

CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES

WADE ROBSON, an individual,)
Plaintiff,)
vs.) No. BC 508502
MJJ PRODUCTIONS, INC., a)
California corporation; MJJ)
VENTURES, INC., a California)
corporation; and DOES 4-50,)
inclusive,)
Defendants.)

** CONFIDENTIAL **

** PURSUANT TO PROTECTIVE ORDER **

VIDEOTAPED DEPOSITION OF LYNETTE JOY ROBSON
Santa Monica, California
Friday, September 30, 2016
Volume I

Reported by:
NADIA NEWHART
CSR No. 8714
Job No. 2364398

PAGES 1 - 319

CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES

WADE ROBSON, an individual,)
Plaintiff,)
vs.) No. BC 508502
MJJ PRODUCTIONS, INC., a)
California corporation; MJJ)
VENTURES, INC., a California)
corporation; and DOES 4-50,)
inclusive,)
Defendants.)

Videotaped deposition of LYNETTE JOY ROBSON,
Volume I, taken on behalf of Defendants, at
808 Wilshire Boulevard, 3rd Floor, Santa Monica,
California, beginning at 10:00 a.m. and ending at
6:22 p.m. on Friday, September 30, 2016, before
NADIA NEWHART, Certified Shorthand Reporter
No. 8714.

CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER

1 APPEARANCES:

2

3 For Plaintiff and the Witness:

4 MANLY STEWART FINALDI

5 BY: VINCE WILLIAM FINALDI

6 Attorney at Law

7 19100 Von Karman Avenue, Suite 800

8 Irvine, California 92612

9 949-252-9990

10 vfinaldi@manlystewart.com

11

12 For Defendants:

13 KINSELLA WEITZMAN ISER KUMP & ALDISERT, LLP

14 BY: KATHERINE T. KLEINDIENST

15 Attorney at Law

16 808 Wilshire Boulevard, 3rd Floor

17 Santa Monica, California 90401

18 310-566-9841

19 kkleindienst@kwikalaw.com

20

21 Also Present:

22 RYAN TIKKER, law clerk

23

24 Videographer:

25 GRANT CIHLAR

Page 3

CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER

1 A It was at the concert, the "Bad" concert --
2 I'm sorry. It was at a meet and greet at the hotel
3 after the concert.

4 Q And you were at that meet and greet because
5 your son had won a dance contest? 10:33:45

6 A Yes.

7 Q Michael Jackson wasn't at the dance contest
8 himself?

9 A No.

10 MR. FINALDI: Calls for speculation. 10:33:54

11 BY MS. KLEINDIENST:

12 Q You didn't see him there, did you?

13 A I did not.

14 Q Where was the dance contest held?

15 A In a Target store. 10:34:01

16 Q In a Target?

17 A Yeah. It was sponsored by Target, Pepsi and
18 CBS Records.

19 Q Okay. How did you find out about it?

20 A A friend of mine told me about it. 10:34:15

21 Q Do you remember how many people participated?

22 MR. FINALDI: Vague and ambiguous.

23 THE WITNESS: There -- there was a heat
24 first, and there was probably about 20 or 30 in the
25 heat and then probably about the same in the finals. 10:34:31

CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER

1 There were two different categories, young --
2 a young age group and an older age group.

3 BY MS. KLEINDIENST:

4 Q And what was the nature of the contest?

5 A It was a -- called dance alike like Michael 10:34:46

6 Jackson to -- to "Bad."

7 Q Okay. And that was when he was on the "Bad"
8 tour?

9 A Yes.

10 Q And you said the meet and greet occurred 10:34:56

11 after one of his concerts on that tour?

12 A Yes.

13 Q There were a lot of people at that meet and
14 greet, right?

15 A Yes, there were. 10:35:08

16 Q Do you remember approximately how many?

17 A I don't. We -- we all went in a VIP bus, and
18 it was a whole busload, so...

19 Q Okay. On a what kind of bus?

20 A They -- they took us all to the concert and 10:35:24

21 then to the meet and greet in a bus, like a full --

22 MR. FINALDI: She said VIP.

23 THE WITNESS: -- a full-sized bus. So

24 whatever a bus holds, 80 to a hundred people, I'm

25 presuming. 10:35:34

CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER

1 Q So what were the two age groups, if you know?

2 A I think like 8 to 12 and 13 to 20, something
3 like that.

4 Q And was this being advertised at the Target
5 stores? 10:37:55

6 A Yes.

7 Q After the meet and greet, I understand that
8 your son performed on stage the next day with
9 Michael?

10 A The next night, he did, yes. 10:38:12

11 Q But otherwise, you didn't see Michael?

12 A We saw him after the second concert. The --
13 the third night, we went to the hotel to take a
14 thank you letter to him. And he found out that we
15 were there and invited us to his suite. We went up 10:38:28
16 and spent an hour and a half with him.

17 Q And who was there?

18 A Just us and Michael. Bill Bray was there
19 initially, his security, but he left. He stayed
20 till we came in, and then he left. 10:38:43

21 Q So when you say "us," it was just you --

22 A It was just Wade and myself.

23 Q And what did you talk about with Michael?

24 A He talked about how talented Wade was, and he
25 showed us -- "Smooth Criminal" was just being edited 10:38:58

Page 38

CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER

1 at the time, and it hadn't been released. And it
2 was -- he was obviously editing and going through
3 it. He had that on a -- on a television screen, and
4 he showed that to us, and we watched that with him.

5 And he asked me to stay in touch with him and 10:39:18
6 gave me the Hayvenhurst address in Encino and asked
7 me to send videos and keep him -- keep in touch with
8 him regarding Wade's career.

9 Q And you did that, right?

10 A I did that. 10:39:33

11 Q And you sent letters?

12 A I did. Nothing ever got to him, but I did
13 send them, yes.

14 Q So you sent letters, and did you also --

15 A And videos. 10:39:41

16 Q Videos?

17 A Uh-huh, yes.

18 Q And how do you know it didn't get to him?

19 A When I fin- -- we did get to see him two
20 years later, he told us he'd never received 10:39:48
21 anything.

22 Q Did he tell you who was living at the
23 Hayvenhurst address?

24 A No, not at the time he didn't, no.

25 Q Approximately how many letters do you think 10:40:00

CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER

1 you sent prior to your -- to your trip to the United
2 States?

3 A Maybe three or four --

4 MR. FINALDI: Vague and ambiguous as to time.

5 THE WITNESS: I'm guessing three or four, 10:40:10
6 maybe.

7 BY MS. KLEINDIENST:

8 Q Okay. So the dance contest was in November
9 of 1987?

10 A Yes. 10:40:15

11 Q And you went to the United States for the
12 first time after that in January of 1990?

13 A Yes --

14 Q So --

15 A -- no -- yes, it was. It was '89/'90. Yes, 10:40:31
16 you're right. Sorry.

17 Q So it was a -- a little over two years later?

18 A Yes.

19 Q And during those two years, you sent about
20 four letters? 10:40:38

21 A I think so. I'm -- I mean, I'm trying to
22 remember.

23 Q Yeah, yeah.

24 A Approximately that. And I -- and whether I
25 sent those and -- and video at different times, I -- 10:40:44

Page 40

CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER

1 I don't remember. But I know I did send video.

2 Q And at that point, video was on -- was it on
3 like a --

4 A VHS, yes. It's back that far.

5 Q And during that time frame, you didn't hear 10:41:02
6 back from Michael Jackson?

7 A I did not, no.

8 Q And you also hadn't -- I mean, he didn't
9 respond to your letters which he didn't receive, but
10 you didn't otherwise hear from Michael Jackson at 10:41:37
11 all either during those two-plus years, correct?

12 A No.

13 Q And you didn't hear from anyone working for
14 him during that time?

15 A They had no contact for us. And I had no 10:41:44
16 contact for him either.

17 You know, he said to us at the time, "You
18 should come to the United States. Call me."

19 Sure. Look him up in the White Pages?

20 Q Well, you came to the United States in 1990, 10:41:57
21 correct --

22 A Yes.

23 Q -- in January?

24 And that, I understand, was for performances
25 with the Johnny Young Talent School? 10:42:07

Page 41

CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER

1 A At Disneyland, yes.

2 Q That both Wade and Chantal were performing
3 in?

4 A Yes.

5 Q And at that point, you did call Michael 10:42:13
6 Jackson, right?

7 A Well, before I left Australia -- Wade had
8 done a lot of television in Australia, so I just
9 called a couple of the television stations asking if
10 they had any sort of contact for him. And they 10:42:24
11 gave -- gave us a number, which turned out to be
12 TriStar Pictures, which wasn't much help.

13 But people just kept passing us around. I --
14 they would give me a number. Someone else would
15 give me another number. And eventually, someone 10:42:41
16 gave me MJJ Production's number.

17 Q So you started out -- before you left for the
18 trip --

19 A Yes.

20 Q -- you called some TV stations in Australia? 10:42:51

21 A Yes.

22 Q And one of them gave you TriStar?

23 A Yes.

24 Q And so I assume you called TriStar when you
25 got here? 10:42:59

CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER

1 A Yes.

2 Q And do you remember what they told you?

3 A I just remember they gave me another number
4 that -- said, "Might help you."

5 And I don't remember what it was. I know we 10:43:06
6 had -- we called two or three numbers before we --
7 someone gave us MJJ's number.

8 Q And, eventually, you got MJJ Productions'
9 number?

10 A Yes. 10:43:17

11 Q And you got ahold of Michael Jackson's
12 personal assistant, Norma Staikos?

13 A Norma Staikos, yes.

14 Q And on that trip to California, it was you,
15 your husband at the time, Dennis -- 10:43:33

16 A Yes.

17 Q -- Wade, Chantal?

18 A Yes.

19 Q And then was it your parents?

20 A My parents, yes. 10:43:40

21 Q And that was it, right?

22 A That was it, along with 40 other people from
23 the dance company.

24 Q Oh, right. But they left, actually, after
25 two weeks? 10:43:50

CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER

1 A Yes.

2 Q And then you stayed on?

3 A Yes.

4 Q And I think that I may have read -- correct
5 me if I'm wrong, that you got in touch -- finally 10:44:01
6 got in touch with someone or Michael himself right
7 around the same time everybody else from your tour
8 was leaving?

9 A Yes.

10 Q So after the -- you got in touch with 10:44:17
11 Michael's personal assistant, you were invited to
12 meet him?

13 A Yeah. She checked with him and -- to see
14 that he remembered us. And then she called us back
15 and asked us to have a meeting with him at Record 10:44:32
16 One in Sherman Oaks.

17 Q And who went to the meeting?

18 A Dennis, myself, Wade and Chantal.

19 Q And there was a photo shoot going on there?

20 A I think so. He was doing -- he was recording 10:45:00
21 "Liberian Girl," and the -- the producer was there.
22 And I know we took a photograph with him. There was
23 somebody there taking photographs.

24 MS. KLEINDIENST: Let me ask you because I
25 don't know. 10:45:18

CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER

1 I'll ask the court reporter to mark this as
2 Exhibit 521.

3 (Exhibit 521 was marked for identification
4 by the court reporter and is attached hereto.)

5 BY MS. KLEINDIENST: 10:45:44

6 Q And do you recognize this picture?

7 A Yes, that's the one taking at Record One.

8 Q Oh, this is from Record One?

9 A Yes.

10 Q And that's you in the top left? 10:45:53

11 A That's me with all the hair, the poodle.

12 Q That was the style at the time, right?

13 A I'm sorry?

14 Q That was the style at the time?

15 A It was in. It was very Janet Jackson at the 10:46:08

16 time.

17 Q Yeah. And this is your daughter Chantal --

18 A Chantal.

19 Q -- in the jean jacket?

20 A Yes. 10:46:16

21 Q And this is your husband Dennis?

22 A Yes.

23 Q And that's Wade in the white hat?

24 A Yes.

25 Q So tell me what you can remember from the 10:46:21

Page 45

CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER

1 meeting at Record One.

2 A We played some VHS footage of Wade
3 performing. Michael wanted to see some -- some of
4 the things. And we all sat and watched that.

5 There was another photograph taken of us -- I 10:46:43
6 think I have it somewhere -- of us sitting, watching
7 something on the television. I was pretty sure we
8 weren't there for very long, maybe an hour and a
9 half. And that's basically all we did.

10 We sat and -- and -- on a couch and -- and 10:46:57
11 just chatted with him for a while. He wanted to
12 know what Wade had been doing. And, you know, we
13 watched some of the footage, took photographs. And
14 then he asked if we'd like to go to Neverland for
15 the weekend. 10:47:10

16 Q So the VHS tapes of Wade performing, that's
17 something that you brought from Australia?

18 A Yes.

19 Q That wasn't from the Johnny Young
20 performance? 10:47:20

21 A No. It was with -- they were Johnny Young
22 performances. He had been performing with this
23 dance company for that -- two years. They danced
24 every weekend and every school holiday. They danced
25 in the -- they did the city center, that type of 10:47:30

Page 46

CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER

1 Q And is each unit one bedroom?

2 A Yes.

3 Q Okay. So were you and hus- -- your husband
4 in one unit and your parents were in another?

5 A Yes. 10:52:24

6 Q And Chantal and Wade both stayed in Michael
7 Jackson's room, correct?

8 A Yes.

9 Q Do you remember how that occurred?

10 A Yes. After having a tour of the house, 10:52:35

11 everybody came back to our suite. My parents were
12 there, and then Michael came back in with the
13 children. They'd been playing arcades, I think, and
14 they came back to the room. And we were all just
15 talking, and he was looking at some of Wade's 10:52:55
16 costumes.

17 And then it was getting late. And, you know,
18 we talked about it getting late. And then the
19 children asked if they could stay with Michael in
20 his room. And he said -- you know, he had -- and 10:53:09
21 we'd been in there and seen the room previously.

22 And he said, "You know, I've got the
23 mezzanine floor with the other bedroom upstairs.
24 And, you know, if they want to stay, they're welcome
25 to stay there." 10:53:26

Page 51

CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER

1 L.A. Gear?

2 MR. FINALDI: Calls for speculation.

3 THE WITNESS: I think so. I --

4 BY MS. KLEINDIENST:

5 Q I'll turn your attention to page 415 of your 11:00:18
6 grand jury transcript, which is 5- -- Exhibit 519.
7 It's the one right in front of you, actually.

8 A What page was it? Sorry.

9 Q 415. There's a lot of numbers on it, but
10 that's the simplest one. 11:00:35

11 So if you look at lines 17 and 18 --

12 A I must have the wrong page. Hold on. I've
13 used the wrong number.

14 Q Oh, yeah. I'm sorry. There's three numbers.
15 It's towards the beginning. 11:01:01

16 A Okay.

17 Q Okay. So lines 17 and 18, you were asked:
18 "And who paid for the trip?"
19 And this is referring to the May 1990 trip.
20 Do you see that? 11:01:13

21 A Yes.

22 Q And your response was "L.A. Gear," right?

23 A Yes.

24 Q And you don't have any reason to believe that
25 your testimony was incorrect, correct? 11:01:20

Page 58

CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER

1 A I don't think so. I don't remember where
2 the -- who the check came from at this stage. I
3 know -- I remember Michael telling them that he
4 wanted to -- wanted Wade to be a part of it.

5 And they said, "Of course, you can" -- 11:01:38
6 because we laughed about it at the time. They said
7 to him, "You can have anyone you want in -- in the
8 photo shoot."

9 He said, "Good, because this little boy lives
10 in Australia." 11:01:49

11 And they had a fit so -- I guess because they
12 had to pay for him to come from Australia.

13 Q Oh, okay. That makes sense. And it looks
14 like on that trip that you stayed at the Holiday Inn
15 on Wilshire? 11:02:04

16 A Yes.

17 Q Okay. And it says that that's across the
18 street from Michael's condo?

19 A Yes.

20 Q And that was a condo in Westwood? 11:02:08

21 A Yes. On the corner of Selby and Wilshire.

22 Q Okay. Do you remember that condo?

23 A Yes.

24 Q Do you remember how many rooms it had?

25 A I always thought it had two bedrooms, but I'm 11:02:26

CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER

1 A Yes.

2 Q And this was -- was this at the ranch?

3 A Yes.

4 Q And I -- I believe that you were, perhaps,
5 spoken to or you spoke to some of Michael's 11:10:35
6 employees at Neverland. Do you remember that?

7 A I think, from memory, I was -- I think I was
8 outside, and I was crying. I was upset because I
9 hadn't seen Wade, and -- and I think it -- I think
10 it was Charli, who was the security, came up to ask 11:10:52
11 me if I was okay. And I -- you know, I told her I
12 was -- I was upset because I hadn't seen Wade all
13 day, and it was Mother's Day.

14 And then I remember being upset -- I had
15 lunch by myself. I remember being upset at lunch 11:11:07
16 and somebody brought me a rose, so they must have
17 talked amongst themselves about me being upset. And
18 someone brought a rose to the table. I can't
19 remember who it was, though.

20 Q Well, when you were upset because you hadn't 11:11:20
21 seen your son, did you go looking for him?

22 A Yeah. I'd spent the whole day looking for
23 him. You know, the ranch is so big that sometimes I
24 spent a whole day looking for them, and we would
25 pass in the night and not find each other. 11:11:33

CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER

1 Since then, I found out that there are secret
2 rooms that I didn't know existed --

3 Q Uh-huh.

4 A -- at the ranch. And Wade now tells me that
5 that's where they would be. 11:11:48

6 But I would spend my time on a golf cart
7 driving around the ranch looking for them, yes.

8 Q Okay. And did you ever ask anyone -- well,
9 did you -- on Mother's Day, did you ask anyone to
10 help you find him? 11:12:01

11 A I wasn't allowed to do that.

12 Q What do you mean you weren't allowed?

13 A I wasn't allowed to let staff know anything
14 about anything that was going on. I would not --
15 I -- I could ask if anyone had seen Wade. I could 11:12:12
16 ask security if they'd seen Wade, but I couldn't
17 verbalize how I was feeling. I actually got
18 reprimanded for doing what I did from Michael. He
19 didn't allow -- he didn't want us talking to the
20 staff, and he didn't allow the staff to talk to us. 11:12:28

21 Q And that was a directive from Michael
22 himself?

23 A Yes.

24 Q And when you say that you were reprimanded by
25 Michael, what do you mean? 11:12:37

Page 68

CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER

1 A I remember him coming into the room, and
2 there was staff around. And I remember, when he was
3 angry, he would have this -- this look on his face
4 that was actually frightening. And he was furious.
5 I could tell by the look in his eyes. And then 11:12:51
6 later, he -- he reprimanded me for letting the staff
7 know that I was upset.

8 Q I mean, were you concerned about your son --

9 A Yes.

10 Q -- on Mother's Day? 11:13:01

11 A I was -- I wasn't concerned for his welfare.
12 I was concerned that Michael knew it was Mother's
13 Day. He had had the day before with his mother.
14 That's why we came that night, because he had a
15 family day on the Saturday. So I was angry and I 11:13:13
16 was hurt that he kept my son away from me on
17 Mother's Day.

18 Q So you were -- you felt left out?

19 A Very -- well, I felt left out of my -- with
20 my -- from my son, yes. 11:13:26

21 Q Right. You wanted to be with your son on
22 Mother's Day?

23 A Of course.

24 Q So you were angry?

25 A Every mother wants to be with their child on 11:13:33

CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER

1 Mother's Day.

2 Q Of course. But you weren't concerned about
3 his welfare?

4 A No, not at that stage.

5 Q Right. I mean, if you had been concerned 11:13:43
6 about his welfare, I'm sure that rules be damned,
7 you would have gone and found him, right?

8 A Yes.

9 Q Or you would have, you know, disregarded any
10 directive from Michael that you not talk to his 11:13:53
11 staff. If you were concerned about --

12 A If I was concerned that he was in -- in any
13 danger, of course, yes.

14 Q Right, particularly on Mother's Day.

15 A Yeah. 11:14:04

16 Q So you did eventually talk to Wade that day?

17 A Yes. They did turn up in the house at some
18 point, later in the day.

19 Q And do you remember your conversation with
20 him? 11:14:19

21 A I don't. I noted here it says that I
22 reprimanded my son. I don't remember that. You
23 know, it was Michael's responsibility. Wade was 7.

24 Q Right.

25 A He probably didn't even remember it was 11:14:35

Page 70

CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER

1 Mother's Day.

2 Q Uh-huh.

3 A But Michael knew, though. My anger was
4 directed at him.

5 Q Okay. And did you talk to him about it? 11:14:42

6 A Yes, we did have a conversation about it.
7 You know, he has a way of smoothing things over.

8 Q Uh-huh. And did Wade tell you what he had
9 been doing that day?

10 A Not that I remember. 11:14:54

11 Q Okay. If you turn to page 176, at the top of
12 the -- 176. I think it should just have been the
13 next page, yeah.

14 So on the line -- starting on line 3, you
15 said that you saw him Sunday night. And they asked 11:15:18
16 you:

17 "Did he tell you what he was doing
18 that day?"

19 And you said:

20 "Sleeping." 11:15:24

21 Do you remember that?

22 A Vaguely. I think he -- he may have said that
23 they'd stayed in the room all day sleeping. What
24 they did was they would stay up all night playing
25 video games and then sleep during the day. So that 11:15:36

Page 71

CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER

1 made sense to me at the time.

2 Q Okay. So when you eventually found Wade, you
3 weren't at all concerned, again, about his -- his
4 welfare; is that right?

5 A Not at the time. 11:15:52

6 Q And he -- what he told you and the way he was
7 acting didn't give you any cause for concern at that
8 time, right?

9 A No. Well, he was coached as -- as to what to
10 say to me. That was obvious. 11:16:02

11 Q Was it obvious at the time?

12 A Probably not at the time. I look back on it
13 now and think about the things that he said to me,
14 and, you know, he was told what to say.

15 Q Right. But that's looking back on it now 11:16:17
16 with -- based on what your son has since told you;
17 is that right?

18 A Probably.

19 Q At the time, you know, you weren't suspicious
20 of what he was saying to you, were you? 11:16:28

21 A Probably not.

22 Q I mean -- and if you were suspicious, you
23 probably would have delved in a little deeper and
24 questioned him --

25 A Yeah, we've had that conversation, yeah. 11:16:39

Page 72

CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER

1 Q You mean you and your son have had that
2 conversation?

3 A Yeah. Well, when -- I've talked to him
4 about, you know, why he didn't come to me and tell
5 me what was going. 11:16:49

6 And, you know, I've said to him, "You know
7 what I would have done?"

8 And he said, "Absolutely, and that's why I
9 didn't say anything."

10 So yes, had I had any suspicions, things 11:16:59
11 would have been very different.

12 Q You mentioned that you have been -- since
13 been told I think by Wade that there were secret
14 rooms?

15 A Yes. 11:17:08

16 Q What has he told you about that?

17 A He told me there was one in the -- where the
18 arcades are, there's one in the back there. And I
19 think there's one behind Michael's bedroom, in -- in
20 Michael's bedroom, there's a room there, as well. 11:17:23

21 Q And what else did he tell you about the
22 secret rooms?

23 A Well, he said that's where they would go.
24 When I couldn't find them, that's where they'd
25 probably -- that's probably where they were. 11:17:36

Page 73

CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER

1 Q Do you know anything about what's in those
2 rooms?

3 A No. I think there's just pillows and that
4 type of thing.

5 Q Has Wade told -- told you anything? 11:17:47

6 A No. I can't -- not that I can remember. He
7 probably -- I vaguely remember him talking about it,
8 but I really honestly don't remember what he said
9 what was in there.

10 Q When did he tell you about the secret rooms? 11:18:01

11 A After he told me about the allegations, about
12 the abuse.

13 Q Immediately after or some time after?

14 A Probably some time after when we've had
15 discussions about the times where I would not be 11:18:14
16 able to find them.

17 Q Uh-huh. And you never saw these rooms
18 yourself, correct?

19 A I have seen the one in Michael's room. I
20 knew that -- I knew that existed, but I didn't know 11:18:33
21 that they used it.

22 Q So when did you see it?

23 A Once Michael asked me -- when he was out of
24 town, he asked me to go into his room to get
25 something for him. And he told me about where -- 11:18:47

CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER

1 where the room was.

2 Q Oh, he asked you to get something from that
3 room?

4 A Uh-huh.

5 Q What did he -- I'm sorry. Was that a yes? 11:18:53

6 A Yes, sorry.

7 Q It's for the court reporter.
8 What did he ask you to get?

9 A Money.

10 Q How big was that room? 11:19:02

11 A Wow, I'm trying to remember. Probably,
12 maybe -- I'm guessing.

13 MR. FINALDI: Don't guess.

14 THE WITNESS: No, it's a long time.

15 BY MS. KLEINDIENST: 11:19:24

16 Q So, I mean, if you can sort of compare -- it
17 wasn't as big as this room, I assume?

18 A Oh, no. It was small. It was small. It was
19 just -- it was behind a closet.

20 Q Uh-huh. 11:19:33

21 A So it was like this -- probably the size of a
22 closet with some dips.

23 Q Like a walk-in closet or a wall closet?

24 A A wall closet, I think.

25 Q Okay. And, I mean, can you remember, I mean, 11:19:46

Page 75

CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER

1 how many people, for example, could stand in that
2 room?

3 MR. FINALDI: Asked and answered.

4 THE WITNESS: Maybe six.

5 BY MS. KLEINDIENST: 11:20:01

6 Q And you said there was money in the room.

7 A Yes.

8 Q And where was that money kept?

9 A In a drawer.

10 Q So there was furniture in the room? 11:20:06

11 A Yes.

12 Q What furniture was in the room?

13 A I just remember the chest of drawers.

14 Q Did you see any other -- other than money,

15 did you see anything else in the drawers? 11:20:20

16 A Not that I remember.

17 Q Other than the chest of drawers, do you

18 remember anything else in the room?

19 A No. I don't remember much about it at all.

20 We were in and out very quickly. I think this room 11:20:34

21 might have been considered his safe room if there

22 was some problem on the property.

23 Q What type of -- I mean, you mean like if

24 somebody was coming and looking for him or --

25 A Yes, yes. 11:20:49

Page 76

CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER

1 Q Did he ever talk to you about the room?

2 A No, I don't think so.

3 Q How did he describe the room when he asked
4 you to get the money?

5 A I don't think he did. He just told me where 11:21:03
6 to come into his room and where to -- and Wade
7 knew -- Wade wasn't with me. He -- he -- he --
8 well, I think I might have talked to Wade about it,
9 and Wade helped me to go where it was, too. But
10 he -- he just described where to go in and where to 11:21:18
11 find it.

12 Q And did you need any assistance getting into
13 Michael's room? Was it locked?

14 A He told me where the key was.

15 Q Oh, there was a key? 11:21:28

16 A Yes. His room was always locked.

17 Q So you found -- you were able to find the
18 key?

19 A Yes.

20 Q Where was the key kept? 11:21:34

21 A It was hidden behind a photograph on the wall
22 in the hallway.

23 Q And that's just where he kept it all the
24 time?

25 A I don't know. I think -- I think I've heard 11:21:45

Page 77

CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER

1 that it changes, because people get to know where it
2 is, so I think he changes it, but --

3 Q Uh-huh.

4 A -- that's where it was then.

5 Q Who did you talk to about the key? 11:21:53

6 A Nobody.

7 Q Oh, so when you said you've heard that it
8 changes, who did you hear that from?

9 A Oh, I think maybe Wade might have told me
10 that it changes; I'm not sure. But I have heard 11:22:00
11 that it -- it changes position.

12 Q But you don't remember where you heard that?

13 A No.

14 Q Do you remember when you heard that?

15 A No. 11:22:08

16 Q This time when you were asked to retrieve
17 money from the hidden room, do you remember when
18 that was?

19 A No. It was around the same time as the grand
20 jury or maybe just before that. It was around that 11:22:28
21 same time period.

22 Q So you think it was maybe before you
23 testified in 1994?

24 A Possibly.

25 Q Certainly before you testified in 2005, 11:22:38

Page 78

CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER

1 right?

2 A Yes.

3 Q And, I mean -- I think I know the answer to
4 this and from your testimony, too, but that -- that
5 room, your knowledge of that secret room which you 11:22:53
6 retrieved money from, that didn't raise any concerns
7 for you with regard to --

8 A Well, I thought it was his safe room --

9 Q Right.

10 A -- where he would hide if there was -- and I 11:23:07
11 knew that existed.

12 Q Okay. And I think the next trip -- well,
13 maybe we already talked about this, but I don't
14 remember, so I'll ask again.

15 The next trip after the May 1990 trip was 11:23:34
16 February 1991; is that right?

17 A Yes.

18 MS. KLEINDIENST: I'm going to ask the court
19 reporter to mark this as Exhibit 522.

20 (Exhibit 522 was marked for identification
21 by the court reporter and is attached hereto.)

22 MR. FINALDI: What number is this?

23 MS. KLEINDIENST: 522.

24 THE WITNESS: I was trying to work out who
25 this was from, and I just realized who. 11:24:36

Page 79

CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER

1 Q So do you remember when you first consulted a
2 lawyer about immigrating to the United States?

3 A No, I don't.

4 Q But it would have been sometime before --

5 A Yes. 11:27:48

6 Q -- November 1990?

7 A Yes.

8 Q When did you first begin thinking about
9 moving to the U.S.?

10 A It was actually Dennis's idea when we were 11:28:00
11 here in the January -- and we were at Disneyland.
12 It was his idea then.

13 Q Do you -- do you remember what he said?

14 A No. He -- he just got a little carried away
15 with the -- the hype that was going on. 11:28:16

16 Q So after -- so Dennis -- do you remember if
17 it was his idea during the first part of your trip
18 when you were performing at Disneyland or -- not
19 you, but your -- your children were performing at
20 Disneyland? 11:28:30

21 A No, I don't remember. I just remember him
22 saying it. And then it was -- we just didn't think
23 about it again after that. It was just -- it was
24 just something that, you know, he just put out there
25 and then -- then -- nothing ever came of it. 11:28:40

CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER

1 Q Okay. So he sort of threw it out there
2 during that first trip.

3 And then when did you start focusing on it
4 again?

5 A Not until after we'd been back a couple of 11:28:52
6 times, and we'd -- we'd talk to Michael about
7 possibly what he could do for Wade's career. He
8 was -- he was the one who said -- his -- his
9 statement was always, "Little one and -- and I are
10 going to rule the world." 11:29:07

11 He had lots of plans for Wade to do things
12 with him.

13 Q Uh-huh.

14 A And he would say to me -- he said to me on
15 that first trip, "It's like looking in a mirror when 11:29:20
16 I look at him. I see myself all over again."

17 He was very excited about his talent and
18 where he could see him going.

19 So during those two trips back and forth
20 to -- to the United States and -- and he was working 11:29:31
21 with Michael and, you know, the -- the idea just
22 grew from that, because he had made a lot of
23 promises about what he could do with Wade's car- --
24 Wade's talent.

25 Q Uh-huh. Well, it looks like this letter 11:29:44

CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER

1 Q But that incident, as well, where you were
2 panicked and you were worried about getting him back
3 to leave for Australia in time, there was nothing
4 about that incident that made you think, oh, maybe
5 we should sort of cut back on talking to Michael? 11:42:17

6 A I did that once.

7 Q Tell me about that time.

8 A I cut him off for six months. I actually was
9 done with him. It was when we first moved here. We
10 were -- when he went -- he left for the "Dangerous" 11:42:36
11 tour, and he told Wade that he would call him while
12 he was on tour. And Wade was 9.

13 And that little boy would come home every day
14 and sit on the couch and wait for Michael to call
15 him. And it broke my heart to see that he would 11:42:54
16 just sit there every day and just wait. And he
17 just -- he didn't call.

18 And, eventually, he did, and I was so angry
19 with him. I said, "I don't care if you don't call
20 Wade, but don't tell him you're going to call and 11:43:10
21 not do that." I said, "You're breaking his heart."

22 And he got angry with me and said, "He should
23 be -- he should be happy that I'm calling him at
24 all. Do you know how many little boys would love to
25 get a phone call from me?" 11:43:24

Page 97

CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER

1 So at that point, I felt that Wade was being
2 emotionally damaged by him. So I changed my number,
3 and I was done. I was finished with him. I was not
4 going to put Wade through this. So for six months
5 we had no contact with him. 11:43:42

6 And somehow he got our number and started
7 calling again and smoothed everything over and made
8 everything okay again. Wade wanted to resume the
9 relationship.

10 Q Can you tell me approximately when that was? 11:43:58
11 I know you said the "Dangerous" tour.

12 A It was 1992, but I don't know when. About
13 the mid '92, I think.

14 Q And you mentioned that Michael had said that
15 he would call Wade and he -- Wade was waiting for 11:44:22
16 his call, and it didn't come?

17 A And that's because he was with Brett Barnes.
18 He took Brett Barnes on that tour with him.

19 Q Okay.

20 A That's why he didn't call. 11:44:32

21 Q Okay. Did you know at the time that he took
22 Brett Barnes?

23 A No. Wade wanted to go on the tour with him,
24 and he told Wade he couldn't take children. And
25 then Wade saw him on television with Brett Barnes on 11:44:37

CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER

1 a balcony.

2 Q Okay.

3 A So that's what was going on there.

4 MS. KLEINDIENST: So -- I'll move to strike

5 the answer for lack of foundation. 11:44:52

6 Q So you -- you mentioned a period --

7 MR. FINALDI: Can we take a break? I need to

8 go to the restroom.

9 MS. KLEINDIENST: Okay. Let's go off the

10 record. 11:45:03

11 THE VIDEOGRAPHER: We are off the record.

12 The time is 11:45 a.m., and this is the end of the

13 first media.

14 (Recess.)

15 THE VIDEOGRAPHER: We're back on the record. 11:59:30

16 The time is 11:59 a.m., and this is the beginning of

17 the second media.

18 Please continue.

19 BY MS. KLEINDIENST:

20 Q Okay. So before we went and took a break, we 11:59:49

21 were talking about the incident before you left for

22 Australia in May/June 1990. Do you remember that?

23 A Yes.

24 Q Okay. And you mentioned that Michael -- or,

25 I'm sorry, Wade came back, and he seemed different 12:00:06

Page 99

CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER

1 A Yes. I honestly can't remember when I made
2 the decision that we wanted to do that. It was --
3 I'm not sure when we actually made that decision.
4 Perhaps after the February trip. I'm not sure.

5 Q Okay. But the letter, which I can't find -- 12:03:58

6 A Oh, from the attorney? Yes, well, if -- if
7 that was about immigration, then maybe it was
8 sooner, but I -- you know, I'm not sure if that -- I
9 know he dealt with passports and things. I honestly
10 don't remember, and I don't know what it was that he 12:04:14
11 was sending back to me either --

12 Q Uh-huh.

13 A -- the photographs. And I really don't
14 remember what that was about. If -- if it was
15 immigration, then maybe I was thinking about it 12:04:22
16 earlier.

17 Q The next trip was in February 1991?

18 A Yes.

19 Q And I think that was for about a week; is
20 that right? 12:04:33

21 A Yes.

22 Q And what was the purpose of that trip?

23 A That was to meet with a choreographer who
24 worked with Michael. Michael had a project in mind
25 that he wanted Wade to work with him and he wanted 12:04:46

CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER

1 Q And, in fact, I think you testified at the
2 criminal trial that Wade had made the decision at
3 5 years old that he wanted to be in the
4 entertainment business --

5 A Yes. 12:17:03

6 Q -- is that right?

7 Do you remember giving an interview on
8 something called "Nick and Desiree's Infinite Dance
9 Cast"?

10 A Oh, I do, yes. 12:17:17

11 Q That was in like the summer of 2011?

12 A If you say so. I don't remember when it was.
13 I remember doing it.

14 Q It was after Michael died, right?

15 A I have no idea. 12:17:29

16 Q In that interview, you mentioned that after
17 you moved to the United States, that you worked with
18 him, being Michael Jackson -- or you didn't work
19 with -- strike that. I'll start over.

20 In that interview, you mentioned that after 12:17:51

21 you moved to the United States in September 1991,
22 you didn't work with him, being Michael Jackson, a
23 lot. You sort of said -- well, you did three music
24 videos, and I think there was the L.A. Gear shoot
25 which was before that. And there might have been 12:18:07

Page 114

CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER

1 one other commercial; is that right?

2 A A Pepsi commercial.

3 Q A Pepsi commercial, that's right.

4 You also said:

5 "I realized very early on that if 12:18:29

6 we were going to make it here, it

7 was going to be up to me. I

8 couldn't really rely on" -- and you

9 said, "Michael kind of lived in a

10 bubble and had a different reality 12:18:39

11 to ours. And so I was the one who

12 had to find agents."

13 Do you remember that?

14 A Yes.

15 THE REPORTER: "I was the one who had to 12:18:49

16 find" what?

17 MS. KLEINDIENST: Agents.

18 THE WITNESS: The funny part is Wade --

19 Michael did find an agent for Wade, but it was CAA,

20 and Wade was 7 years old and not known in this 12:18:58

21 country. And CAA was not going to be any -- and

22 that's why I said Michael lived in a bubble.

23 He had no idea of anything outside of his

24 realm. So -- Wade wasn't in that category for CAA.

25 It would not have been beneficial for him to be with 12:19:18

Page 115

CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER

1 CAA.

2 MS. KLEINDIENST: Right.

3 THE WITNESS: Michael tried to help, but he
4 just didn't understand what needed to be done.

5 BY MS. KLEINDIENST: 12:19:27

6 Q And when you were asked if you really had to
7 manage Wade's career, you responded:

8 "I did. I did everything."

9 Is that right?

10 A I did what I had to do to -- to make things 12:19:34
11 happen.

12 Before we left Australia -- and I think
13 there's something in my testimony somewhere along
14 the line -- and when I testified in 2005, I couldn't
15 remember this, but I do remember now. They talked 12:19:46
16 about Michael had promised film and television and
17 recording deals. And when I read that testimony in
18 2005, I thought, I don't remember this. But now I
19 do.

20 Because Michael had gotten that deal with 12:20:02
21 Sony, and he had said to me, "I'm going to have
22 films -- I'm going to do films, I'm going to do
23 television, and I'm going to do music, and little
24 one will be a part of all of that."

25 Well, that never happened. The music did, 12:20:13

Page 116

CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER

1 A Yes.

2 Q And that was --

3 A And then "Jam" -- "Jam" was the second one in
4 Chicago.

5 Q Do you remember what year that was? 12:21:27

6 A Yes. It was when the riots were here. When
7 was that? In '93? '92, maybe -- I think it would
8 be '92.

9 Q Uh-huh.

10 A And Michael had promised Wade the "Jam" 12:21:39
11 video, and then I wasn't hearing from him.

12 And I kept calling Norma and saying, "You
13 know, what's going on? He's supposed to be doing
14 the 'Jam' video. Michael had promised him this."

15 And I -- she said, "Let me find out." 12:21:58

16 And I just wouldn't hear, I wouldn't hear.
17 So -- and then he was actually up for another job,
18 so I was calling her saying, "Are we doing the 'Jam'
19 video or not? Because otherwise, I need to take
20 this other job."

21 And at the last minute, they said, "Yes,
22 you're doing it."

23 And we flew to Chicago. And once again,
24 Brett Barnes was there.

25 Q Uh-huh.

CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER

1 A And that's why he wasn't going to include
2 Wade in the "Jam" video. He didn't want him there
3 because Brett Barnes was there. And he told Wade
4 that they had strep throat so he couldn't be with
5 him, that he had -- couldn't hang out with him 12:22:29
6 because they both had strep throat. And he told us
7 that Brett Barnes was a cousin.

8 I'm like, "Really? From Australia? How do
9 you have cousins in Australia?"

10 Q Didn't he call a lot of people cousins? 12:22:41

11 A After the fact, I heard that. Yeah, I did
12 hear that. It was the first time I'd heard it.

13 Q Uh-huh. So when this was going on -- well,
14 let me back up.

15 So you -- you mentioned going and doing the 12:22:54
16 "Jam" video, and that was in Chicago?

17 A Yes.

18 Q And during that time, did you feel like
19 Michael was kind of avoiding Wade?

20 A Well, Michael -- you know, when you look 12:23:04
21 back, he had a habit. Every 12 months, there would
22 be somebody new who was his special friend.

23 Q Uh-huh.

24 A Actually, when we arrived to do the "Black or
25 White" video, it was Macaulay Culkin. 12:23:15

CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER

1 Q Uh-huh.

2 A And Wade felt pushed aside a little bit,
3 because Macaulay was the favored at that time. And
4 every 12 months, there was somebody new. And then,
5 you know, 12 months later, it was -- it was Brett 12:23:29
6 Barnes, and then it was Jordy Chandler.

7 Q And you were upset that Wade was sort of
8 being cast aside?

9 MR. FINALDI: Assumes facts not in evidence,
10 misstates testimony. 12:23:37

11 You can explain.

12 THE WITNESS: Upset for Wade. Wade was
13 feeling that someone else was more important than he
14 was. I mean, kids get jealous. So I didn't -- and,
15 you know, once -- it goes back to the emotional 12:23:52
16 damage. I -- I saw it as emotional damage at the
17 time.

18 BY MS. KLEINDIENST:

19 Q And you felt protective of Wade?

20 A Of course. 12:24:03

21 Q All right. The "Heal The World" video, do
22 you remember when that was?

23 A I don't. I remember it being out in the
24 desert, Lancaster. It was around the same time as
25 the Pepsi commercial, because funnily enough -- or 12:24:23

Page 120

CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER

1 maybe that was another one. There were two "Heal
2 The World" music videos. The first one, he had been
3 working on the Pepsi commercial, and then he went
4 from that set straight to "Heal The World."

5 And it was the same teacher on the set, and 12:24:36
6 she said to him, "You've worked today. You cannot
7 work on this."

8 So he couldn't do it. And then he did the
9 second one, but I don't know how much later that
10 was. 12:24:50

11 Q And I think I saw for one of these videos, at
12 least, he was paid around \$200?

13 A That's what they got paid. If they -- if
14 they weren't union, they -- then he got \$200, yeah.

15 Q So that was true for all the videos? 12:25:01

16 A No. The "Black Or White" video was a union
17 video, so he -- I don't know what the SAG rate was.
18 I think it was around the \$500 mark at that stage.

19 Q But it wasn't paying the rent?

20 A No. We had money. We came with some money. 12:25:19

21 Q Sure.

22 A So we were -- you know, we were surviving.
23 And then I had put money into that second house that
24 we bought, which my husband gave me my share back,
25 so we had -- we were surviving on that. 12:25:31

Page 121

CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER

1 Q Right. It wasn't -- you weren't --

2 A We weren't --

3 Q -- paying your bills with the money from
4 those videos?

5 A No, no. Nobody pays bills with money from 12:25:40
6 videos.

7 Q And Wade worked really hard for his success,
8 right?

9 A He did.

10 Q I think he started teaching dance when he was 12:25:50
11 how old?

12 A 12.

13 Q 12.

14 And then he got into choreography?

15 A At 14. 12:25:59

16 Q And he had a lot of success in that, right?

17 A Yes.

18 Q What were some of his big projects?

19 A Britney Spears, NSYNC. He worked with Pink,
20 Usher. It goes on. 12:26:09

21 Q And that was -- well -- and you -- you were
22 managing him at that time, right?

23 A Yes.

24 Q So even though you originally came over sort
25 of with a connection to Michael, you made your own 12:26:31

Page 122

CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER

1 A Yes.

2 Q Okay. And then you were asked:

3 "Did you go to him and ask him if

4 he would be your sponsor?"

5 And you responded: 12:32:40

6 "I talked to him about it, and he

7 said he would do whatever he could

8 do. He just instructed his office

9 to do whatever was needed."

10 Do you see that? 12:32:49

11 A Yes.

12 Q And then he -- on line 8, he asks:

13 "Did Mr. Jackson have to actually

14 sign anything to be your sponsor, if

15 you recall?" 12:33:03

16 And your response is:

17 "Yes."

18 Right?

19 A Correct.

20 Q And then he asks: 12:33:09

21 "And did you ask him to do that?"

22 And you responded:

23 "Yes, pretty much. Basically, I

24 asked for help, so that was the only

25 way we could stay, so yes." 12:33:19

Page 128

CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

Do you see that?

A Yes.

Q And he -- and then he asks:

"And he did help you, right?"

And you responded:

12:33:27

"Yes, he did."

Correct?

A Yes.

Q And then he asked:

"Did you feel like you owed him

12:33:32

anything after he helped sponsor

your family to stay in the U.S.?"

And your response is:

"No, not at all."

Right?

12:33:43

A Well, that's pretty much, basically, the same thing as what was asked earlier, yes.

Q Right. Okay. And after moving to the United States -- and we talked about this a little when we were talking about your employment history -- you worked as a manager at Pigments Cosmetics?

12:33:58

A Yes.

Q And I think in your testimony, you describe yourself as on loan from MJJ Productions?

A Yes.

12:34:15

Page 129

CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER

1 did get to that level. He was considered one of the
2 top five choreographers in the world eventually, but
3 at this stage, I didn't know that.

4 Q But he was a very talented dancer?

5 A He was. 12:42:54

6 Q And I think there's a reference in here to
7 Wade also being a dancer that danced in the style of
8 Michael Jackson; is that right?

9 A He imitated Michael initially. That's how he
10 started. That's what inspired him to dance. 12:43:13

11 Q And he was certainly very talented at that?

12 A Yes.

13 Q And, arguably, one of the best in the world
14 at dancing in that style for his age?

15 A Possibly. I -- I have no way of me knowing 12:43:27
16 that, but possibly. I don't think there were too
17 many doing it.

18 Q Well -- and you reviewed this application
19 that was submitted on -- on your behalf, correct?

20 A I -- 12:43:37

21 MR. FINALDI: Calls for speculation.

22 THE WITNESS: -- guess so.

23 BY MS. KLEINDIENST:

24 Q And you cer- --

25 MR. FINALDI: Don't guess. 12:43:41

Page 136

CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER

1 THE WITNESS: No, I --
2 MR. FINALDI: Say what you know.
3 THE WITNESS: I mean, I -- it's 25 years ago.
4 I don't remember. I imagine that I would have,
5 but... 12:43:48
6 BY MS. KLEINDIENST:
7 Q And you certainly wouldn't have knowingly
8 submitted anything that was incorrect to the U.S.
9 government, right?
10 A No. 12:43:57
11 Q If you turn to -- it's marked as ROBS 0570,
12 and there's an Exhibit B label on the top.
13 A Okay.
14 Q This refers to petitioner MJJ Ventures, Inc.
15 Do you see that? 12:44:22
16 A Yes.
17 Q And it says it's an entertainment company
18 founded and headed by Michael Jackson.
19 Do you see that?
20 A Yes. 12:44:28
21 Q And that was your understanding, that MJJ
22 Ventures was one of Michael Jackson's companies?
23 A Yes.
24 Q And if you go down further on the page, it
25 says: 12:44:39

Page 137

CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER

1 "Established in February 1991, the
2 petitioner is wholly owned by
3 Michael Jackson and operates in
4 conjunction with other companies
5 which are owned by Michael Jackson." 12:44:47

6 Do you see that?

7 A Yes.

8 Q And that was your understanding of what MJJ
9 Ventures was, right?

10 A Yes. 12:44:55

11 MR. FINALDI: Calls for speculation that she
12 ever read this or ever knew it.

13 MS. KLEINDIENST: Okay. You can set that
14 aside.

15 Q Okay. So we've been talking about Michael 12:45:22
16 Jackson sponsoring you to obtain the visa to come to
17 the United States and work, right?

18 A Right.

19 Q But you would have remained -- well, let me
20 strike that. 12:45:34

21 You were already close friends with Michael
22 Jackson by the time you moved here in September
23 1991, right?

24 A Right.

25 Q And you had visited him on multiple 12:45:40

CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER

1 occasions?

2 A Right.

3 Q At one point, you were talking to him on a
4 daily basis?

5 A Correct. 12:45:50

6 Q And you would have remained friends with
7 Michael Jackson even if he didn't agree to help
8 sponsor you to come to the United States to work,
9 correct?

10 MR. FINALDI: Calls for speculation. 12:46:00

11 THE WITNESS: I don't know. I presume so. I
12 mean, we -- we considered him a friend, so --

13 BY MS. KLEINDIENST:

14 Q You wouldn't have just cut off a friend,
15 because he wouldn't agree to help sponsor you for a 12:46:13
16 visa, would you?

17 A No.

18 MR. FINALDI: Calls for speculation, asked
19 and answered, argumentative.

20 BY MS. KLEINDIENST: 12:46:19

21 Q Did -- I'm sorry. Did you --

22 MR. FINALDI: I'm ready for lunch.

23 BY MS. KLEINDIENST:

24 Q Did you respond?

25 A I said no. 12:46:23

Page 139

CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER

1 MS. KLEINDIENST: Okay. Let's break for
2 lunch.
3 THE VIDEOGRAPHER: We are off the record.
4 The time is 12:46 p.m.
5 (Lunch recess.) 02:00:23
6 THE VIDEOGRAPHER: We're back on the record.
7 The time is 2:00 p.m.
8 Please continue.
9 BY MS. KLEINDIENST:
10 Q Okay. In your deposition in 1994, you 02:00:45
11 testified that between September 1991 and July of
12 1993, you stayed at Neverland four or five times,
13 but Michael was generally not there.
14 Does that sound right to you?
15 MR. FINALDI: Assumes facts not in evidence, 02:01:00
16 calls for speculation. Which pages are you talking
17 about?
18 MS. KLEINDIENST: Page 124. You're welcome
19 to look at it. It's the bound one --
20 THE WITNESS: The bound one? 02:01:21
21 MS. KLEINDIENST: -- which, for the record,
22 is Exhibit 518.
23 THE WITNESS: 124, did you say?
24 MS. KLEINDIENST: Yes.
25 Q Do you see line 4, it says: 02:01:42

Page 140

CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER

1 "What I want to try to get from
2 you, if I can, is some sense -- so I
3 don't have to go through every
4 visit, how many times, approximately,
5 has your son stayed at the ranch 02:01:54
6 from September 1991 to July of '93?"
7 And you said:
8 " We have stayed there maybe four
9 or five times, not many, but never
10 with Michael." 02:02:04
11 They said:
12 " From -- okay. From September '91
13 to July '93, Michael wasn't there?"
14 And your response was:
15 " He was there in the June/July 02:02:12
16 visit, but that was the only one."
17 Do you see that?
18 A Yes.
19 Q And that's consistent with your recollection?
20 A I don't really remember. It's so long ago. 02:02:22
21 I mean, I can only say that's what I testified.
22 Q And you were testifying to the best of your
23 ability at that time?
24 A Yes.
25 Q Okay. And then if you turn to the crim- -- 02:02:37

Page 141

CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER

1 MR. FINALDI: Calls for --
2 THE WITNESS: Aft- --
3 MR. FINALDI: -- speculation.
4 BY MS. KLEINDIENST:
5 Q Sorry? 02:05:13
6 A After.
7 MR. FINALDI: Vague and ambiguous.
8 BY MS. KLEINDIENST:
9 Q So you never went to the Century City condo
10 during the time that you were going to the Westwood 02:05:19
11 condo?
12 A No.
13 Q You went there after?
14 A Yes.
15 Q Okay. And are you -- were you aware that 02:05:24
16 Michael and Wade were sleeping in the same room at
17 the Century City condo on any occasions?
18 A Yes. Sometimes there were others there, as
19 well. It wasn't just Wade there.
20 Q Okay. 02:05:43
21 A He had other boys staying there, as well.
22 Q Who can you recall seeing?
23 A Emmanuel Lewis, Jordy Chandler, and then
24 there were these two little boys that spent a lot of
25 time with Michael. They lived in Ojai. I -- I know 02:05:58

Page 144

CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER

1 one's name was Anthony. I can't remember what the
2 other boy's name was.

3 They had really long hair. They were Latino.
4 And I picked them up one day when Wade was doing the
5 Pepsi commercial. They had been staying there with 02:06:14
6 Michael.

7 Q And the Pepsi commercial was when?

8 A Was it the Pepsi commercial? It might have
9 been something else. Wade was working on something
10 with Michael -- it was the Pepsi commercial. I 02:06:34
11 can't remember what date that was. I can't remember
12 when that was.

13 Q Had the Pepsi commercial happened before you
14 testified in 1994?

15 MR. FINALDI: Calls for speculation. 02:06:46

16 THE WITNESS: I can't remember.

17 BY MS. KLEINDIENST:

18 Q And the two boys from Ojai, you said Anthony
19 and another boy?

20 A And his -- his brother, yeah. 02:06:58

21 Q That was his brother?

22 A Yes.

23 Q And you said that you drove them somewhere?

24 A I took them with me to the -- the set because
25 Michael hadn't had any sleep. They'd had him up all 02:07:08

Page 145

CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER

1 went with him.

2 Q Was that June Chandler?

3 A Yes.

4 Q Had you met June Chandler at that point?

5 A I think so. I think I had met her before 02:08:40
6 that at Neverland.

7 Q And what can you recall -- well, strike that.
8 What time of day was it that you left and
9 Jordy and Michael left together?

10 A It was at night. 02:08:53

11 Q Okay. And what can you recall about when you
12 saw Emmanuel Lewis at the Century City condo?

13 A You know, I don't think I saw him. He was
14 there, but I think he was in the bathroom. I just
15 came to pick Wade up, and I don't think I actually 02:09:14
16 saw him. But Wade had said that he had been there
17 for the night. But I think he was in the bathroom.
18 I didn't actually see them.

19 Q So you knew he was there from Wade?

20 A Yes. 02:09:26

21 Q Did Wade tell you about anyone else that he
22 had stayed with at the Century City condo?

23 A Not that I can recall.

24 Q And I believe that you and Wade stayed with
25 Michael in Las Vegas on one occasion? 02:09:44

CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER

1 A Yes.

2 Q And that was at The Mirage Hotel?

3 A Yes.

4 Q And I think you said that you had a suite?

5 A Yes. 02:09:54

6 Q And there were two bedrooms in the suite?

7 A Correct.

8 Q And you stayed in one?

9 A Yes.

10 Q And Michael was in the other? 02:10:01

11 A Yes.

12 Q And did Wade stay in one, or did he go back
13 and forth? What was -- what did he do?

14 A He stayed in -- in Michael's room. We had
15 one day where we were all in the bed together 02:10:17
16 watching cartoons all day, into the night. And this
17 is the sort of thing that made me feel comfortable,
18 because we -- we all -- I mean, Wade would talk to
19 me about how they would do that.

20 That's -- when I'd ask him what you were 02:10:34
21 doing in Michael's room, that's what they -- he
22 would tell me they were doing, watching cartoons and
23 eating popcorn.

24 So for me to sit there all day in his bed and
25 do that made me feel very comfortable that it was 02:10:45

Page 148

CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER

1 exactly what they -- they did.

2 Q It was easy to picture because you had done
3 it yourself?

4 A Exactly. But at -- at -- I think we were
5 there for two nights, and he did stay with Michael 02:10:57
6 the -- the two nights.

7 Q And was anyone else staying with you in that
8 suite?

9 A No.

10 Q Your daughter Chantal testified that Michael 02:11:05
11 Jackson also on occasions slept at your house?

12 A On two occasions, two nights, one after the
13 other.

14 Q Okay. So it was --

15 A Two consecutive. 02:11:23

16 Q -- one time but two nights?

17 A Two consecutive nights, yes.

18 Q Okay. And where were you living at that
19 time?

20 A In Hollywood, on Hudson. 02:11:31

21 Q Was that an apartment?

22 A A condo.

23 Q Was that the first place you lived --

24 A No, the second.

25 Q Oh, this first place was when you were in 02:11:42

CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER

1 Q Oh, really?

2 A Uh-huh.

3 Q That was the one in Hollywood?

4 A Yes.

5 Q So if I'm doing the math correctly, you 02:12:40
6 said -- so you moved there in Septem- -- in -- to
7 the United States in September 1991. You were at
8 Oakwood Apartments for about a month, so that takes
9 you into October.

10 A Yes. 02:12:52

11 Q And then 18 months in West Hollywood, so
12 that's going to take you through 1992 into early
13 like March or so of 1993?

14 A '3.

15 Q March or April. 02:13:06

16 And then you were living in the Hollywood
17 apartment?

18 A Yes.

19 Q And you were there for eight years.

20 Do you remember when during that eight years 02:13:13

21 Michael stayed with you?

22 A It was during his marriage to Lisa Marie, but
23 I don't know exactly when. That was the reason he
24 came to stay with us, because he wanted to get away
25 from Lisa Marie. 02:13:30

Page 151

CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER

1 Q That's what he told you?

2 A Yes. And Lisa Marie was calling, looking for
3 him. He left our number with her the first night,
4 and she called a couple of times.

5 And -- and he said, "Oh, you know, she's just 02:13:42
6 checking that I'm at the number that I've given
7 her."

8 And then there -- Wade and he were in the
9 recording studio during the day, and they came back
10 again the next night. 02:13:51

11 And Wade said to him, "Don't forget to call
12 Lisa Marie."

13 And he said, "Oh, I'll wait till later. If I
14 call her now, she'll want me to come home. I'll
15 leave it later and just say I'm staying at the 02:14:03
16 studio."

17 Q And he stayed there for -- at your house for
18 two nights?

19 A Yes.

20 Q And how many bedrooms did your Hollywood 02:14:08
21 condo have?

22 A Two.

23 Q So, generally, would -- and Chantal was still
24 living there?

25 A I think she was in college. 02:14:19

Page 152

CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER

1 Q Okay.

2 A Maybe not. I don't remember her being there,
3 but I might be wrong. She might have been too young
4 for college. She might have been there. I can't
5 remember.

02:14:36

6 Q Well, at some point, Chantal was living at
7 the --

8 A Oh, yes.

9 Q -- Hollywood condo?

10 A Yeah.

02:14:40

11 Q And when she was, did she and Wade share a
12 room?

13 A Yes.

14 Q And when Michael stayed with you, did he
15 sleep in Wade's room?

02:14:48

16 A No. They slept on the futon in the living
17 room.

18 Q Okay. Both nights?

19 A Yes.

20 Q And can you describe sort of the layout of
21 that condo. How close the two bedrooms were to the
22 living room, for example?

02:15:01

23 A They were upstairs. There was a second
24 level.

25 Q Okay. So it was a -- sort of a duplex?

02:15:22

Page 153

CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER

1 And he asked you:

2 "Did" -- "did you ask your son,
3 has Michael ever tried to do
4 anything to you or touch you or
5 anything like that?"

02:20:03

6 And you said:

7 "No."

8 And he said:

9 "Did your son respond?"

10 And you said:

11 "Yes."

12 He said:

13 "What did your son say?"

14 You said:

15 "He laughed and said it was
16 ridiculous."

02:20:09

17 Was that accurate?

18 A Yes.

19 Q And you believed Wade when he said it was
20 ridiculous, right?

02:20:19

21 A He was very convincing. And, you know, I --
22 I look back at it now, and he's -- he's told me how
23 he was groomed for this, and Michael would talk to
24 him about that. And I -- I had no idea that that
25 was going on. That was what these conversations

02:20:27

Page 159

CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER

1 were on the phone a lot, where he was being groomed
2 and taught what to say. And he did a good job. He
3 had me convinced.

4 He was -- he would look me in the eye time
5 and time again and tell me that nothing ever 02:20:39
6 happened. And I believed him. I thought -- I
7 thought that he would be telling me the truth. But
8 he was so frightened by what he was being told on
9 the other end, he was too afraid to tell me the
10 truth. 02:20:57

11 Q That's what you've since learned, right?

12 A Yes.

13 Q But throughout the time up until passed --

14 A He was very convincing.

15 Q Yeah. And throughout -- up until after 02:21:04
16 Michael passed away, he always was very consistent
17 in his story to you that nothing ever happened?

18 A He was.

19 Q And he was believable?

20 A He was -- he should have had an Oscar. He 02:21:15
21 was very convincing.

22 Q I understand that after the Jordan Chandler
23 allegations came out, the police came to your door;
24 is that right?

25 A Yes. 02:21:40

CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER

1 criminal trial?

2 A I saw that on television. I didn't really
3 have any connection to that at all.

4 Q And after you saw those -- that those
5 allegations were being made on television, did you 02:34:19
6 talk to Wade?

7 A I think so. I don't remember anything
8 specific, but we -- we would have talked about it.
9 I -- I don't have any -- any real memory of what was
10 said, though. 02:34:39

11 Q Did you talk to Michael about the Gavin
12 Arvizo allegations?

13 A We weren't talking to Michael much at that
14 time. We were really not having any connection.
15 You know, he went through these friendships with 02:34:50
16 different boys, so we -- we wouldn't -- we weren't
17 really seeing much of him at the time.

18 Q Do you remember reading about any other
19 allegations in the press from, say, the time of the
20 Chandler allegations up until the Gavin Arvizo 02:35:11
21 allegations?

22 A I don't -- I can't recall anything.

23 Q At some point you heard about the allegations
24 that were made by Blanca Francia, correct?

25 MR. FINALDI: Vague and ambiguous. Vague as 02:35:37

Page 172

CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER

1 A Michael hugged everybody, yes.

2 Q But nothing you ever saw made you suspect
3 that anything improper was going on between Michael
4 and your son, correct?

5 A No. He was -- he was always very proper in 02:45:03
6 front of me. I mean, he would put him on his --
7 only once he put him on his lap on a plane when we
8 were going to Vegas to comfort him because we had
9 disturbance. He -- Michael was affectionate with
10 everybody, so it didn't stand out that he was doing 02:45:19
11 anything.

12 Q And when the Jordy Chandler accusations came
13 out, you gave interviews on TV defending Michael,
14 right?

15 A Well, we were sort of coerced to do that by 02:45:32
16 Anthony Pellicano, I mean, really coerced.

17 Q Did you at the time feel coerced?

18 A Yes, yes. It's not easy to go on television
19 and admit that you've allowed your son to sleep in
20 somebody's bed, even though at the time I thought -- 02:45:48
21 I knew how -- I knew how it appeared. Although I
22 didn't think there was anything going on, I knew how
23 it appeared.

24 Anthony Pellicano was an interesting man. He
25 spent a lot of time with us. 02:46:09

Page 183

CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER

1 sorry. This was -- this was after the fact, when --
2 after -- after Michael died and -- and he talked
3 about the abuse.

4 I asked him why he -- you know, I said, "As a
5 child, you were too frightened to come to me and 02:51:49
6 tell me about it. So why as an adult, as you're
7 older, and when this" -- the abuse stopped when he
8 was 14. Like, "Why wouldn't you have come to me
9 then?" Because as a mother, that was very hurtful
10 that he was not able to come and talk to me about 02:52:08
11 it.

12 And he said -- he said it was the shame -- as
13 you get older, the shame sets in, and he was just
14 too ashamed to talk about it. And I think that's
15 why he didn't want to testify again, was the shame. 02:52:21

16 Q So that's what he told you about why he
17 didn't testify once he became an adult?

18 A Yes.

19 Q And before he testified at the criminal
20 trial? 02:52:38

21 A He told me that -- he told me that after he
22 told us about the abuse, when he talked about the
23 trial, and that's why he didn't want to testify.
24 Because if he told the truth, it would be the shame.
25 And then he also felt that loyalty to Michael still 02:52:55

CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER

1 A Probably in the '99 trip.

2 Q Did you ask what type of medication?

3 A No.

4 Q How did it come up?

5 A I think I saw him taking some medication. 03:28:02

6 Q Did you ask him what it was?

7 A No. I think I -- I remember saying, "Is this
8 prescription medication?"

9 And he just said, "Yes."

10 Q Did you ask any other follow-up questions? 03:28:22

11 A No. And this was part of the problem, that
12 he was upset with the family because we didn't look
13 into what he was going through. He felt that we --
14 we weren't interested enough to look into it, and
15 that was part of the issue. 03:28:33

16 Q After you saw him taking medication, did his
17 demeanor change at all?

18 A No.

19 MR. FINALDI: Calls for expert opinion, calls
20 for speculation. 03:28:44

21 BY MS. KLEINDIENST:

22 Q Did you notice any change in him at all after
23 he took that medication?

24 A No.

25 Q Did you ever hear him sort of talking about 03:28:50

Page 208

CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER

1 time, I just offered to help.

2 Q But he asked you to?

3 A Probably, yes. I can't remember exactly, but
4 I would -- I would think so. Either he or Amanda
5 would have asked. 03:39:21

6 Q You said he couldn't understand what he
7 was -- what was going on. How do you know that?

8 A Because he told me.

9 I was questioning the change in him, and he's
10 like, "I -- I don't understand either. I don't 03:39:36
11 know."

12 Q Did he tell you anything else about what was
13 going on?

14 A No. It was just a -- you know, a general
15 conversation about his state -- a state of mind that 03:39:49
16 was not him.

17 Q Shane testified this week that he was worried
18 about his ability to support his family and
19 financial concerns. Did he share that with you?

20 MR. FINALDI: Assume facts not in evidence, 03:40:02
21 misstates testimony.

22 THE WITNESS: I don't remember him saying --
23 not at that time. I mean, I know at some point
24 it -- it was a real concern for him, because he'd
25 always had such an amazing career. And -- and you 03:40:17

Page 218

CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER

1 tend to live at a standard according to what you're
2 earning. And then if -- if that went away, then
3 there -- there was a concern, yes.

4 BY MS. KLEINDIENST:

5 Q Do you remember when you talked to him about 03:40:31
6 that?

7 A No.

8 Q But it was sometime when he started
9 struggling with his career, sometime after then?

10 A Yes. 03:40:41

11 Q So sometime after he stepped away from "Step
12 Up 4"?

13 A Yes.

14 Q Did he ever talk to you about having problems
15 with -- in his marriage? 03:41:00

16 A No. I don't know that he ever has.

17 Q Did he ever talk to you about having
18 difficulty sleeping?

19 A At the time he -- when he was going through
20 that, he was having trouble sleeping, yes. 03:41:10

21 Q How do you know?

22 A He told me.

23 Q Is that in the same car ride to the
24 acupuncturist?

25 A Oh, I don't know. Actually, I don't know if 03:41:18

Page 219

CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER

1 He didn't tell me anything else.

2 Q Did you ask him what it was about?

3 A Well, yes. I mean, this was during the time
4 when he had this anger towards me, and I had no idea
5 what it was about. 04:08:52

6 I had conversations with Amanda, and this was
7 before Amanda knew about the abuse too. And she
8 suggested it may be because I brought him to the
9 United States at such a young age and -- and he --
10 and she didn't know. She was looking for reasons 04:09:09
11 for it.

12 It was suggested that, perhaps, I worked him
13 too hard as a manager, that -- that I had put
14 pressure on him. We didn't know. We just knew
15 there was some anger. We didn't know what it was 04:09:25
16 about. And I knew that I was going to go to the
17 therapist's office and find out.

18 Q So you said this was before Amanda knew about
19 the abuse. Are --

20 A When -- when I had that conversation with 04:09:35
21 her, not this.

22 Q Okay.

23 A She already knew at this stage.

24 Q Okay. So how long before this e-mail had you
25 sensed that your son Wade had some anger towards 04:09:44

Page 241

CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER

1 you?

2 A Well, it had been going on for quite a while,
3 since he started having the problem with work.

4 He -- they -- it developed, and -- and -- and I just
5 noticed there was a pushback from me. 04:09:58

6 Q So --

7 A There was nothing volatile or anything.
8 There was just a pushback.

9 Q So going back to when he stopped working on
10 "Step Up 4"? 04:10:08

11 A I think so. It was in that range. I'm not
12 sure. That's probably -- it's probably not that far
13 back, because that was a year. It was -- it was --
14 I know there was a period of about five months
15 where -- so maybe it was just that year. Because it 04:10:22
16 was a per- -- I know there was a period of five
17 months where there was -- there was some -- some
18 resentment. There was something going on.

19 Q And had you tried to talk to Wade about it?

20 A I did talk to Wade about it. I would meet 04:10:32
21 with him -- Amanda wouldn't talk to me. That's why
22 I know it was five months. Amanda wouldn't talk to
23 me, because she felt that Wade had to have a
24 conversation with me first before she could have a
25 conversation with me. 04:10:48

Page 242

CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER

1 She felt that he had to go through it with
2 me. So I -- that's why I know five months, because
3 I would meet Wade outside of their home with -- with
4 his son, Koa, so that I could see Koa. So I knew it
5 went on for about five months. 04:11:02

6 Q And Amanda wouldn't talk to you for five
7 months?

8 A No. But actually, Amanda -- that -- that
9 five months actually went through to Thanksgiving.
10 So it was during this time through to Thanksgiving, 04:11:15
11 actually, because I know it ended at Thanksgiving.
12 So the five-month period actually was after this,
13 I'm sorry.

14 Q Okay. So do you remember how long before
15 this you felt that Wade was angry with you? 04:11:26

16 A No. I just remember when he was going
17 through this and we -- we were trying to find
18 somebody to help him. And I remember being with
19 Amanda and her making suggestions as to why she
20 thought it was would be -- because this was before 04:11:42
21 we knew about the abuse.

22 So it was probably a few months before the --
23 before the -- when he told us about the abuse in
24 May.

25 Q Okay. And do you know how he found Dr. Shaw? 04:11:51

CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER

1 have to.

2 This has already been marked as Exhibit 511.

3 Do you recognize this e-mail?

4 A I -- I vaguely remember getting it, yes.

5 Q Okay. And this is an e-mail from Wade to a 04:45:58

6 number of people, and you're bcc'd on it, correct?

7 A Yes.

8 Q And it was sent on September 7th, 2012?

9 A Yes.

10 Q And Wade says in the -- I guess it's sort of 04:46:11

11 the third paragraph that starts with "now":

12 "Now that you know the truth of my

13 past, I wanted to remind you of the

14 importance and imperative nature of

15 your confidentiality." 04:46:33

16 Do you see that?

17 A Yes.

18 Q Had you talked to Wade about the importance

19 of your confidentiality?

20 A No. I mean, I got this e-mail like everybody 04:46:44

21 else. Nothing was said to me before this.

22 Q Okay. So when he says, "I wanted to remind

23 you," he wasn't referring to a conversation he had

24 with you in particular?

25 A No. 04:46:58

Page 257

CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER

1 Q Okay. In the next paragraph, it says:

2 "It is crucial for multiple
3 reasons, not least of which is the
4 safety of myself and my family. It
5 is also an extremely sensitive legal
6 matter."

04:47:03

7 Do you see that?

8 A Yes.

9 Q And had you had conversations with Wade about
10 filing a lawsuit before you received this e-mail?

04:47:10

11 MR. FINALDI: Calls for speculation.

12 THE WITNESS: I don't think so, not back --

13 not back then. I don't know what that means

14 other -- the safety I understand because the press

15 were trying to find him.

04:47:25

16 BY MS. KLEINDIENST:

17 Q When you say, "The press were trying to find
18 him," what are you talking about?

19 A Well, he had press stalking him in Maui.

20 There was a photograph of him and -- and Koa and

04:47:46

21 Amanda coming out of a supermarket. I can't

22 remember when all of this became public, that the

23 press found out. I'm not sure. But I know he -- he

24 told me right in the very beginning that they were

25 going to move to Maui because -- for the safety of

04:48:06

Page 258

CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER

1 Q And do you remember this incident?

2 A Yes.

3 Q "They told him to tell me they were --

4 that they were offering six figures

5 for me to change my story." 05:46:06

6 Do you see that?

7 A Yes.

8 Q What was happening? What are you talking

9 about there?

10 A I was defending Michael, and the "National 05:46:12

11 Inquirer" wanted me to change my story. And -- and

12 they were going to pay me a lot of money to do it.

13 Q And was that when you were testifying in the

14 Chandler case?

15 A Yes. 05:46:26

16 Q Okay.

17 A But, apparently, my only relationship with

18 Michael was to get what I could out of him

19 career-wise and money-wise. You know, there's all

20 sorts of stories about claims and -- that I took 05:46:44

21 money from Michael; I didn't.

22 Q On the second page, you're talking about

23 Wade's testimony. And I think this is when he

24 testified -- it wasn't before the grand jury, but it

25 was a more informal setting; is that right? 05:47:15

Page 295

CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER

1 A It was the two district attorneys, and he had
2 his attorney with him.

3 Q And you said:

4 "You were moonwalking for them.

5 You were very convincing. We all 05:47:25

6 believed you."

7 Do you see that?

8 A Yes.

9 Q And is that an accurate description of your
10 state of mind and -- at the time? 05:47:34

11 A He was. He was convincing.

12 MR. FINALDI: Vague and ambiguous as to time.

13 Which time?

14 MS. KLEINDIENST: When he was testifying.

15 THE WITNESS: He -- he was -- 05:47:40

16 MR. FINALDI: That she thought --

17 Hang on.

18 That she thought he was lying? It's vague

19 and ambiguous.

20 BY MS. KLEINDIENST: 05:47:50

21 Q When Wade testified in -- around -- in the
22 Chandler case before the district attorneys, he was
23 very convincing, right?

24 A Well, I wasn't there. So I -- I only -- I
25 saw him dancing and them all saying good-bye to him. 05:47:59

Page 296

CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER

1 Q So what did you mean when you said:
2 "You were very convincing"?

3 A His attorney said he did a good job.
4 Q And you said:
5 "We all believed you." 05:48:08
6 What did you mean?

7 A Well, I believed everything he said. I mean,
8 he convinced everybody that -- that Michael was
9 innocent. He was very convincing out of -- out of
10 fear of going to prison for the rest of his life. 05:48:16

11 Q That's what he's told you since then?
12 A Yes.

13 MS. KLEINDIENST: We're going to the e-mail
14 printed September 1st at 6:08 p.m., which we'll mark
15 as Exhibit 547. 05:48:48
16 (Exhibit 547 was marked for identification
17 by the court reporter and is attached hereto.)
18 BY MS. KLEINDIENST:
19 Q This appears to be an e-mail exchange between
20 you and Wade on October 4th, 2012 at 3:06 p.m. 05:49:23
21 Do you see that?
22 A Yes.
23 Q This e-mail exchange, the subject line says:
24 "Questions for mom, 2.0."
25 Do you see that? 05:49:36

Page 297

CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER

1 interested in Macaulay Culkin to -- from the -- from
2 the get-go, so I made a decision to do things
3 ourselves.

4 He still worked with Michael, and we were
5 still employed by Michael. Michael paid for dance 06:03:41
6 classes for him. He helped him buy recording
7 equipment. There was a lot of work still going on,
8 but I wasn't going to rely on Michael entirely,
9 because I -- he was not going to fulfill his
10 promises. 06:03:55

11 Q Did you ever confront Michael about not
12 fulfilling his promises?

13 A There were times when I would have to act --
14 like for the "Jam" video, I would have to
15 continually call. There was another time when he 06:04:05
16 did something, and he -- he said, "Oh, I forgot to
17 call Wade."

18 I'm like, "You forgot to call Wade. You
19 brought us here to work with you, and you forgot to
20 call him?" 06:04:19

21 "Yes, I did."

22 Q And what was his response?

23 A He -- he just smoothed it over. He just --
24 he -- I can do whatever I want, whenever I want
25 basically is his attitude. 06:04:29

Page 308

CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER

1 Q You said that you realized very early on
2 after you came to the States that it wasn't -- that
3 he wasn't going to fulfill those promises, right?

4 A Yes.

5 Q Did you ever think about just going back to 06:04:37
6 Australia?

7 A At times.

8 Q But you decided to stay?

9 A I --

10 MR. FINALDI: Obviously. 06:04:49

11 THE WITNESS: Obviously, yeah. You know,
12 I -- I believed that Wade had a future here, and
13 I -- I felt like he had gone as far as he could go
14 in Australia. He really needed to be here.

15 BY MS. KLEINDIENST: 06:05:06

16 Q Going down to the next paragraph, it starts
17 out:

18 "He was charismatic."

19 Do you see that?

20 A Yes. 06:05:13

21 Q And here you're talking about Michael?

22 A Yes.

23 Q You say:

24 "He was charismatic and

25 manipulative, but he came across as 06:05:15

Page 309