvizo in the Los
6 Angeles area. Mr. Sneddon said he showed her the photograph portion of the
7 Department of Motor Vehicles record for Jesus Salas that your Affiant had earlier
8 obtained. Mr. Sneddon said he had covered up the printed information on the
9 document and that only the photograph was visible to Mrs. Arvizo. Upon seeing the
10 photograph, Mrs. Arvizo immediately said, "That's Jesus. Head of Security at
11 Neverland Ranch."

12
13 Mrs. Arvizo told us that several weeks after being held at Neverland Ranch following
14 their return from Miami, and while her children were still there, she received calls from
15 Child Protective Services (CPS) in Los Angeles. Mrs. Arvizo told the Jackson people
16 about the calls and how CPS wanted to interview the children. She said she saw this
17 as an opportunity to get her children out of Neverland. She was told by Frank that her
18 children would have to return to Neverland after the CPS interview and could not leave
19 until they made a public relations rebuttal film for Michael Jackson.

20
21 Mrs. Arvizo said she agreed that her children could participate in the film so that they
22 would be allowed to leave Neverland. The three children were taken to the home of
23 Hamid Moslehi in West Hills to make the film. Mrs. Arvizo explained that the film was
24 made at three o'clock in the morning on February 20, 2003, just hours before the
25 scheduled 9:00 a.m. CPS interview at her home.

26
27 Your Affiant was present on November 7, 2003, when Detective Sgt. Steve Robel
28 called Mrs. Arvizo to get more details about the filming incident. Sgt. Robel has since
29 relayed to your Affiant the information he gathered during the conversation. Mrs.
30 Arvizo told Sgt. Robel that Vinnie Amen picked her up at her boyfriend Jay's place and

1 that the children were brought from Neverland by Vinnie. They all met at Mr. Moslehi's
2 house where the filming occurred. She described the house as a two-story home with
3 a pool table and that to the right of the entryway was a bedroom and a bathroom.
4 Present at the filming were Hamid, Vinnie, Brad Miller and a young male she could only
5 identify as working for Marc Schafel, and who asked a lot of questions. The filming was
6 done by Hamid in the living room of his house. Hamid was in charge of the filming. A
7 big black movie camera on a tri-pod and a large background screen were used in the
8 filming.

9

10 During your Affiant's initial conversation with Mrs. Arvizo, she said the name of the
11 filmer was Hamid Moslehi and provided home and cell phone numbers and an e-mail
12 address for him. She said this information was given to her by Hamid. From this
13 information, your Affiant was able to confirm from Department of Motor Vehicles
14 records that Hamid Moslehi lives at [REDACTED] West Hills, California 91307.

15

16 On November 4, 2003, at your Affiant's request, Los Angeles Police Department
17 Detective Crowe, from the West Hills Division, drove by the above address. Det.
18 Crowe related to your Affiant that [REDACTED] is a two-story white stucco
19 residence with green trim. It is located on the east side of the street. It has a two-car
20 garage and the numbers [REDACTED] are stenciled in black on the curb. Det. Crowe
21 observed a 2001 Chevrolet Suburban, license number [REDACTED] registered to Hamid
22 Moslehi, in the driveway. With this information in hand, your Affiant accessed Accurint
23 Database to see what other information could be learned about this person. Through
24 this source you Affiant determined that Moslehi owns a business named "I Film, Inc."
25 located at [REDACTED] in Los Angeles, California. The business's
26 corporate headquarters is listed as [REDACTED] West Hills, California 91307.

27

28 On Wednesday, November 12, 2003, your Affiant learned from District Attorney Tom
29 Sneddon that on Saturday, November 8, 2003, he personally met with Mrs. Arvizo in
30 the Los Angeles area. He showed her a copy of a Department of Motor Vehicles record

1 containing a picture of Hamid Moslehi. Only the picture portion of the record was
2 visible. Upon seeing the photograph she immediately said, "That's Hamid." She
3 identified the person in the picture as the same person who lived at the Lester Lane
4 address and did the filming of the children in the early morning hours of February 20,
5 2003, before the CPS interview.

6
7 Mrs. Arvizo was asked about the February CPS interview and why they did not make
8 any disclosures to the CPS investigators. She told us that one of Michael's security
9 guards, Asef (unknown spelling and unknown last name), was present when CPS
10 investigators showed up at her home. Mrs. Arvizo said when Asef was told by CPS to
11 leave the room for the interview, he pulled her into the bedroom and gave her a small
12 recording device and told her to keep it on during the interview. Asef warned her not to
13 say anything wrong about Michael Jackson, because they knew where her parents
14 lived. He also had hidden a recording device in the room, just in case she did not do
15 as she was told. She felt she had no choice but to deny to CPS any wrongdoing by
16 Michael Jackson. She added that she did turn off the recorder that Asef gave to her.

17
18 After the CPS interview, the Arvizo family was then taken back to Neverland by Chris
19 Tucker's fiancée, Aja. Mrs. Arvizo said the Jackson people wanted to verify that
20 nothing was said to CPS and to make sure the film was okay. Mrs. Arvizo said the
21 Jackson people then got them passports and were insistent that they leave for Brazil to
22 keep them out of the public's eye. She did not want to go to Brazil and told the
23 Jackson people Gavin had to keep pre-scheduled doctor appointments in Los Angeles.
24 Even after doing the film, they were not allowed to leave the Ranch.

25
26 Mrs. Arvizo said that she and the children remained at Neverland until March of 2003.
27 She recalled that Gavin had an appointment to go to a medical laboratory on March 10,
28 2003. She and Gavin were taken to the appointment in Los Angeles by Vinnie. The
29 appointment was for a creatine clearance. Mrs. Arvizo explained that a 24-hour urine
30 sample had been collected from Gavin and was to be delivered to the lab. This is when

1 she learned about Gavin's drinking alcohol. Gavin told her he had drunk alcohol the
2 night before and was afraid it would show in the urine test. Gavin told her that Michael
3 gave him wine and that Michael called it "Jesus Juice." Gavin also said that Michael
4 was concerned the alcohol would show in the urine test. On the way to the laboratory,
5 the driver, Vinnie, stopped at a restaurant so that Mrs. Arvizo could use the restroom.
6 When Mrs. Arvizo returned to the car, she noticed that the container of Gavin's urine
7 was almost empty, though it had been full before they stopped at the restaurant. Vinnie
8 told her that he had accidentally knocked it over and spilled the contents. Mrs. Arvizo
9 told us that the container had a screw-on top and it would have been impossible to spill
10 the container's contents. She believes Vinnie emptied the urine from the container on
11 purpose so that the alcohol would not be detected.

12
13 Subsequently, investigators determined that follow-up questions needed to be asked of
14 Mrs. Arvizo. On Wednesday, August 13, 2003, at 1720 hours, your Affiant and Sgt.
15 Robel met Mrs. Arvizo in Los Angeles to conduct a follow-up interview. The interview
16 took place in a hotel near the victims' residence

17
18 Mrs. Arvizo was asked if she had any information about the telephone conversations
19 between Michael Jackson and Gavin. She replied that she remembered Gavin telling
20 her things which she felt were peculiar. For example, Gavin's favorite color is the
21 same as Michael's favorite color. Also, whatever Gavin liked, Michael liked as well.
22 Mrs. Arvizo said that Gavin would share these things with her. She said soon after
23 Michael learned that Gavin was sharing information with her about their conversations,
24 Gavin began closing up and not telling her things. Mrs. Arvizo explained it was a
25 process over time. When asked if Gavin ever shared with her any threats made by
26 Michael to Gavin, she said no.

27
28 It was clarified with Mrs. Arvizo that every time she was at Neverland Ranch, she
29 stayed in the guest quarters. She described there being four separate guest quarters

1 that were all furnished slightly different. Each guest quarter building was a one-room
2 structure with an attached bathroom.

3

4 Mrs. Arvizo was asked to clarify why some of her things are in a storage unit. Mrs.
5 Arvizo began by telling us that "they," meaning "Jackson's people," had given her
6 different reasons why it was important that she and the children no longer live in their
7 Los Angeles apartment. The reason most often given was because there were people
8 that were going to kill her and the children. She was asked who was telling her this,
9 and she said "Michael's people," and she named Frank, Vinnie, Deiter, Ronald and
10 Brad Miller, all of whom told her that at different times. They told her that people had
11 broken into her apartment. Mrs. Arvizo told us she believed them. They promised her
12 they would be buying her a house and an apartment, so the family would have two
13 places to go to, back and forth. She was told the reason for this was so nobody could
14 find them. She explained that at that time her residence was in East Los Angeles, and
15 that it was a small "bachelor apartment." Mrs. Arvizo said Michael's people moved her
16 things the first weekend in March of this year (2003).

17

18 Mrs. Arvizo explained they wanted to get rid of all of her things because, she was told,
19 they were going to get her all new furniture. It was during this time, they were talking
20 about relocating her to a different country. This is when, Mrs. Arvizo explained, things
21 weren't "matching up" to her. They were promising they were going to put the children
22 in a private school as a security measure, due to the fact reporters were following the
23 children. Mrs. Arvizo found out that was not true. When she contacted the children's
24 school, she was told that no reporters had come to the school to speak with the
25 children. School officials also told her they were unaware of the children being
26 followed. She said there was never anything like what Michael's people had made
27 them feel frightened of.

28

29 Mrs. Arvizo advised your Affiant that she was not physically present when her
30 possessions were boxed, moved and stored. The items stored included furniture and

1 clothes and other personal belongings. There was not much furniture because it was a
2 very small apartment. What she found peculiar was that the interest in moving her
3 things manifested itself when they found out she had kept the notes Michael Jackson
4 had sent or written Gavin. She had hidden some of the notes in a planted clay pot that
5 wound up in the storage locker. Others notes and the registration documents for the
6 Bronco were in her apartment prior to Michael's people placing her belongings in
7 storage.

8
9 At the time of storage, Mrs. Arvizo was not told the location of the storage facility, but
10 only that it would be in her name. Later, after she had escaped from the Ranch, she
11 hired attorney Bill Dickerman to formally request of Michael Jackson that her stored
12 possessions be returned to her. Through Dickerman's efforts, the storage unit was
13 located, but they learned from the storage company that the unit was under the name of
14 a "Brad Miller" and that storage fees were in arrears.

15
16 During our initial interview on July, 2003, Mrs. Arvizo provided us with numerous
17 documents and correspondence between her attorney, Mr. Dickerman, and attorney
18 Mark J. Geragos. A review of these letters reveals that Dickerman authored a March
19 26, 2003, "Demand Letter" for the return of numerous items belonging to Mrs. Arvizo's
20 family, including the possessions in the storage unit and other items that were either in
21 Michael Jackson's or Jackson's agent's possession. In an April 6, 2003 letter to
22 Attorney Dickerman, Attorney Geragos responded, "Please give me a call so we can
23 make arrangements." In a letter dated April 15, 2003, Geragos wrote, "We have
24 retrieved various items from storage and would appreciate your advising us as to where
25 they should be delivered."

26
27 From these letters and conversations referenced in other letters that form the
28 correspondence between Attorneys Geragos and Dickerman, it is clear to your Affiant
29 that Mark Geragos was acting, or at least purporting to act, as the agent for Michael
30 Jackson in reference to Dickerman's demands, and that he possessed knowledge of

1 and control over many of the items demanded, particularly those in the storage unit.
2 Interesting among the various discussions in the correspondence was the information
3 in an April 8, 2003, letter authored by Attorney Dickerman to Attorney Geragos
4 documenting a conversation they had had earlier that afternoon. The letter references
5 the fact that, according to Geragos, the move was videotaped and that there is a
6 document purporting to show that had Mrs. Arvizo signed off on the move. Mrs. Arvizo
7 denies signing any such document.

8

9 During a conversation with Mrs. Arvizo and Jay Jackson on September 16, 2003, your
10 Affiant learned that the storage company and Jackson's lawyers agreed that the
11 Arvizos could regain possession of the stored items if they paid the outstanding storage
12 fees of \$580. Mrs. Arvizo did not have the money to pay for retrieval of the items. The
13 Santa Barbara County Sheriff's Department and the District Attorney's Office agreed
14 amongst themselves to split the amount of the storage fees so that a search could be
15 conducted of the stored property to determine whether evidence in the form of notes
16 authored by Michael Jackson to Gavin were still among the stored possessions. Jay
17 Jackson further related that when he initially called Dino's Storage and spoke with
18 "George" (last name unknown) who purported to be the owner, he was informed that
19 they could not get access to the storage unit because Mrs. Arvizo's name was not on
20 the account.

21

22 On October 1, 2003, Jay Jackson (Mrs. Arvizo's boyfriend) and Mrs. Arvizo went to
23 Dino's Moving and Storage located at 12641 Saticoy Street, North Hollywood,
24 California 91605. The \$580 outstanding storage fee was paid and they retrieved the
25 items from the locked container and placed them in a U-Haul. Before leaving, Mrs.
26 Arvizo checked to see if the Michael Jackson notes were still there, hidden in the
27 potted plant. They were not. Nor were they or the other notes concealed in her
28 apartment's furnishings among any of the items retrieved from the container. After
29 loading the possessions into the rental U-Haul, your Affiant learned from a

1 conversation with Sgt. Robel that they met Sgt. Robel and Lt. Jeff Klapakis at a nearby
2 7-Eleven Store.

3
4 Sgt. Robel told your Affiant that he obtained the paperwork given to Jay Jackson by
5 Dino's earlier that morning. Your Affiant has reviewed this paperwork. It reflects that
6 the storage unit was rented on March 1, 2003. The address on the billing statement
7 was "Brad Miller, 211 South Beverly Drive, Beverly Hills, California 90212." Another
8 document, which appears to be the storage rental agreement, also reflects "Brad Miller"
9 as the renter, but with a different address. "CK #1477" is handwritten on that
10 document. It is dated "3-1-03" at the top. A third document, entitled "Non-Negotiable
11 Warehouse Receipt and Contract," with "Warehouse Receipt No. 439" printed in the
12 upper right-hand corner, reflects that the items that were placed in storage were
13 received on the account of "Brad Miller, 211 S. Beverly Drive. B.H. 90212 #108."

14
15 On October 30, 2003, your Affiant requested a Department of Motor Vehicles records
16 for "Brad Miller." The returned record, with photograph, reflects a Brad Greg Miller with
17 an address of 2160 Century Park East 1707, Los Angeles, California 90067.

18
19 A confidential reliable agent was asked to visit the building located at 211 South
20 Beverly Boulevard, Beverly Hills. Around 11:00 a.m. on November 14, 2003, that
21 individual made contact with a female employee in the reception area of office No. 205,
22 which was the number shown next to Mr. Miller's name on the directory inside the
23 entrance to the building. The receptionist stated that Private Investigator Miller was no
24 longer in that office, but had moved downstairs to office No. 108. The individual
25 proceeded downstairs to Office No. 108 and observed the name "Bradley Miller" on the
26 door. The door was locked.

27
28 Records of the California Bureau of Security and Investigative Services reflect that
29 Bradley Greg Miller of Beverly Hills is currently licensed as a private investigator
30 (License No. 17530.)

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Mr. Sneddon informed your Affiant he met with Mrs. Arvizo on November 8, 2003. The purpose of the meeting was to secure her signature to some applications for victims' compensation, to pick up several items of evidence that she wanted turned over to investigators, and to show her two photographs. Mr. Sneddon showed her a Department of Motor Vehicles photograph of Brad Miller he had obtained from Sheriff's investigators. Only the photograph itself, and not any of the printing on the document, was shown to the witness. Upon seeing the photograph, she immediately said, "That is Brad Miller."

Mrs. Arvizo was asked to clarify if the storage of her household goods happened before or after the CPS interview. She said it was after the interview. Mrs. Arvizo explained she was becoming more concerned. Michael's people promised to get a tutor for the children; that did not happen. She stated matter-of-factly that the school books her children had taken to Neverland disappeared. She believes they were taken by Frank, Vinnie, Ronald or Deiter. Mrs. Arvizo said those individuals were getting angry with her and threatening her when she wanted to go to the doctor's appointments with Gavin in Los Angeles. She was thinking that if they really cared about her children, they would want Gavin to go to his appointments with his doctor. She could not understand the urgency of them wanting the family to leave the country.

Mrs. Arvizo explained that everything that they were made to endure with Michael and Michael's people has interrupted her family's life and affected Gavin's and Star's behavior. Mrs. Arvizo said Gavin's demeanor and conduct has changed noticeably. He recently shot her in the leg with a BB gun, and he gets angry for no reason or cause. Star now clings to her for no reason.

Mrs. Arvizo went on to say that Michael's people wanted her and the children to go to Brazil. She did not want to. She told them she did not want to be moved and leave her things behind. They wanted her to sign a piece of paper stating she wanted to

1 move. She told them she was not signing anything. She demanded to know where
2 her things were and who had moved them.

3

4 Your Affiant has read and reviewed a Santa Barbara County Sheriff's Continuation
5 Sheet authored by Sgt. Steve Robel, dated October 31, 2003. The report reflects that
6 on October 28, 2003, at 1600 hours, Sgt. Robel talked to Mrs. Arvizo by telephone
7 regarding the passports and visas she had mentioned in her earlier discussions with us
8 in July 2003. Your Affiant gleaned from that report the following information:

9

10 Frank Tyson and Vinnie Amen told Mrs. Arvizo and her children they needed to get
11 passports and visas in order to travel to Brazil. They told her and her children that they
12 needed to re-locate to Brazil due to the death threats being placed on her family's lives.
13 Some time around February 26, 2003, Mrs. Arvizo and her children were driven to a
14 Wal-Mart or a Rite-Aid store, possibly in the Santa Maria area, to have passport
15 photographs taken. After getting their photographs taken, they were driven to Marc
16 Schafel's house, who lives in the Calabasas area. According to Mrs. Arvizo, Schafel
17 was represented to be the head of "MJJ Productions." Mrs. Arvizo said that Tyson and
18 Amen picked up the passport applications from Schafel.

19

20 Thereafter, Tyson and Amen drove them to the Federal Building in Los Angeles at
21 which time they submitted their passport applications. The fees for the passports were
22 paid with a check from "MJJ Productions." Mrs. Arvizo believes it was around March 1,
23 2003, when Tyson and Amen then took the family to the Brazilian Consulate in Los
24 Angeles to get their visas. She said that during the passport and visa process, she and
25 her children, along with Frank Tyson and Vinnie Amen, stayed at a motel in Calabasas.
26 She believes the motel was a Country Inn and Suites, but she is not positive of that.
27 During their stay at the motel, she and the children were not able to leave their room
28 unless they were escorted by Tyson or Amen. She further added that Jackson's
29 representatives purportedly purchased airline tickets for them to fly to Brazil. She
30 reported to Sgt. Robel that neither she nor the children knew the name of the airline,

1 but she did see the visas and the passports. Neither she nor her children were given
2 possession of the visas or passports, which were retained by the Jackson people. She
3 believes the "Jackson people" still have them.

4

5 Mrs. Arvizo was asked why she returned to Neverland after escaping in the middle of
6 the night in February, 2003. She said Frank called her and told her he wanted her to
7 go back to the Ranch, and that Ronald and Deiter had been fired. She said Frank also
8 told her that the children were in grave danger, and that Mrs. Arvizo didn't know that
9 Michael Jackson's people were receiving daily death threats on the children. Frank
10 told her not to return to her apartment, because if she did, she'd see that the threats
11 are real. Frank told her that her parents' house was under surveillance by the persons
12 making the death threats on the children. Mrs. Arvizo said she believed what Frank
13 was telling her. When she told Frank about Ronald and Deiter threatening her, he
14 (Frank) assured her that Ronald and Deiter had been fired. Mrs. Arvizo said those are
15 the reasons she returned to Neverland Ranch with her children.

16

17 Mrs. Arvizo said that upon returning to Neverland, the first people she saw were Ronald
18 and Deiter. When she saw that Deiter and Ronald had not been fired, she wanted to
19 leave the Ranch with her children. Frank told her she could leave, but the children
20 had to stay.

21

22 Mrs. Arvizo was asked to clarify what happened after Gavin's medical appointment in
23 L.A. on March 10th. Mrs. Arvizo said only she, Vinnie and Gavin went to the medical
24 lab. Star and Davellin were still back at Neverland Ranch. They were supposed to
25 return to the Ranch after the appointment. After Vinnie spilled Gavin's urine sample,
26 she finally felt she had something people were going to believe and that she was not
27 crazy. In the past Frank had told her that they did things a certain way so that if she
28 ever went to somebody they would be able to refute her. Mrs. Arvizo said that is why
29 she has been very careful about not telling anyone what has happened to her and her

1 family. Mrs. Arvizo stated that along the way, she had to make things appear "natural
2 and normal" and she went along with their requests.

3

4 Among the things discussed in the previously noted November 15, 2003 conversation
5 between District Attorney Sneddon and Mrs. Arvizo was the fact that what remained of
6 the urine sample had been delivered to the lab that day. She subsequently received a
7 letter from Kaiser Hospital stating that the sample was insufficient to do the creatine
8 clearance test. Attorney Dickerman has the Kaiser letter.

9

10 Directly after Gavin's medical appointment, she told Vinnie since she was going to
11 Brazil she needed to get her nails done and other feminine beauty treatments. What
12 she really wanted was to get as close as she could to her boyfriend's place of work to
13 contact him. She told Vinnie she would return to Neverland, but first needed to stop by
14 the salon, which was near her boyfriend's work. Vinnie called Frank at Neverland.
15 Frank told Vinnie to take her to the salon, but they had to leave immediately afterward.

16

17 From the salon Mrs. Arvizo called her boyfriend and told him of her situation. She said
18 her boyfriend arrived at the salon shortly after. When Vinnie saw her boyfriend arrive,
19 he told her it was time to go. Mrs. Arvizo said she wanted to spend some time with her
20 boyfriend, but Vinnie responded it was not part of the plan. Vinnie stepped outside of
21 the salon to call Frank. Vinnie then returned inside the salon and told her it was
22 unacceptable and that she had to return to Neverland. When Vinnie again stepped
23 out of the salon she noticed Gavin to be nervous and frightened. Gavin told her, "No
24 Mommy, you're messing up the plan." She said that Frank's plan was for them to
25 return to Neverland and immediately leave for Brazil. Mrs. Arvizo said she knew if she
26 went back to Neverland Ranch, she would be made to go to some unknown city in
27 Brazil. They described it as away from any hotels in a place that would have no
28 Americans, so no one would recognize them and be able to send the killers there.

29

1 Mrs. Arvizo was asked if she ever went back to Neverland Ranch and she said no.
2 She told Vinnie she had to make a court appearance regarding child support the next
3 day (March 11, 2003). She said Davellin and Star would need to be present in court.
4 Mrs. Arvizo explained this would be a chance for her to get all of her children in Los
5 Angeles. They refused to bring Davellin and Star, and told her that she needed to
6 return. When this plan failed, she thought of another way to get Davellin and Star out
7 of Neverland Ranch. Mrs. Arvizo explained she had to make some type of plan that
8 was not suspicious, because she said Frank told her he could make the children
9 disappear.

10

11 Mrs. Arvizo explained how she was able to get Davellin and Star out of Neverland
12 Ranch. She told Frank that her parents were ill and she wanted the children to see
13 their grandparents one last time before leaving for Brazil. She told Frank the
14 grandparents would see that the children are well taken care of, and if anyone ever
15 questioned the grandparents, the grandparents would say everything is fine with the
16 children. Mrs. Arvizo had Jay Jackson contact her parents and tell them of the
17 situation. He did, and they agreed to go along with the plan. Her father then called
18 Neverland and spoke with the children, knowing that Frank would be listening to the
19 phone call.

20

21 Mrs. Arvizo's father told the children that he was ill and needed to see them. Soon she
22 received a phone call from Frank. He told her that the children could only visit
23 grandpa for one hour and that she had to promise him that she would return. Mrs.
24 Arvizo told Frank she agreed to return, but she wanted the children to have two days
25 with the grandparents, not just one hour. Frank agreed only after Mrs. Arvizo promised
26 Frank she would stay in Brazil for as long as they wanted. Mrs. Arvizo said both
27 Davellin and Star were then brought down by Vinnie to the grandparents' home.

28

29 Mrs. Arvizo was asked if they had returned to Neverland Ranch after two days. Mrs.
30 Arvizo said no. The day after they returned Davellin and Star to her she called Jesus

1 and left a voice-mail message, telling him they were not going to return. Frank then
2 called her parents' house and told them they are not getting their things back. He
3 repeatedly called her parents' home and left threatening messages on the answering
4 machine. Mrs. Arvizo was asked if they still had the answering machine tape, and she
5 said no.

6
7 Michael's people continued to try to get the Arvizo children back to Neverland Ranch.
8 They refused to return her things in storage. Someone slipped a note under her
9 parents' front door indicating Gavin and Star needed to call Neverland immediately. In
10 addition, Frank and Vinnie both came knocking on her apartment door. When she
11 wouldn't answer the door, they started throwing rocks at her apartment.

12
13 Mrs. Arvizo was asked why, in her opinion, Jackson's people lied to her about the
14 death threats and were trying to move her to Brazil. Mrs. Arvizo replied, "Because they
15 did wrong." Mrs. Arvizo was asked what they did wrong, and she said "because of the
16 things they knew they did to Gavin, Star, Davellin and to her." She said she believed
17 they thought because she lived in East Los Angeles, that nobody would care or miss
18 them.

19
20 Mrs. Arvizo was reminded of the CPS interview incident, and asked if the bodyguard
21 Asef ever retrieved the second recorder. Mrs. Arvizo said as soon as the interview
22 was over, the bodyguard entered the living room while the three ladies were still there.
23 It was during this time she believes Asef retrieved the second recorder, but she did not
24 know from where. Mrs. Arvizo added that Asef did not leave until he made sure that
25 the three ladies from Child Welfare Services were gone.

26
27 On Monday, July 7, 2003, at about 1150 hours, Detective Sgt. Steve Robel and I
28 interviewed Davellin. The interview took place at the CALM Cottage in Santa Barbara.
29 Davellin said she met Michael Jackson during the time Gavin was hospitalized in the
30 year 2000. She explained that Michael Jackson was in telephone contact with Gavin

1 and Michael had invited the whole family to go to Neverland Ranch. Davellin said she,
2 her father, her mother, Gavin and Star visited Neverland Ranch for about one week.
3 While at Neverland Ranch, Davellin and her parents had their own rooms in guest
4 units. Gavin and Star stayed in Michael Jackson's bedroom. Davellin went on to say
5 Gavin told her Michael asked Gavin and Star to stay in his bedroom and that Michael
6 told Gavin and Star to ask their parents during dinner for permission for them stay with
7 him in his room.

8
9 Davellin said Star told her that during this first visit to Neverland Ranch, Gavin and Star
10 saw pornography on the computer. Star also told her about a book containing naked
11 women in Michael's office. Gavin was present when Star told her this information.
12 Gavin told her not to say anything because Michael would get mad. Gavin told her
13 everything is secret and that they can't say anything.

14
15 Davellin related that Gavin and Star visited Neverland Ranch many times without her.
16 She had been to Neverland Ranch only twice before February of 2003. The second
17 time she visited Neverland Ranch was when the TV show "Living with Michael Jackson"
18 was being filmed in September 2002. The family learned about the airing of "Living
19 with Michael Jackson" in the United Kingdom when reporters came to their house in
20 Los Angeles. Right after the show aired in England, Michael called Gavin and invited
21 the family to join him in Florida for a press conference "to fix all this."

22
23 Davellin said she was mostly excluded from joining Gavin and Star when they were with
24 Michael. She was never invited to stay in Michael's bedroom. Days would go by
25 without her seeing Gavin or Star while at Neverland Ranch. Davellin told me Michael
26 had given Gavin and Star nicknames. Gavin's nickname was "Apple Head" and Star's
27 was "Blowhole." She did not get a nickname.

28
29 Davellin was asked if she ever saw or heard of Michael ever doing anything
30 inappropriate with Gavin or Star. Davellin said she saw Michael give alcohol to Gavin

1 and Star. During a visit to the Ranch, as she walked into the arcade room she saw the
2 three go down a hidden staircase behind the jukebox. She followed Michael, Gavin
3 and Star into the wine cellar where she saw Michael giving Gavin and Star cups of
4 wine. I asked Davellin how she knew it was wine. She replied that they were in a
5 wine cellar and there was nothing else there to be drinking. Also, Gavin later told her
6 that they (Gavin and Star) drank wine with Michael in the wine cellar.

7

8 Gavin also told her they were drinking alcohol every night and asked her not to tell their
9 parents. Gavin told her that they drank wine and alcohol given to them by Michael in
10 Sprite and Diet Coke cans. They also drank "Skyy" (a brand of vodka) and tequila.
11 Gavin told her that he told Michael the doctors said he couldn't drink alcohol and
12 Michael replied something to the effect of he, Gavin, shouldn't believe in doctors.

13

14 On another occasion she walked into the kitchen at Neverland and saw Michael mixing
15 alcoholic drinks and giving them to Gavin and Star. She said Michael called wine
16 "Jesus Juice" and she personally heard Michael use the term "Jesus Juice."

17

18 Davellin said that in Michael's jet on the way back from Miami in February of this year,
19 she saw Gavin and Star drinking from Diet Coke cans. She said later, Gavin told her
20 he was drinking wine on the plane and that Michael had given him a watch and jacket
21 as a bribe not to tell anyone.

22

23 Davellin said she was told by Gavin and Star that they played a game with Michael
24 where they made prank phone calls. They told her that if they didn't make a prank
25 phone call they had to drink alcohol.

26

27 Both Gavin and Star disclosed to her that Michael talked about masturbation and if
28 white stuff came out when they touched themselves. Gavin and Star also told her
29 about Michael "humping" a mannequin and another instance when Michael undressed
30 in front of Gavin and Star. Gavin also disclosed to her that Michael had touched

1 Gavin's "behind" with Michael's hand outside of Gavin's clothing and that Gavin felt
2 uncomfortable. Michael talked to him about sex and that Michael wanted Gavin to
3 leave his underwear in Michael's basket (hamper) when he changed clothes. Later she
4 learned Gavin's underwear was never returned. When Gavin's clothes were sent back
5 to him in a suitcase after they left Neverland for the last time, he found all of his
6 clothes, except for his underwear.

7

8 Davellin went on to say that she observed Michael always kissing, caressing and
9 hugging Gavin. Michael would obsessively adjust Gavin's shirt all the time. Michael
10 did this mostly with Gavin and not Star. She believes Michael's behavior with Gavin
11 was inappropriate, however Gavin has not disclosed anything else to her. She feels
12 that there is more that Gavin is not talking about. Davellin described seeing a change
13 in Gavin's behavior. He used to be more open with her and now he keeps to himself.
14 Before the last visit to Neverland, he was a "loving little boy," but now he is more
15 aggressive and quiet. Davellin feels something is very wrong with Gavin.

16

17 Davellin said Star did not disclose anything to her about being touched by Michael, but
18 he told her of a phone in Michael's bedroom that could monitor all of the phone lines in
19 Neverland Ranch. He told her of an instance where he walked into Michael's room
20 and saw Frank and the "German guy" listening to Mrs. Arvizo's personal telephone call.
21 Star told her that when they saw him they quickly turned it off.

22

23 Davellin was asked why none of this was told to the CPS workers during the interview
24 in February of this year. Davellin said she was scared to say anything. One of
25 Michael's security guards was there and that he had talked with Mrs. Arvizo in the
26 bedroom before CPS arrived. She was told of death threats on them and she felt she
27 couldn't say anything. Also, while at Neverland Ranch she was told they could not
28 leave because of death threats. She said that when they did call 9-1-1, it rang the
29 security office at Neverland.

30

1 Davellin was asked to describe Michael's room. She said there is a hallway leading to
2 Michael's bedroom. In the hallway is a double door which has a code lock and a
3 surveillance camera. She did not know the code, but Gavin and Star may know it.
4 After entering the double doors, there are stairs that lead down into a room. She
5 explained that Michael's bedroom has two levels. On the lower floor there is a TV,
6 jukebox, couch and fireplace. There are two restrooms on the lower floor and a
7 staircase that leads to the upper level which contains Michael's bed. On the level that
8 contains Michael's bed, there is also a computer, tapes and a pull-down TV screen.
9 This concluded our initial interview with Davellin.

10

11 On August 3, 2003 at 1702 hours, there was a follow-up interview of Davellin in Los
12 Angeles. The interview took place at the same location as her mother's interview.
13 Davellin was asked how Gavin has been acting. Davellin described Gavin as
14 becoming progressively more argumentative. Davellin was asked if Gavin has shared
15 any information from our previous interview with him. She said no.

16

17 Davellin was reminded of the wine cellar incident, and she was asked to describe the
18 wine cellar. She described going down a staircase and turning to the right where there
19 are some "cubby holes" that contained sleeping bags. There is a doorway leading into
20 a room. In the room were wine bottles on the wall, and a counter with a cupboard of
21 cups. When asked when she observed the wine cellar, she said it was many times
22 during their last visit to Neverland Ranch after the trip to Miami. Davellin added that
23 she observed Michael, Gavin, Star, and Frank come up from the wine cellar many times
24 carrying cups.

25

26 Next, Davellin was asked about the time they left Neverland Ranch late in the evening.
27 Davellin explained that a worker by the name of Jesus took them out of Neverland at
28 her mother's request. She believes the car used to transport them was a black Rolls
29 Royce, and that they left about midnight. The reason for them leaving Neverland late
30 at night was because Michael's people were very controlling and told them they could

1 not leave Neverland. They were not allowed to call their grandparents and say where
2 they were. They were being told there were death threats on their lives. When asked
3 who Michael's people are, she said Frank, Vinnie, Deiter, and Ronald. She added
4 they were also not allowed to watch the news. Deiter and her mother were in a room,
5 and they were always yelling. When asked if she heard what they were yelling about,
6 she said she only heard yelling. Deiter also told them what to say and how to behave,
7 and what they were supposed to tell everybody regarding the filming.

8

9 Davellin was asked if she or anyone in her family had ever been threatened and she
10 said they were told about having death threats on their lives. They did not give a
11 reason for the death threats. She was specifically asked if death threats were made to
12 her and she said that she could not remember. When asked if she was scared while
13 they were at Neverland, she said yes, and that she just wanted to leave.

14

15 Davellin was asked if she recalled the CPS workers' interview at their home, and she
16 said yes. She was asked who was present at the interview. She said the three social
17 workers and Michael's security guard. She did not know the security guard's name.
18 She did not know why he was there. He just showed up on that day. Aja, Chris
19 Tucker's fiancée, and their son, were also there. When asked the reason for Aja's
20 presence, she said she was there only as a friend. Also present during the interview
21 were Gavin, Star, and their mother. Davellin was asked if Aja, the baby, and the
22 security guard were allowed to remain during the interview. She said no. She
23 explained they were asked to leave. At that time, Aja and the baby left and the
24 security guard pulled her mother into the bedroom and closed the door. A few
25 moments later, the security guard left and her mother rejoined them. She observed
26 something black in her mother's hand. Later her mother told her the security guard
27 had given her a tape recorder and wanted her to place it in the room while they were
28 being interviewed by the social workers.

29

1 Davellin was asked why during the interview with the social workers, she did not say
2 anything about the threats and not being able to leave Neverland Ranch. She said,
3 "We were so scared, we didn't want to say anything." She told us that she told the
4 social workers that everything was okay. Davellin was asked if anyone told her to say
5 that and she said yes. Davellin said before leaving Neverland Ranch for their meeting
6 with the CPS workers, Michael's people told them to tell the social workers that
7 everything is okay and that there is nothing wrong. When asked who told them to say
8 that, she indicated Frank and Deiter told them at different times. She was asked if she
9 was told by Frank and Deiter of any consequences if they did not say what they
10 wanted, she said no.

11

12 Davellin was asked if she recalled what Gavin and Star had told her about a
13 mannequin and she said yes. She was asked if she had seen the mannequin. She
14 said Michael had several mannequins and did not know which one it was.

15

16 Davellin was asked if Gavin and Star had described to her any more detail about the
17 incident where Michael was naked in front of them. They told her that Michael walked
18 naked one time in front of them and acted like nothing was wrong.

19

20 On Monday, July 7, 2003, at about 1335 hours, your Affiant and Detective Sgt. Steve
21 Robel interviewed 12-year-old Star. The interview took place at the CALM Cottage in
22 Santa Barbara. Star said he attends John Burrows School and receives average
23 grades. He is involved in a Navy-sponsored kids program called Sea Cadets.

24

25 During the rapport building and developmental assessment, I noted Star appeared to
26 have age-consistent knowledge and behavior. When asked if he knew the difference
27 between right and wrong, he indicated that he did. When asked to give an example of
28 something wrong, he said "to lie." Another example of something wrong was to "steal."
29 When asked what happens if one lies or steals, he said "get in trouble." An example of

1 something right, he said was "to tell the truth." Star said he was taught right and wrong
2 by his mother.

3
4 Star told us he met Michael Jackson when he was nine years old through Gavin, who at
5 the time was in the hospital for cancer. Star said he was not sure why, but Michael
6 Jackson called Gavin at the hospital. Shortly after Michael Jackson began talking on
7 the phone with Gavin at the hospital, the family was invited by Michael to go to
8 Neverland Ranch. Star said his biological father, mother, sister, Gavin and he were
9 picked up by Michael's limo and taken to Neverland for one night. His father, Gavin
10 and he stayed in one guest unit and his mother and sister stayed in another. During
11 the visit, Michael Jackson gave DVDs and a laptop computer as gifts to Gavin.

12
13 During their first visit, Star said activities included going on rides and driving golf carts.
14 While riding in golf carts, Michael wanted Gavin and Star to curse. Michael asked
15 them "what's your favorite curse word." Their parents were not present during this
16 incident. The family was returned home the next day in Michael's limo. He could not
17 recall anything else that happened during this first visit.

18 Star stated that Michael Jackson remained in telephone contact with Gavin. Michael
19 would call and talk with Gavin for hours. When asked how often Michael would call
20 Gavin, he said Michael called once every other day. He did not know what Michael
21 and Gavin talked about.

22
23 Star told us he was not sure if the following incident happened on the first visit or
24 second visit to Neverland. Michael's long-time friend, Frank Tyson, was present with
25 them in Michael's bedroom. Frank connected Gavin's laptop computer to the internet
26 and Michael started searching for pornographic websites. Michael typed either
27 www.pussy.com or www.teenpussy.com and they (Gavin and Star) saw "naked ladies."
28 Star described seeing a female holding her shirt up and exposing her breasts and
29 Michael commented "Got milk?" Michael's son, Prince, was sleeping nearby and
30 Michael told Prince he was "missing out." Frank Tyson told them not to tell their

1 parents about the porn. Michael asked Gavin to stay in Michael's bedroom. Star
2 reiterated he was not sure if it was on the first or second visit.

3
4 Star told us that on the same night they saw porn on the computer, they all slept in
5 Michael's bedroom. He and Gavin slept on Michael's bed while Frank and Michael
6 slept on the floor in sleeping bags.

7
8 Star had a difficult time being able to recall each individual visit to Neverland Ranch.
9 When asked, he said he remembers going to Neverland Ranch a total of six or seven
10 times. On some visits to Neverland, Michael would not be there. He recalls one time
11 going to Neverland with only his father and Gavin.

12
13 In February of this year (2003), Michael invited Gavin to Miami to do a press
14 conference regarding the TV show. He, his sister, Gavin and their mother traveled to
15 Miami aboard Chris Tucker's private plane to meet with Michael. Once they arrived
16 they stayed in the same hotel as Michael. He added that no press conference took
17 place while they were there.

18
19 Star said that while in Miami, Gavin was acting strange. Gavin told him that he was
20 drinking wine with Michael. Gavin would meet often with Michael in the bathroom.
21 When he asked Gavin what he and Michael were doing in the bathroom, he told him
22 they were just talking. Star said he thinks they were in Miami for three days, but was
23 not sure.

24
25 Star described the following incident as happening on Michael's private plane during
26 the return flight from Miami. Michael gave him a can of Diet Coke to drink. Upon
27 tasting it, Star said it tasted like rubbing alcohol. Gavin told him that it was wine. He
28 observed a red color around the rim of the can. Michael also told him there was wine
29 in the can. Star said Michael was acting funny on the plane. Michael was poking
30 others in the "butt" with his foot. He was making crank calls on the plane to unknown

1 people and asking, "Does your pussy stink?" During the flight, he observed Gavin fall
2 asleep with his head on Michael's chest. He saw Michael licking the top of Gavin's
3 head while Gavin was asleep. Star physically showed us Michael's action by sticking
4 his tongue out and moving his head, much like a cat would do when grooming. Others
5 on the plane were Michael's children, two nannies, Michael's doctor, his sister and his
6 mother. The nannies' names were Patti and Grace (unknown last names). He
7 believed the doctor's name to be Dr. Farshchian. When the plane landed, a limo took
8 them all directly to Neverland Ranch.

9
10 During their stay at Neverland Ranch after visiting Miami, Star said he and Gavin both
11 slept in Michael's bedroom. He described drinking alcohol every day and that he and
12 Gavin were given wine and vodka by Michael. When asked how he knew it was
13 vodka, Star replied "that's what it said on the bottle." He said Michael called wine
14 "Jesus Juice." They drank in Michael's bedroom, his office and the arcade room.
15 Michael would give Gavin more alcohol than he gave to Star.

16
17 On one occasion during this stay as Star was walking up a staircase that leads to
18 Michael's bedroom, he saw Gavin and Michael in Michael's bed. Gavin was asleep or
19 passed out from drinking. Gavin was wearing pajamas and Michael was wearing a t-
20 shirt, underwear and socks. Both Gavin and Michael were on top of the sheets. He
21 saw Michael "jacking off" under his underwear with his right hand. Michael's left hand
22 was under the front of Gavin's pajama pants. Michael was lying on his back and Gavin
23 was sleeping on his side. Star said he then left to go sleep in the guest quarters.

24
25 Star told us he observed Michael and Gavin in Michael's bed a second time under the
26 same circumstances. Again he was walking up the staircase to Michael's bedroom
27 and again saw Michael doing the same thing to Gavin as described above, but this time
28 Michael had his own penis out of his underwear while "stroking it." He said Michael's
29 penis was "hard." When asked to explain, Star stated Michael had an erection in his
30 penis. Star again left to go sleep in guest quarters.

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Star stated that Michael often wanted Star to leave the bedroom and only have Gavin sleep in Michael's room. Star described being locked out of Michael's bedroom once with Gavin still inside with Michael.

Star described another incident where Gavin was sleeping in Michael's bed. Star was half asleep in a chair next to the bed. Michael came into the bedroom and got into bed with Gavin. He believes Michael thought he was asleep. He observed Michael scoot up to Gavin who was curled up and sleeping on his side. Michael began moving his hips back to front against Gavin's back side. Gavin was wearing pajamas and Michael was wearing underwear. Star said he then pretended to wake and Michael quickly moved away from Gavin and pretended to be asleep.

Star described Michael Jackson's bedroom as having double doors that have several locks, including a combination lock. He said the combination is either 1960* or 1849*. The 1849* is a general combination for Neverland Ranch and Star believes 1960* is the combination to Michael's room. Michael's bedroom is two levels or floors. On the first floor is a fireplace, digital piano, big-screen TV, phone and two bathrooms. The floor is a combination of exposed wood and tan-colored carpeting. A staircase leads to a second-floor room that has Michael's bed. The railing at the top of the stairs is made of wood and matches the floor. There is a picture of Michael with celebrated geniuses hanging on the wall above Michael's bed, a TV screen that comes down from the ceiling and a table with a computer on it.

Star stated that on one occasion Michael wanted Gavin and him to take sleeping pills. Michael told him to go and get the sleeping pills from Rudy the head chef. Michael wanted Gavin and Star to take the pills, but somehow the subject changed and the pills were forgotten. He kept the sleeping pill and their attorney now has it.

1 Star described seeing Michael Jackson naked on one occasion. Gavin and he were
2 sitting up on the edge of Michael's bed watching TV in Michael's bedroom. Michael
3 walked into the bedroom completely naked, except for socks. When they saw Michael
4 was naked, they quickly looked away. Michael told them "it's okay, it's okay" and sat
5 on the bed with them, and then said "you guys should do the same." Star said
6 Michael's penis was erect during this incident.

7

8 When asked to describe Michael's penis, Star said he did not remember details
9 because he only glanced at it, but motioned with his hands that Michael's penis was
10 approximately five to seven inches long. Sgt. Robel asked what happened next. Star
11 stated the incident happened quickly and they left the room.

12

13 Star told us that Michael Jackson's bedroom has a phone that can monitor all of the
14 phone lines at Neverland Ranch. During their stays at Neverland, Michael Jackson
15 would keep him and Gavin away from clocks and "dates." This made it difficult for
16 them to keep track of how long they were at Neverland Ranch.

17

18 When asked, Star said Michael Jackson touched him inappropriately. The incident
19 occurred when they were in a golf cart. Star was driving the golf cart and Michael was
20 next to him. Michael then reached over and touched Star's "testicles and penis" over
21 his clothes with Michael's left hand. He did not say anything to Michael and continued
22 driving the golf cart.

23 On another occasion Michael told them a story about a movie where a kid was
24 masturbating and then "humped" a dog. Michael talked about masturbation and asked
25 them if white stuff came out of their private area.

26

27 Star described seeing a black suitcase in Michael's office which contained pornography
28 magazines. The magazines included Playboy and Hustler. They contained only
29 pictures of naked women, not men or children. They also saw Michael "hump" a

1 female child mannequin on Michael's bed. Michael was dressed and only acted like
2 he was having sex with the mannequin.

3
4 Star said that Michael once told him never to tell about anything that they did, even if a
5 gun was held to his head. Star said Frank Tyson threatened him by saying he would
6 have all of the family killed if Star told anyone what they did with Michael Jackson.
7 When asked, Star said he was scared of Frank.

8
9 Star told us he has seen a change in Gavin since the last visit to Neverland. He said
10 Gavin gets angry more often and at times is quieter than before.

11
12 It was determined after our interview with Star on July 7, 2003 that there were follow-up
13 questions that needed to be asked. On Wednesday, August 13th, at about 1632
14 hours, your Affiant and Detective Sgt. Robel conducted a follow-up interview at a Los
15 Angeles hotel near the victims' residence. The interview began by asking Star if there
16 was anything that he had shared with Gavin, or Gavin with him, after our initial
17 interview. Star said no.

18
19 Star was asked where he stayed during the very first stay at Neverland Ranch. Star
20 said, "The guest units." Star was asked about Davellin's statement that on the very
21 first visit, they stayed in Michael's bedroom. Star replied, "That was on the second
22 night." He was unsure how many days they had stayed on the Ranch on the first visit.
23 He believes it was on the second day of the first visit that they stayed in Michael's
24 bedroom. Michael and Frank also stayed in the bedroom. Star described Frank as
25 Frank Tyson. He is a 23-year-old Italian with black curly hair.

26
27 When asked during the CPS interview why he did not disclose anything about what
28 was going on with Michael's people and Michael himself, Star replied that Michael had
29 scared them by threatening them that he was going to kill them. He then clarified that
30 it was not Michael that actually made the threat, but "Michael's people." He was asked

1 if he was personally threatened or if he heard a threat, and he said yes. Frank told
2 him that if Star didn't protect Michael, something bad would happen to the family. The
3 threat was made at the snack area of the theater at Neverland. He was the only one
4 there at that moment. Frank made another threat a couple days before the CPS
5 meeting. Star was asked if Frank knew that they would be meeting with the ladies from
6 Child Welfare Services, and he said yes. When Star was asked why he thought Frank
7 had made that threat, he said, "Because he already knew what Michael did to us." If
8 they had told the truth, Michael would have gone to jail. When asked if he was
9 threatened by anyone else, he said no.

10

11 Star said that he was not actually asked any questions by the CPS workers. Their
12 questions were mainly directed at Mrs. Arvizo and Gavin. He is sure he did not say
13 anything bad about Michael, because he was scared.

14

15 Star was asked if he remembered the "escape" from Neverland Ranch. He said yes.
16 It was late at night and Deiter and Ronald were there. They were threatening his
17 mother. His mother then asked a person by the name of Jesus if there was any
18 chance he could take them home, because they were afraid. Jesus got a car, and
19 around midnight they left.

20

21 Star was asked if Deiter or Ronald ever made any threats to him and he said no, but
22 Deiter would have chats with them about what and what not to say. By this he meant
23 they were told what to say to the camera for the rebuttal show. He was asked if they
24 were told what to say to CPS, and he said he believes so, but is not really sure
25 because it was so long ago.

26

27 Star was asked to describe to us the guest quarters at Neverland Ranch. He said
28 there were four guest units. Two faced the house and two faced the lake. Each of the
29 guest units has a single room with an attached bathroom. Each guest unit was
30 furnished differently.

1

2 Star was reminded of the previous interview, where he mentioned the word "jacking off"
3 to describe what Michael was doing to himself. He was asked what he meant by
4 "jacking off." He said, "He was masturbating." When asked for his definition of
5 masturbating, he replied, "Where you stroke your penis." He was asked if he saw
6 Michael doing that and he said yes. He described Michael's left hand touching Gavin
7 and Michael's right hand stroking Michael's penis. He said Michael's left hand was
8 inside the front of Gavin's boxer shorts.

9

10 Star was asked if there was anything he has forgotten to share with us or that we had
11 not asked about. He believes there was something else, but he could not remember.
12 He was asked if he was truthful with everything he has told us and he said yes. He
13 was asked if they had met any other children visiting Neverland that he thinks this may
14 have happened to. He said they had met two children, Marie Nicole and Aldo. He
15 believes they are Frank's sister and brother. Aldo is 11 years old and Marie Nicole is
16 either 14 or 15.

17

18 On Monday, July 7, 2003, at about 1500 hours, your Affiant and Detective Sgt. Steve
19 Robel interviewed Gavin at the CALM Cottage in Santa Barbara. Sgt. Robel began the
20 interview by asking Gavin some personal information. Gavin indicated he will be
21 entering 8th grade and currently has average grades. He likes football and baseball,
22 but is precluded from playing because of doctor's orders. I noted that during the
23 rapport-building and developmental assessment portion of the interview, Gavin
24 appeared to have age-consistent knowledge and behavior. I also noted that Gavin
25 spoke in low tones and appeared to be a little shy or reserved. Gavin was asked if he
26 knew the difference between right and wrong. He indicated that he did. He was asked
27 to give an example of what is wrong. He said, "stay up too late" and "fighting." He
28 also said it is wrong to "break something" and "kill people." When asked, Gavin said
29 "help people" and "call 9-1-1" are examples of something right to do. He has learned

1 right and wrong by figuring it out himself and also was taught the difference by his
2 parents.

3

4 Gavin told us that he met Michael Jackson in the year 2000. He was in the hospital
5 with cancer when Michael placed a telephone call to him. He was not sure if Michael's
6 contact with him was made through the "Make a Wish Foundation" or other contacts.
7 Michael called him regularly and they talked about video games, famous people, and
8 the Simpson's. Michael called him about three times a week and also called him at
9 home when he left the hospital. Shortly after Michael began calling, he invited him and
10 his family to Neverland Ranch.

11

12 Gavin recalled that Michael Jackson sent a limousine to pick up the family. It took
13 them to Neverland Ranch for their first visit. His mother and father, his sister Davellin,
14 his brother Star and he all went to Neverland Ranch and met Michael in person for the
15 first time. The first visit to Neverland Ranch was for one night.

16

17 Gavin said he was not sure if it was the first or second visit to Neverland that Michael
18 asked him to stay in Michael's bedroom. He said at first Michael wanted only him to
19 stay in the bedroom, but he insisted to Michael that Star be allowed to stay as well.
20 Michael told him to ask his parents during dinner if he and Star could stay in the
21 bedroom.

22

23 Gavin said it was during this time that Michael gave him a laptop computer as a gift.
24 He described the computer as a black-colored "Apple" computer. Later, while in
25 Michael's bedroom, Frank, who is a friend of Michael's, connected the laptop to the
26 internet. Michael, Frank, Star and he then began looking at "porn" on the computer.
27 They saw "naked girls." He added that Michael told him not to tell his parents about
28 what they were doing. Gavin said that night he and Star slept in Michael's bed while
29 Frank and Michael slept on the floor.

30

1 Gavin told us he visited Neverland Ranch about five to ten times. He recalled being at
2 Neverland with only his father, Mrs. Arvizo, and possibly Star on one occasion. During
3 some of his visits to Neverland Ranch, Michael was not there.

4
5 Gavin remembered once visiting with Michael Jackson at the Hilton in Universal City.
6 His father took him to Universal City to meet Michael. His father drove the "Bronco"
7 truck that Michael had given him as a gift. The visit was only for the day. When
8 asked what they did, Gavin said he watched a movie with Michael and his children
9 while lying in bed. He said they talked, hung out and wrestled around.

10
11 Gavin told us that the Bronco and laptop computer given to him by Michael were later
12 taken back.

13
14 Gavin recalled one visit to Neverland Ranch where only his sister, Star and he were
15 there. On the first day of that visit, Michael wanted him to make a film. Michael told
16 him he would put him in the movies and that this was Gavin's audition. Michael told
17 him to say on the film how Michael had helped him. His sister and Star watched as he
18 was filmed. Michael was there during the first day, but then left. After Michael left,
19 they stayed in the guest units for a couple of days.

20
21 Gavin told us that the next time he saw Michael Jackson was in February of this year
22 (2003). Michael called him and wanted him to fly to Florida for a news conference.
23 Gavin, his mother, sister and Star flew to Florida on Chris Tucker's private plane to
24 meet with Michael. When they arrived in Florida, there was no press conference.

25
26 Gavin said that during the stay in Miami, Michael Jackson gave him wine. Michael told
27 him that he had something to relax him. Michael emptied a Diet Coke can and filled it
28 with wine. Michael told Gavin it was wine and to "just drink it." He drank the wine and
29 that it gave him a headache.

30

1 Gavin said Michael also gave him cans filled with wine on the flight from Miami and
2 gave him a watch. Michael told him the watch was worth \$75,000 and not to say
3 anything about the alcohol.

4
5 After Miami, they returned to Neverland where Michael gave him wine, "Skyy" vodka
6 and Bacardi every day. Michael told him not to tell anyone and that it was "their little
7 secret." Michael Jackson also gave alcohol to Marie Nicole (Frank's sister or cousin).

8
9 When Sgt. Robel asked Gavin if Michael Jackson had ever touched him
10 inappropriately, I observed Gavin's demeanor to change. Gavin sighed, became quiet,
11 lowered his head and took some time to answer. Gavin was reassured that he was
12 doing the right thing. Gavin said the following incident took place during the last days
13 of the visit to Neverland Ranch directly after returning from Miami.

14
15 Michael had him drink alcohol and he felt "kinda drunk." Michael told him that boys
16 have to masturbate or they go crazy. Michael told him a story of a boy who had sex
17 with a dog. Michael told him that he wanted to show Gavin how to masturbate. He
18 told Michael "no," but Michael said "I'll do it for you" and "I'll show you." Michael then
19 grabbed him in his private area. Gavin said that both he and Michael were wearing
20 pajamas and lying on Michael's bed. Michael placed his hand down the front of
21 Gavin's pajamas and started masturbating him. Gavin said he told Michael he didn't
22 want to do it, but Michael kept masturbating him. Michael told him "it's okay" and "it's
23 natural." Michael did not stop masturbating him for a long time. Gavin added that
24 Michael asked him "If you masturbate, does white stuff come out?" Gavin could not
25 recall if he ejaculated.

26
27 Gavin told us that Michael masturbated him every night that Star wasn't sleeping in
28 Michael's bedroom. When asked, he said this occurred less than five times. He was
29 not made to masturbate Michael and never saw Michael's penis during these incidents.
30 He did say that Michael once made him touch Michael's "private part" over the clothes.

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Gavin said on another occasion Michael showed him a black suitcase containing magazines and comics of naked women. The magazines included Hustler and Playboy. Once he also saw Michael pretend to have sex with a child female mannequin. Michael was fully dressed and had the mannequin on his bed. He described Michael "humping" the mannequin as if he was having sex with it.

Gavin did not disclose any other inappropriate touching by Michael. He did say that Michael hugged him a lot and would kiss him on the head a lot. Gavin said that all of the inappropriate touching happened at Neverland after the trip to Miami when he slept in Michael's bed almost every night.

Gavin said during the stay at Neverland after Miami, Frank was mad at Gavin's mother. Frank called his mother a "bitch," because she wanted to leave Neverland Ranch. While at Neverland, Frank also threatened to have Mrs. Arvizo killed if Gavin ever said anything about the alcohol. Gavin told us he was scared that they would be killed. When asked, Gavin said Michael never threatened him.

On Wednesday, August 13, 2003, at about 1530 hours, Detective Sgt. Robel and I conducted a follow-up interview of Gavin. The interview took place in a Los Angeles hotel near Gavin's residence.

The interview began by Sgt. Robel asking Gavin if, while he was at Neverland Ranch, Michael Jackson ever said he wanted to be alone with Gavin. Gavin said "Yes." Michael would often tell him that he wanted to have a "meeting" with him. He and Michael talked about what Gavin wanted to be when he grew up. He told Michael he wanted to be a comedian and actor. Michael told him that he could help him. Gavin added that they just talked about "regular stuff." Gavin was asked if during their phone conversations Michael had ever said he wanted Gavin to go to Neverland Ranch alone. Gavin answered, "Yes." Also, Michael at first wanted only him to go to Miami. The

1 question was clarified by asking Gavin if during any of the many phone calls that he
2 received from Michael, Michael ever invited him to Neverland Ranch by himself. Gavin
3 said Michael would tell him, "I want you to come to my ranch." He did not know if
4 Michael was requesting that he come alone and he would always ask Michael if he
5 could bring his family.

6
7 Gavin was asked why he met with Michael Jackson at the hotel at Universal City. He
8 explained he was talking with Michael on the phone when Michael told him he was at
9 the Hilton Hotel in Universal City. The conversation with Michael was about visiting.
10 Gavin described his visit with Michael at the Universal City Hilton as watching
11 television for about two hours. After about two hours, Michael left to go to a studio.
12 During the visit, Gavin's father was in an adjacent room.

13
14 Gavin was asked what color was the wine given him by Michael in Miami and if anyone
15 else was given wine. He said it was white wine and Michael poured it into a can.
16 Michael gave him the wine while both of them were in Michael's bedroom. Michael
17 poured it into a Coke can and gave it to him to drink. He and Michael then joined his
18 family in the living room and he continued to drink the wine from the can, which was
19 unknown to anyone else. No one else was given alcohol at that time. When asked
20 how much he drank, he said only one can-full. When asked how much he drank on
21 the plane flight back from Miami, he said a whole can of wine. Michael would tell him,
22 "Keep on drinking, take another sip."

23
24 Gavin was asked to describe or clarify how he felt when he described himself in the
25 prior interview as feeling "kinda drunk" while in Michael's bedroom. Gavin said he felt
26 like someone had spun him around a lot and when he sat down the room continued
27 spinning. He also felt this way in the wine cellar arcade and just about every time
28 Michael gave him alcohol. He was asked if he felt this spinning sensation just when he
29 and Michael were alone together, and he said "Yes".

30

1 Gavin was asked to clarify why Michael Jackson gave him a watch and jacket. He
2 explained that Michael gave him the watch and told him it was so that he would not tell
3 about the alcohol at the hotel. He described the watch as being all gold with a gold
4 wristband with diamonds on the face of the watch with blue stones instead of numbers.
5 The watch brand was "Rado." Michael gave him the jacket while they were in Miami
6 and it was not given to him for any particular reason. Your Affiant now has both the
7 watch and the jacket.

8
9 Gavin was asked why Michael Jackson gave him a Bronco. He explained that he was
10 telling Michael that their car was not that good and Michael gave them the Bronco so
11 that Gavin could be taken to his doctor's appointments. This happened in 2000.

12 Gavin was asked why the Bronco and the laptop were taken back. He said he did not
13 know and added that the laptop had a battery problem, and that his mother contacted
14 Evie (Michael's assistant) and told her about the problem. His mother mailed the
15 laptop to Evie, and they never received it back. He said basically the same thing
16 happened with the Bronco. Something was wrong and they promised to fix it and it
17 was never returned.

18
19 Gavin was asked to clarify how long they were at Neverland Ranch directly after they
20 returned from Miami. He said he was not sure, because they were not allowed to keep
21 track of dates and time, but he believes it was weeks. Gavin was asked if he knew the
22 reason why they were not allowed to leave Neverland Ranch. He replied, "I don't
23 know, only that they didn't want us to leave." When asked how he knew that they did
24 not want them to leave Neverland Ranch he said, "Every time we tried to leave, they
25 would stop us." When asked how they would stop them he said, "The security was told
26 to stop us if we went to the gate." When asked who exactly told them they could not
27 leave he said, "Frank," and that Frank did not give a reason. Gavin recalled one
28 incident where they contacted a manager by the name of Jesus (later identified as
29 Jesus Salas), and they asked to leave. He described the family packing their bags late
30 at night and leaving in a car with Jesus.

1
2 Gavin was asked if while at Neverland, he had ever been threatened. He said only his
3 mother was threatened. When asked if he heard the threats he said Frank told him, "I
4 could have your mother killed." The threat took place in the main house at Neverland
5 Ranch, and believes his sister and Star were present at the time the threat was made.
6 When asked why he thought the threat was made, Gavin said because "my mom
7 always wanted to leave" and "she was always telling him that she did not want to stay
8 there anymore, she wanted to go home." Gavin was asked how he felt about the
9 threats towards his mother. He said he was scared, and he believed the threats to be
10 credible because Michael Jackson is a billionaire.

11
12 Gavin was asked about the Child Protective Services (CPS) interview and who was
13 present. He said there were three ladies, his mother, and a security guard. Gavin
14 was asked why he did not disclose anything to the CPS people. He said by then they
15 were really afraid of Frank and Michael. He explained that Michael would tell Frank,
16 and Frank would tell them things as if it was coming from Frank in order to make
17 Michael look good. When asked if he was afraid of Frank, he said, "yes." He was not
18 directly threatened not to say anything, but they were afraid and he observed the
19 security guard take his mother into the bedroom prior to the interview. When asked
20 what he was afraid of, Gavin said he was afraid they might kill his mother.

21
22 Gavin was asked if he knew what the relationship was between Frank and Michael.
23 He said they told them they were cousins or something. He described Frank as being
24 Italian. Frank was light-skinned with curly hair, about 5' 8", with a skinny build. Frank
25 is 20-something and that Michael has known Frank since Frank was a baby. Jackson
26 told him Frank was born in New Jersey.

27
28 Gavin was asked where at Neverland Ranch he was given drinks by Michael Jackson.
29 He said Michael gave him drinks in Michael's bedroom and also in the arcade. He
30 described a wine cellar located below the arcade. When asked what type of drinks he

1 was given by Michael, he said white wine, red wine, vodka and Jim Beam. Gavin was
2 asked to describe the arcade. He said the arcade was in a separate building located
3 behind the main house. It is a two-story building that contains video games on both
4 the first and second levels. Gavin described the wine cellar to be below the first level
5 of the arcade. To access the wine cellar, you have to go down a flight of stairs that
6 leads to a door. Past the door is a small room, which contains a couch, a vase, and
7 another door that leads to a room that contains wine bottles. Gavin said that
8 sometimes it would be just he and Michael in the wine cellar. At other times Star would
9 be there and sometimes his sister would be there. Sometimes Michael would also give
10 wine to Marie Nicole and Aldo (unknown last name). Gavin added that Aldo would not
11 always drink because he did not like it. They would sometimes drink straight from the
12 bottle and sometimes from glasses. The wine was sometimes red and sometimes
13 white. When asked how much he drank while in the wine cellar, he said sometimes
14 one to three glasses.

15
16 Gavin was asked about the sleeping arrangements while at Neverland Ranch and who
17 slept in Michael's bed. He said, "Me, and sometimes my brother." He was unsure, but
18 said Star slept in Michael's bed possibly seven times. When asked if Michael was in
19 the bed also, he said, "yes." Gavin added that sometimes Star, Aldo and Michael
20 would all be in the bed. Sometimes it would be he and Michael, and sometimes it
21 would be he, Aldo and Michael.

22
23 Gavin was reminded that it was very important that he be honest and to give as much
24 detail as he possibly could. He was then asked about his initial interview's description
25 of Michael speaking about masturbation. He was asked what he thinks masturbation
26 means. Gavin said that his grandma had explained to him that grown men must
27 masturbate, because if they don't, they may go out and rape a woman. Gavin was
28 asked to describe what masturbation is. He said it is when a grown man touches
29 himself in his private area. When asked what he meant by private area, he said,
30 "penis." When asked what else happens, Gavin said, "ejaculation."

1
2 Gavin was asked if Michael Jackson did that to him. He said, "Yes." He was drinking
3 at the time Michael did that to him. He was asked how much he had drank. Gavin said
4 that he had a couple of gulps from a wine bottle and felt lightheaded. Gavin was
5 asked how long Michael Jackson masturbated him. He said until he ejaculated.
6 Gavin clarified that Michael masturbated Gavin with his hand. When asked where he
7 ejaculated he said, "inside my pants." He added that his pants were up and that the
8 incident occurred on Michael's bed. Gavin was asked again if the masturbation was
9 for 5 or 10 minutes, and he said he did not know.

10
11 Gavin was asked to clarify if anything was said by Michael prior to masturbating him.
12 He said Michael had told him that he wanted to show him how to masturbate. He does
13 not believe Michael said anything during the actual act of masturbation. He said
14 ejaculation is "When sperm comes out of the penis." He was asked if Michael said
15 anything after the act of masturbation and he said that Michael asked him if it felt good.
16 Gavin did not reply to Michael's question. He was asked if Michael had done anything
17 to himself, and he said that he did not think so. When asked if he was made to do
18 anything to Michael, he said, "I don't know. I don't think he did." Gavin believes
19 Michael asked him something about touching Michael, but he told Michael he didn't
20 want to.

21
22 When asked if Michael did anything else to him, Gavin replied, "No." Gavin said these
23 incidents occurred toward the end of their last visit to Neverland before they stopped
24 going to Neverland. When asked how many times Michael had done this to him, he
25 replied, "Every time my brother wasn't there, for a total of five times." When asked if he
26 ejaculated every time, he said, "Yeah, I think so." Gavin was asked if Michael ever
27 kissed him, rubbed him, or did anything else. He said Michael would rub his back and
28 also kiss him on his head a lot. When Gavin was reminded that he told us that
29 Michael had made him touch Michael on the outside of Michael's pants, he said he

1 could not remember that. Gavin was asked if Michael had been drinking during the
2 times that Michael masturbated him and he indicated yes.

3
4 He said Michael would tell him to put his underwear he was wearing during the
5 masturbation into Michael's hamper before showering. This happened after each time
6 Michael masturbated him. He said this happened about seven times. The underwear
7 was not given back to him. Michael bought him new ones. Gavin described his
8 underwear as white "Hanes" brand briefs, size small.

9
10 Gavin described the suitcase containing magazines he mentioned during the first
11 interview. It was hard plastic, about the size of a normal briefcase, and with locks
12 popping up on each side, much like a briefcase. It was located on the first level of
13 Michael's bedroom, down a hallway, past a door in a small room that contained a small
14 couch.

15
16 Gavin was asked to describe the mannequin Michael "humped." He believes it was a
17 black girl wearing overalls, but indicated that Michael has several mannequins of both
18 boys and girls, and the mannequin may have been wearing a dress.

19
20 Gavin was asked who connected the computer to the Internet and who searched for
21 porn. He said it was Frank. He could not remember the website. Gavin recalled the
22 images of the pornographic website to be pictures of naked teenage females. The
23 girls were on beds, exposing their private areas. None of the pictures were of males.
24 Michael was the one who directed Frank to go to specific sites.

25
26 Gavin was asked why he thought Michael wanted him to do the filming for the show.
27 He said Michael was probably going to use the film to make himself look good. He
28 thought the film was going to be kept by Michael for himself. Michael told him that this
29 film was going to be sort of his audition, and that Michael was going to put him in
30 movies. Michael told him what to say on the film. This all occurred on the occasion

1 when a part of the "Living with Michael Jackson" video was being filmed at the
2 Neverland Ranch.

3
4 Gavin was told that it is very important in this investigation and he tell us everything
5 and not to hold back any information. He was told it is important that he be honest,
6 and not to be embarrassed. Gavin said there was nothing else. This concluded the
7 interview.

8
9 Your Affiant has detailed in this affidavit the fact that the child victims and their mother
10 were interviewed separately and admonished not to discuss their interviews or this
11 case with each other. It is important to note that during the course of the two interviews
12 detailed in this affidavit, Mrs. Arvizo was not aware that Gavin had been molested. She
13 believed the focus of our investigation was the family's having been held against their
14 wishes at the Neverland Ranch upon their return from Miami and their escape in March.
15 Mrs. Arvizo told your Affiant she had contacted an attorney to help get their
16 possessions back and to set up contacts with law enforcement to report what had
17 happened to them. She emphasized that she was not interested in money.

18
19 Your affiant is aware through a conversation with Sgt. Robel that around 5:00 p.m. on
20 September 30, 2003, that Sgt. Robel, Lt. Klapakis and District Attorney Tom Sneddon
21 met with Mrs. Arvizo and her family in a Los Angeles hotel and informed her that our
22 conversations with her children had established that Gavin had been molested. This
23 was the first time she was aware of the nature of her children's disclosures to law
24 enforcement.

25
26 Your Affiant has read and reviewed the affidavit of former Santa Barbara County
27 Sheriff's Detective Deborah Linden, outlining the details of a 1993-94 child molest
28 investigation of Michael Jackson. The victim in that investigation was a 13-year-old
29 boy. Detective Linden is now San Luis Obispo City Chief of Police.

30

PAGES 65-72 REDACTED
(RE 1993-94 INCIDENT)

1 The Arvizo family's separately-elicited accounts corroborate one another. A trained
2 forensic psychologist evaluated the youngsters and deemed them credible. The mere
3 fact of forty-five-year-old Jackson's three-year-long interest in the adolescent Gavin is
4 corroborating in itself; it would strike a reasonable person as grossly abnormal. So is
5 the way that interest manifested itself: endless telephone conversations with the
6 youngster; inappropriate and relatively public touching, kissing, licking and cuddling of
7 him; expensive gifts, cross-county flights, the relocation of the family from their modest
8 quarters in Los Angeles, his efforts to have them take up residence in Brazil.

9

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23 In the now-famous interview of Michael Jackson by the BBC's Martin Bashir in "Living
24 with Michael Jackson" that aired on February 6, 2003, Jackson denied that inviting
25 Gavin to his bed was sexually motivated: "It's not sexual," he insisted. "We're going to
26 sleep. I tuck them in. We play; I put a little, like, ah, music on. I tell a story to 'em; I
27 read a book. It's very sweet. I put the fireplace on. We give 'em hot milk. You know,
28 we have a; cookies. It's very charming. Very sweet. It's what the whole world should
29 do."

30

1 In contrast, none of the children's accounts, even to the CPS workers, mentions "hot
2 milk," "cookies," and "reading stories."

3
4 **Requested Search Of Hamid Moslehi's Residence/Film Studio**

5
6 It is your Affiant's training and experience that individuals in the film business usually
7 maintain copies of the things filmed. Often the items maintained include the entire
8 filming process, as well as the finished product. The film can also be converted into
9 DVD or discs and stored, saved or viewed on a computer. Moreover, your Affiant
10 believes there is probable cause set forth in the affidavit to believe that Hamid Moslehi
11 is a professional filmer who does some of that work in his residence which doubles as
12 his corporate headquarters. It is reasonable to believe that his corporate headquarters
13 would contain documents in the form of letters, invoices, bills or other such documents
14 billing Michael Jackson, Neverland Ranch, Brad Miller, MJJ Productions, or one of the
15 other individuals or agents of Michael Jackson named in this search warrant for the
16 filming of Mrs. Arvizo's children's February 20, 2003 in what your Affiant will call the
17 "Michael Jackson Apology."

18
19 **Requested Search Of Office Of Investigator Miller**

20
21 Your Affiant believes this affidavit also establishes probable cause to believe that
22 private investigator Bradley G. Miller was employed by or acting as an agent for
23 Michael Jackson or representatives or employees of Michael Jackson in the prolonged
24 false imprisonment of Mrs. Arvizo's family and the unlawful taking of Mrs. Arvizo's
25 hidden Michael Jackson-Gavin correspondence from her stored contents. The affidavit
26 reflects that the storage unit was in Brad Miller's name and billed to his business
27 address. He was also present at the Hamid Moslehi filming of the Mrs. Arvizo family's
28 forced "Michael Jackson Apology" film. Based on Jay Jackson's conversation with
29 George, the owner of Dino's, regarding customer access to the storage unit, it is

1 reasonable to conclude that any entry into the storage unit, any search thereof, or the
2 taking of the notes stored there was done by Brad Miller or with his permission.

3
4 Therefore, your Affiant also believes there is reasonable and probable cause to believe
5 that Brad Miller, as a licensed, professional investigator, may still have the notes or
6 some documentation in the form of the notes, or correspondence, memoranda or other
7 such writings reflecting their transfer to someone else. It is also reasonable to believe
8 that a search of his business records will produce records showing his employment by
9 Michael Jackson, MJJ Productions, or one of the other Michael Jackson agents
10 responsible for the false imprisonment of the Arvizo family. Such records would include
11 letters, memorandums, invoices, billings and cancelled checks confirming his payment
12 of the rental of Dino's Storage facility where the Arvizo family possessions were kept
13 and the letters were taken.

14
15 **Requested Search Of "Neverland Ranch"**

16
17 Your affiant believes there is reasonable and probable cause to believe that at Michael
18 Joe Jackson's "Neverland Ranch," there is corroborating evidence of Jackson's
19 pedophilic interests, in the form of the pornographic magazines he shared with Gavin
20 and Starr, children's underwear, and briefcase containing the magazines of naked
21 women shown the boys.

22
23 According to the Arvizo children's statements to investigators, they stayed in the main
24 residence and Mrs. Arvizo stayed in one of the guest houses. They also visited almost
25 all of the buildings and entertainment attractions surrounding the ranch's main
26 residence, including but not limited to the arcade, theatre, tree house and "trophy"
27 building.

28
29 Your Affiant has attached as Exhibit "1" to this affidavit an aerial photograph of
30 Neverland Ranch, depicting the various buildings and attractions which have been

1 identified by name. The accuracy of these designations was established from the
2 following sources:

3 1) On September 16, 2003, the Arvizo family was shown Exhibit "1". They identified
4 the main residence, guest quarters, arcade, theatre, tree house, train station, zoo,
5 carnival and recreational area;

6 2) In October, 2003, District Attorney Tom Sneddon provided investigators with
7 photographs taken during the 1993-94 investigation of the main residence, both
8 exterior and interiors and most of the outbuildings depicted on Exhibit "1." Mr. Sneddon
9 also related that he was personally present during the consensual photo and video
10 documentary of the premises arranged by Michael Jackson's then-attorneys and
11 viewed the main residence, arcade and theatre, as well as surrounding areas;

12 3) From a review of a video tape taken on the same consensual search referenced
13 above; and

14 4) from conversations with other sheriff's personnel familiar with the ranch and its
15 buildings.

16
17 As noted on Exhibit "1" and confirmed by the sources noted above, both the arcade and
18 theatre are outbuildings, unconnected to the main residence. The arcade is a two-story
19 wood-trimmed building immediately adjacent to the tennis courts. The series of guest
20 quarters are near, but not attached to, the main residence.

21
22 From some of these same sources, your Affiant determined that the ranch has a
23 security headquarters building near the main residence, and is connected to the main
24 residence by a stone archway. It is believed that the security headquarters contains
25 surveillance monitoring systems. (A photograph of a security building is attached as
26 Exhibit #2.) The photograph has "HQ" in black on front with an arrow pointing to the
27 building. Designation "Exhibit 2" is on the back of the photo.

28
29 Also from reviewing the 1993-94 photographs and talking to District Attorney Sneddon,
30 your Affiant determined that at the time of these photos the downstairs area of Michael

1 Jackson's bedroom also contained his bed. In all other respects, it is consistent with
2 their description. The photos do confirm the existence of the staircase leading to a
3 second floor area capable of accommodating the bed as described by the children.

4
5 As set forth in this affidavit, your affiant has personally met with the Arvizo family,
6 including each of the children on multiple occasions. Your affiant has arranged to have
7 all individuals searching the premises authorized by this search warrant to have recent
8 photographs of the children for use in connection with the existence of the search
9 warrant.

10
11 Your affiant also requests authorization to video and photo document each of the
12 premises to be searched. The affidavit sets forth specific information detailing the
13 location of events at Neverland Ranch and Moslehi's residence. Photo and video
14 documentation will be necessary to further refine, preserve and authenticate the
15 location or condition of the premises for further investigation and trial purposes.

16
17 Your affiant believes there is reasonable and probable cause to believe that at
18 Neverland Ranch, Hamid Moslehi's business headquarters located in his residence at
19 [REDACTED] West Hills (Los Angeles County) and at Private Investigator Bradley
20 G. Miller's office located at 211 South Beverly Drive, Suite 108, Beverly Hills,
21 California, there are notes, personnel records, telephone records, lists of names and
22 telephone records, phone message pads, appointment books, rolodexes, business
23 cards, telecopies or facsimile material, contracts, agreements, bills, invoices, receipts,
24 photographs, calendars, diaries, cash receipts journals, cash disbursement journals,
25 payroll journals, ledgers, reports, writings, day planners, correspondence, and
26 cancelled checks related to the investigation of the false imprisonment of Janet Arvizo
27 and her family and the molestation of Gavin Arvizo.

28
29 It is reasonable to infer that some of these records may be stored either in a computer
30 or on some type of computer storage device such as floppy disks, zip drives, removable

1 tape cartridges, or CD-ROMs. I know that many people use computers to conduct their
2 business, and that unlike drugs or stolen property, records are typically kept on the
3 premises for years after they were created.

4
5 Your Affiant discussed the practicality and risks associated with an on-premises search
6 of computer records and systems with Det. McCammon, who is assigned to the
7 Sheriff's High Tech Crimes Unit. Det. McCammon explained to me that based upon his
8 training and experience, computer systems commonly consist of computer hardware,
9 software, and data. Some computer systems may include multiple computers
10 connected together, including workstations and servers. Det. McCammon believes that
11 some of the information sought to be searched/seized may be contained on computers,
12 separate computer media, personal digital assistants (e.g., Palm Pilot) and/or digital
13 cameras.

14
15 Searching the subject's computer, separate computer media, personal digital
16 assistants, and/or digital cameras to the degree necessary to discover all stored
17 information encompassed by the warrant requested in this case would be impractical,
18 risky and difficult. A search performed at the premises could risk destruction of
19 evidence. Persons concerned about detection are able to "rig" their computers in such
20 a way that an otherwise innocuous instruction acts as a signal for the computer to
21 erase data. Det. McCammon or other investigators may not be able to perform even a
22 cursory search without spending a great deal of time at the scene ensuring that the
23 computer has not been "rigged." Those person may also employ computer security
24 programs which can only be bypassed, if they can be circumvented at all, by specialists
25 using a sophisticated laboratory. It would also be difficult to perform a thorough search
26 of the subject's computer at the scene because Det. McCammon or other investigators
27 may not be familiar with the operating system used on that computer. Computers are
28 capable of storing large amounts of data; a thorough search of a single computer may
29 take days or weeks. It would be impractical to perform such a search at the premises.

30

1 It would also be difficult to search all loose computer media at the scene. The subject
2 may maintain too many disks to allow a thorough search within a reasonable time.
3 Some removable storage media may contain the equivalent of tens of thousands of
4 pages of information. An investigator cannot exclude even those floppy disks labeled
5 as commercial software, because it is easy for anyone to copy new information onto
6 those media. It is impossible to know how many floppy disks are at the premises until I
7 arrive. In addition, in order to avoid using the subject's computer (which may be
8 rigged) to examine the separate computer media, Det. McCammon would have to bring
9 another computer onto the premises. It is impossible to predict which application
10 programs (as well as other programs, such as drivers) out of the hundreds available
11 have been used by the subject to create files stored on the computer media.
12 Therefore, it is impossible to ensure that any computer brought onto the premises could
13 be used to examine the media.

14
15 Thus, I request permission to remove all computers and computer media for further
16 examination.

17
18 As discussed above, I am requesting permission to search and seize computer
19 systems, computer networks, computer hardware, personal digital assistants, digital
20 cameras, software, and data located at the premises. I intend to search and seize
21 computer equipment, which could be considered to be computer peripherals, including
22 but not limited to monitors, keyboards, input devices (such as mice and trackballs),
23 printers, tape drives, optical/CD-ROM drives, and modems (used to communicate with
24 other computers), found together or separately from one another.

25 I need to seize monitors, keyboards, input devices, and printers because they are
26 integral parts of computer systems and are used to completely perform the functions of
27 those computer systems, including the display of data (potential evidence) contained
28 within those systems. In order to ensure accurate retrieval of the evidence contained
29 within the computer, I need to be able to seize and analyze the computer in its current
30 configuration. I need to seize modems because they may contain evidence (in the form

1 of stored phone numbers) of other computers with whom the user(s) of computers
2 found at the premises communicated.

3
4 I also request permission to seize any documentation or other material describing the
5 operation of any computer, software, and/or computer peripherals found at the
6 premises, including instructions on how to access the data, files, or other materials
7 stored within same, including but not limited to computer manuals, printouts,
8 passwords, file name lists, "readme" and/or "help files." That information may be
9 necessary to enable Det. McCammon or other investigators to operate computers and
10 software searched and/or seized in accordance with the warrant requested by this
11 affidavit. That documentation is also relevant insofar as it may contain information
12 identifying the owner and/or user of that computer, and provide evidence that the owner
13 of the computer knew how to operate the computer.

14
15 Your Affiant is aware that computer and computer-related items subject to seizure
16 pursuant to the requested warrants may contain privileged information. Therefore, after
17 consulting with District Attorney Tom Sneddon, the following plan was developed to
18 ensure that no such computerized information will be accessed without an opportunity
19 for the individuals whose computers are seized, or their designees, to meet with
20 investigators and identify which information they may claim is legally privileged. The
21 information so identified will then be downloaded, sealed and delivered to the Santa
22 Barbara Superior Court for judicial determination whether the information qualifies as
23 legally privileged. In the event it is determined that downloading could or would reveal
24 the content or nature of the contents a special master will be sought.

25
26 Within 48 hours of the seizure of any computer or computer-related items, your Affiant
27 or his designee will notify the owners thereof that they have 10 days within which to
28 identify any computer information for which they assert a privilege.

29

1 Your affiant request that the affidavit be sealed and not disclosed to the public for 45
2 days. There are numerous individuals and events that require further investigation.
3 Your affiant believes the information or items obtained pursuant to this search warrant
4 may also require follow-up investigation. Immediate disclosure of the information in the
5 affidavit would jeopardize the Santa Barbara Sheriff's Department's further
6 investigation of this offense.

7
8 Most of the pre-search warrant investigative individuals identified or events set forth in
9 this affidavit were not followed up on before the warrant for fear of jeopardizing the
10 warrant and with the knowledge that they would substantially have increased the
11 likelihood that the evidence or information would have been destroyed. For this
12 reason, investigators are requesting an opportunity to complete those tasks not
13 reasonably possible prior to the execution of this warrant. Hence, the request for 45
14 days sealing.

15
16 Your Affiant commenced the actual physical mechanics of preparing this affidavit and
17 *jl* attached search warrant at 4:30 a.m. of November 17, 2003; and your Affiant
18 affixed his signature under oath to this affidavit before the undersigned magistrate at
19 the time and date attested by said magistrate; and elapsed time reflected herein has
20 been diligently utilized by your affiant in the mechanics of physically preparing these
21 documents, locating and consulting with District Attorney Thomas Sneddon in reference
22 to the aforementioned preparation; locating the appropriate magistrate; and
23 transporting these documents to the magistrate for his official action in connection
24 therewith.

25
26 Your Affiant has reasonable cause to believe that grounds for the issuance of a search
27 warrant exist, as set forth in Section 1524 of the Penal Code, based upon the
28 aforementioned information, facts and circumstances.

29

1 WHEREFORE, your affiant prays that a search warrant be issued for seizure of said
2 property to be disposed of according to law.

3
4 

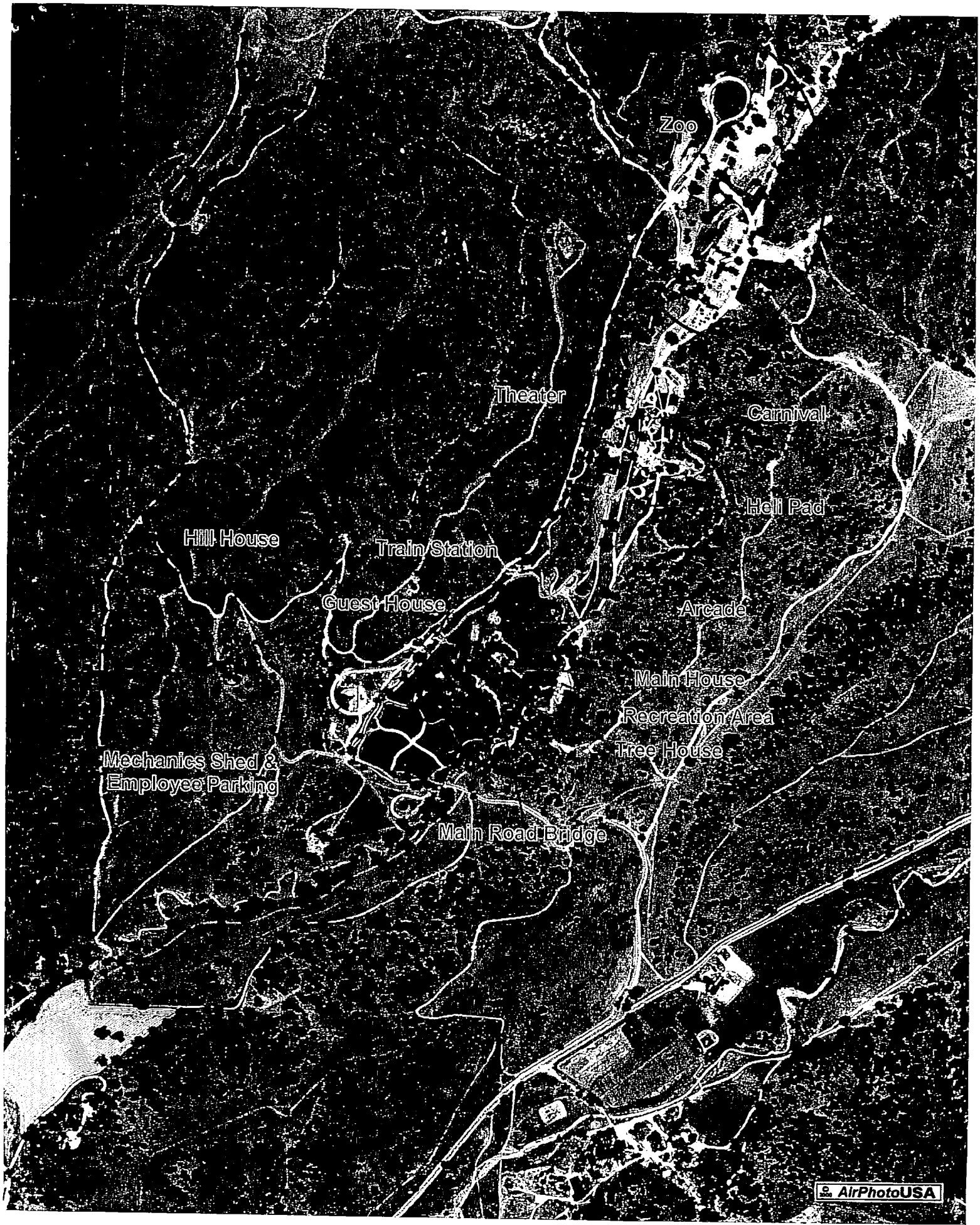
5 _____
6 Signature of Affiant

7
8 Detective

9 _____
10 Position of Affiant

11
12
13 Sworn to before me and subscribed in my presence
14 at 5:32 a.m./p.m. on November 17, 2003.
15
16
17





Zoo

Theater

Carnival

Hill House

Train Station

Hill Pad

Guest House

Arcade

Main House

Recreation Area

Tree House

Mechanics Shed &
Employee Parking

Main Road Bridge

AirPhotoUSA

884686 EXHIBIT #1