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SUPERIOR COURT OF THE STATE OF CALIFORNIA  
IN AND FOR THE COUNTY OF LOS ANGELES

WADE ROBSON, AN INDIVIDUAL,	)	
	)	
PLAINTIFF,	)	
	)	
VS.	)	CASE NO.
	)	BC508502
MJJ PRODUCTIONS, INC., A	)	VOLUME I
CALIFORNIA CORPORATION; MJJ	)	
VENTURES, INC., A CALIFORNIA	)	
CORPORATION; AND DOES 4-50,	)	
INCLUSIVE,	)	
	)	
DEFENDANTS.	)	
	)	

Deposition of BLANCA FRANCIA, taken on behalf  
of the Plaintiff at 3753 Howard Hughes Parkway,  
Suite 200, Las Vegas, Nevada 89169, commencing at  
10:20 a.m., Tuesday, September 6, 2016, before  
Sandra I. Schoettlin, C.S.R. No. 8308.

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VIDEO TECHNICIAN:

Joe Camp

ALSO PRESENT:

Wade Robson

Mario Espinosa

1 guess, just say "I don't remember."

2 BY MR. FINALDI:

3 Q. Now -- now -- so -- I'm sorry. So we were  
4 talking about the dancing inside of the room. There was  
11:47:34 5 fog. How did that come about?

6 A. At that time he -- he came from Los Angeles,  
7 and I remember he's asking me -- he calling me and  
8 telling me to come to the ranch and cook for him 'cause  
9 the cook wasn't there, the chef. So he came -- he  
11:47:54 10 called me and told me to cook for him. So I went to the  
11 other part at the ranch to give him the food that I  
12 cooked.

13 Q. Did you have your son with you?

14 A. I had my son with me. He was playing somewhere  
11:48:11 15 else, but he was with little Wade and at the dancing  
16 room, and I remember taking the food, and that's how I  
17 saw him dancing with --

18 Q. With Wade?

19 A. With Wade.

11:48:22 20 Q. And how were they dancing?

21 A. It was normal to me.

22 Q. Was he doing like standard Michael Jackson  
23 dance moves?

24 A. Yes.

11:48:35 25 Q. Yeah.

1 We took your son's deposition in this case.

2 A. Uh-huh.

3 Q. And he said that he remembers an instance where  
4 you and he went to the ranch at night, and you saw Wade  
11:48:49 5 dancing with Michael.

6 A. Uh-huh.

7 Q. And Michael was teaching him a move where he  
8 grabs his genitals --

9 A. Uh-huh.

11:48:56 10 Q. -- does that move.

11 Did you see that happening?

12 A. No, I did not.

13 Q. Okay. Did you see Michael touching Wade at all  
14 while they were dancing?

11:49:08 15 A. No.

16 Q. How was Wade doing at dancing?

17 A. He was -- he was doing good.

18 Q. Okay.

19 A. He kept on saying, "Look. Look."

11:49:25 20 Q. Were they dancing together, like, in unison?

21 MS. MACISAAC: Objection. Vague and ambiguous.

22 THE WITNESS: Separate you mean or --

23 BY MR. FINALDI:

24 Q. Separate, but were they -- were they in sync,  
11:49:37 25 dancing together the same moves?

1 Q. Okay. And what were those beds used for?

2 MS. MACISAAC: Calls for speculation.

3 THE WITNESS: They have glass in it so they  
4 were -- people can lay there and watch the movies.

01:31:14 5 BY MR. FINALDI:

6 Q. Did you ever see any kids in those beds?

7 A. Yes.

8 Q. Which kids?

9 A. I remember this -- I forgot his name. I keep  
01:31:26 10 forgetting his name. Jimmy.

11 Q. Jimmy Safechuck?

12 A. Yeah. That's most that I remember. I  
13 remember --

14 Q. Did you ever see any -- I'm sorry. Go ahead.  
01:31:37 15 Did you ever see any sick kids in those beds from the  
16 hospitals or anything like that?

17 A. No.

18 Q. Like, cancer patients or anything like that?

19 A. No.

01:31:49 20 Q. Did you ask Michael why -- why those beds were  
21 in there, in the theater?

22 A. Yes, I remember asking him.

23 Q. And what did he say?

24 A. And he says that they were for so people can  
01:32:01 25 rest and for -- be comfortable and watch movies.

1 objection. It's improper under the code.

2 Q. Now, did there ever come a time when you came  
3 into Michael's room and you heard him in the shower with  
4 a boy?

01:47:24 5 A. Yes.

6 Q. Can you describe that.

7 A. I came with clothes, that I remember, and went  
8 into his room, and I hear loud music, and I hear  
9 laughing and giggling and, you know, screaming, you  
01:47:56 10 know, and as I was walking to the bathroom, to the  
11 shower, I hear little voice of a boy and Michael's  
12 voice, and I -- as I was walking, I looked down and I  
13 saw a pair of underwear which was little underwears and  
14 Michael's underwear, and I stopped, and I saw them in  
01:48:33 15 the shower.

16 Q. Was it kind of fogged --

17 A. Yes.

18 Q. -- the glass?

19 So you saw an outline of Michael's body?

01:48:52 20 A. Yes. And I hear a little -- the giggling.

21 Q. Okay.

22 A. The little boy's.

23 Q. Whose voice did the little voice sound like?

24 A. Wade.

01:49:02 25 Q. Wade was staying at the property at the time;

1           correct?

2           A.   Yes. And I know they were his little  
3 underwears because I washed them before.

4           Q.   Were they green?

01:49:15 5           A.   Green. Neon green.

6           Q.   Did you stay there watching?

7           A.   No. I watched him, and that's when I -- when  
8 I -- when I -- when I start to realize what's going on.

9           Q.   Tell me about that.

01:49:41 10          A.   I see him taking baths, taking -- staying at  
11 the Jacuzzi from -- from Havenhurst, but at that time  
12 when I saw him with the little underwears there and --  
13 and his underwear, that's when I started to realize  
14 maybe something's going on here.

01:50:19 15          Q.   Did you start to think that maybe it wasn't  
16 just innocent play?

17          A.   Yeah.

18          Q.   Were you worried for the boys when you started  
19 to think about this when you saw them in the shower?

01:50:36 20          A.   I feel so guilty about little Wade. I felt  
21 like I didn't do anything. I didn't say anything. I  
22 could have said something to the mother, and then I  
23 didn't say anything, and -- and that was burning me all  
24 the time, and I didn't say anything, and I still  
01:51:03 25 continued working there.

1 A. Well, they were out so I don't know if they  
2 sleep there, but one day they were there, everything was  
3 messy.

4 Q. So when you saw Michael in the shower and you  
01:59:55 5 knew Wade was in there, did you think back to your son  
6 and the times that Michael was alone with your son?

7 A. Yes.

8 Q. And what did it make you think in your head?  
9 What was going through your head?

02:00:10 10 A. What happened to my son?

11 Q. Did you tell your -- did you -- did you stop  
12 bringing your son over to Neverland after that?

13 A. Yeah. Yeah. I brought him maybe two times  
14 after that, but I -- after that, I try not to.

02:00:35 15 Q. Did Michael ever ask, "Where is your son?"  
16 "Why don't you bring him around?"

17 A. Yes.

18 Q. And what did you say?

19 A. He told me, "Be sure to bring him just when I'm  
02:00:45 20 here, and don't let him" -- "don't let him talk to  
21 anyone." That's it.

22 Q. And did he ask you, "Why don't you bring him  
23 around any more?"

24 A. No. I don't remember that.

02:01:04 25 Q. Are you okay?

1 There was a ranch manager.

2 Q. And what made you scared of them?

3 A. Because as Michael said, they didn't like me.  
4 So whatever I do or say, they always made a big deal of  
02:43:33 5 it.

6 Q. Is one of the reasons why you left  
7 MJJ Productions to help protect your son?

8 MS. MACISAAC: Objection. Leading. Misstates  
9 the witness's testimony. Asked and answered before.

02:43:48 10 THE WITNESS: Not -- no.

11 BY MR. FINALDI:

12 Q. No?

13 Is one of the reasons why you left because of  
14 the stuff you saw happening with Michael Jackson --

02:43:58 15 A. Yes.

16 Q. -- and the boys?

17 MS. MACISAAC: Objection. Can I just get a  
18 second to object?

19 It's leading the witness. And it's asked and  
02:44:03 20 answered.

21 BY MR. FINALDI:

22 Q. Okay. So could you explain what you -- how  
23 what you saw with Michael Jackson and the boys led to  
24 you quitting.

02:44:17 25 A. In the beginning it wasn't that much boys being

1           there, and then it -- to me it felt like it was getting  
2           out of hand. It was -- it was too much, you know. It  
3           was like every time he was there, there were boys. And  
4           feeling the way I felt, you know, something is going on  
02:44:48 5           that I don't want to believe. And I was tired.  
6           Mentally I was tired.

7           Q.     Is it true that you didn't want to be a part of  
8           that anymore?

9           A.     Yes.

02:45:06 10          Q.     You didn't want to help him keep secrets?

11          A.     I didn't want to --

12          MS. MACISAAC: Objection. Leading the witness.

13          THE WITNESS: I didn't want to do it anymore.

14          That's how I felt.

02:45:12 15          BY MR. FINALDI:

16          Q.     Yeah.

17          A.     I don't want to do this anymore. I can't do  
18          this anymore, and at that time --

19          Q.     Do what anymore? I'm sorry.

02:45:21 20          A.     Participate in that anymore. And at that time  
21          that lady Adrian told me, "Don't you know what's going  
22          on" -- "really going on with the kids?"

23          And I say, "No."

24          She said, "You know. You know what's going  
02:45:38 25          on."

1 year or so?

2 A. No.

3 Q. And your lawsuit against Mr. Jackson, was that  
4 related to your employment --

03:08:02 5 A. Yes.

6 Q. -- and the stress and everything you talked  
7 about?

8 A. Yes.

9 Q. Did it settle?

03:08:14 10 A. Did it --

11 Q. Did it settle --

12 A. Yes.

13 Q. -- the case?

14 And you received a settlement; correct?

03:08:19 15 A. Yes.

16 Q. And your son did as well?

17 A. Yes.

18 Q. When he was 18?

19 A. Yes.

03:08:23 20 MR. FINALDI: Okay. All right. I think I'm  
21 pretty close. Let's take a break and let me check my  
22 notes and then we can trade places.

23 VIDEO TECHNICIAN: The time is approximately  
24 3:08 p.m.

03:08:48 25 We are going off the record.

1 THE WITNESS: He wasn't there.

2 BY MS. MACISAAC:

3 Q. He wasn't there?

4 A. No.

03:35:01 5 Q. Do you recall telling the police back in 1993  
6 that the primary reason you quit your job at  
7 Neverland Ranch was because of disputes with other  
8 employees who were jealous of you and envious of your  
9 position with Michael?

03:35:16 10 A. Yes.

11 Q. You told the police that; right?

12 A. I think I told, yes.

13 Q. That was true; right?

14 A. Yes.

03:35:31 15 Q. In your experience in -- excuse me. Let me  
16 strike that.

17 In your experience working for Michael Jackson,  
18 did you ever conclude that he was very childlike?

19 A. Yes, he was.

03:35:44 20 Q. Do you recall telling the police that you  
21 thought part of Michael's problem was that he didn't  
22 realize that he was an adult?

23 A. I don't remember --

24 Q. Okay.

03:35:58 25 A. -- saying that.

1 deposition and I think also probably from your testimony  
2 this morning was that took place at the Wilshire condo;  
3 is that right?

4 A. Yes.

03:50:15 5 Q. Do you recall that in the Chandler case you  
6 testified that you saw Michael Jackson and your son on  
7 top of the sleeping bag, not in the sleeping bag?

8 A. The thing is the sleeping bag had a zipper, and  
9 the sleeping bag was open all the time, and that how --  
03:50:46 10 like a bed.

11 Q. My question was do you remember --

12 A. So --

13 MR. MANLY: Let her finish, Counsel. She's not  
14 finished.

03:50:52 15 THE WITNESS: So when they lay on top of the  
16 sleeping bag, they roll in the sleeping bag. They not  
17 zip up in the sleeping bag.

18 BY MS. MACISAAC:

19 Q. So what you saw in the condo was them on the  
03:51:06 20 sleeping bag, but not in it, not zipped up in it; right?

21 A. Not zipped up.

22 Q. Okay. And you made that very clear in your  
23 deposition; right?

24 A. Yes.

03:51:15 25 MR. FINALDI: Calls for speculation.

1 case that you believe you took your son Jason to the  
2 Neverland Ranch on maybe five occasions?

3 A. Did I remember that I --

4 Q. Do you think you testified to that? Does  
03:54:19 5 that -- let me ask you this -- let me strike that.

6 Do you recall that you took your son Jason to  
7 the Neverland Ranch about five different times while you  
8 were employed up in Santa Maria?

9 A. I think more than that but -- more than five.

03:54:33 10 Q. And when you would take Jason to the  
11 Neverland Ranch, you didn't make him stay with you in  
12 the kitchen or where you were --

13 A. No.

14 Q. -- you kind of let him roam?

03:54:52 15 And I think this is a question that  
16 Mr. Johnny Cochran asked you, but I'll ask you again.  
17 As a mother, if you had something -- if you thought  
18 something bad was going to happen to your son Jason, you  
19 would have never brought him to Neverland Ranch;  
03:55:06 20 correct?

21 A. Yes.

22 Q. Just to confirm, if you had thought that  
23 Michael Jackson was going to hurt your son, you would  
24 not have brought him to the Neverland Ranch and let him  
03:55:15 25 go unattended; right?

1 A. I don't know if it's yes to that question or no  
2 to the answer. So what is it?

3 Q. Okay. So my question is you didn't think  
4 anything bad was going to happen --

03:55:26 5 A. No.

6 Q. -- to your son?

7 A. No.

8 Q. And that was despite everything that you had  
9 seen either at the Wilshire condo --

03:55:31 10 A. Yes.

11 Q. -- or Encino -- let me finish -- or at  
12 Neverland?

13 MR. FINALDI: Vague as to time.

14 BY MS. MACISAAC:

03:55:36 15 Q. Right?

16 A. Yes.

17 Q. When you were bringing your son to the  
18 Neverland Ranch, you did not believe anything bad was  
19 going to happen to him?

03:55:42 20 MR. FINALDI: Same objection.

21 THE WITNESS: No.

22 BY MS. MACISAAC:

23 Q. That's a double negative so I'm really -- I'm  
24 sorry. It's late in the day.

03:55:54 25 Did you believe anything bad was going to

1           happen to your son when you --

2           A.     No.

3           Q.     -- brought him to the Neverland Ranch?

4           A.     No.

03:56:13 5           Q.     When you were being deposed in December '93 and  
6           January '94 in the Chandler case, do you know whether  
7           you had yet threatened to sue Michael Jackson?

8           A.     Excuse me?

9           Q.     Sure.

03:56:29 10           In '93 and '94, when you were being deposed in  
11           the Chandler case, do you know whether you had  
12           threatened to sue Michael Jackson at that point in time?

13           MR. FINALDI: Objection. Argumentative.

14           THE WITNESS: Did I know? No.

03:56:42 15           BY MS. MACISAAC:

16           Q.     You hadn't; right? You hadn't threatened to  
17           sue Michael at that time?

18           A.     No.

19           Q.     You weren't looking for money --

03:56:48 20           A.     No.

21           Q.     -- from Michael Jackson?

22           You hadn't made any kind of --

23           A.     No.

24           Q.     -- allegation against Michael Jackson based on  
03:56:55 25           sexual abuse or your employment at the time that you

1 as to "followed up."

2 BY MS. MACISAAC:

3 Q. Do you know that by the time that you either  
4 sued Michael Jackson or threatened to sue him that your  
03:58:43 5 story had evolved or morphed into you seeing  
6 Michael Jackson in the sleeping bag with your son and  
7 them being zipped up and you asking that your son come  
8 out?

9 MR. FINALDI: Hang on. Vague and ambiguous.  
03:58:57 10 Argumentative.

11 THE WITNESS: I don't -- I don't remember that.

12 BY MS. MACISAAC:

13 Q. Do you remember your story changing at all ever  
14 whereby you went from acknowledging and correcting  
03:59:07 15 Mr. Feldman that your son and Michael were on top of the  
16 bag to then later saying they were inside the bag and  
17 you had to tell your son to come out?

18 A. I don't remember that.

19 Q. Prior to threatening to sue Michael Jackson or  
03:59:24 20 prior to suing him, did a lawyer or anyone else ever  
21 discuss with you that your claim against Michael Jackson  
22 would be better if you said that he was inside the  
23 sleeping bag with your son zipped up and that you  
24 couldn't see their bodies?

03:59:38 25 MR. FINALDI: Hang on. Hang on. Assumes facts

1 not in evidence. Calls for speculation. And it calls  
2 for information protected by the attorney-client  
3 privilege.

4 So I have to let you know you have an  
03:59:47 5 attorney-client privilege. You don't have to answer  
6 that question.

7 THE WITNESS: I don't remember.

8 BY MS. MACISAAC:

9 Q. Okay. Possible; you just don't remember?

03:59:54 10 A. No. I -- no, it's not possible. I don't  
11 remember talking to anyone. No, I didn't talk to  
12 anyone.

13 Q. Well, didn't you talk to your lawyers before  
14 your filed a complaint --

04:00:00 15 A. Yeah.

16 Q. -- against Michael Jackson?

17 Let me just finish. I'm sorry. I don't mean  
18 to offend you at all, Ms. Francia. It's just -- it's  
19 really late in the day, and it's super hard for the  
04:00:10 20 court reporter.

21 MR. MANLY: It's not that late.

22 MS. MACISAAC: It actually is very late in the  
23 business day.

24 Q. So didn't you have discussions with your  
04:00:21 25 lawyers prior to either suing or threatening to sue

1 Michael Jackson where you told them what had allegedly  
2 happened between Michael and your son?

3 MR. FINALDI: Same objections. Calls for  
4 attorney-client privilege. I don't know why you're  
04:00:35 5 asking questions about this, Counsel. It's improper.

6 THE WITNESS: You're asking me did they ask  
7 me that it would be better if I say that the sleeping  
8 bag was zipped up?

9 BY MS. MACISAAC:

04:00:45 10 Q. Yes.

11 A. No. I never had that conversation.

12 Q. Okay. And you never would have said that  
13 because it never happened; right?

14 MR. FINALDI: Vague and ambiguous.

04:00:53 15 THE WITNESS: No. I don't remember.

16 BY MS. MACISAAC:

17 Q. Do you get that it sounds much worse, it sounds  
18 much more sinister or suspicious to say that  
19 Michael Jackson was in the sleeping bag zipped up, you  
04:01:17 20 couldn't see their bodies, you were telling your son to  
21 get out than to say they were on top of the sleeping bag  
22 watching television?

23 MR. FINALDI: Calls for speculation. Compound.  
24 Argumentative. Calls for expert opinion.

04:01:27 25 THE WITNESS: That it sounds --

1 BY MS. MACISAAC:  
2 Q. It sounds worse? It sounds more suspicious?  
3 A. Yes.  
4 Q. You get that; right?  
04:01:32 5 A. Yes.  
6 Q. You testified -- do you -- do you recall  
7 testifying in the Chandler matter that you never saw  
8 Jimmy Safechuck in Michael Jackson's bed at the Encino  
9 house?  
04:01:58 10 A. Can you repeat the question?  
11 Q. Sure.  
12 Do you recall testifying in the Chandler matter  
13 that you never saw Jimmy Safechuck in Michael Jackson's  
14 bed at the Encino house?  
04:02:07 15 A. Yes. He never went to the Encino house.  
16 Q. Jimmy Safechuck was never in the Encino house?  
17 A. Never in the Encino house, no.  
18 Q. Do you recall testifying in the Chandler matter  
19 that you only saw Michael Jackson and Jimmy Safechuck in  
04:02:29 20 the Jacuzzi tub at the ranch one time?  
21 A. I get all the boys confused.  
22 Q. Sure. Sure. Maybe it's just easier to go to  
23 the testimony.  
24 Let's look at Exhibit 10 --  
04:02:49 25 A. Okay.

1	case that when you entered Michael Jackson's room on	10:26:35
2	this day in December of 1989, the door was locked and	10:26:38
3	you had to use your key?	10:26:42
4	A. Yes.	10:26:43
5	Q. And if you turn to page 393, and this is	10:26:46
6	again Exhibit 11, 393. And if you look at lines 5 to	10:26:50
7	9 on that page, 393.	10:27:02
8	A. Yes.	10:27:07
9	Q. You further testified under oath that when	10:27:07
10	you approached the bathroom that day and heard the	10:27:09
11	water running, you knew someone was there?	10:27:13
12	A. Page 393?	10:27:15
13	Q. Yeah. From 5 to 9. Do you see that you	10:27:16
14	testified that when you approached the bathroom on	10:27:20
15	that day, you heard the water running and you knew	10:27:22
16	somebody was in the bathroom. Do you see that?	10:27:25
17	A. Yes. Yes.	10:27:26
18	Q. Okay. And if you look at the same page,	10:27:30
19	393, and you focus on lines 8 to 9, do you see that	10:27:33
20	you further testified that despite hearing the water	10:27:38
21	run and believing someone was in the bathroom, you	10:27:41
22	did not turn around but you entered the bathroom	10:27:44
23	anyway?	10:27:46
24	A. Yes.	10:27:47
25	Q. Let's turn to page 395. And I want to	10:27:57

1 focus you on lines 4 to 7. Do you see that you again 10:28:02  
2 confirmed under oath in this deposition in 1994 that 10:28:07  
3 once you heard the shower running, you knew that 10:28:11  
4 somebody was in the bathroom. Do you see that? 10:28:14  
5 A. Yes. 10:28:16  
6 Q. And let's focus on the same page of 10:28:23  
7 Exhibit 11, page 395, lines 18 to 20 now. Lines 18 10:28:25  
8 to 20. Do you see that you testified under oath that 10:28:32  
9 you had never previously been in the bathroom when 10:28:35  
10 Michael Jackson was showering and that this was the 10:28:37  
11 first time that you had approached the shower while 10:28:40  
12 Mr. Jackson was showering? 10:28:42  
13 A. Yes. 10:28:45  
14 Q. Let's go to page 396. And look at lines 13 10:28:50  
15 to 15. Do you see that you testified under oath that 10:28:58  
16 the reason you didn't turn around was because you 10:29:08  
17 wanted to get a peek of Michael Jackson without his 10:29:11  
18 clothes on? 10:29:15  
19 A. That was the question. 10:29:23  
20 Q. So at page 396 -- 10:29:25  
21 A. 15. 10:29:28  
22 Q. -- line 13, the question was: 10:29:28  
23 "You wanted to peek and see this man with 10:29:30  
24 no clothes on, right, ma'am? 10:29:31  
25 "Answer: Yeah." 10:29:34

1	Do you see that?	10:29:35
2	A. Yes.	10:29:37
3	Q. I've accurately read your testimony from	10:29:38
4	1994?	10:29:40
5	A. Yes.	10:29:41
6	Q. And then you talked about what you actually	10:29:49
7	saw when you took this peek.	10:29:52
8	A. Yes.	10:29:55
9	Q. And we're going to go over that. And I'm	10:29:55
10	going to read it into the record. And I'm going to	10:29:57
11	start and I want you to follow along with me.	10:29:59
12	A. Okay.	10:30:01
13	Q. I'm going to start at page 397, line 14.	10:30:02
14	And I'm going to read into the record until 399,	10:30:06
15	line 23. This is Exhibit 11. We're starting at 397,	10:30:09
16	line 14.	10:30:13
17	So starting at 397, page 397, line 14:	10:30:29
18	"Question: When you looked around the	10:30:33
19	corner, what did you see at that point?	10:30:35
20	"Answer: What do you mean? I see	10:30:37
21	him. I saw Michael.	10:30:39
22	"Question: What did you see? You saw	10:30:41
23	Mr. Jackson?	10:30:45
24	"Answer: Uh-huh.	10:30:47
25	"Question: Did he have any clothes	10:30:48

1	on?	10:30:50
2	"Answer: I didn't see that.	10:30:51
3	"Question: What did you see?	10:30:53
4	"Answer: I just saw the shadow.	10:30:55
5	"Question: You saw the shadow of what	10:30:57
6	you believe was Michael Jackson?	10:30:59
7	"Answer: Yes.	10:31:03
8	"Question: You never saw him, did	10:31:04
9	you?	10:31:06
10	"Answer: No.	10:31:07
11	"Question: You saw the shadow of what	10:31:08
12	you thought was a man, right?	10:31:10
13	"Answer: Yes.	10:31:12
14	"Question: Did you see any other	10:31:15
15	shadow at that point?	10:31:17
16	"Answer: No.	10:31:18
17	"Question: Was the glass foggy?	10:31:19
18	"Answer: Yeah.	10:31:21
19	"Question: So you couldn't really see	10:31:23
20	clearly the glass, right? You just saw a figure; is	10:31:25
21	that right?	10:31:28
22	"Answer: Uh-huh.	10:31:29
23	"Question: You saw only one figure at	10:31:31
24	that point?	10:31:34
25	"Answer: Yes.	10:31:35

1	"Question: Okay. And as you saw this	10:31:37
2	one figure, did you at that point continue on or did	10:31:39
3	you turn around and go back?	10:31:41
4	"Answer: I went back.	10:31:43
5	"Question: So you now -- you have	10:31:45
6	seen your peek. You have taken your peek as you	10:31:48
7	said, right?	10:31:51
8	"Answer: Yes	10:31:53
9	"Question: And your peek was looking	10:31:53
10	for just a very short time like that?	10:31:56
11	"Answer: Yes.	10:31:59
12	"Question: Was it very quick?	10:32:00
13	"Answer: Yeah.	10:32:02
14	"Question: And you saw what appeared	10:32:03
15	to be a man, right?	10:32:04
16	"Answer: Yes.	10:32:06
17	"Question: You only saw one figure,	10:32:08
18	right?	10:32:10
19	"Answer: Yeah.	10:32:10
20	"Question: And then you then turned	10:32:12
21	around and went back out, correct?	10:32:15
22	"Answer: Yes.	10:32:17
23	"Question: Is that right?	10:32:20
24	"Answer: Yes.	10:32:21
25	"Question: And that's all you saw?	10:32:25

1	"Answer: Yes.	10:32:26
2	"Question: Is that right?	10:32:27
3	MR. MANLY: Counsel, could you slow down?	10:32:29
4	BY MS. MACISAAC:	10:32:29
5	"Answer: Yes.	10:32:29
6	"Question: You never saw any other	10:32:30
7	person in there when you were inside there, did you?	10:32:34
8	"Answer: No. But once I got close to	10:32:37
9	it, I hear laughing.	10:32:40
10	"Question: But you never saw anybody	10:32:41
11	else in the shower, right?	10:32:44
12	"Answer: No."	10:32:46
13	Did I correctly read your deposition	10:32:50
14	testimony from January of 1994?	10:32:52
15	A. Yes.	10:32:57
16	Q. So I counted up that during just this	10:33:01
17	portion of your testimony that I just read into the	10:33:05
18	record, that you said under oath at least six times	10:33:07
19	that you only saw one figure in the shower --	10:33:12
20	A. Yes.	10:33:16
21	Q. -- on that day in December 1989, correct?	10:33:17
22	A. Yes.	10:33:19
23	Q. So let's talk about what you heard, what	10:33:29
24	you actually heard during the shower incident in	10:33:31
25	December of 1989.	10:33:35

1	A.	Yes.	10:33:36
2	Q.	So still on Exhibit 11, starting at	10:33:37
3		page 399, lines 24 through page 417, I'm going to	10:33:40
4		read that into the record.	10:33:47
5		MR. FINALDI: You're reading 399 to 417?	10:33:49
6	BY MS. MACISAAC:		10:33:51
7	Q.	No. 399, lines 24 through page 400, line	10:33:52
8	17.	Sorry.	10:33:56
9		Are you with me?	10:33:59
10	A.	Yes.	10:34:00
11	Q.	So again, on Exhibit 11, page 399, line 24.	10:34:00
12	A.	Okay.	10:34:06
13	Q.	"Question: You heard some laughing?	10:34:06
14		"Answer: Yeah.	10:34:09
15		"Question: When was it you heard the	10:34:11
16		laughing?	10:34:13
17		"Answer: When I got real close. When	10:34:15
18		I saw and hear the laugh.	10:34:17
19		"Question: What kind of laughing did	10:34:19
20		you hear?	10:34:21
21		"Answer: You know, just laughing.	10:34:22
22		Not real loud but laughing like hee hee hee, like	10:34:25
23		that.	10:34:29
24		"Question: You heard hee hee hee	10:34:30
25		laughing?	10:34:32

1	"Answer: Yeah, like that.	10:34:33
2	"Question: Did you recognize any	10:34:34
3	voices you heard?	10:34:37
4	"Answer: It was Michael.	10:34:38
5	"Question: You heard Michael	10:34:39
6	laughing?	10:34:41
7	"Answer: Yes.	10:34:41
8	"Question: Did you hear anything else	10:34:43
9	other than Michael laughing?	10:34:45
10	"Answer: No.	10:34:46
11	"That's all you heard?	10:34:47
12	"Answer: Uh-huh."	10:34:49
13	Do you see that?	10:34:53
14	A. Yes.	10:34:54
15	Q. Did I accurately read your testimony, your	10:34:54
16	under oath testimony from January of 1994?	10:34:56
17	A. Yes.	10:34:58
18	Q. So here again, asked more than once what	10:35:10
19	you heard, and you said more than once that you only	10:35:13
20	heard one voice laughing?	10:35:15
21	MR. FINALDI: Asked and answered.	10:35:18
22	BY MS. MACISAAC:	10:35:18
23	Q. Is that yes?	10:35:18
24	A. That's what I, that's what I say.	10:35:20
25	Q. And after this, Mr. Cochran asked you a	10:35:22

1 series of follow-up questions to really make sure 10:35:27  
2 that he had gotten your testimony correct regarding 10:35:29  
3 this alleged 1989 shower incident -- 10:35:32  
4 MR. FINALDI: Assumes facts not in 10:35:36  
5 evidence. 10:35:36  
6 BY MS. MACISAAC: 10:35:37  
7 Q. -- and to make sure that you were telling 10:35:37  
8 the truth. Do you remember that? 10:35:38  
9 MR. FINALDI: Assumes facts not in evidence 10:35:40  
10 as to Mr. Cochran's state of mind. 10:35:40  
11 BY MS. MACISAAC: 10:35:44  
12 Q. Well, let's look at what Mr. Cochran asked 10:35:44  
13 you. And this is Exhibit 11 starting at page 400. 10:35:47  
14 And I'm going to read into the record lines 18 10:35:51  
15 through page 402, line 3. 10:35:57  
16 So let's start. Exhibit 11, page 400, 10:36:00  
17 line 18. 10:36:03  
18 "Question: So let me see if I 10:36:04  
19 understand it. You came in there. This is December 10:36:07  
20 of 1989. You were curious and you wanted to take a 10:36:09  
21 peek at Mr. Jackson while he was showering once you 10:36:13  
22 got in there, right? 10:36:16  
23 "Answer: Uh-huh. 10:36:18  
24 "Question: You went around and you 10:36:19  
25 took a peek. Through a foggy shower glass you saw 10:36:22

1	the figure of what you thought was a man, what you	10:36:25
2	think was Mr. Jackson?	10:36:28
3	"Answer: Yes.	10:36:30
4	"Question: And you heard a giggle or	10:36:31
5	a laugh that appeared like Mr. Jackson's laugh,	10:36:33
6	right?	10:36:36
7	"Answer: Yes.	10:36:37
8	"Question: And you turned around and	10:36:41
9	you left?	10:36:41
10	"Answer: Yes.	10:36:42
11	"Question: You never saw anybody else	10:36:43
12	in that shower right? At that point?	10:36:44
13	"Answer: Well, no.	10:36:47
14	"Question: Then you then left the	10:36:49
15	room; is that right?	10:36:50
16	"Answer: Yes.	10:36:51
17	"Question: And you have now told me	10:36:54
18	everything that occurred on that particular occasion	10:36:55
19	regarding the shower; isn't that right?	10:36:57
20	"Answer: Yes.	10:36:59
21	"Question: And again, you are under	10:37:00
22	oath today, right?	10:37:02
23	"Answer: Yes.	10:37:03
24	"Question: And you are telling the	10:37:05
25	truth to the best of your ability	10:37:06

1	"Answer: Yes.	10:37:08
2	"Question: You are not lying to us,	10:37:09
3	are you?	10:37:10
4	"Answer: No.	10:37:11
5	"Question: You are being honest?	10:37:12
6	MR. MANLY: Counsel, could you slow down,	10:37:14
7	please?	10:37:15
8	BY MS. MACISAAC:	10:37:17
9	Q. "Answer: Yes.	10:37:17
10	"Question: And you have told us	10:37:17
11	everything, right?	10:37:18
12	"Answer: Yes."	10:37:19
13	Ms. Francia, did I read that testimony that	10:37:21
14	you gave under oath in 1994 accurately?	10:37:24
15	A. Yes.	10:37:28
16	Q. Do you recall testifying in	10:37:44
17	Michael Jackson's criminal trial in 2005 regarding	10:37:45
18	this alleged shower incident?	10:37:48
19	A. Did I come over?	10:37:50
20	Q. Do you recall testifying in --	10:37:51
21	A. Yes.	10:37:53
22	Q. -- Michael Jackson's criminal trial --	10:37:53
23	A. Yes.	10:37:57
24	Q. -- in 2005 regarding this alleged shower	10:37:57
25	incident from '89?	10:38:00

1	A. Yes.	10:38:01
2	Q. Do you know whether your testimony under	10:38:02
3	oath at the trial differed from what I've just read	10:38:03
4	you?	10:38:06
5	A. I don't remember.	10:38:07
6	Q. When you were testifying in 2005 at	10:38:14
7	Michael's criminal trial, that was approximately	10:38:16
8	16 years after this alleged 1989 shower incident had	10:38:20
9	taken place, correct?	10:38:24
10	A. I don't remember.	10:38:26
11	Q. But '89 to 2005 is approximately 16 years,	10:38:27
12	isn't it?	10:38:31
13	A. Yes.	10:38:31
14	Q. And 2005 was about 11 years after you gave	10:38:32
15	the testimony?	10:38:36
16	MR. MANLY: Is this a math quiz?	10:38:38
17	MS. MACISAAC: I'm just trying to create a	10:38:40
18	record, John.	10:38:41
19	MR. MANLY: I mean, we're all here --	10:38:42
20	MS. MACISAAC: John --	10:38:45
21	MR. MANLY: Don't John me.	10:38:45
22	MS. MACISAAC: John, I get to --	10:38:46
23	MR. MANLY: You're sitting here asking her	10:38:46
24	math equations.	10:38:49
25	MS. MACISAAC: John --	10:38:50

1	MR. MANLY: Get to your testimony.	10:38:51
2	MS. MACISAAC: I get to take the deposition	10:38:52
3	that I want to take.	10:38:54
4	MR. MANLY: Okay.	10:38:56
5	MS. MACISAAC: Do you agree with that?	10:38:57
6	MR. MANLY: Not if it violates the	10:38:58
7	rules.	10:39:00
8	MS. MACISAAC: Okay. Do you think I'm	10:39:00
9	violating a rule?	10:39:01
10	MR. MANLY: I think you're harassing her.	10:39:02
11	MS. MACISAAC: I don't think I'm harassing	10:39:04
12	her at all.	10:39:04
13	MR. MANLY: You can ask whatever you want	10:39:04
14	in the depositions. But, you know, don't --	10:39:05
15	MS. MACISAAC: John --	10:39:08
16	MR. MANLY: -- don't ask her to do math	10:39:08
17	equations. It's not right.	10:39:10
18	BY MS. MACISAAC:	10:39:12
19	Q. Ms. Francia, obviously your deposition in	10:39:12
20	the Chandler case was a lot closer in time to	10:39:15
21	whatever you saw in 1994 than your criminal trial	10:39:17
22	testimony would have been in 2005.	10:39:21
23	MR. FINALDI: Stipulated.	10:39:23
24	MS. MACISAAC: You stipulate to that?	10:39:25
25	MR. FINALDI: It's a simple fact.	10:39:26

1	BY MS. MACISAAC:	10:39:27
2	Q. You agree with that, right?	10:39:27
3	A. Yes.	10:39:28
4	Q. After you testified -- I'm sorry.	10:39:32
5	By the time you testified in the criminal	10:39:38
6	trial in 2005, you had already sued Michael Jackson	10:39:40
7	and reached a settlement with him?	10:39:44
8	A. Yes.	10:39:46
9	Q. Were you called by the prosecution in	10:39:49
10	Michael Jackson's criminal trial?	10:39:51
11	A. Yes.	10:39:55
12	MR. FINALDI: Calls for speculation.	10:39:56
13	BY MS. MACISAAC:	10:39:58
14	Q. Let's talk about the Hard Copy interview.	10:40:02
15	Back in 1993, you sold a story to Hard Copy	10:40:08
16	for \$20,000, correct?	10:40:14
17	MR. FINALDI: Assumes facts not in	10:40:15
18	evidence.	10:40:15
19	THE WITNESS: Yes, I remember.	10:40:16
20	MR. FINALDI: Misstates the facts.	10:40:18
21	BY MS. MACISAAC:	10:40:19
22	Q. Back in 1993, was \$20,000 a great deal of	10:40:23
23	money to you?	10:40:26
24	A. Yes.	10:40:27
25	Q. It was more than you made in a year,	10:40:28

1	BY MS. MACISAAC:	11:10:09
2	Q. 276. Line 14, through 277, line 17.	11:10:09
3	A. 277?	11:10:17
4	Q. 276, line 14, through 277, 17. I'll read	11:10:18
5	it into the record.	11:10:22
6	Starting page 276, line 14:	11:10:24
7	"Question: Now to begin, I believe	11:10:26
8	that at the end of your last deposition I asked you	11:10:28
9	if you would be kind enough to bring for us a copy of	11:10:31
10	the Hard Copy contract.	11:10:34
11	"Answer: Yes.	11:10:35
12	"Question: Do you remember that?	11:10:36
13	"Answer: Uh-huh.	11:10:37
14	"Question: Did you bring that	11:10:38
15	contract with you today?	11:10:40
16	"Answer: No.	11:10:41
17	"Question: Why didn't you bring it	11:10:43
18	with you?	11:10:45
19	"Answer: Well, after the deposition	11:10:45
20	here, the first time that I came, I got really upset	11:10:48
21	about all this. And I got rid of my contract. And I	11:10:52
22	just -- I just got rid of it.	11:10:56
23	"Question: Let me see if I understand	11:10:57
24	that. When you say you got rid of it, what does that	11:10:59
25	mean?	11:11:02

1	"Answer: Well, just threw them away.	11:11:03
2	"Question: You are telling us now	11:11:05
3	that you became so upset that you threw the contract	11:11:07
4	away?	11:11:09
5	"Answer: Yeah. I don't want to	11:11:10
6	remember that Hard Copy thing that I --	11:11:12
7	"Question: You don't have a copy of	11:11:15
8	the Hard Copy contract with you today?	11:11:17
9	"Answer: No.	11:11:19
10	"Question: And you don't have a copy	11:11:20
11	of the Hard Copy contract in your possession at all;	11:11:21
12	is that right?	11:11:24
13	"Answer: No, not today.	11:11:25
14	"Question: And the reason for that is	11:11:27
15	because you became so upset that you just threw it	11:11:29
16	away?	11:11:31
17	"Answer: Yes."	11:11:32
18	Did I read your testimony correctly?	11:11:35
19	A. Yes.	11:11:36
20	Q. Ms. Francia, do you recall why you didn't	11:11:38
21	want Michael Jackson or his lawyers to see the	11:11:42
22	Hard Copy contract?	11:11:43
23	MR. FINALDI: Assumes facts not in	11:11:45
24	evidence. Misstates her testimony.	11:11:45
25	THE WITNESS: I wanted to see --	11:11:46

1	BY MS. MACISAAC:	11:11:48
2	Q. Do you recall why you destroyed the	11:11:48
3	contract?	11:11:49
4	MR. FINALDI: Same objections.	11:11:52
5	THE WITNESS: No.	11:11:53
6	BY MS. MACISAAC:	11:11:53
7	Q. Was there something in the contract that	11:11:54
8	you did not want Michael Jackson or his lawyers to	11:11:56
9	see?	11:11:58
10	MR. FINALDI: Assumes facts not in	11:11:59
11	evidence.	11:11:59
12	BY MS. MACISAAC:	11:12:03
13	Q. If you recall.	11:12:03
14	A. No.	11:12:04
15	Q. Do you have any memory as to why you ripped	11:12:09
16	that contract up?	11:12:11
17	A. No. I remember having a copy, but I don't	11:12:13
18	remember saying anything that I don't want to see it.	11:12:20
19	Q. Do you recall how you got the \$20,000 from	11:12:35
20	Hard Copy? Was it a check?	11:12:37
21	A. Yes.	11:12:42
22	Q. You deposited that check?	11:12:44
23	A. Yes.	11:12:46
24	Q. Do you know whether you got the check from	11:12:48
25	Hard Copy between the first session of your	11:12:51

1 deposition in the Chandler case and the second, it 11:12:53  
2 was in between those two deposition sessions that you 11:12:56  
3 actually got the check from Hard Copy? 11:12:59  
4 MR. FINALDI: Calls for speculation. 11:13:02  
5 THE WITNESS: I don't remember. 11:13:02  
6 BY MS. MACISAAC: 11:13:05  
7 Q. If you look at Exhibit 11, page 277, 11:13:05  
8 lines 18 through 25, do you see that you testified 11:13:12  
9 that you had received the \$20,000 check from 11:13:19  
10 Hard Copy in between the first and second sessions of 11:13:21  
11 your deposition in the Chandler case? 11:13:25  
12 A. Page 2 -- 11:13:27  
13 Q. 277, lines 18 to 25. 11:13:29  
14 A. Okay. Yes. I mean, I'm sorry. 11:13:31  
15 Q. Yes. Page 277, line 18 through 25 -- 11:13:45  
16 A. Yes. 11:13:49  
17 Q. -- you testified that you received the 11:13:49  
18 \$20,000 check from Hard Copy between the first 11:13:50  
19 session of your deposition in the Chandler case and 11:13:52  
20 the second, correct? 11:13:55  
21 A. Yes. 11:13:56  
22 Q. Now, between these two sessions of your 11:14:03  
23 deposition, you apparently got rid of the contract, 11:14:06  
24 the Hard Copy contract, and you spent the Hard Copy 11:14:15  
25 money as quickly as you can? 11:14:17

1	A. Yes.	11:14:19
2	Q. Is there anything else that you recall	11:14:20
3	sitting here today as to why you wanted to get rid of	11:14:21
4	the Hard Copy contract and you wanted to spend that	11:14:23
5	money as fast as you could?	11:14:25
6	A. Like I said before, I thought it was going	11:14:33
7	to go away, you know, all this. Because it was at my	11:14:35
8	deposition, they made a whole big deal out of the	11:14:42
9	\$20,000. You know, that's why you're doing that	11:14:46
10	because of the \$20,000. That's why you're doing that	11:14:50
11	because of the \$20,000.	11:14:53
12	And I thought \$20,000 is not -- I mean, it	11:14:55
13	was to me a lot of money, but for what's going on,	11:14:59
14	you know, they were spending a lot of money and	11:15:09
15	they're focusing on \$20,000 that they thought that I	11:15:12
16	was selling the story or was selling Michael Jackson.	11:15:20
17	Q. So if you really wanted to dispel the idea	11:15:25
18	that you were -- had taken the money, that you had	11:15:29
19	sold the story that may have been untrue about	11:15:32
20	Michael Jackson and \$20,000 --	11:15:36
21	MR. MANLY: Can I --	11:15:39
22	BY MS. MACISAAC:	11:15:39
23	Q. -- did you consider giving the money back	11:15:39
24	to Hard Copy if that was your concern?	11:15:40
25	MR. MANLY: Can I have that question read	11:15:44

1 back, please. 11:15:44

2 MS. MACISAAC: I can strike the question, 11:15:44

3 it was an awkward question. 11:15:45

4 BY MS. MACISAAC: 11:15:47

5 Q. If your concern -- 11:15:47

6 A. I was already -- I'm sorry. 11:15:50

7 Q. Sure. I guess what I'm trying to get at is 11:15:51

8 I hear you saying that you wanted to spend the money 11:15:52

9 as quickly as possible because your credibility had 11:15:55

10 been attacked based on the idea that you had taken 11:15:57

11 \$20,000 in exchange for saying certain things about 11:16:00

12 Michael Jackson. 11:16:02

13 And I'm wondering if the idea is that you 11:16:03

14 want to make yourself look honest and remove this 11:16:06

15 issue, want to give the \$20,000 back? 11:16:10

16 A. Because I was already -- I was already 11:16:14

17 being called a liar. I was selling Michael Jackson 11:16:19

18 for \$20,000. I was selling my son for \$20,000. I 11:16:22

19 was selling what I saw for \$20,000. I was already -- 11:16:28

20 Q. Figured you had already been attacked? 11:16:37

21 A. Yeah. 11:16:41

22 Q. Okay. 11:16:41

23 Now, we just went over your testimony where 11:16:45

24 we talked about Mr. Cochran asking you at your first 11:16:48

25 session of the deposition whether you had a copy of 11:16:52

1 the Hard Copy contract. And you said no, it was at 11:16:54  
2 home. 11:16:59

3 Do you recall that during the second 11:17:01  
4 session of your deposition in the Chandler matter, 11:17:02  
5 you admitted that that was not true, that you, in 11:17:05  
6 fact, had had the Hard Copy contract with you during 11:17:08  
7 the first session? 11:17:10

8 A. I don't remember. 11:17:12

9 Q. Do you remember whether you had a copy of 11:17:17  
10 the Hard Copy contract at the first session of your 11:17:19  
11 deposition December 15th, 1993? 11:17:23

12 A. I don't remember. 11:17:25

13 Q. Do you remember showing it to Larry Feldman 11:17:26  
14 that day? 11:17:28

15 A. No. I don't remember. 11:17:32

16 Q. Let's look at Exhibit 11. And I would like 11:17:40  
17 you to turn to page 278. And starting at line 16, I 11:17:44  
18 am going to read into the record through page 279, 11:18:01  
19 line 9. So this is Exhibit 11, page 278, starting at 11:18:04  
20 line 16: 11:18:09

21 "Question: And with regard to this 11:18:10  
22 contract with Hard Copy, did you give Mr. Feldman a 11:18:12  
23 copy of that contract? 11:18:15

24 "Answer: The first time. The first 11:18:17  
25 time I showed it to him. 11:18:20

1	"Question: And did you give him a	11:18:21
2	copy of it?	11:18:23
3	"Answer: No.	11:18:24
4	"Question: When was the first time	11:18:25
5	you showed it to him?	11:18:27
6	"Answer: I think -- when was the	11:18:29
7	first time? Oh, when I came here.	11:18:32
8	"Question: In other words, you are	11:18:35
9	saying you had a copy of the contract when you were	11:18:36
10	here on December 15th?	11:18:38
11	"Answer: Yeah, but I didn't give it	11:18:40
12	to him.	11:18:42
13	"Question: What did you do with it	11:18:43
14	that day?	11:18:45
15	"Answer: I just took it home.	11:18:46
16	"Question: Did you show it to	11:18:48
17	Mr. Feldman?	11:18:49
18	"Answer. Uh-huh.	11:18:50
19	"Question: Do you know if he made a	11:18:51
20	copy of it?	11:18:53
21	"Answer: No, I don't."	11:18:55
22	Did I accurately read that testimony?	11:18:58
23	A. Yes.	11:19:00
24	Q. So Mr. Cochran had caught you in a lie,	11:19:01
25	correct? Do you recall that?	11:19:03

1	MR. FINALDI: Assumes facts not in	11:19:05
2	evidence. Calls for speculation. Argumentative.	11:19:05
3	THE WITNESS: I don't remember.	11:19:07
4	BY MS. MACISAAC:	11:19:09
5	Q. Do you remember him asking you some heated	11:19:10
6	or embarrassing questions about the fact that you had	11:19:13
7	previously testified in December 15th that you didn't	11:19:16
8	have the Hard Copy contract with you and that it was	11:19:19
9	at your home?	11:19:22
10	MR. FINALDI: Why don't you point her to	11:19:26
11	the testimony?	11:19:27
12	THE WITNESS: I don't remember.	11:19:27
13	MS. MACISAAC: I'm going to, I just want to	11:19:27
14	know if she remembers.	11:19:28
15	THE WITNESS: I don't remember.	11:19:29
16	BY MS. MACISAAC:	11:19:30
17	Q. Do you remember at all being in the hot	11:19:33
18	seat or feeling uncomfortable that it had shown that	11:19:34
19	you had lied?	11:19:37
20	MR. FINALDI: Objection. Argumentative.	11:19:38
21	THE WITNESS: I don't remember.	11:19:40
22	BY MS. MACISAAC:	11:19:41
23	Q. Let's look at the exchange. I'd have you	11:19:45
24	turn to Exhibit 11 to page 383. Starting at line 20,	11:19:49
25	and I'm going to read into the record through	11:20:03

1	page 386, line 1, and I would ask you --	11:20:06
2	A. 86?	11:20:10
3	Q. Sure. Start at page 383, line 20. And I'm	11:20:11
4	going to read into the record from line 20 of	11:20:14
5	page 383 to page 386, line 1.	11:20:17
6	And I would ask you to follow along with	11:20:22
7	me.	11:20:23
8	So this is page 383 of Exhibit 11, starting	11:20:25
9	at line 20:	11:20:28
10	"Question: And remember last time	11:20:29
11	when you testified, I asked you if you had, on	11:20:30
12	December 15 if you had the Hard Copy contract here?	11:20:34
13	"Answer: Uh-huh.	11:20:38
14	"Question: You said no, you did not	11:20:40
15	have it. Okay?	11:20:42
16	"Answer: Uh-huh.	11:20:45
17	"Question: Remember that?	11:20:46
18	"Answer: Yes.	11:20:48
19	"Question: And then today you told us	11:20:50
20	that you did have the contract here because you	11:20:52
21	showed it to Mr. Feldman.	11:20:54
22	"Answer: Yeah, but --"	11:20:56
23	A. Excuse me. You said page 283?	11:20:59
24	Q. No, 383, ma'am. I'm sorry. So let's start	11:21:02
25	again. 383. Are you there?	11:21:05

1	A. Okay.	11:21:13
2	Q. Okay. And just bear with me. 383, we're	11:21:17
3	going to start with line 20. And I'm going to try to	11:21:22
4	go slow for the court reporter.	11:21:26
5	"Question: And remember last time	11:21:27
6	when you testified, I asked you if you had, on	11:21:30
7	December 15th, if you had the Hard Copy contract	11:21:32
8	here?	11:21:35
9	"Answer: Uh-huh.	11:21:36
10	"Question: You said no, you did not	11:21:38
11	have it. Okay?	11:21:39
12	"Answer: Uh-huh.	11:21:42
13	"Question: Remember that?	11:21:43
14	"Answer: Yes.	11:21:46
15	"Question: And then today you told us	11:21:47
16	that you did have the contract here because you	11:21:50
17	showed it to Mr. Feldman.	11:21:52
18	"Answer: Yeah, but.	11:21:53
19	"Question: Were you lying, then, when	11:21:55
20	you told us you didn't have the contract?	11:21:56
21	"Answer: Well, I didn't have -- I	11:21:58
22	don't have it with me. I didn't have it here with	11:22:01
23	me.	11:22:03
24	"Question: I understand you don't	11:22:04
25	have the contract with you now, but today you told me	11:22:06

1	earlier that you had the contract, that contract, the	11:22:08
2	last time you were here because you showed it to	11:22:12
3	Larry Feldman.	11:22:14
4	"Answer: Yes.	11:22:15
5	"Question: Remember that?	11:22:17
6	"Answer: Yes.	11:22:18
7	"Question: So when you said you	11:22:19
8	didn't have the contract, you were lying?	11:22:21
9	"Answer: No, I didn't have it.	11:22:23
10	"Question: Where was it?	11:22:24
11	"Answer: Mrs. Sutherland took my book	11:22:26
12	and she took all my stuff.	11:22:29
13	"Question: Ma'am, do you know the	11:22:31
14	difference between lying or not? Let me show you	11:22:33
15	this question.	11:22:35
16	"Answer: Uh-huh.	11:22:35
17	"Question: This is what I asked you	11:22:38
18	and, Counsel, on page 233, you were asked this	11:22:41
19	question," and then Mr. Cochran reads from your	11:22:43
20	previous deposition.	11:22:47
21	"Question: And do you have a copy of	11:22:48
22	that today with you, the contract?	11:22:49
23	"Answer: No.	11:22:51
24	Then this is your answer:	11:22:53
25	"Yes, I didn't have it.	11:22:54

1	"Question: Where was it?	11:22:55
2	"Answer: It was in the hotel."	11:22:56
3	And then Mr. Cochran reads from your	11:22:58
4	previous December 15th testimony again.	11:23:00
5	"Question: Where is your copy?	11:23:03
6	"Answer: At home."	11:23:06
7	Then Mr. Cochran asked you:	11:23:08
8	"So you were lying about that. It	11:23:09
9	wasn't at home. You just told me a few minutes ago	11:23:10
10	it was with Mrs. Sutherland in a book somewhere.	11:23:13
11	"Answer: Yeah, it was in a book.	11:23:15
12	"Question: Ma'am, isn't it true that	11:23:17
13	somebody told you to get rid of that contract, that	11:23:19
14	you can't give that contract to Mr. Cochran?	11:23:21
15	"Answer: No. Nobody did.	11:23:24
16	"Question: Isn't that correct?	11:23:26
17	"Answer: No.	11:23:27
18	"Question: That you were just playing	11:23:28
19	games with us?	11:23:30
20	"Answer: No.	11:23:32
21	"Question: Because we can get that	11:23:33
22	contract, ma'am.	11:23:34
23	"Answer: I know.	11:23:35
24	"Question: You don't plan to give us	11:23:36
25	the contract?	11:23:38

1	"Answer: I don't have it anymore."	11:23:38
2	Did I read your testimony correctly from	11:23:41
3	January of 1994?	11:23:43
4	A. Yes.	11:23:45
5	Q. Does that refresh your recollection that	11:23:48
6	you were caught in a lie?	11:23:49
7	MR. FINALDI: Misstates testimony. Assumes	11:23:51
8	facts not in evidence --	11:23:52
9	THE WITNESS: I don't remember.	11:23:53
10	MR. FINALDI: -- and misstates the	11:23:53
11	evidence.	11:23:55
12	BY MS. MACISAAC:	11:23:56
13	Q. You don't remember?	11:23:58
14	A. I don't remember.	11:23:59
15	Q. Reading it now, though, do you see that it	11:24:01
16	appears that you were lying?	11:24:03
17	A. Yes.	11:24:04
18	MR. FINALDI: Same objections.	11:24:05
19	BY MS. MACISAAC:	11:24:06
20	Q. Is that a yes?	11:24:06
21	A. Probably.	11:24:07
22	MS. MACISAAC: I'd like to take a quick	11:24:13
23	break.	11:24:14
24	THE VIDEOGRAPHER: We are off the video	11:24:17
25	record. The time is 11:24 a.m.	11:24:19

1	(A recess was taken from 11:24 a.m. to	11:24:25
2	11:32 a.m.)	11:24:25
3	THE VIDEOGRAPHER: We are back on the video	11:32:30
4	record. The time is 11:32 a.m.	11:32:32
5	BY MS. MACISAAC:	11:32:35
6	Q. Ms. Francia, do you realize you're still	11:32:36
7	under oath?	11:32:39
8	A. Yes.	11:32:40
9	Q. At your last deposition in September in	11:32:41
10	this case, I believe that you told Mr. Finaldi that	11:32:43
11	you thought that Michael Jackson had manipulated you,	11:32:47
12	and the way that he did that, by telling you that	11:32:50
13	certain Neverland Ranch employees didn't like you.	11:32:53
14	Do you recall that?	11:32:57
15	A. Yes.	11:32:57
16	Q. Wasn't it true that there were many	11:33:00
17	Neverland Ranch employees that didn't like you?	11:33:01
18	A. Yes.	11:33:04
19	MR. FINALDI: Calls for speculation.	11:33:05
20	BY MS. MACISAAC:	11:33:05
21	Q. Yes?	11:33:05
22	A. Yes.	11:33:05
23	Q. So Mr. Jackson wasn't lying to you?	11:33:06
24	MR. FINALDI: Assumes facts not in	11:33:09
25	evidence.	11:33:09

1	BY MS. MACISAAC:	11:33:09
2	Q. There were a lot of people that didn't like	11:33:09
3	you?	11:33:11
4	MR. FINALDI: Assumes facts not in evidence	11:33:11
5	and calls for speculation.	11:33:12
6	THE WITNESS: Yes.	11:33:12
7	BY MS. MACISAAC:	11:33:13
8	Q. Do you recall testifying in the Chandler	11:33:22
9	matter that employees at Neverland Valley Ranch	11:33:25
10	thought you were a dangerous person?	11:33:28
11	A. Did I remember?	11:33:32
12	Q. Yes. Do you remember that you testified in	11:33:33
13	the Chandler matter that employees of the Neverland	11:33:35
14	Valley Ranch, that the other employees you worked	11:33:38
15	with thought you were a dangerous person?	11:33:40
16	A. I don't remember.	11:33:42
17	Q. Would it surprise you if you testified to	11:33:43
18	that?	11:33:46
19	MR. FINALDI: Calls for speculation.	11:33:47
20	THE WITNESS: Not dangerous.	11:33:48
21	BY MS. MACISAAC:	11:33:51
22	Q. What?	11:33:52
23	A. They thought that I was telling Michael	11:33:54
24	what was going on.	11:33:58
25	Q. Any other reasons that you recall that	11:34:02

1 maybe people didn't like you? 11:34:03

2 A. Because he -- because I had a lot more 11:34:08

3 privilege than other people. 11:34:15

4 Q. You had more privileges when it came to 11:34:17

5 Michael Jackson? 11:34:19

6 A. Yes. 11:34:20

7 Q. And that's the only reason that you can 11:34:20

8 recall that people didn't like you at the Neverland 11:34:23

9 Valley Ranch? 11:34:25

10 A. Yes. 11:34:25

11 Q. They were jealous of you? 11:34:26

12 A. Yes. 11:34:27

13 Q. And your relations with Michael Jackson? 11:34:27

14 A. Yes. 11:34:29

15 Q. Who is Adrian that worked at the Neverland 11:34:31

16 Valley Ranch? Do you remember Adrian? 11:34:35

17 A. One of the workers. 11:34:36

18 Q. And I would like to look at Exhibit 11 11:34:38

19 again. And let's go to page 360. 11:34:40

20 A. 11? 11:34:46

21 Q. Yes. Page 360. And I would like to focus 11:34:47

22 on lines 14 through 16, this is Exhibit 11. 11:35:03

23 Do you see that you were asked at line 14: 11:35:08

24 "Question: If Adrian said that you 11:35:09

25 were a dangerous person, that would not be true; is 11:35:11

1	that right?	11:35:13
2	"Answer: Everybody would say that	11:35:14
3	there."	11:35:16
4	Do you see your testimony?	11:35:19
5	A. Yes.	11:35:19
6	Q. Does that refresh your recollection that	11:35:20
7	you testified that employees at the Neverland Valley	11:35:21
8	Ranch thought you were a dangerous person?	11:35:25
9	MR. FINALDI: Misstates testimony. Read it	11:35:28
10	down, she says something different.	11:35:29
11	THE WITNESS: No, to me dangerous means a	11:35:32
12	killer.	11:35:34
13	BY MS. MACISAAC:	11:35:38
14	Q. Not physically dangerous. You didn't think	11:35:39
15	they thought you were physically dangerous, just	11:35:41
16	maybe untrustworthy?	11:35:44
17	A. Yes.	11:35:45
18	Q. Do you think they thought you were a liar?	11:35:46
19	MR. FINALDI: Calls for speculation.	11:35:49
20	THE WITNESS: No.	11:35:50
21	BY MS. MACISAAC:	11:35:51
22	Q. But untrustworthy?	11:35:52
23	A. Yes.	11:35:53
24	Q. Do you think that people thought you were	11:36:04
25	untrustworthy at the Neverland Valley Ranch because	11:36:09

1	you had played a role in getting another employee	11:36:12
2	fired?	11:36:15
3	MR. FINALDI: Calls for speculation.	11:36:17
4	THE WITNESS: Because I will tell Michael	11:36:22
5	what's going on, and Norma, his secretary, I will	11:36:23
6	tell stuff that's, what was going on. But she will	11:36:27
7	find out what was going on and find out that it was	11:36:34
8	true.	11:36:36
9	BY MS. MACISAAC:	11:36:36
10	Q. Okay.	11:36:37
11	A. That's why people didn't trust me.	11:36:37
12	Q. Did you ever get -- play a role in getting	11:36:41
13	anyone fired at the Neverland Valley Ranch?	11:36:43
14	MR. FINALDI: Calls for speculation.	11:36:46
15	BY MS. MACISAAC:	11:36:46
16	Q. Other than telling on them to Norma or to	11:36:49
17	Michael?	11:36:51
18	A. No.	11:36:52
19	Q. You don't think that ever happened?	11:36:53
20	A. No.	11:36:54
21	MR. FINALDI: I need to take a quick break,	11:37:09
22	sorry.	11:37:11
23	MS. MACISAAC: You want to take a quick	11:37:11
24	break?	11:37:11
25	THE VIDEOGRAPHER: We are off the video	11:37:14

1	record at --	11:37:15
2	MR. MANLY: You can keep going.	11:37:17
3	MS. MACISAAC: So we're right back on?	11:37:21
4	Okay.	11:37:21
5	BY MS. MACISAAC:	11:37:22
6	Q. Let's talk about your friend Vangie that	11:37:22
7	helped you get money from Hard Copy. Didn't you play	11:37:25
8	a role in Vangie getting fired?	11:37:28
9	MR. MANLY: Calls for speculation. Lacks	11:37:32
10	foundation.	11:37:33
11	THE WITNESS: I don't think she got fired	11:37:42
12	because of me. I got -- I remember doing something	11:37:43
13	that --	11:37:49
14	BY MS. MACISAAC:	11:37:54
15	Q. That contributed to Vangie being fired?	11:37:54
16	A. Yes.	11:37:57
17	Q. And your friendship with Vangie ended	11:37:57
18	because you did that something that contributed --	11:38:00
19	A. Excuse me?	11:38:02
20	Q. And your friendship with Vangie ended	11:38:02
21	because you did that something that got her fired?	11:38:04
22	MR. MANLY: Objection. Lacks foundation.	11:38:08
23	THE WITNESS: No.	11:38:10
24	BY MS. MACISAAC:	11:38:10
25	Q. Contributed to her being fired?	11:38:10

1 MR. MANLY: Objection. Lacks foundation. 11:38:10  
2 Calls for speculation. 11:38:10  
3 THE WITNESS: We never got -- we never 11:38:11  
4 got -- we never ended our friendship. We continue 11:38:14  
5 being friends after that. 11:38:17  
6 BY MS. MACISAAC: 11:38:18  
7 Q. But I thought you testified earlier that 11:38:19  
8 you're no longer friends, you couldn't even remember 11:38:21  
9 her last name? 11:38:23  
10 A. No. I'm no longer friends with her because 11:38:24  
11 I'm -- I moved from Santa Maria here and even when I 11:38:26  
12 saw her in Santa Maria, I talked to her. We talked. 11:38:35  
13 Q. Do you recall that during the first session 11:38:42  
14 of your deposition in the Chandler matter you denied 11:38:43  
15 that you had said or done anything that contributed 11:38:46  
16 to Vangie being fired? 11:38:48  
17 A. Yeah. Like I say, she wasn't fired because 11:38:52  
18 of me. But I think I contributed. 11:38:56  
19 Q. You don't think she was fired solely 11:38:58  
20 because of you -- 11:39:00  
21 A. Yes. 11:39:01  
22 Q. -- but you contributed to her being fired? 11:39:01  
23 A. Yes. 11:39:04  
24 Q. But do you recall testifying in the first 11:39:04  
25 session of your deposition in the Chandler matter 11:39:06

1 that you hadn't done or said anything that 11:39:07  
2 contributed to Vangie being fired? 11:39:11  
3 MR. MANLY: Objection -- 11:39:13  
4 THE WITNESS: Yes, at that time -- 11:39:13  
5 MR. MANLY: -- overbroad. Hold on. 11:39:13  
6 Ms. Francia, hold on. 11:39:15  
7 Objection. Lacks foundation. Calls for 11:39:16  
8 speculation. 11:39:17  
9 If you're going to refer to testimony, read 11:39:18  
10 it. 11:39:20  
11 MS. MACISAAC: Sure. 11:39:20  
12 MR. MANLY: Don't just represent it. 11:39:21  
13 MS. MACISAAC: Okay. Sure. 11:39:22  
14 BY MS. MACISAAC: 11:39:24  
15 Q. Let's go to Exhibit 10. Page 207. So 11:39:25  
16 Exhibit 10, page 207. 11:39:28  
17 If you start at line 20, if you read on 11:39:50  
18 that page, just read the page to yourself, and then 11:39:54  
19 I'll -- and up until 208, page 5, and then I'll ask 11:39:57  
20 you questions about it. 11:40:01  
21 A. 206? 11:40:03  
22 Q. 207. I'm sorry, 207, starting at line 1, 11:40:04  
23 just read to yourself, to the following page, 208, 11:40:07  
24 line 5. 11:40:11  
25 A. Yes. 11:40:58

1	Q. Okay. So during this section of your	11:40:59
2	testimony in Exhibit 10, you were discussing Vangie	11:41:02
3	being fired from the ranch, correct?	11:41:07
4	A. Yes.	11:41:08
5	Q. Okay. And if you start on line 20 at	11:41:08
6	page 207.	11:41:12
7	"Question: You had nothing with her	11:41:13
8	being fired, though?	11:41:15
9	"Answer: No, I don't think so.	11:41:16
10	"Question: You didn't?	11:41:17
11	"Answer: No.	11:41:18
12	"Question: Okay. So in other words,	11:41:19
13	you're telling me you were friends with her at the	11:41:21
14	ranch?	11:41:24
15	"Answer: Yeah.	11:41:24
16	"Question: And you never had any --	11:41:25
17	she got fired, but it was nothing you said or did?	11:41:26
18	"Answer: Oh, no, no.	11:41:30
19	Did I read that correctly?	11:41:32
20	A. Yes.	11:41:33
21	Q. So you agree with me that during the first	11:41:34
22	session of your deposition in the Chandler matter you	11:41:36
23	denied that Vangie being fired had anything to do	11:41:39
24	with anything that you had done or said?	11:41:42
25	MR. MANLY: You're mischaracterizing what	11:41:44

1	she said. It mischaracterizes the record. It	11:41:45
2	mischaracterizes her prior testimony.	11:41:47
3	MS. MACISAAC: Thanks for coaching.	11:41:49
4	MR. MANLY: Excuse me. I'm making	11:41:50
5	deposition objections.	11:41:52
6	MS. MACISAAC: Okay. Are you done?	11:41:53
7	MR. MANLY: No. And don't you tell me I'm	11:41:54
8	coaching when you know damned well I'm not.	11:41:56
9	MS. MACISAAC: Please don't swear on the	11:41:58
10	record.	11:42:00
11	MR. MANLY: Oh, is "damn" swearing?	11:42:00
12	MS. MACISAAC: Yes.	11:42:01
13	MR. MANLY: Okay. You know darned well I'm	11:42:02
14	not. Okay. Don't accuse me of coaching when you	11:42:04
15	know I'm making a deposition objection that's right	11:42:06
16	in the evidence code.	11:42:09
17	BY MS. MACISAAC:	11:42:10
18	Q. Do you agree that you testified during the	11:42:11
19	first session of your deposition in the Chandler	11:42:13
20	matter that Vangie -- that you didn't have anything	11:42:16
21	to do with Vangie being fired?	11:42:20
22	MR. MANLY: Objection --	11:42:23
23	THE WITNESS: Yes.	11:42:23
24	MR. MANLY: -- mischaracterizes her	11:42:24
25	testimony. Mischaracterizes the evidence.	11:42:24

1 BY MS. MACISAAC: 11:42:27

2 Q. You agree with how I read it? 11:42:27

3 A. I read that, yes. 11:42:29

4 Q. Now, during the second session of your 11:42:39

5 deposition in the Chandler case, when you were 11:42:42

6 cross-examined by Johnnie Cochran, do you remember 11:42:46

7 that he caught you in what I'll call another lie, 11:42:50

8 where you admitted in fact you did have something to 11:42:52

9 do with Vangie going fired? 11:42:54

10 MR. MANLY: Objection. Argumentative. 11:42:56

11 Lacks foundation. And calls for speculation. 11:42:57

12 THE WITNESS: Like I say, I contributed or 11:42:59

13 I did something, but it wasn't my fault why she got 11:43:05

14 fired. 11:43:07

15 BY MS. MACISAAC: 11:43:08

16 Q. But that's not what you said in Exhibit 10. 11:43:08

17 MR. MANLY: That's exactly what she said. 11:43:10

18 MS. MACISAAC: No, she did -- it's not what 11:43:12

19 you said. 11:43:12

20 MR. MANLY: You can -- 11:43:13

21 MS. MACISAAC: Let's go over it. 11:43:13

22 MR. MANLY: You can ask her questions. But 11:43:13

23 don't characterize what she said. That's your 11:43:15

24 opinion. You're not a witness. If you want to 11:43:17

25 testify, I'll take your deposition, I would be more 11:43:19

1 than happy to, but you don't get to characterize her 11:43:23  
2 testimony. Ask her questions. 11:43:26  
3 BY MS. MACISAAC: 11:43:28  
4 Q. Page 207, please. Exhibit 10, line 20. 11:43:29  
5 "Question: You had nothing to do with 11:43:39  
6 her being fired, though? 11:43:41  
7 "Answer: No, I don't think so. 11:43:42  
8 "Question: You didn't? 11:43:43  
9 "Answer: No. 11:43:45  
10 "Question: Okay. So in other words, 11:43:46  
11 you're telling me you were friends with her at the 11:43:48  
12 ranch? 11:43:50  
13 "Answer: Yes. 11:43:51  
14 "Question: And you never had any -- 11:43:52  
15 she got fired, but it was nothing you said or did? 11:43:54  
16 "Answer: Oh, no, no." 11:43:57  
17 Did I read that correctly? 11:43:59  
18 A. Yes. 11:44:00  
19 MR. MANLY: That's the second time you read 11:44:01  
20 it correctly. 11:44:02  
21 BY MS. MACISAAC: 11:44:04  
22 Q. So is it fair to say that you testified 11:44:04  
23 under oath -- 11:44:05  
24 A. Yes. 11:44:06  
25 Q. -- that you did not say anything or do 11:44:06

1	anything that contributed to Vangie being fired?	11:44:08
2	A. I say -- what happened, she got rid of some	11:44:14
3	papers. I remember. And I posted it. I put it on	11:44:24
4	the board.	11:44:29
5	Q. You put it on the board?	11:44:31
6	A. On the board.	11:44:33
7	Q. Okay. So you think what happened was	11:44:33
8	Vangie and you got written up for being late. Do you	11:44:38
9	recall that?	11:44:42
10	A. I don't remember.	11:44:42
11	Q. But Vangie got some kind of notice and you	11:44:43
12	ripped it up and then you posted it on a bulletin	11:44:45
13	board. Is that your memory?	11:44:48
14	A. Something like that.	11:44:50
15	Q. Okay. And Vangie got fired for that,	11:44:51
16	right?	11:44:53
17	A. I think that's why she got fired. I don't	11:44:56
18	remember.	11:44:59
19	Q. But you do remember posting the notice on	11:45:00
20	the bulletin board, correct?	11:45:04
21	A. Yes. Something like that.	11:45:06
22	Q. Is that a "yes"?	11:45:08
23	A. Yes.	11:45:09
24	Q. Let's look at what you testified about this	11:45:14
25	incident in the second session of your deposition in	11:45:16

1 the Chandler case. If you look at Exhibit 11, let's 11:45:19  
2 go to page 365. And I'm going to read into the 11:45:25  
3 record, page 365, line 24, through 368, line 12. 11:45:47  
4 So this is Exhibit 11, page 365, starting 11:45:53  
5 at line 24: 11:45:58  
6 "Question: Now, what I was going to 11:45:59  
7 ask you about was in December of 1990, do you 11:46:01  
8 remember a time in December of 1990 at the ranch that 11:46:04  
9 both you and Vangie were written up for something you 11:46:08  
10 had done at the ranch there, that you were written 11:46:11  
11 up, that you got in trouble for not signing your 11:46:13  
12 timecard? Do you remember that time? 11:46:15  
13 "Answer: Uh-huh, yes. 11:46:18  
14 "Question: The two of you got in 11:46:20  
15 trouble for not signing your timecard? 11:46:22  
16 "Answer: Yes. 11:46:24  
17 "Question: And that the next thing 11:46:24  
18 that happened, Vangie's written up notice was torn 11:46:26  
19 into little shreds and put in a plastic bag and stuck 11:46:29  
20 on the bulletin board? 11:46:32  
21 "Answer: Excuse me, what was that? 11:46:33  
22 "Question: Okay. Then after that, 11:46:34  
23 Vangie's written up notice was torn into little 11:46:36  
24 shreds and put in a plastic bag and stuck on the 11:46:39  
25 bulletin board in a housekeeper's room. Remember 11:46:41

1	that happening?	11:46:44
2	"Answer: Yes.	11:46:45
3	"Question: And that Gayle Goforth and	11:46:46
4	Norma Staikos thought that Vangie had done this and	11:46:48
5	she was fired for insubordination, and that was on	11:46:51
6	January 4th, 1991. Remember that?	11:46:53
7	"Answer: Yes.	11:46:55
8	"Question: But Gayle later found out	11:46:57
9	that it was you who had torn up the timecard and that	11:46:59
10	Vangie got fired for something that you had done and	11:47:02
11	Vangie was innocent; isn't that correct?	11:47:05
12	"Answer: We made a photocopy, yes.	11:47:08
13	"Question: Can you answer that yes or	11:47:10
14	no?	11:47:11
15	"Answer: No.	11:47:12
16	"Question: That's not true?	11:47:13
17	"Answer: I ripped it up --	11:47:14
18	"Question: Yes.	11:47:16
19	"Answer: -- but I didn't put it on the	11:47:17
20	Bulletin board.	11:47:18
21	"Question: But you tore it up, right?	11:47:20
22	"Answer: Yes.	11:47:21
23	"Question: And you saw your friend	11:47:22
24	Vangie get fired for doing this, right?	11:47:24
25	"Answer: Yes.	11:47:27

1	"Question: But you never spoke up,	11:47:28
2	did you?	11:47:29
3	"Answer: I told her.	11:47:30
4	"Question: You told who?	11:47:32
5	"Answer: And Norma surprised us	11:47:34
6	talking and saying I will tell Norma that I did it.	11:47:36
7	"Question: Did you tell Norma?	11:47:38
8	"Answer: I told Norma, yes -- no, I	11:47:40
9	told Vangie, and Norma was there and I saw Norma.	11:47:43
10	"Question: The question is did you	11:47:46
11	tell Norma that --	11:47:48
12	"Answer: No.	11:47:49
13	"Question -- that you had done it?	11:47:50
14	"Answer: No.	11:47:53
15	"Question: And Vangie got fired for	11:47:54
16	this, right?	11:47:55
17	"Answer: Yes.	11:47:56
18	"Question: And you never said a word	11:47:57
19	to help your friend, right?	11:47:59
20	"Answer: No."	11:48:00
21	Did I read that testimony correctly?	11:48:02
22	A. Yes.	11:48:04
23	Q. So is it fair to say that you lied in your	11:48:10
24	deposition, Exhibit 10, when you said you had said or	11:48:15
25	done nothing that contributed to Vangie getting	11:48:19

1	fired?	11:48:22
2	MR. MANLY: Objection. Mischaracterizes	11:48:22
3	her testimony and mischaracterizes the evidence and	11:48:23
4	argumentative.	11:48:25
5	You can answer.	11:48:26
6	THE WITNESS: I remember telling Vangie	11:48:29
7	that I was going to tell Norma, and Norma said -- and	11:48:30
8	Vangie says no. They had a discussion because when	11:48:34
9	she was called to the office and she had a	11:48:38
10	discussion, she said I'm going to leave anyways.	11:48:41
11	And I remember Norma was listening to the	11:48:44
12	conversation, but I told her, I'm going to tell her	11:48:51
13	that, no, it wasn't just that. Something like that.	11:48:54
14	But that's how I felt, that I would contribute to --	11:48:56
15	BY MS. MACISAAC:	11:49:03
16	Q. You felt that you did contribute?	11:49:03
17	A. Yes.	11:49:04
18	Q. Okay. But that's very contradictory to	11:49:05
19	what you said under oath --	11:49:08
20	MR. MANLY: Stop arguing with the witness.	11:49:10
21	MS. MACISAAC: Is it?	11:49:12
22	MR. MANLY: Put your hand down. I'm not --	11:49:12
23	you're not giving me instructions. You're arguing	11:49:12
24	with the witness. Ask her questions. Don't argue	11:49:15
25	with her.	11:49:17

1	BY MS. MACISAAC:	11:49:18
2	Q. Your testimony that you believed that you	11:49:19
3	had contributed to Vangie being fired was very	11:49:22
4	inconsistent with what you said under oath at the	11:49:27
5	first session of your deposition in the Chandler	11:49:30
6	matter, correct?	11:49:32
7	MR. MANLY: Objection. Argumentative.	11:49:33
8	Mischaracterizes the record and mischaracterizes her	11:49:35
9	testimony.	11:49:38
10	THE WITNESS: Yes. At that time, I just	11:49:40
11	remember like that. But then now I remember more	11:49:43
12	things than I remember at that time.	11:49:48
13	BY MS. MACISAAC:	11:49:50
14	Q. Right. And you also remember that, in	11:49:50
15	fact, you did put the notice on the bulletin board	11:49:52
16	even though you denied it under oath in 1994 to	11:49:57
17	Mr. Cochran?	11:50:01
18	MR. MANLY: Mischaracterizes what she said.	11:50:02
19	THE WITNESS: Yes. I think I did put it	11:50:04
20	there.	11:50:06
21	BY MS. MACISAAC:	11:50:06
22	Q. You think you did?	11:50:07
23	A. I think I did.	11:50:08
24	Q. Why did you tell Mr. Cochran you didn't?	11:50:08
25	A. I didn't remember at that time. See,	11:50:11

1	there's more things that I remember sometimes.	11:50:12
2	Q. With time?	11:50:21
3	A. With time.	11:50:22
4	Q. In 1995, this incident happened four years	11:50:23
5	earlier.	11:50:25
6	A. Yes.	11:50:26
7	Q. Your testimony is today, some 25 years	11:50:27
8	later, you have better memory?	11:50:29
9	A. I have not better memory. But I remember	11:50:31
10	more stuff that I would have said at that time and	11:50:33
11	that I didn't say it.	11:50:38
12	Q. Got it.	11:50:39
13	Do you think instances like this instance	11:50:41
14	with Vangie where she got fired because of the notice	11:50:44
15	that you put on the bulletin board, do you think	11:50:48
16	instances like that contributed to people or other	11:50:50
17	employees at Neverland Valley Ranch thinking you were	11:50:53
18	untrustworthy?	11:50:56
19	MR. MANLY: Argumentative.	11:50:58
20	THE WITNESS: There were things that I saw	11:51:01
21	people getting drunk, people getting --	11:51:02
22	BY MS. MACISAAC:	11:51:05
23	Q. That's just a yes or no.	11:51:05
24	MR. MANLY: Hey, no.	11:51:07
25	MS. MACISAAC: I'll ask --	11:51:08

1	MR. MANLY: Don't interrupt. Don't	11:51:08
2	interrupt her testimony. You're not allowed to do	11:51:08
3	that.	11:51:10
4	MS. MACISAAC: Okay.	11:51:10
5	MR. MANLY: You let her answer the	11:51:10
6	question.	11:51:10
7	MS. MACISAAC: Let me withdraw the	11:51:11
8	question. I want to ask a specific question.	11:51:12
9	MR. MANLY: No, go ahead and finish your	11:51:13
10	answer, ma'am.	11:51:14
11	BY MS. MACISAAC:	11:51:14
12	Q. Specific instances --	11:51:14
13	MR. MANLY: You finish --	11:51:14
14	BY MS. MACISAAC:	11:51:15
15	Q. Specific instances like what you did with	11:51:15
16	Vangie --	11:51:17
17	MR. MANLY: Counsel --	11:51:18
18	BY MS. MACISAAC:	11:51:18
19	Q. -- contributed to people thinking that you	11:51:18
20	were untrustworthy at Neverland Valley Ranch?	11:51:20
21	MR. MANLY: Counsel --	11:51:25
22	BY MS. MACISAAC:	11:51:26
23	Q. That's a yes or no.	11:51:26
24	MR. MANLY: -- you let her finish her	11:51:26
25	answer.	11:51:26



1	spoke to him in 1993 that you loved Michael, right?	11:55:30
2	A. Yes.	11:55:33
3	Q. Did you have any nicknames or terms of	11:55:37
4	affection for Michael that you used while you worked	11:55:40
5	at Neverland Valley Ranch?	11:55:42
6	A. No.	11:55:44
7	Q. Do you recall referring to Michael Jackson	11:55:44
8	as "my Michael" when you were working at the	11:55:47
9	Neverland Valley Ranch?	11:55:50
10	A. No.	11:55:51
11	Q. Let's look at Exhibit 11 and go to	11:55:52
12	page 357.	11:55:58
13	A. 11?	11:56:01
14	Q. Yes. 11. Page 357. And I would like you	11:56:01
15	to look at lines 8 through 13. Line 8:	11:56:13
16	"Question: Did you refer to Michael	11:56:25
17	as 'my Michael' around the house there when you	11:56:27
18	worked there?	11:56:30
19	"Answer: Yeah.	11:56:30
20	"Question: When you said 'my	11:56:30
21	Michael,' would other people start laughing when you	11:56:33
22	would say that?	11:56:36
23	"Answer: Yeah."	11:56:36
24	Did I read that correctly?	11:56:38
25	A. Yes.	11:56:39

1 Q. Does that refresh your recollection that 11:56:39  
2 you referred to Michael Jackson as "my Michael" when 11:56:40  
3 you worked at Neverland Valley Ranch? 11:56:43  
4 A. I don't remember that, but I probably said 11:56:45  
5 it. 11:56:47  
6 Q. Do you think it's possible that you were 11:56:50  
7 referring to Michael Jackson affectionally as "my 11:56:52  
8 Michael" at a time when you thought that he might be 11:56:55  
9 a child molester? 11:56:58  
10 MR. MANLY: Objection. Lacks foundation. 11:57:03  
11 Calls for speculation. 11:57:04  
12 THE WITNESS: Which one is that? 11:57:05  
13 BY MS. MACISAAC: 11:57:06  
14 Q. I'm just asking you, do you think it's 11:57:06  
15 possible that you were walking around affectionately 11:57:08  
16 calling Michael Jackson "my Michael" when you at the 11:57:09  
17 same time thought that he was hurting children? 11:57:13  
18 A. I don't remember that. Did I thought? 11:57:19  
19 Q. You don't remember it? 11:57:22  
20 A. No. 11:57:23  
21 Q. Okay. Would that seem odd to you that you 11:57:24  
22 were affectionally referring to Michael Jackson as 11:57:26  
23 "my Michael" but you might have thought that he was 11:57:28  
24 molesting a child? 11:57:32  
25 MR. MANLY: Objection. Vague as to time. 11:57:34

1	THE WITNESS: Should I answer it?	11:57:44
2	MR. MANLY: Yeah.	11:57:46
3	THE WITNESS: I mean, what was the	11:57:46
4	question?	11:57:46
5	BY MS. MACISAAC:	11:57:46
6	Q. I mean, I'm trying to say whenever it was	11:57:48
7	at the ranch that you were referring to	11:57:50
8	Michael Jackson as "my Michael," you obviously didn't	11:57:51
9	think he was a child molester, right?	11:57:54
10	MR. MANLY: Objection. Vague as to time	11:57:57
11	and misstates her testimony.	11:57:59
12	You can answer.	11:58:00
13	THE WITNESS: To me, child molester is seen	11:58:04
14	sexual --	11:58:10
15	BY MS. MACISAAC:	11:58:12
16	Q. Ma'am, at the time --	11:58:12
17	MR. MANLY: Let her finish her answer.	11:58:13
18	THE WITNESS: Sexual. No sex, specifically	11:58:15
19	sex, you know, violating. But with the time, he came	11:58:18
20	to, how come he likes kids so much? But I loved him.	11:58:27
21	I like him.	11:58:33
22	BY MS. MACISAAC:	11:58:34
23	Q. A lot of people loved him that knew him.	11:58:34
24	A. And I didn't want to believe that.	11:58:39
25	Q. Right. But what I'm trying to say is that	11:58:41

1 obviously at a time when you were using the term "my 11:58:43  
2 Michael," you didn't believe it. You can look back 11:58:46  
3 now and think something different, I get that. 11:58:49  
4 What I'm saying is when you were calling 11:58:51  
5 him "my Michael" at the ranch, you loved him and you 11:58:52  
6 did not believe he was hurting children? 11:58:55  
7 A. No. 11:58:58  
8 MR. MANLY: Objection. Mischaracterizes -- 11:58:58  
9 THE WITNESS: I didn't believe it. 11:58:58  
10 MR. MANLY: -- her testimony. 11:58:58  
11 BY MS. MACISAAC: 11:58:59  
12 Q. You didn't believe it, correct? 11:58:58  
13 A. I didn't want to believe it. 11:59:00  
14 Q. I think we touched on this already, but I 11:59:05  
15 just want to ask you a few questions. 11:59:08  
16 Other employees at the ranch, including 11:59:08  
17 Gayle Goforth, thought you were too possessive of 11:59:09  
18 Michael Jackson. 11:59:13  
19 A. Yes. 11:59:14  
20 Q. Do you recall that there was an incident 11:59:17  
21 where Gayle tried to get into Michael's bedroom to 11:59:18  
22 put like a new duvet cover or something and you 11:59:20  
23 wouldn't let her? 11:59:23  
24 A. Yes. 11:59:24  
25 Q. Did you get in trouble for that? 11:59:25

1	.tell Mrs. Robson that Mr. Jackson was engaging in	12:52:37
2	inappropriate conduct with her son?	12:52:40
3	A. No. Not that I know. I don't know.	12:52:42
4	Q. The shower event, did you share that with	12:52:45
5	anybody at MJJ Productions?	12:52:48
6	A. No.	12:52:49
7	Q. How come? Why didn't you?	12:52:50
8	A. To me, it looked -- it looked normal to me	12:53:01
9	that he was showering. So I think it was	12:53:05
10	confidential.	12:53:11
11	Q. <u>Was it well known at the ranch that</u>	12:53:16
12	<u>Mr. Jackson would always have little boys or little</u>	12:53:21
13	<u>girls in his bed?</u>	12:53:24
14	MS. MACISAAC: Objection. <u>Vague and</u>	12:53:27
15	<u>ambiguous.</u>	12:53:27
16	THE WITNESS: <u>It was well known?</u>	12:53:28
17	BY MR. MANLY:	12:53:29
18	Q. <u>Yes.</u>	12:53:30
19	A. <u>Yes.</u>	12:53:30
20	Q. <u>Everybody knew he did that, right?</u>	12:53:31
21	A. <u>Everybody knew.</u>	12:53:33
22	Q. Was there ever discussion -- well, what	12:53:33
23	would have happened, if you know, based on what	12:53:36
24	happened to other employees, if you complained that	12:53:39
25	he was doing that?	12:53:41

1	Q.	No, 423 of Exhibit 11.	13:35:40
2	A.	So --	13:35:55
3	Q.	Just read over page 423. I just want you	13:35:56
4		to familiarize yourself with --	13:36:02
5	A.	11?	13:36:04
6	Q.	423 of Exhibit 11.	13:36:04
7	A.	Okay. What question?	13:36:07
8	Q.	Sure. Just starting around line 10 to the	13:36:11
9		bottom of the page.	13:36:13
10	A.	Okay.	13:36:15
11	Q.	And just read from page 423, line 10,	13:36:52
12		through 428, line 14. Just read that to yourself.	13:36:55
13		MR. FINALDI: Which page?	13:37:12
14		MS. MACISAAC: 423, line 10, through 428,	13:37:15
15		line 14.	13:37:17
16		BY MS. MACISAAC:	13:37:29
17	Q.	Just take your time and read it over.	13:37:29
18		Okay. So is it fair to say that at this	13:39:17
19		point during your testimony, Mr. Feldman was	13:39:20
20		following up on the inconsistency we just talked	13:39:24
21		about between what you had testified to on	13:39:26
22		December 15th, 1993, and what you told Mr. Cochran	13:39:30
23		earlier that day?	13:39:33
24		MR. FINALDI: Calls for speculation.	13:39:34
25		THE WITNESS: Yes.	13:39:35

1	BY MS. MACISAAC:	13:39:35
2	Q. And do you see that Mr. -- this is page	13:39:36
3	423. Mr. Feldman specifically read to you testimony	13:39:39
4	where you had said that you had -- exactly what	13:39:45
5	Mr. Manly had read, the testimony where you said that	13:39:48
6	you saw Mr. Jackson and Wade Robson in the shower	13:39:50
7	together. This is the top of page 423.	13:39:54
8	And he asked you was that true. And your	13:39:58
9	answer then was well, I supposed that it was him	13:40:01
10	because he was with him that day.	13:40:04
11	A. Because he what?	13:40:07
12	Q. Because he was with him that day.	13:40:09
13	A. Yes.	13:40:11
14	Q. So you did not say when Mr. Feldman showed	13:40:11
15	you the prior testimony that Mr. Manly just showed	13:40:14
16	you, you didn't say, oh, that's true, I did see him.	13:40:16
17	You said that you had supposed that you saw	13:40:20
18	Wade Robson based on the fact that he was there at	13:40:22
19	the ranch with Michael Jackson, correct?	13:40:24
20	A. Yes.	13:40:27
21	MR. FINALDI: Misstates testimony.	13:40:28
22	BY MS. MACISAAC:	13:40:30
23	Q. And then if you turn --	13:40:34
24	THE VIDEOGRAPHER: I'm sorry to interrupt.	13:40:35
25	But can you put a mic on so we can hear your	13:40:35

1	objections.	13:40:39
2	MR. FINALDI: Sure.	13:40:55
3	BY MS. MACISAAC:	13:40:57
4	Q. If you look at page 423, starting at	13:40:57
5	line 23, Mr. Feldman again showed you your prior	13:41:00
6	testimony.	13:41:02
7	"Question: How many times?	13:41:02
8	"Answer: Besides him in the tub, I	13:41:04
9	saw him once.	13:41:04
10	"Question: Is that true?	13:41:06
11	"Answer: Yes.	13:41:07
12	"Question: One time in the shower?	13:41:08
13	And your answer to that was yes.	13:41:10
14	And then Mr. Feldman said was that true?	13:41:12
15	And then your answer at line 6 on page 424	13:41:15
16	was: "Well, like I said, I suppose it was him."	13:41:18
17	Do you see that?	13:41:22
18	A. Yes.	13:41:22
19	MR. FINALDI: Asked and answered.	13:41:23
20	BY MS. MACISAAC:	13:41:24
21	Q. And I read that accurately?	13:41:24
22	A. Yes.	13:41:25
23	Q. Was that true?	13:41:26
24	A. That's what I'm saying. It was just	13:41:28
25	Michael and Wade at that time.	13:41:30

1	Q. Right. But you didn't say you saw Wade.	13:41:32
2	You said that you just --	13:41:34
3	A. But nobody else --	13:41:36
4	Q. -- assumed it was Wade?	13:41:36
5	A. Nobody else will be in the shower but	13:41:38
6	Michael and Wade because they were there that day.	13:41:40
7	Nobody else. Not the gardeners, not security go	13:41:44
8	there and take a shower. Just them.	13:41:46
9	Q. It was a big ranch, wasn't it?	13:41:49
10	A. Yeah. But nobody ever would come and take	13:41:51
11	a shower in Michael's shower.	13:41:53
12	Q. Right, because you only saw one figure.	13:41:53
13	This is asking you. Mr. Feldman is following up and	13:41:55
14	saying did you see Wade and you're saying no, I just	13:41:58
15	supposed he was in there.	13:42:01
16	MR. FINALDI: All right. Asked and	13:42:02
17	answered. You're just arguing with her.	13:42:02
18	THE WITNESS: Still, thinking that it was	13:42:05
19	him because he was the only person who take a shower	13:42:08
20	in the shower.	13:42:11
21	BY MS. MACISAAC:	13:42:12
22	Q. Okay. And then -- and then he asked you,	13:42:13
23	if you turn to page 426, Mr. Feldman, he asked you if	13:42:18
24	you heard two people giggling in that shower, and	13:42:23
25	this is line 3 to 4. "Did you hear two people	13:42:27

1	giggling in the shower?"	13:42:31
2	And your answer in 1994 was, at line 5:	13:42:32
3	"Well, I didn't really -- see, it was,	13:42:34
4	it was noisy and it was -- I knew that I wasn't	13:42:36
5	doing, you know, something appropriate, you know,	13:42:39
6	just to walk in and want to peek.	13:42:41
7	"Question: But could you tell whether	13:42:44
8	two people were in the shower? In other words, did	13:42:46
9	you hear two different voices, two different giggles?	13:42:49
10	"Answer: I only hear Mr. Jackson, but	13:42:51
11	I didn't see Wade in the room. So once they came out	13:42:54
12	of the room, that's what I supposed, that they were	13:42:56
13	in there together in the shower."	13:42:58
14	Do you see that? Did I read that	13:42:59
15	accurately?	13:43:01
16	A. Yes.	13:43:01
17	Q. And then on page 427, at lines 22 to 24, up	13:43:02
18	through page 428, line 14 -- let me start this way.	13:43:17
19	Why don't you go to page 428, lines 9 to 14.	13:43:23
20	"And how long after you saw Wade's	13:43:31
21	underwear and Mr. Jackson's underwear at the shower,	13:43:33
22	Mr. Jackson giggling, did you see then Wade and	13:43:36
23	Mr. Jackson together?	13:43:39
24	"Answer: How long?	13:43:40
25	"Question: How much time elapsed?	13:43:41

1	"Answer: Maybe an hour later."	13:43:43
2	Did I read that accurately?	13:43:44
3	A. Yes.	13:43:45
4	Q. Was that truthful?	13:43:45
5	A. Yes.	13:43:46
6	Q. We served you with a subpoena before you	13:43:55
7	came today and I forgot to mark it before. Did you	13:43:58
8	have any -- did you search for responsive documents?	13:44:01
9	Did you have any? I think you said last time you	13:44:04
10	have no responsive documents left related to	13:44:06
11	Michael Jackson?	13:44:08
12	A. No.	13:44:08
13	Q. So you don't have any responsive documents?	13:44:09
14	A. Any what?	13:44:11
15	Q. Documents related to Michael Jackson --	13:44:11
16	A. No.	13:44:13
17	Q. -- or your employment?	13:44:13
18	A. No.	13:44:14
19	Q. You testified just a few minutes ago that	13:44:31
20	you believed that you knew that Michael Jackson had	13:44:33
21	allegedly molested your son when you testified at the	13:44:36
22	Chandler deposition in '93 and '94?	13:44:39
23	A. Yes.	13:44:45
24	Q. I didn't see anywhere reading your	13:44:46
25	testimony that you had testified that you believe	13:44:47