

1 DECEMBER 12, 2016, SANTA MONICA, CALIFORNIA

2 THE VIDEOGRAPHER: Good morning. We are on the
3 record at 10:03 a.m., on December 12th, 2016, for the
4 videotaped deposition of Mr. Wade Robson. We're taping
5 this deposition at 808 Wilshire Boulevard, Third Floor,
6 in the City of Santa Monica, California, 90401, in the
7 action entitled Wade Robson v. MJJ Productions, Inc., et
8 al. The case number is BC508502, in the Superior Court
9 of the State of California, County of Los Angeles.

10 My name is Michael Currie. I'm the video
11 production specialist with Ben Hyatt Certified
12 Deposition Reporters in Encino, California. This is
13 tape one of Volume I.

14 Would counsel and all present please identify
15 yourselves for the record.

16 MS. KLEINDIENST: Katherine Kleindienst for
17 defendants.

18 MR. FINALDI: Vince Finaldi, Manly Stewart
19 Finaldi, for the plaintiff.

20 MR. STEWART: Morgan Stewart, Manly Stewart &
21 Finaldi, for plaintiff.

22 THE VIDEOGRAPHER: Okay, the court reporter
23 today is Sue Lansing, also with Ben Hyatt.

24 Ms. Lansing, will you please swear in the
25 witness.

1 WADE JEREMY WILLIAM ROBSON,
2 having been duly administered an oath in accordance
3 with CCP 2094, was examined and testified as
4 follows:

5 EXAMINATION

6 BY MS. KLEINDIENST:

7 Q. All right, good morning.

8 A. Good morning.

9 Q. Could you please state and spell your name for
10 the record.

11 A. Yeah. Wade, W-a-d-e, William, sorry, Jeremy,
12 J-e-r-e-m-y, and William, W-i-l-l-a, i-a-m. It's like I
13 never go through telling my middle names; right? And
14 Robson; R-o-b-s-o-n.

15 Q. Great. And have you ever gone by any other
16 names?

17 A. No.

18 Q. I want to talk for a minute, I know that you've
19 testified before, but I want to talk about, well, first
20 of all, the two times that I know of and whether you've
21 testified any other times. The first time I'm aware
22 that you've testified under oath was during the Jordy
23 Chandler allegations. Do you remember that?

24 A. Yes.

25 Q. And it's my understanding -- well, let me ask

1 you, do you know whether that was a deposition or what
2 type of testimony you were giving?

3 MR. FINALDI: Calls for legal conclusion.

4 THE WITNESS: Yeah, I'm not positive. I think,
5 I think it was a deposition.

6 Q. BY MS. KLEINDIENST: But it was in an informal
7 conference room type setting?

8 A. Yeah, like this type setting, yeah.

9 Q. And it was in lieu of testifying before the
10 grand jury?

11 MR. FINALDI: Same objection.

12 THE WITNESS: Yes.

13 Q. BY MS. KLEINDIENST: And that was when you were
14 11?

15 A. I believe so, yeah.

16 Q. And then, the second instance that I know of is
17 when you testified at the criminal trial in Santa
18 Barbara in 2005. Do you recall that?

19 A. Yes.

20 Q. And that was when you were how old?

21 A. I believe I was 22.

22 Q. And that was actually in a courtroom setting;
23 is that correct?

24 A. Yes.

25 Q. Other than those two instances, have you ever

1 provided testimony under oath before?

2 MR. FINALDI: Calls for legal conclusion.

3 THE WITNESS: The only other one I remember was
4 as a part of this case, or, the estate case, which I
5 believe was in 2014.

6 Q. BY MS. KLEINDIENST: Right. So that was a
7 deposition?

8 A. Yes.

9 Q. And that was given in connection with the
10 probate case against the estate?

11 A. Yes.

12 Q. And that's the only other time that you are
13 aware of that you've testified under oath?

14 A. That is all I recall, yeah.

15 Q. I'll go over some ground rules because I think
16 it's always good to anyway. If you don't understand my
17 question or you need me to clarify my question, please
18 let me know. Do you understand?

19 A. Yes.

20 Q. We can take a break at any time. So, just let
21 me know. The only thing I would ask is if there's a
22 question pending, that you would go ahead and answer the
23 question before we take the break. Do you understand?

24 A. Yes.

25 Q. As you know and as you can see, we have a court

1 reporter who is recording everything we're saying, so
2 for her sake we need to not talk over each other. So,
3 if you could wait for me to ask my question before you
4 start to answer, and I'll try to let you finish your
5 answer before I ask the next question. Okay?

6 A. Yes.

7 Q. Also for the court reporter's sake you need to
8 answer audibly rather than give, shake your head or give
9 a more vague answer like "uh-huh" or "huh-uh." Just a
10 simple "yes" or "no" will reflect better on the
11 transcript. Do you understand?

12 A. Yes.

13 Q. Are you represented by counsel here today?

14 A. Yes.

15 Q. Your counsel may make objections for the
16 record. Go ahead and let them finish their objection,
17 again, for the court reporter's sake, and then you can
18 go ahead and answer the question unless they instruct
19 you not to. Do you understand?

20 A. Yes.

21 Q. After the deposition you'll be given a chance
22 to read the transcript and make any corrections that you
23 deem necessary. But if you change the substance of your
24 testimony as it appears in the transcript, those changes
25 could be used to question your credibility as a witness,

1 so it's important you give your best testimony here
2 today. Do you understand?

3 A. Yes.

4 Q. And you understand that even this is, even
5 though this is an informal conference room setting, that
6 you're under oath and under penalty of perjury just as
7 if you were testifying in a court of law?

8 A. Yes.

9 Q. And is there any reason that you cannot testify
10 truthfully and to the best of your recollection here
11 today?

12 A. No.

13 Q. What did you do to prepare for this deposition?

14 MR. FINALDI: Objection; calls for
15 attorney/client privileged communications. Instruct not
16 to answer.

17 Q. BY MS. KLEINDIENST: Did you meet with counsel?

18 MR. FINALDI: You can answer that yes or no.

19 THE WITNESS: Yes.

20 Q. BY MS. KLEINDIENST: When did you meet with
21 counsel?

22 A. This morning.

23 Q. Where did you meet?

24 A. Coffee Bean across the street.

25 Q. And how long did you meet before you came over?

1 A. About 30 minutes.

2 Q. Did you meet with counsel any other time to
3 prepare for this deposition?

4 A. Yes.

5 Q. When was that?

6 A. Last Friday.

7 Q. And how long did you meet?

8 A. Couple of hours.

9 Q. And who was, who was there?

10 A. Mr. Vince Finaldi.

11 Q. Anyone else?

12 A. At some point John Manly was there.

13 Q. And when you say a couple hours, you mean,
14 like, two or three?

15 A. Yeah, around that range.

16 Q. Did you meet with counsel any other days apart
17 from today and last Friday to prepare for this
18 deposition?

19 A. No.

20 Q. Did you review any documents to prepare for
21 this deposition?

22 A. Yes.

23 Q. Did any of those documents help you refresh
24 your recollection of facts or information about your
25 past?

1 A. I didn't need them to.

2 Q. Have you spoken to anyone else besides your
3 counsel about your deposition today?

4 A. No details about it. My mother and wife, you
5 know, know that I'm doing it, but nothing beyond that.

6 Q. In this lawsuit you've made allegations that
7 Michael Jackson sexually abused you from when you were 7
8 to when you were 14 years old; is that correct?

9 A. Yes.

10 Q. And I understand at some point you were writing
11 a book about the abuse that you claim to have suffered
12 as a child; is that right?

13 A. Yes.

14 Q. When did you begin to write that book?

15 A. It's hard to pin down because it didn't start
16 as, for the purpose of writing a book. So, at some
17 point in the latter half of 2012, once I had begun
18 therapy with Dr. Shaw, who was the one that I disclosed
19 to for the first time about the sexual abuse, I started
20 writing just for the sake of processing. You know, for
21 me it was as if my whole life I had been, I understood
22 that, as an example, that down was up and all of a
23 sudden I understood that down was down. So it was this
24 need for me to kind of go back through my whole life and
25 my whole story with Michael and reprocess it. So, that

1 was why the writing started, purely for that purpose.

2 And then, at some point, again, latter half of
3 2012, I realized that this could possibly be a powerful
4 tool to get the truth out there, to educate people, to
5 educate other victims, to support other victims, to
6 educate parents, to prevent abuse, and I thought maybe
7 that that could be an impactful way to do it, in a book.

8 Q. You had been in therapy previously before
9 meeting with Dr. Shaw; correct?

10 A. Yes.

11 Q. Had you previously done writing as a part of
12 your therapy to help process things that were going on
13 in your life?

14 A. Well, let me delineate, not necessarily as a
15 part of the therapy, you know. I mean, meaning it
16 wasn't instructed by the therapist or anything like
17 that, but, yeah, I imagine I've, you know, done some
18 writing before, just to process my own thoughts and
19 feelings.

20 Q. And where did you typically do that; would that
21 be in hand or on a device?

22 A. Typically hand.

23 Q. In handwritten journals or note pads?

24 A. Usually note pads.

25 Q. Is that something you would typically keep?

1 A. No.

2 Q. What, what would typically happen to those note
3 pads? When would you dispose of them?

4 A. When, you know, like, a legal pad, like, when
5 it was done I would just get rid of it. Throw it out.

6 Q. So they're not writings that you would go back
7 and look at again?

8 A. No.

9 Q. And when you started writing after talking to
10 Dr. Shaw about being abused and you started writing for
11 the purpose of processing, did you again start writing
12 on note pads?

13 A. Yeah, I believe it started note pad but at some
14 point I moved to writing on the computer.

15 Q. Do you recall when that happened?

16 A. When I moved to writing on the computer?

17 Q. Yeah.

18 A. No, I don't.

19 Q. Do you recall if you moved to writing on the
20 computer around the time that you thought that you might
21 write a book?

22 A. I think it was prior, prior to realizing that
23 that's what I maybe wanted to do with it.

24 Q. And when you started writing on a computer,
25 what type of program would you use?

1 A. I think it was, it was like a, like a
2 note-taking application, something like an Evernote.

3 Q. Do the notes you write, that you wrote at that
4 point when you started, when you moved from note pads to
5 the computer, do those still exist?

6 A. I'm not sure.

7 MR. FINALDI: Vague and ambiguous. Vague and
8 ambiguous as to what we're talking about; the notes
9 before or the computer notes?

10 MS. KLEINDIENST: Let me clarify.

11 Q. So, you moved from writing down your thoughts
12 or your feelings or -- I don't want to characterize it,
13 but whatever writing you were doing, you moved from
14 writing by hand to a computer and you said it was in
15 some sort of note-taking application.

16 A. Right.

17 Q. Did the computer note-taking application save
18 those notes after you finished writing each one?

19 A. Yes.

20 Q. And do they still exist?

21 A. Those ones I'm not sure because once I decided
22 that this would maybe be important for me to do a book
23 form, those writings that I had done before deciding
24 that I moved into, you know, this format that I was
25 writing in which was some -- I don't know what it was

1 called but it is some other book-writing application and
2 no longer needed those, you know, the previous versions
3 of them in EverNote. So, all that to say is that
4 anything that I would have written before I decided to
5 experiment with the book idea went into the, went into
6 the book, you know, and didn't stay in a previous form.

7 Q. So, just to clarify, are you saying that you
8 copied the text and pasted it, for example, into the
9 book-writing software?

10 A. Uh-huh, and then got rid of the notes.

11 Q. And then you deleted the notes?

12 A. Yeah, out of Evernote, yeah.

13 Q. I think you said, but I want to make sure,
14 you're not sure what the book-writing software is
15 called?

16 A. Possibly it was called "Story," that's coming
17 to mind, but I'm not sure.

18 Q. Is that something that you bought specifically
19 for the purpose of writing this book?

20 A. Yeah.

21 Q. I've never used Story, we may not even be sure
22 that it is Story, so can you just describe the software
23 that you used to write the book?

24 A. It, I mean, liking similar to an Evernote in a
25 way, I mean, like a note-taking software, the benefit of

1 it was that it would, you know, the format was
2 automatically set up as far as if you wanted to write a
3 chapter title and then move to the body of the text, it
4 would, you know, like a screen writing piece of
5 software, it had those things kind of set up for you.
6 And, you know, on the left there was, like, a side bar
7 that would have, you know, all your chapters laid out
8 and so it was kind of easy to navigate for, you know,
9 the purpose of creating a book.

10 Q. While you were writing a book did you save
11 different drafts of the book?

12 A. I don't recall. I don't believe so.

13 Q. So, you only had one working draft the entire
14 time?

15 A. Yes.

16 Q. And did you ever finish that draft?

17 A. No.

18 Q. When did you stop writing it?

19 A. Might take me a moment to think on that.

20 I would say maybe somewhere around, somewhere
21 around April of 2013, something like that.

22 Q. Did you ever write any outlines or descriptions
23 of your book?

24 A. No.

25 Q. When you were working on writing your book,

1 approximately how much time were you spending on it each
2 week, on average?

3 A. I would maybe write an hour a day, so, you
4 know, five to seven hours sort of thing.

5 Q. And that was from the second half of 2012 until
6 April or so of 2013?

7 A. Around then, yeah.

8 Q. During that time frame were you employed?

9 A. No, I wasn't.

10 Q. Apart from working for approximately an hour a
11 day on your book, what were you doing with your time?

12 A. Lots of therapy. I was in therapy with Dr.
13 Shaw five to six hours a week. I was reading. I was
14 meditating. And first and foremost I was being a dad,
15 you know. We had -- so, at that point my son, what am I
16 talking about, later 2012, so, he was 2 and a bit.

17 Q. At this point you were still living in Los
18 Angeles; correct?

19 A. Yes.

20 Q. You mentioned that you were doing a lot of
21 reading. Could you list the -- well, let me strike
22 that.

23 Was that all reading related to childhood
24 sexual abuse?

25 A. No.

1 Q. What percentage of the reading was related to
2 childhood sexual abuse?

3 MR. FINALDI: Calls for speculation, vague and
4 ambiguous.

5 THE WITNESS: I would speculate that maybe 50%,
6 yeah, something like that.

7 Q. BY MS. KLEINDIENST: Was the other 50% just for
8 pleasure?

9 A. Just for pleasure. More than that. It was a
10 lot of spiritual reading, so, for healing.

11 Q. So, what types of books or magazines or other
12 written materials were you reading?

13 A. Lots of eastern philosophy, some Buddhism,
14 books like A New Earth, which is a nondenominational
15 spiritual book. That sort of thing.

16 Q. And the other 50% which did relate to childhood
17 sexual abuse, was that mostly books or what percentage
18 was books?

19 A. Or what?

20 Q. I mean, I guess anything else; material on the
21 Internet, magazine articles, news articles.

22 A. Mostly books.

23 Q. Could you list for me, I know this may be
24 difficult so, you know, do your best, the books that
25 you've read about childhood sexual abuse?

1 A. The main one that I spent a lot of time with
2 and really helped me -- gosh, I keep blanking on this
3 name. It was --

4 Q. Victims No Longer?

5 A. Yeah, that's the one. Victims No Longer,
6 classic guide for male sexual abuse victims. I remember
7 when I first opened it, which, you know, was somewhere
8 in maybe June 2012, somewhere around there, and I was
9 still, you know, I had begun -- I disclosed on May 8th,
10 yeah, to Dr. Shaw about the sexual abuse. And I had
11 begun the slow process of, of, you know, beginning to
12 try and deal with it and beginning to try and process
13 it.

14 And even at the point when I opened this book I
15 was still, you know, "oh, this stuff is
16 compartmentalized," for over 22 years, so it was still a
17 slow process and really hard for me to, to understand
18 it, to, to make all the connections between all of the
19 symptoms that I had suffered and was suffering and the
20 abuses. So, all this to say, as I opened the book it
21 was kind of like is this really going to be -- am I
22 going to relate to this, you know. Am I really one of
23 them. And I still wasn't sure, you know.

24 And as I started reading the book and just, you
25 know, like it was written about me. It was the craziest

1 experience. Oh my God, you know, I can relate to that.
2 In the book there's a lot of stories from other male
3 survivors and that sort of thing and I just, the degree
4 to which I could relate to them and relate to the
5 commonalities was just really heavy, you know.

6 Q. So, was Victims No Longer the first book that
7 you read about childhood sexual abuse?

8 A. I believe so. Yeah, for sure it was.

9 Q. Have you read it multiple times?

10 A. Yes.

11 Q. Can you estimate how many?

12 A. I would say twice.

13 Q. So, other than Victims No Longer, have you read
14 any other books about childhood sexual abuse?

15 A. I read a book called Conversations with a
16 Pedophile. This was later, probably late 2013, maybe.
17 Maybe early 2014. Yeah.

18 Q. Anything else?

19 A. I don't think anything else to completion. I
20 think I read some of The Courage to Heal. That's all I
21 can remember.

22 Q. Do you remember when you read part of Courage
23 to Heal?

24 A. I don't.

25 Q. During that time --

1 A. Which time?

2 Q. Same time which we've been talking about, sort
3 of mid 2012 to April 2013, were you part of any group
4 therapy or meetings?

5 A. Yeah. I think from about maybe March 2013 til
6 about May 2013 I was a part of, in Los Angeles, Adult
7 Survivors of Child Abuse Support Group.

8 Q. How did you get involved with them?

9 A. I think I initially -- in the book Victims No
10 Longer, at some point, kind of closer to the end, it
11 kind of goes through, you know, stages of healing, and
12 somewhere close to the end they talked about, you know,
13 that being an option, support groups, and it can be
14 really helpful for some people. So, I remember first
15 reading about that, you know, when I first read the
16 book, so in the mid 2012 range, and being very
17 interested in that but being terrified of that.

18 You know, it was such an isolated journey that
19 I was going through at that point, it was just kind of
20 between, meaning the healing process, between my
21 therapist Dr. Shaw, and my wife, and close family. And
22 so, anyway, I worked up the courage to -- I, you know, I
23 Googled and found this group in L.A. and tried it out.

24 Q. And did you find it helpful?

25 A. I did.

1 Q. Have you continued in Hawaii to attend a group
2 therapy or meetings?

3 A. Yes. I started my own, because there wasn't
4 one that existed there. You know, once I moved there I
5 looked for something similar to what I was in in L.A.
6 and couldn't find it, so I took the training to become a
7 facilitator of this, that same format, Adult, ASCA,
8 Adult Survivors of Child Abuse, and started my own
9 group, which I still run.

10 Q. And how often does that meet?

11 A. Once a week.

12 Q. And approximately how many people attend your
13 group at this point?

14 A. Fluctuates between, like, six and ten.

15 Q. You said that you took the training to become a
16 facilitator. What's involved in that training?

17 A. There was a manual to read that essentially is
18 as a facilitator of this particular support group you
19 are not considered any sort of expert on child sexual
20 abuse or a, a therapist of any kind, you're just there
21 to kind of know the rules of the group and to keep it
22 safe. If someone is not following the rules and making
23 the environment unsafe for others, you're trained to
24 learn how to deal with that and so the manual was about
25 that. And then there was two phone trainings with the

1 organization of about two hours each.

2 Q. When you say "the organization," is that the
3 Adult Survivors of Child Sex Abuse?

4 A. That's the name of the group. The organization
5 is The Morris Center. They created the format.

6 Q. Did you have any concerns about writing a book?

7 MR. FINALDI: Vague and ambiguous.

8 THE WITNESS: Yeah, could you expand on that
9 any more or clarify that any more?

10 Q. BY MS. KLEINDIENST: Well, you've told me some
11 of the reasons that you wanted to write a book.

12 A. Uh-huh.

13 Q. But when you decided to write a book, did you
14 have any concerns or fears or anxieties about it?

15 A. Not initially. At some point in the process I
16 became concerned that, you know, my prior testimonies,
17 ones we spoke of, the '93 one and the 2005 one, would be
18 contrary to the truth that I was writing in the book and
19 if there would be any legal issues for me because of
20 that.

21 Q. So, you were concerned about the perjury issue?

22 MR. FINALDI: Objection; calls for legal
23 conclusion, argumentative.

24 THE WITNESS: Yes.

25 Q. BY MS. KLEINDIENST: Any other concerns?

1 A. You know, if I was, if I was going to go
2 through with it, with the book, I have a small child,
3 you know, this is, like, it's going to be very, the
4 truth that I was writing that was going to be in the
5 book, details of the abuse. That's intense stuff and
6 there was going to be, I imagined, you know, intense, an
7 intense scope on it and media on it that could be, you
8 know, just hard for my wife and my child to go through,
9 you know. So, I was aware of that, you know, and had
10 concerns about that.

11 Q. With regard to the legal concern, did you speak
12 to anyone other than a lawyer about that concern?

13 A. My wife.

14 Q. And what did she say?

15 A. I don't remember.

16 Q. Do you remember what you said to her?

17 MR. FINALDI: Objection; marital privilege, but
18 we're going to let him answer these questions.

19 Go ahead and answer if you remember.

20 THE WITNESS: No. I mean, I could speculate,
21 but, I mean, I don't remember any particular details
22 besides the kind of thing I just said to you, you know,
23 that my, that my prior testimony was different than the
24 truth that I'm writing in this book so, you know, there
25 could maybe be some sort of legal issue to do with that,

1 I don't know, you know.

2 Q. BY MS. KLEINDIENST: And with regard to the
3 intense scope or media, I think you described it,
4 concern, who did you talk to about that?

5 A. Same. Would have been my wife, yeah.

6 Q. Do you remember her response?

7 A. I mean, I think she had some, some level of
8 concern about that as well. I mean, I would talk to her
9 about the intensity of, you know, which was of a, you
10 know, a different version of it, but when I was 11, you
11 know, during the Jordan Chandler case, just the intense
12 media and how intense that was. Same as -- and then,
13 she went through, my wife, went through the 2005 trial
14 with me and saw and experienced the intensity of that
15 sort of process. So, same, same sort of concerns as me.
16 Not so concerned for herself, concerned for our son, you
17 know.

18 But, you know, those parental sort of concerns
19 were natural, but then, with Amanda, my wife, it went
20 beyond that and she -- we had been going through so much
21 together at this point, this being, you know, what, my
22 second breakdown within a year, what led to the
23 disclosure of this abuse, something that, you know, I
24 had never told her. We had been together for I believe
25 around ten years at that point.

1 This was such an intense period and really
2 scary for her. I mean, what I was going through
3 emotionally. But because of all of that she had an
4 understanding of the importance, the possible importance
5 of the truth that I was writing in this book and the
6 possible importance of how that could impact other
7 victims of Michael's, other victims of any predator, and
8 affect parents that could possibly, you know, educate
9 them and help them prevent this sort of thing happening
10 to them.

11 And us being parents and my son being such a
12 huge part of why and how this could finally come forth
13 for me in the first place, us being now so vigilant
14 about our son and protecting him, now beginning to have
15 understanding of what I went through, that the possible
16 importance outweighed the concerns that we had.

17 Q. Was there ever a time when Amanda told you that
18 she didn't want you to publish a book?

19 A. No.

20 Q. She ever suggest to you that maybe you
21 shouldn't?

22 A. I don't remember her ever suggesting to me that
23 I shouldn't. There were definitely conversations about,
24 like, let's just be, let's make sure that we're on the
25 same page here. Let's, let's talk about, you know, all

1 the possible things that could be hard about this for us
2 individually and for us as a family and for Koa. So,
3 there were definitely those sort of intense
4 conversations, but I don't remember her ever telling me,
5 suggesting that I shouldn't do it.

6 Q. At some point you got a book agent; right?

7 A. Yes.

8 Q. And was that Renaissance Literary & Talent
9 Agency?

10 A. I believe so. I don't remember, I mean, I
11 remember the name of the guy.

12 Q. Is that Alan Nevins?

13 A. Yes.

14 Q. When did you first get in contact with Mr.
15 Nevins?

16 A. I, I don't remember in a very detailed sense,
17 but I believe it would have been in the latter half of
18 2012.

19 Q. How did you get in contact with Mr. Nevins?

20 MR. FINALDI: Attorney/client communication.
21 Objection to the extent it calls for attorney/client
22 privileged communications so instruct not to answer.

23 Q. BY MS. KLEINDIENST: I assume you're going to
24 follow the instruction?

25 A. I will.

1 Q. Did you have a Non-Disclosure Agreement with
2 Mr. Nevins?

3 MR. FINALDI: Calls for legal conclusion, same
4 objection. Instruct not to answer.

5 Q. BY MS. KLEINDIENST: You're going to follow
6 your counsel's instruction?

7 A. I will.

8 Q. When you first got in touch with Mr. Nevins,
9 what did he tell -- strike that.

10 When you first got in touch with Mr. Nevins,
11 what did you tell him that you wanted to do?

12 MR. FINALDI: Same objection. Instruct not to
13 answer.

14 MS. KLEINDIENST: Just to clarify, Mr. Finaldi,
15 are you going to instruct not to answer if he had
16 communications with Mr. Nevins outside of an attorney's
17 presence?

18 MR. FINALDI: Well, that wasn't your question.

19 MS. KLEINDIENST: My question was a
20 communication with Mr. Nevins.

21 MR. FINALDI: With Mr. Nevins, yes. Which
22 could include communications with an attorney present,
23 communications with other legal counsel present, so, you
24 know, instruct not to answer.

25 Q. BY MS. KLEINDIENST: Mr. Robson, did you have

1 any communications with Mr. Nevins without an attorney
2 present?

3 A. I don't believe so.

4 Q. Did you have any communications with Mr. Nevins
5 or conference calls with Mr. Nevins that included
6 someone from a publishing house?

7 MR. FINALDI: Same objection. Instruct not to
8 answer.

9 MS. KLEINDIENST: So you're going to instruct
10 not to answer any communications between Mr. Robson and
11 an outside publishing house?

12 MR. FINALDI: Mr. Robson -- if an attorney was
13 present, absolutely.

14 Q. BY MS. KLEINDIENST: Did you try to get your
15 book published?

16 A. Yes.

17 Q. And which publishing houses did you send it to?

18 MR. FINALDI: Assumes facts not in evidence.

19 THE WITNESS: Well, I don't believe any
20 publishing house saw anything that I wrote. So, I
21 didn't send it to any publishing house.

22 MS. KLEINDIENST: I'm going to ask the court
23 reporter to mark this as Exhibit 555.

24 (Deposition Exhibit No. 555
25 was marked for identification.)

1 Q. BY MS. KLEINDIENST: Do you know who Ingrid is?

2 A. I don't.

3 Q. Do you recognize this e-mail exchange as an
4 e-mail that was sent to you from Mr. Nevins on January
5 25th, 2013?

6 A. Yes.

7 Q. On the second page it says "Ingrid Connell
8 Editorial Director, Sidgwick & Jackson." Are you
9 familiar with Sidgwick & Jackson?

10 A. I'm not.

11 Q. Do you know -- well, it appears that, what's
12 her last name, Ms. Connell has been considering your
13 book proposal; is that fair?

14 MR. FINALDI: Calls for speculation, assumes
15 facts not in evidence.

16 THE WITNESS: Yeah, it seems that way.

17 Q. BY MS. KLEINDIENST: What did you instruct Mr.
18 Nevins to tell outside publishing houses about your
19 book?

20 MR. FINALDI: Assumes facts not in evidence
21 that he instructed anything.

22 Also, Wade, don't testify if you know what's
23 under the redactions as to those because those have been
24 objected to on the basis of attorney/client privilege.
25 Don't testify about any of that stuff.

1 THE WITNESS: Could you repeat the question?

2 Q. BY MS. KLEINDIENST: Sure. What did you tell
3 Mr. Nevins to tell publishers about your book?

4 MR. FINALDI: Assumes facts not in evidence.

5 THE WITNESS: Well, I don't remember any
6 specific instruction, meaning, me telling Mr. Nevins
7 what to say to publishers. What I remember is telling
8 Mr. Nevins what, the kind of things that the book
9 entailed and what the purpose of the book was for me,
10 which, which I've previously stated, meaning, it being
11 of benefit, of help, to other victims and to parents,
12 institutions, to help prevent.

13 I was really clear with him that I did not want
14 to be a part of any sort of book that was focused on
15 sensationalism. That I really want this to be about
16 being of help, being of impact. So, I just wanted him
17 to really understand that, that that would reflect,
18 hoping that that would reflect the kind of people he
19 talked to and the kind of places he talked to, that they
20 would understand that I wasn't interested in a tabloid
21 sensationalism sort of book.

22 Q. BY MS. KLEINDIENST: Did you authorize Mr.
23 Nevins to speak to outside publishers?

24 A. Yes.

25 Q. Did you tell him which publishers to speak to?

1 A. No.

2 Q. Did you tell him that you were requesting a
3 certain amount of money for your book?

4 A. No.

5 Q. Did you have any discussions about money with
6 respect to your book?

7 MR. FINALDI: Objection; calls for
8 attorney/client communications. Instruct not to answer.

9 Q. BY MS. KLEINDIENST: Did you have any
10 conversations with anyone other than an attorney about
11 the amount of money you wanted for your book?

12 A. No.

13 Q. When I spoke to Mr. Nevins on the phone he
14 volunteered to me that you had demanded a large amount
15 of money for your book. Are you saying that he's lying?

16 MR. FINALDI: Assumes facts not in evidence,
17 assumes -- and also lacks foundation and it's
18 argumentative.

19 So, you can respond to the extent you know, but
20 do not disclose any attorney/client privileged
21 communications.

22 THE WITNESS: Tell me again what he said I
23 said.

24 Q. BY MS. KLEINDIENST: That you were demanding a
25 very large amount of money for your book.

1 A. Not true.

2 MR. FINALDI: And vague and ambiguous as to
3 "very large amount of money."

4 MS. KLEINDIENST: Going to ask the court
5 reporter to mark this as Exhibit 556.

6 (Deposition Exhibit No. 556
7 was marked for identification.)

8 (Witness peruses exhibit.)

9 THE WITNESS: Okay.

10 Q. BY MS. KLEINDIENST: You're not on this entire
11 e-mail exchange but it looks like the e-mail at the
12 bottom of the page is a February 23, 2013 e-mail that
13 you sent to Mr. Nevins; is that correct?

14 MR. FINALDI: Did you get this from Mr. Nevins?

15 MS. KLEINDIENST: Yes.

16 THE WITNESS: Yes, it looks that way.

17 Q. BY MS. KLEINDIENST: Do you remember whether he
18 responded to your e-mail?

19 MR. FINALDI: Calls for speculation.

20 THE WITNESS: I don't remember.

21 Q. BY MS. KLEINDIENST: Why were you asking him to
22 let you know all the publishers that he had been to?

23 A. I don't recall.

24 Q. At the top of the page there are three names
25 and each one appears to be -- well, strike that.

1 Do you remember speaking to any of these three
2 people?

3 MR. FINALDI: Assumes facts not in evidence.

4 THE WITNESS: We talking about Ingrid, Tracy
5 and Lisa?

6 MS. KLEINDIENST: Yes.

7 THE WITNESS: No, I don't remember speaking to
8 any of them.

9 Q. BY MS. KLEINDIENST: Do you remember speaking
10 to anyone at Harper Collins?

11 A. I believe so.

12 Q. Do you recall when that conversation took
13 place?

14 A. I don't.

15 Q. Do you recall what Harper Collins said or the
16 representative from Harper Collins said on that call?

17 A. What they said? I mean, they said a lot of
18 things. Looking for -- do you want to narrow that?

19 Q. Everything that you can remember that they said
20 on that call.

21 A. I remember them saying things like this seems
22 like a really important story that should be out there.
23 You know, things like we've got to see if this, I mean,
24 like, we'd, we'd love to do something like this. We've
25 got to see if it makes sense for us. That sort of

1 thing.

2 Q. Do you remember anything else?

3 A. No.

4 Q. Did you have more than one call with a
5 representative from Harper Collins?

6 A. Not that I recall.

7 Q. Do you remember who the representative from
8 Harper Collins was?

9 A. I don't.

10 Q. Next to these three ladies' names at the top of
11 the page it says "Passed," "Passed," and then "Reading."
12 Do you have any idea what Lisa Sharkey was reading?

13 MR. FINALDI: Calls for speculation.

14 THE WITNESS: I don't.

15 Q. BY MS. KLEINDIENST: Absolutely no idea what
16 she was reading?

17 MR. FINALDI: Calls for speculation. He was
18 not cc'd on this e-mail, it wasn't even sent to him.
19 Asked and answered, argumentative.

20 THE WITNESS: I don't.

21 Q. BY MS. KLEINDIENST: Are you aware of any
22 written materials being sent to publishing houses?

23 A. I don't remember there -- well, that's a broad
24 thing. Written materials of any kind from anyone?

25 Q. Sure.

1 A. Yeah? Well, what I was going to speak to
2 specifically is that I don't remember my writings,
3 meaning what I was working on for the book, being sent
4 to any publishers. They may have been, but I didn't, I
5 don't recall that. I didn't think they were.

6 Q. Did you authorize them to be sent to
7 publishers?

8 A. I don't remember. From my, if my memory serves
9 me, I don't remember that, that that was something that
10 we weren't doing.

11 Q. When did you stop pursuing a book deal?

12 MR. FINALDI: Assumes facts not in evidence.

13 THE WITNESS: I believe it would have been
14 somewhere around, I mean, somewhere in the first quarter
15 of 2013.

16 Q. BY MS. KLEINDIENST: Why did you stop pursuing
17 a book deal?

18 A. I realized that it was very possibly not going
19 to be, meaning doing a book, not going to be as
20 impactful in that form as, as I wanted the message, as I
21 wanted the truth of Michael's sexual abuse of me to get
22 out there and be of help.

23 Q. Why?

24 A. Because I realized that possibly doing what we
25 are doing now, a lawsuit, would give me a platform to do

1 a lot more than a book could do, meaning, take
2 depositions, gather evidence to support the truth. And
3 eventually have a jury, you know, of 12 people or
4 whatever it is, proclaim that it is the truth.

5 Whereas, a book scenario, which, you know, once
6 released, is essentially out of my control, that it
7 could be, it could be exactly what I didn't want it to
8 be in the beginning, meaning, it being a tabloid,
9 sensationalism sort of thing that, you know, has some
10 attention on it for a minute and then fades away.

11 Q. What do you mean by "out of my control"?

12 A. I don't know, just what I mean. Once you --
13 meaning how it's -- yeah, once you release it, what else
14 can you -- there it is, what else can you do about it,
15 meaning, how people are going to receive it and it just
16 becoming that sensationalism, you know, media tabloid
17 sort of thing. Not being powerful enough, meaning, just
18 as I said, you know, being able to go through the
19 process of gathering evidence and prove that my truth is
20 the truth.

21 Q. Do you feel like litigating a lawsuit is more
22 in your control?

23 A. More in my control. No, I don't think I would,
24 I don't think I would flip meaning of control in
25 relation to a lawsuit. It would just be the other

1 things that I said, that there's much more opportunity
2 to do a lot more in proving the truth than just some
3 words in a book.

4 Q. Did any of the publishing houses that
5 considered your book express interest in actually going
6 forward with it?

7 A. Yes.

8 Q. Which publishing house?

9 A. The only one that I remember, because I, the
10 one we stated, talking to Harper Collins. I don't know
11 who it was that I spoke to, but just on that call, you
12 know, I remember them, as I previously stated,
13 expressing interest in moving forward with it. I think
14 there may have been some others that I didn't speak to
15 directly, meaning, hearing about through Alan Nevins,
16 but I don't remember who.

17 Q. Did any of the publishing houses that were
18 given an opportunity to pursue your book actually say
19 affirmatively, "Yes, we will publish it"?

20 A. Not that I, not that I recall, no.

21 Q. Did you ever tell your mother that no one would
22 touch your book?

23 A. That no one would touch my book. I don't
24 recall telling her that.

25 Q. Is it possible that you did and you just don't

1 remember or you're sure that you did?

2 MR. FINALDI: You're just calling -- asking him
3 to speculate.

4 So, don't speculate, just say what you know.

5 THE REPORTER: Counsel, I need you to put your
6 mike on.

7 MR. FINALDI: I will.

8 Q. BY MS. KLEINDIENST: When you were writing your
9 book, what resources did you draw on in order to put out
10 your story? Do you understand what I'm asking?

11 A. No.

12 Q. So, one resource I assume is your memory?

13 A. Uh-huh.

14 Q. But did you, apart from your own memory, is
15 there any other resource, whether a person or, you know,
16 a written source of information, anything like that,
17 that you used in order to help you write your book?

18 A. You know, being that I was a young child
19 through a lot of the story, in relation to my story with
20 Michael, you know, certain amount of dates, exact dates
21 and things like that that I didn't remember, never knew.
22 So, when it came to those sort of details I would ask my
23 mother about those sort of things.

24 Other than that, you know, I had, I had videos
25 of, of, you know, like, when I first danced with Michael

1 when I was 5 in Australia in '87, you know, pictures of
2 Michael and I together, things like that to kind of look
3 back over and, you know, clarify certain memories that I
4 had, remind me of certain memories.

5 Q. Other than your mother, was there anyone else
6 that you talked to about these events to help you write
7 your book?

8 A. I may have also checked some memories against,
9 like, my sister, Chantal. You know, this is, this is
10 how I remember this going, a certain thing going down,
11 do you remember it going down the same way, things like
12 that.

13 Q. And did you do any Internet research?

14 A. The only type of Internet research I can
15 remember is, would also relate to dates. I remember
16 specifically trying to find out what the exact date was
17 that, that I first met Michael when I was 5 and the date
18 that I performed. So, I remember going to, like,
19 Wikipedia to, you know, look up when was Michael
20 Jackson's Bad Tour in Australia, things like that.

21 Q. Did you ever ask your mother for any written
22 materials to help you write your book?

23 A. I think along the same lines but maybe I would
24 ask her, you know, of a certain period of time. You
25 know, "Could you just jot down the bullet points of what

1 you remember," asking my mother that. You know, of how,
2 the details of when we went to the ranch the first time
3 and, you know, just how did that unfold, the external
4 details. So, yeah, I would ask her to sort of, you
5 know, just write that back to me in a bullet point form
6 or things like that.

7 MS. KLEINDIENST: All right, I'm going to ask
8 the court reporter to mark this as Exhibit 557.

9 (Deposition Exhibit No. 557

10 was marked for identification.)

11 (Witness peruses exhibit.)

12 THE WITNESS: Okay.

13 Q. BY MS. KLEINDIENST: Do you recognize this
14 e-mail as an e-mail exchange between you and your mother
15 in July 2012?

16 A. I do.

17 MS. KLEINDIENST: I'm going to ask the court
18 reporter to mark this Exhibit 558.

19 (Deposition Exhibit No. 558

20 was marked for identification.)

21 (Witness peruses exhibit.)

22 THE WITNESS: Okay.

23 Q. BY MS. KLEINDIENST: And it looks like the
24 e-mails towards the bottom of the page are the same as
25 certain e-mails in the exchange on 557, but this is

1 another e-mail exchange between you and your mother in
2 July of 2012; correct?

3 A. Yes.

4 Q. By this time were you already working on
5 writing a book?

6 A. I'm not sure. It's possible, I'm not sure.

7 Q. Do you know why you were asking these
8 questions?

9 A. Well, it was, it was at least, as I stated in
10 the beginning, you know, going back and writing through
11 everything and going back and kind of writing through
12 all the stories to kind of get it, a coherent narrative,
13 you know, of how it all went down. So, it was at least
14 that, just for that purpose. It is possible that I had
15 decided to start working on turning these writings into
16 a book.

17 MS. KLEINDIENST: I'm going to ask the court
18 reporter to mark this as Exhibit 559.

19 (Deposition Exhibit No. 559
20 was marked for identification.)

21 (Witness peruses exhibit.)

22 THE WITNESS: Okay.

23 Q. BY MS. KLEINDIENST: And this is another e-mail
24 exchange?

25 MR. FINALDI: You read the whole thing?

1 There's multiple pages.

2 MS. KLEINDIENST: Yeah, take your time if I
3 give you an exhibit.

4 THE WITNESS: Oh, sorry. I thought it was a
5 continuation.

6 (Witness continues to peruse exhibit.)

7 MR. FINALDI: Can we take a break whenever
8 you're ready?

9 MS. KLEINDIENST: Yeah, we can take it after
10 this.

11 MR. FINALDI: Yeah, yeah.

12 THE WITNESS: Okay.

13 Q. BY MS. KLEINDIENST: Do you recognize this as
14 an e-mail exchange between you and your mother from July
15 22nd and 23rd, 2012?

16 A. Yes.

17 Q. On the second page, the e-mail at the top of
18 the page, which I believe is an e-mail from you to your
19 mother, you said, "You mentioned that I could look at
20 the pages you had written towards a book."

21 Do you recall a conversation with your mother
22 about the fact that she had been writing a book?

23 A. Yes.

24 Q. When did you first find out that your mother
25 was writing a book?

1 A. That's hard because I think she had multiple
2 phases of working on one. Yeah, like, I think one goes,
3 meaning one phase for her, I mean, I really would be
4 speculating about a date, but goes back, you know, maybe
5 two or three years earlier than 2012, because I remember
6 just wanting to write a story about what she thought was
7 our story at that point, meaning my family's story, and
8 what she thought was the true story between Michael and
9 I, meaning, what she thought was the true story, that
10 there was no abuse. So, and then she stopped and then
11 she went back to it. So, it's pretty foggy about that,
12 but...

13 Q. Well, let me try to break it down a little bit
14 more.

15 A. Yeah.

16 Q. Do you know if your mother was writing a book
17 or did she ever tell you that she was writing a book
18 before Michael Jackson died?

19 A. I don't recall.

20 Q. And you said that she went back to it at some
21 point. Are you talking about in the last few years
22 before you told her about the abuse or after?

23 A. I don't know of her -- so, I'm talking about
24 before I disclosed the abuse. I don't know of her or
25 not going back to it post me disclosing.

1 Q. Have you had any conversations with her post
2 you disclosing about her potentially writing a book?

3 A. Yeah, I believe there have been.

4 Q. Do you recall when you had this conversation?

5 A. I don't.

6 Q. Do you remember having any of those
7 conversations in the last year?

8 A. To be safer, I would say maybe within the last
9 two years.

10 Q. Did your mother ever send you any drafts of her
11 book?

12 A. I don't recall. I mean, it seems like maybe
13 so. As I'm reading this e-mail here.

14 MR. FINALDI: Don't speculate.

15 THE WITNESS: But I don't recall.

16 Q. BY MS. KLEINDIENST: Do you remember ever
17 reading a draft of her book?

18 A. I don't.

19 MS. KLEINDIENST: We can take a break.

20 MR. FINALDI: Just a quick restroom break.

21 MS. KLEINDIENST: Sure.

22 THE VIDEOGRAPHER: The time is 11:10 a.m. and
23 we are off the record.

24 (A recess was taken.)

25 (Ms. MacIsaac joins the proceedings.)

1 THE VIDEOGRAPHER: The time is 11:21 a.m. and
2 we're back on the record.

3 MS. KLEINDIENST: I'll ask the court reporter
4 to mark this as Exhibit 560.

5 (Deposition Exhibit No. 560
6 was marked for identification.)

7 MS. KLEINDIENST: And there's no Bates No. on
8 this document but I'll represent that it is a document
9 produced by Chantal Robson at her deposition.

10 (Witness peruses exhibit.)

11 THE WITNESS: Okay.

12 Q. BY MS. KLEINDIENST: Do you recognize this as
13 an e-mail exchange between you and your sister Chantal
14 on July 31st, 2012?

15 A. Yes.

16 MS. KLEINDIENST: I'll ask the court reporter
17 to mark this as Exhibit 561.

18 (Deposition Exhibit No. 561
19 was marked for identification.)

20 (Witness peruses exhibit.)

21 THE WITNESS: Okay.

22 Q. BY MS. KLEINDIENST: Do you recognize this as
23 an e-mail that you sent to your mom on August 27, 2012?

24 A. Yes.

25 Q. You say, "As I write out my story with

1 Michael..." Do you know if by this point you had
2 decided to write a book?

3 A. I don't know.

4 Q. You mentioned, "...there are a lot of details
5 that I either just don't remember or never knew that you
6 might have memory of." Do you see that?

7 A. Yes.

8 Q. I think you've already said this, but during
9 the time of these events you were 5 years old to 14; is
10 that correct?

11 A. The bulk of the events, yeah.

12 Q. I personally don't remember anything from
13 before I was 14, so is it fair to say that there were
14 things or details that you didn't know at that point
15 because you weren't focused on them?

16 MR. FINALDI: Vague and ambiguous and
17 unintelligible.

18 THE WITNESS: I can speak to, as I said before,
19 details like dates, you know, of when we took visits
20 from Australia to L.A. to be with Michael, detail like
21 how exactly long were those visits, you know, what
22 amount of time did we stay at, you know, Neverland
23 versus whether it would have been the Westwood condo,
24 that sort of thing.

25 Q. BY MS. KLEINDIENST: Those are details that you

1 knew at some point but you may not remember?

2 A. Right.

3 Q. Then there are probably some other details
4 that, like you said, that you may have never known;
5 correct?

6 A. Yeah. I mean, that's a really broad statement,
7 like, yeah, I'm not, I'm not all knowing. So, yeah,
8 there definitely were details.

9 Q. Well, when you were, like, 5 years old for
10 example, you entered into a dance competition?

11 A. Right.

12 Q. And your mother has testified that that dance
13 competition was put on by Target, CBS Records and Pepsi.
14 Are you aware of that testimony?

15 A. Aware of the testimony, no.

16 Q. And do you know who put on that dance
17 competition?

18 A. I don't recall, yeah. I didn't know at the
19 time and, yeah.

20 Q. Because when you're 5 years old you're not
21 really focused on which companies are putting on a dance
22 competition; right?

23 A. Right.

24 MS. KLEINDIENST: I'll ask the court reporter
25 to mark this as Exhibit 562.

1 (Deposition Exhibit No. 562
2 was marked for identification.)

3 (Witness peruses exhibit.)

4 THE WITNESS: Okay.

5 Q. BY MS. KLEINDIENST: Do you recognize this as
6 an e-mail exchange between you and your mother on
7 September 10th and 11th, 2012?

8 A. Yes.

9 Q. And in this exchange you ask your mom to write
10 bullet points of yours and your family's involvement in
11 the 1993 criminal investigation; correct?

12 A. Yes.

13 Q. Do you remember if your mom ever sent you those
14 details?

15 A. I don't remember.

16 MS. KLEINDIENST: I'll ask the court reporter
17 to mark this as Exhibit 563.

18 (Deposition Exhibit No. 563
19 was marked for identification.)

20 (Witness peruses exhibit.)

21 THE WITNESS: Okay.

22 Q. BY MS. KLEINDIENST: This is an e-mail that you
23 sent to your mom on September 12th, 2012; correct?

24 A. Yes.

25 Q. And like some of these other e-mails, in this

1 e-mail you're asking your mom questions about your past
2 interactions with Michael Jackson that you may not
3 remember or may have never known; right?

4 MR. FINALDI: Calls for speculation, also
5 compound.

6 THE WITNESS: Yes. So, let me just clarify
7 this. So, a lot of this -- the reason these questions
8 came up for me was, first, because I remembered them,
9 you know what I mean? I remembered, you know, to take
10 examples, like, when did I audition for Johnny Young. I
11 knew I auditioned for Johnny Young. When did I go on
12 WOMBAT TV. I knew I went on WOMBAT TV; right? So,
13 there's, I mean, I believe, an element in all of these
14 where I'm asking because I remember the scenario.

15 And in a lot of these cases, because I had
16 already written down a version of how I, you know, how I
17 remember it, so this was a process of me kind of
18 checking the external details of what I remember against
19 what my mom remembers of the same scenario.

20 Q. BY MS. KLEINDIENST: And is there any record of
21 how you originally wrote down the story or if you
22 received details from your mom -- well, strike that.

23 Is there any record of how you originally wrote
24 down the story?

25 A. I don't believe so, because it would have

1 been -- what date are we here? September. Either way,
2 either if it was, as we stated earlier, that I started
3 kind of in that Evernote -- well, I started in hand,
4 handwritten; right? Moved to the Evernote type program,
5 and then moved to the, if it was called "Story," the,
6 you know, book-writing application; right? And whenever
7 I transferred to a new thing, a new app. or whatever,
8 the files before I got rid of.

9 And then, the way the novel or the book writing
10 application worked was just that, you know, you were
11 working on essentially one large document. So, it
12 wasn't like, you know, keeping different versions of
13 things, it was like, you know, I would, if I went in and
14 changed, I mean, I don't recall either way.

15 Q. Uh-huh.

16 A. If I got answers from these and if, you know,
17 if some of those answers to, you know, details like
18 dates and time periods differed from what my mother
19 remembered and what I remembered and I changed those
20 things, that would only be, I mean, the final version
21 would be the only thing that I have. So just that one
22 document I was working with.

23 Q. So, if your mother wrote back to you and
24 answered one of these questions and it differed from
25 your version of how you had written it out, would you

1 rely on her memory or yours?

2 MR. FINALDI: Calls for speculation and assumes
3 facts not in evidence.

4 THE WITNESS: Yeah, I mean, that's a broad
5 answer because it really depends on what the actual
6 question was. You know, so, if, if it was, if I'm
7 talking about something, yeah, when I was 5 years old or
8 7 years old and, and her answer as far as dates, you
9 know, specific dates of when it happened was different
10 to mine, in that scenario more than likely I would
11 depend on her answer because I was 5 and she was
12 whatever she was, an adult.

13 If it was, you know, I don't know, if she spoke
14 differently about, I don't know, so, something like,
15 something that's more kind of subjective like how I
16 acted or how I felt or, or even, you know, something
17 that Michael said to me, those sort of things, her word
18 is not necessarily the holy grail, you know. I may rely
19 more on my memory than hers. But dates, probably her
20 when I was younger.

21 MS. KLEINDIENST: I'll ask the court reporter
22 to mark this as Exhibit 564.

23 (Deposition Exhibit No. 564
24 was marked for identification.)

25 (Witness peruses exhibit.)

1 THE WITNESS: Okay.

2 Q. BY MS. KLEINDIENST: This is an e-mail that you
3 sent to your mother on September 12th, 2012; correct?

4 A. Yes.

5 MS. KLEINDIENST: I'll ask the court reporter
6 to mark this as Exhibit 565.

7 (Deposition Exhibit No. 565
8 was marked for identification.)

9 (Witness peruses exhibit.)

10 THE WITNESS: Okay.

11 Q. BY MS. KLEINDIENST: This is an e-mail that you
12 sent to your mother and copied to yourself on October
13 4th, 2012; correct?

14 A. Yes.

15 Q. And the subject line is "Questions for Mom -
16 2.0"?

17 A. Yes.

18 Q. Do you remember this e-mail?

19 A. Do I remember this e-mail. No.

20 Q. Have you reviewed this e-mail recently?

21 A. No.

22 Q. Have you looked for this e-mail in the last few
23 months?

24 A. Possibly.

25 Q. Did you find it?

1 A. I mean, not -- sorry, let me -- not
2 specifically looking for this e-mail. The reason I said
3 "possibly" was because of discovery; right? You guys
4 were looking for documentation, I was supposed to look
5 through for anything and everything that, you know,
6 referenced Michael, referenced anything to do with this
7 case. So, possibly, you know, within that -- I don't
8 know when I, you know, came across this and produced it,
9 but possibly within that realm I did but I wasn't
10 looking for, you know, this e-mail specifically.

11 Q. So you never remember looking for an e-mail
12 specifically called "Questions for Mom 2.0"?

13 A. I don't remember.

14 MR. FINALDI: Calls for speculation.

15 MS. KLEINDIENST: I'll ask the court reporter
16 to mark this as Exhibit 566.

17 (Deposition Exhibit No. 566
18 was marked for identification.)

19 (Witness peruses exhibit.)

20 THE WITNESS: Okay.

21 Q. BY MS. KLEINDIENST: Do you recognize this
22 e-mail as an e-mail exchange between you and your mom on
23 October 4th and 5th, 2012?

24 A. Yes.

25 Q. In the e-mail in the middle of the first page

1 there's a reference to obtaining money from a closet in
2 Neverland. Do you see that?

3 A. Yes.

4 Q. Do you remember that?

5 A. I remember that it happened, meaning, that my
6 mother got this money, you know, for the car. I don't
7 remember -- that's all I remember of it.

8 Q. So, you remember that she got money for a car.
9 Did you, do you, separate from this e-mail, remember
10 that it came from a closet, meaning, the money?

11 A. Yeah, I remember that it was from Michael and I
12 remember it was from -- I don't remember if I remembered
13 exactly it was from a closet or not, but it was from his
14 room and it was from some secret spot in his room at the
15 ranch.

16 Q. Did you, if you remember, go with your mother
17 to the room to get the money?

18 A. I don't remember.

19 Q. Do you remember if you told your mother where
20 to go to get the money?

21 A. I don't remember.

22 MR. FINALDI: Assumes facts not in evidence.

23 Q. BY MS. KLEINDIENST: Were you aware of any
24 secret rooms at Neverland?

25 A. Yes.

1 Q. How many?

2 A. I remember that there was a sort of secret room
3 inside one of the closets in his Neverland bedroom. I
4 remember that there was a secret room also at Neverland
5 at the second level of the arcade. I think that's all I
6 remember.

7 Q. So, two?

8 A. Yeah.

9 Q. You said there was one in the closet in
10 Michael's bedroom; correct?

11 A. At Neverland, yeah.

12 Q. Do you remember how one would access that room?

13 MR. FINALDI: Vague and ambiguous.

14 THE WITNESS: I don't. It's foggy.

15 Q. BY MS. KLEINDIENST: Do you remember --

16 MR. FINALDI: You talking about his bedroom?

17 It's vague and ambiguous. I'm not sure, the bedroom or
18 the secret room?

19 MS. KLEINDIENST: Sure.

20 Q. So, we're talking about a secret room that was
21 in Michael Jackson's closet in his bedroom; correct?

22 A. Yes.

23 Q. And I was just wondering if you remembered how
24 someone would access that room.

25 A. The secret room?

1 Q. Right.

2 A. Yeah, I don't remember.

3 Q. Do you remember how big it was?

4 A. I remember it being small. I can't describe it
5 any more. I mean, as far as I remember it, it was from
6 the closet, from one of his closets that you would get
7 to this little secret area, and I remember it being
8 small. Maybe you could -- I mean, I don't know, three,
9 three to five-foot range, you know.

10 Q. When you say "three to five-foot range" --

11 A. Or two to five foot, like, width.

12 Q. Width. And how about depth?

13 A. Three to six foot at the max, I believe.

14 Q. How many times did you go into the secret room
15 behind Michael Jackson's closet?

16 A. I can't remember exactly, but I would say in
17 the range of two to five times.

18 Q. Do you remember the first time?

19 A. No.

20 Q. Do you remember if the first time was before or
21 after you moved to the United States?

22 A. I believe it was before.

23 Q. Do you remember if the first time was during
24 your first visit to the United States or after?

25 A. My first visit to the United States or after.

1 Yeah, I don't know if it was the first one. Could have
2 been.

3 Q. And how about the last time you went in that
4 secret room, do you remember when that was?

5 A. I don't.

6 Q. Do you remember if it was before or after you
7 moved to the United States?

8 A. Possibly after.

9 Q. Do you remember any of the contents of that
10 room?

11 A. Yeah. What I remember the most is the
12 pornography. That was one of the reasons he took me in
13 there was to show me magazines that were mostly
14 heterosexual explicit, you know, full-naked sex,
15 pornography magazines. And this was, this was early on
16 for me. I mean, I would have been 7 or 8 at the oldest
17 the first time.

18 There was also more of, like, some fetish kind
19 of stuff where there was these really obese women naked
20 having sex with, I believe, you know, more normal-sized
21 men. I remember that. I mean, those images have never
22 left my mind; right? I mean, 7, 8-year-old, it was
23 pretty shocking stuff to see. He also showed me videos,
24 pornography videos that may have come from that closet
25 as well.

1 Q. So, you remember there being pornography in the
2 room. Let's start with the magazines. Approximately
3 how many magazines were there?

4 A. What I remember is --

5 MR. FINALDI: Vague and ambiguous.

6 THE WITNESS: -- them, the magazines, coming
7 from what seemed like a filing cabinet sort of thing.
8 Like, a bottom drawer of a filing cabinet. It seemed
9 like a lot, but I don't, I don't know, because, you
10 know, like, if you're looking at a filing cabinet and
11 it's full, you can't necessarily tell what all the
12 contents are.

13 MS. KLEINDIENST: Sure.

14 THE WITNESS: So I remember him pulling
15 pornography magazines out of there. I don't know if --
16 there was a decent amount that he pulled out, like, you
17 know, in the range of ten to twenty. The whole thing
18 could have been pornography, I don't know though.

19 Q. BY MS. KLEINDIENST: And you think it was in
20 the bottom drawer?

21 A. That's what I remember.

22 Q. Do you remember how many drawers there were?

23 A. I don't.

24 Q. Do you remember ever seeing the contents of any
25 drawer other than the bottom drawer?

1 A. I don't remember.

2 Q. Other than the filing cabinet, was there any
3 other furniture in the secret closet behind Michael
4 Jackson's bedroom?

5 MR. FINALDI: Misstates testimony.

6 MS. KLEINDIENST: All right, let me start again
7 then.

8 Q. Other than the filing cabinet, was there any
9 other furniture in the secret room in the closet in
10 Michael Jackson's bedroom?

11 MR. FINALDI: Misstates testimony.

12 THE WITNESS: I don't, I don't remember other
13 furniture. My memory consists of, as I said, the filing
14 cabinet, magazines, pornography magazines, pornography
15 videotapes, and beyond that I remember just tons of
16 stuff, like, you know, like it was just super cluttered
17 with things. I don't remember what they were but I just
18 remember it being a sort of, you know, claustrophobic
19 sort of feeling space, tight space, with, you know,
20 storage, tons of stuff, but I don't know what.

21 Q. BY MS. KLEINDIENST: So, the secret room in the
22 closet in Michael Jackson's bedroom had a lot of stuff
23 in it?

24 A. Uh-huh. Yes.

25 Q. And given that there was a lot of stuff in the

1 closet, how many people could fit in that space?

2 MR. FINALDI: Calls for speculation.

3 THE WITNESS: I don't know.

4 Q. BY MS. KLEINDIENST: I mean, when you went into
5 that room, do you remember sort of being cramped up
6 against stuff or was there room for you to stand without
7 anything touching you?

8 A. There definitely wasn't a lot of room. I mean,
9 kind of just enough room to be, to be in there with
10 Michael, you know.

11 Q. Was there anywhere to sit or would you stand?

12 A. My memory is -- yeah, I don't remember sitting
13 anywhere. It was standing or kneeling towards, you
14 know, the filing cabinet.

15 Q. Do you have any specific recollection of any of
16 the other items in the room, something that stood out?

17 A. No.

18 Q. And when you were being shown pornography, was
19 that in the room or would you just go in to get it and
20 come back out of the secret room?

21 A. I remember being shown some of it in the room.
22 I believe some of it, I mean, the videos were taken out
23 of the room to play on his, his TV that was in front of
24 the bed in his Neverland bedroom. The magazines may
25 have come out, I'm not sure though. I remember looking,

1 being shown them in the secret room and/or, you know,
2 the closet right in front of it, you know.

3 Q. Do you remember how many videos you saw in the
4 room?

5 A. In the bedroom?

6 Q. Well, I mean, I'm asking a slightly different
7 question. Sorry it wasn't clear. Do you remember how
8 many videotapes you saw sitting in or stored in the
9 secret room?

10 A. No.

11 Q. And you described for me the contents of the
12 pornography magazines. I'm not sure I got your
13 description of what types of videos they are so could
14 you let me know what types of videos you remember
15 seeing?

16 A. Yeah, I remember seeing heterosexual
17 pornography, so, heterosexual sex. I remember it being
18 mostly white male, like, caucasian male and females.
19 Blonde hair is what I remember. And I remember seeing
20 oral sex, I remember seeing full penetration, vaginal
21 penetration. I remember seeing the men ejaculating on
22 women's faces.

23 Q. Other than heterosexual pornography, do you
24 remember seeing any other types of pornography on video?

25 A. On video. No, I don't remember any other types

1 on video.

2 Q. You mentioned a second secret room which you
3 said was on the second level of the arcade?

4 A. Yeah.

5 Q. Where is the arcade at Neverland?

6 A. So, if you walked out of the backdoor from the
7 main house, which was off of the kitchen, and you pretty
8 much walked straight, it was a separate building next to
9 the pool. That was the arcade.

10 Q. And where was the second, or, the secret room
11 on the second level of the arcade?

12 A. So, yeah, second level and then towards the --
13 I mean, on the back wall there was, there was a door
14 that was a smaller door that was really hard to sort of
15 notice unless you knew it was there.

16 Q. When you say "a smaller door," how big are you
17 talking?

18 A. From my memory, kind of like a, like a
19 four-foot-height door, something like that.

20 Q. And how big was the secret room on the second
21 level of the arcade?

22 A. I would say -- I remember it being sort of
23 narrow. So, the length would have been in the range of,
24 like, I don't know, maybe a twelve, ten to twelve foot
25 sort of thing. And the width, you know, maybe, like,

1 eight to ten sort of range, from what I remember.

2 Q. What do you recall being in the secret room on
3 the second level of the arcade?

4 A. I remember that it was carpeted with a sort of
5 lighter carpet. I remember there were big stuffed
6 animals in there, like, Mickey Mouse and that sort of
7 thing. I remember something to sort of sit/lay on like
8 a, I don't know, some sort of low futon-type thing that
9 from what I remember wasn't, you know, wasn't a couch as
10 far as a regular sort of couch height, it was lower to
11 the ground, you know. It might have been just a
12 mattress sort of thing but I remember a futon sort of
13 thing.

14 Q. Other than the futon, do you remember any
15 furniture anywhere?

16 A. I have an image that maybe there was a TV in
17 there. I'm not sure. It's possible. That's all I
18 really remember.

19 Q. And apart from the big stuffed animals, do you
20 remember any other things in the room other than what
21 you've described already?

22 A. I don't.

23 Q. Do you remember how the room would be accessed;
24 if you needed a key for example or if you could just
25 open the door?

1 A. From what I remember, you could just open it.

2 Q. You mentioned that it wasn't a door that you
3 would necessarily obviously see.

4 A. Right.

5 Q. Why was that? Can you describe why the door
6 wasn't obvious?

7 A. Oh, to me why it wasn't obvious?

8 Q. Yes.

9 A. I think it was the sort of thing where, you
10 know, when you see most doors there's a doorjamb, a
11 frame, and that sort of whole thing where it's, you
12 know, it's noticeably set out that there's a door there.
13 This didn't have any sort of noticeable door frame at
14 all so it was kind of, you know, the same paint, same
15 texture, as the wall. Smooth, just straight across.
16 So, you know, all you could notice would be the, you
17 know, super thin line, sort of outline of the door.

18 I have a feeling that there was maybe -- the
19 furniture scenario and the arcade scenario changed so
20 frequently in everywhere but in the arcade. I'm having
21 a memory that at some point there was possibly, like, a
22 couch in front of it or some sort of piece of furniture
23 in front of the door that you would need to move to get
24 to the door. But it wasn't always that way.

25 Q. Did the door have a handle?

1 A. A doorknob, I think so.

2 Q. In Exhibit 566 there is a mention in your
3 mother's e-mail in the middle of the page of journals.
4 Do you see that?

5 A. The middle of the page?

6 Q. Sorry, yeah. There's an e-mail in the middle
7 of the page from your mother to you and the last line of
8 that e-mail she says, "I would have to look up my
9 journals."

10 A. Yes, I see that.

11 Q. And your responses is, "I imagine those
12 journals have lots of stuff in them?" Do you see that?

13 A. Yes.

14 Q. Do you remember ever looking at your mom's
15 journals?

16 A. Yes.

17 Q. Do you remember doing that recently?

18 A. No.

19 Q. When do you remember looking at your mom's
20 journals?

21 A. The last time meaning?

22 Q. Sure.

23 A. Within, within the last -- probably more than a
24 year ago. Within the last two years but more than a
25 year ago, I believe.

1 Q. So, during the course of this lawsuit?

2 A. Yes.

3 Q. Is that something that she sent you copies of
4 or did you go to her house and look through them?

5 A. I believe I had, I already had some of them.
6 And then, the ones that I didn't have she sent to me.
7 This is me living in Maui and her living in Los Angeles.

8 Q. She sent you copies or the physical journal?

9 A. The physical journal, yeah.

10 Q. And the ones that you had already, why did you
11 have those? When did you receive them?

12 A. I just kind of always -- well, not always. The
13 reason I had them was because when my mother and I still
14 lived together, the last time was in a house in Tarzana
15 which she moved out of that somewhere in 2003, I
16 believe. So, anyway, that was, up until then, up until
17 early 2003, that was, you know, the family house where
18 all of our stuff and everything was stored.

19 When she moved out she didn't take -- you know,
20 we had tons of stuff in massive boxes and that sort of
21 thing. She didn't take everything. She didn't take all
22 those storage items, they kind of stayed at now what
23 became my house and that stuff just stayed with me, you
24 know, as I moved from place to place over the years.
25 So, I just still had some of that stuff.

1 Q. Got it.

2 I'll ask the court reporter to mark this as
3 Exhibit 567.

4 (Deposition Exhibit No. 567
5 was marked for identification.)

6 (Witness peruses exhibit.)

7 THE WITNESS: Okay.

8 Q. BY MS. KLEINDIENST: This is an e-mail exchange
9 between you and your mother and the dates range from
10 October 4th to October 18th; correct?

11 A. Let's check the dates.

12 Q. Sure.

13 A. Yes.

14 Q. The e-mails you've been looking at in the last
15 several exhibits were all from 2012. Have you continued
16 to consult your mother about facts or information that
17 you either don't remember or you may have never known
18 during the course of this lawsuit?

19 A. Yeah, certain details, yeah.

20 Q. I'm going to hand you what's been previously
21 marked as Exhibit 541.

22 A. (Witness peruses exhibit.)

23 Okay.

24 Q. This appears to be an e-mail exchange between
25 you and your mother on February 15, 2016; is that

1 correct?

2 A. I don't see a year. I see February 15th.

3 Q. Do you remember this e-mail exchange?

4 A. No, don't remember.

5 Q. Do you remember asking your mom about a witness
6 statement from Charli Michaels?

7 A. No.

8 Q. Do you remember your mom -- do you remember
9 talking to your mom at all about a witness statement
10 from Charli Michaels?

11 A. No.

12 Q. Do you remember your mom ever refuting what was
13 said by Charli Michaels in that witness statement?

14 A. No.

15 MS. KLEINDIENST: I'll ask the court reporter
16 to --

17 THE WITNESS: Can we take a quick bathroom
18 break?

19 MS. KLEINDIENST: Sure. I think we have to
20 change the tape anyway. Let's go off the record.

21 THE VIDEOGRAPHER: This marks the end of DVD
22 number one. The time is 12:03 p.m. and we're off the
23 record.

24 (A recess was taken.)

25 THE VIDEOGRAPHER: This marks the beginning of

1 DVD number two in today's deposition of Mr. Wade Robson.

2 The time is 12:14 p.m. and we're back on the record.

3 MS. KLEINDIENST: I'll ask the court reporter
4 to mark this as Exhibit 568.

5 (Deposition Exhibit No. 568
6 was marked for identification.)

7 (Witness peruses exhibit.)

8 MR. FINALDI: 568?

9 MS. KLEINDIENST: Yes.

10 THE WITNESS: Okay.

11 Q. BY MS. KLEINDIENST: This is an e-mail that you
12 received from your mother on February 16th, 2016;
13 correct?

14 A. Yes.

15 Q. You can set that aside.

16 I'll ask the court reporter to mark this as
17 Exhibit 569?

18 (Deposition Exhibit No. 569
19 was marked for identification.)

20 Q. BY MS. KLEINDIENST: Before you look at Exhibit
21 569, with regard to Exhibit 568, do you remember any
22 follow-up conversations with your mother about this
23 e-mail?

24 A. I don't remember.

25 Q. Okay.

1 A. 69?

2 Q. 569, yeah.

3 A. (Witness peruses exhibit.)

4 Okay.

5 Q. This is an e-mail exchange between you and your
6 mother on May 9th; correct?

7 A. Correct.

8 Q. Do you remember this e-mail exchange?

9 A. No.

10 Q. So, do you remember whether it took place
11 earlier this year?

12 A. I'm not sure.

13 MS. KLEINDIENST: I'll ask the court reporter
14 to mark this as Exhibit 570.

15 (Deposition Exhibit No. 570
16 was marked for identification.)

17 THE WITNESS: Okay.

18 Q. BY MS. KLEINDIENST: This is an e-mail from
19 your mother to you on October 16, 2016; correct?

20 A. Yes.

21 Q. Do you remember what prompted this e-mail?

22 A. No, I don't.

23 Q. So, you don't remember any conversation with
24 your mother that resulted in you receiving this e-mail?

25 A. I don't.

1 Q. Do you know what Janet Jackson music video
2 she's referring to?

3 A. Yes. I don't know if I can remember the name
4 of the song. I think I would have been around, around
5 15 years old when I danced in this Janet Jackson music
6 video. I can't remember what the song was called.

7 MS. KLEINDIENST: I'll ask the court reporter
8 to mark this as Exhibit 571.

9 (Deposition Exhibit No. 571

10 was marked for identification.)

11 Q. BY MS. KLEINDIENST: I'm not going to ask you
12 that many questions --

13 A. This may take a while.

14 Q. -- about this. If you can just review enough
15 to -- well, let me ask you this: Based on the first
16 page of this document, do you know what this is?

17 A. I believe it is writing by my mother.

18 Q. And is this a document that you have in
19 electronic form?

20 A. I'm not sure.

21 Q. Is it a document that you have in paper form?

22 A. I'm not sure. I don't think so.

23 Q. Do you remember if this was sent to you via an
24 e-mail?

25 A. I'm not sure.

1 Q. Do you know if you have this document saved
2 somewhere on your computer?

3 A. I don't know.

4 Q. Do you remember when you received a copy of
5 this document?

6 A. I don't. I don't know if I did.

7 Q. Well, I'll represent to you that this is from
8 your production.

9 A. Okay.

10 Q. So, do you, do you know where you found this
11 document -- well, strike that.

12 Did you assist in looking for and collecting
13 documents?

14 A. For?

15 Q. For this case.

16 A. Yes.

17 Q. And do you know where you found this document?

18 A. No. Do you still want me to scan through it or
19 anything?

20 Q. No, that's okay. You can set it aside.

21 Are you aware whether or not your mother is
22 actively shopping a book right now?

23 MR. FINALDI: Calls for speculation, assumes
24 facts not in evidence.

25 THE WITNESS: I'm not aware of.

1 Q. BY MS. KLEINDIENST: Have you talked to your
2 mother or has your mother ever told you that she wanted
3 to write a book regarding childhood sexual abuse?

4 A. I don't recall.

5 Q. During this lawsuit have you done any online
6 research that would help you in putting together facts
7 or information for this lawsuit?

8 MR. FINALDI: Asked and answered.

9 THE WITNESS: Facts and information regarding
10 what?

11 Q. BY MS. KLEINDIENST: Anything that might be
12 helpful to you in this lawsuit.

13 A. Yeah, only the type of stuff that I've stated
14 before as far as, you know, particular dates that
15 Michael was touring Australia, things that would
16 correlate with, you know, where he was and where I was
17 that may have been public knowledge, dates and places,
18 things like that.

19 MS. KLEINDIENST: I'll ask the court reporter
20 to mark this as Exhibit 572.

21 (Deposition Exhibit No. 572
22 was marked for identification.)

23 (Witness peruses exhibit.)

24 THE WITNESS: Okay.

25 Q. BY MS. KLEINDIENST: This is an e-mail that you

1 sent to yourself on June 28, 2014; correct?

2 A. Yes.

3 Q. And the subject line is "MJ facts article"?

4 A. Yes.

5 Q. And it looks like it includes a link to
6 mjfacts.info/wade-robson-michael-jackson. Do you see
7 that?

8 A. Yes.

9 Q. Do you remember looking at this website?

10 A. No.

11 Q. Do you remember why you sent this link to
12 yourself?

13 A. No.

14 Q. Are you familiar with the website MJ Facts?

15 A. Only, I mean, no, I don't remember it in
16 general. I mean, I see that it exists here.

17 Q. Do you know what it is?

18 A. No.

19 Q. Do you know what types of content it has?

20 A. No.

21 Q. Do you know whether the people that host that
22 website have any particular views about Michael Jackson?

23 A. I don't recall.

24 Q. Do you recall obtaining any other documents --
25 well, strike that.

1 Do you recall obtaining any documents from
2 mjfacts.com for purposes of this lawsuit?

3 A. I don't remember.

4 MS. KLEINDIENST: Go ahead and mark this as
5 Exhibit 573.

6 (Deposition Exhibit No. 573
7 was marked for identification.)

8 Q. BY MS. KLEINDIENST: Again, this is a big
9 document so I don't want you to read the whole thing
10 right now, but just look, read enough so that you can
11 identify the document if you can.

12 A. Okay.

13 (Witness peruses exhibit.)

14 Okay.

15 Q. What is Exhibit 573?

16 A. This is what started as my writing to just kind
17 of reprocess my life and the truth of my story with
18 Michael, and then began to turn into this being a goal,
19 to turn it into a book.

20 Q. I notice across the top it says "FOR MY
21 ATTORNEYS."

22 A. Uh-huh.

23 Q. When did you add that?

24 MR. FINALDI: Calls for speculation.

25 THE WITNESS: I don't remember.

1 Q. BY MS. KLEINDIENST: And if you look at the
2 last page, I'm not sure if you can but from this page
3 can you tell whether this is the entire draft of your
4 book?

5 A. Yeah, I mean, not, not based on reading the
6 page, because I don't, I mean, I haven't, I haven't
7 reread any of this stuff since I wrote it, but based on
8 I know I produced all that there was of the book, you
9 know.

10 Q. And I think that you maybe testified before
11 that you stopped working on the book in March of 2013;
12 is that right? Or April?

13 A. I thought maybe around then, yeah.

14 Q. And have you worked on it at all since then?

15 A. No, I don't believe so.

16 Q. Are you still thinking about publishing a book?

17 A. It's still a possibility. It's not ruled out.

18 Q. Is it something that you're actively pursuing
19 right now?

20 A. No.

21 Q. I want to go through some of your history with
22 Michael Jackson.

23 A. Okay.

24 Q. I understand that you first met him in November
25 of 1987; is that right?

1 A. I know it was 1987. I believe it was November,
2 yeah.

3 Q. And that was a, after a dance contest in
4 Australia?

5 A. Yes.

6 Q. And the dance contest, I understand, was held
7 at a Target store; do you remember that?

8 A. I believe so.

9 Q. Were there multiple phases of the contest?

10 A. Yeah, I think there were at least two, at least
11 that I was a part of.

12 Q. And were they the same day or different days?

13 A. Different days, I think.

14 Q. Were they the same location or different
15 locations?

16 A. I believe same location.

17 Q. And do you remember seeing Michael Jackson at
18 either phase of that dance contest?

19 A. At the dance contest, no.

20 Q. Is it true that most of the contestants in that
21 dance contest were girls?

22 MR. FINALDI: Calls for speculation.

23 THE WITNESS: I don't remember.

24 Q. BY MS. KLEINDIENST: Do you remember how many
25 contestants there were?

1 A. No, I don't.

2 Q. I understand the prize of the contest was to
3 attend a meet-and-greet with Michael Jackson at one of
4 his concerts?

5 A. Yes.

6 Q. And that was during the Bad Tour?

7 A. Yes.

8 Q. Did you also get, as a prize for that dance
9 contest, tickets to the concert? .

10 A. I'm not sure.

11 Q. You did attend a meet-and-greet with Michael
12 Jackson at one of his concerts; correct?

13 A. After, yeah.

14 Q. Do you recall where that meet-and-greet took
15 place?

16 A. I believe it was at a hotel. I think the hotel
17 he was staying at but I don't know what the hotel was.

18 Q. Okay. Prior to going to that meet-and-greet,
19 do you recall going with your mom to the airport to try
20 to meet Michael as he was flying in?

21 A. Yes.

22 Q. Do you remember how long before the concert
23 that was?

24 A. No.

25 Q. Did you actually meet Michael at the airport?

1 A. No.

2 Q. Do you remember if you had asked to go to the
3 airport to meet Michael or if it was your mom's idea?

4 A. I don't know.

5 Q. When you went to the meet-and-greet after one
6 of Michael's concerts, how many people from your family
7 were also there?

8 A. I only remember my mother and my father. It's
9 possible that my sister was there too, but I only
10 remember mother and father.

11 Q. And do you remember there being a lot of other
12 people other than your family also at that
13 meet-and-greet?

14 A. Yes.

15 Q. I understand that at that meet-and-greet you
16 only had the opportunity to speak to Michael for a few
17 minutes; is that about right?

18 A. Yes.

19 Q. And while you were at that meet-and-greet you
20 showed Michael some of your dance moves?

21 A. I'm not sure if I actually showed him dance
22 moves. I remember him commenting -- I was, you know,
23 dressed like him, right, in a, like, a homemade Bad
24 outfit, and I remember him commenting on my outfit and I
25 believe he asked me, like, I don't even know if he knew

1 why I was there, meaning, in relation to the dance
2 contest, because I remember him asking me if I danced,
3 you know. I think I said yes and then, and then he
4 asked if I wanted to dance with him in the, in the show,
5 which was in, I don't know, couple nights from then,
6 upcoming show.

7 Q. Do you remember your mom volunteering to
8 Michael that you would be at that concert the next
9 night?

10 A. I don't.

11 Q. So, you did dance on stage with Michael at a
12 concert in Australia; correct?

13 A. Yes.

14 Q. And that, again, was within a few days of the
15 meet-and-greet?

16 A. I believe so.

17 Q. When you -- that night that you danced on
18 stage, did you have any time with Michael off stage?

19 A. Not that night I don't believe.

20 Q. So, you didn't have any conversations with
21 Michael that night?

22 A. I believe our only interaction that night was
23 on stage.

24 Q. And then, I understand that you had another
25 interaction with Michael Jackson soon thereafter when

1 you and your mom went to the hotel where he was staying;
2 is that right?

3 A. Yeah.

4 Q. And you hadn't been invited to come to the
5 hotel, that was something that you and your mom did of
6 your own initiative; correct?

7 MR. FINALDI: Calls for speculation.

8 THE WITNESS: Yeah, I believe -- no, I don't
9 believe we were invited. Yeah, I believe that we went
10 so Mom could drop off a thank you letter of some kind.

11 Q. BY MS. KLEINDIENST: And you went and dropped
12 off the thank you letter with some sort of publicist?

13 A. I don't think we went with a publicist. So, if
14 we talk specifically about my recollection of that
15 encounter, you know, is we went to the hotel and some
16 things happened and next thing I knew my mother and I
17 were, you know, in the suite with Michael, spending time
18 with him. So, the details that actually enabled that to
19 happen, you know, I've learned from my mother of how
20 that went down.

21 Q. Got it.

22 Do you have any personal recollections of how
23 long you were at the hotel before you went up to the
24 suite or is it just a blur?

25 A. Yeah, it's kind of a -- I remember it felt like

1 a while. I don't know how much of that is just
2 anticipation stretching time or not, I don't know.

3 Q. And it was just you and your mom that went to
4 the hotel; is that right?

5 A. I believe so, yeah.

6 Q. Your mom also went up with you to the hotel
7 suite where Michael was staying?

8 A. Yes.

9 Q. And she was with you the entire time; right?

10 A. Yes.

11 Q. I think that you, I understand that you watched
12 videos with Michael in his hotel suite?

13 A. Yeah. Michael had us sit and lie on his bed in
14 the suite and watch what was, I believe, a rough cut at
15 that point of what became his Moonwalker movie.

16 Q. Your mom has said that she was in the middle
17 between you and Michael while you were watching those
18 videos. Do you remember that?

19 A. I don't remember what the, you know, bed
20 orientation was.

21 Q. Okay. And you don't -- well, strike that.

22 It's your understanding that Michael never
23 asked for your contact information while you were
24 hanging out with him at his hotel suite?

25 A. I don't know.

1 Q. Do you have any knowledge of him asking for
2 your contact information?

3 A. No.

4 Q. And do you have any recollection of anyone
5 giving him your contact information?

6 A. I don't remember.

7 Q. After you hung out with Michael in his hotel
8 suite with your mother, --

9 A. Can I add to that --

10 Q. Sure.

11 A. -- previous question?

12 What I remember is that he wanted us to stay in
13 contact with him in some shape or form. He said, you
14 know, make sure -- and I don't know how he said to do
15 that. It may have been, you know, "through my
16 assistant," whatever, I don't know, but I remember him
17 requesting, you know, "Please stay in contact with me,
18 send me pictures," you know, "send me videos of what
19 Wade's doing," but I don't know how that played out or,
20 you know.

21 Q. Other than what you've just testified to, there
22 were no arrangements made at that meeting with Michael
23 in his hotel suite for you guys to get together again?

24 MR. FINALDI: Calls for speculation.

25 THE WITNESS: Not that I know of.

1 Q. BY MS. KLEINDIENST: To your knowledge?

2 A. Not that I know of.

3 Q. And I understand that your, your family did
4 send Michael letters and videos in the years following
5 that meeting. Are you aware of that?

6 A. I'm not sure, yeah.

7 Q. Okay. So, you're not sure one way or the other
8 whether your mother sent letters to Michael Jackson in
9 the years following meeting him in 1987?

10 A. Yeah, I don't know one way or the other.

11 Q. Do you recall -- well, strike that.

12 I understand that you, after meeting Michael
13 Jackson -- well, strike that.

14 After you participated in the dance contest, I
15 understand that you auditioned for the Johnny Young
16 Talent School; is that correct?

17 A. Yeah, at some point after that, yeah.

18 Q. You don't remember how long after?

19 A. I don't.

20 Q. And in the years that followed you winning the
21 dance contest, you started dancing professionally; is
22 that right?

23 A. Yes.

24 Q. And you were -- that was consuming a large part
25 of your life; is that fair to say?

1 A. Yes.

2 Q. In fact, it was -- you went to the Johnny Young
3 Talent School; correct?

4 A. Like, I --

5 Q. Attended?

6 A. I attended, yeah.

7 Q. Is that a, is that an academic school as well
8 as a dance school or just a dance school?

9 A. Just a dance school.

10 Q. And how often would you go to take dance
11 lessons there?

12 A. I don't know with any certainty. But I would
13 say a decent amount, at least two to three times a week,
14 maybe.

15 Q. And you were also doing performances on the
16 weekends?

17 A. Yeah.

18 Q. Was that every weekend or twice a month or?

19 A. It was a lot. So, I can't say with any
20 certainty, but more than likely, you know, more than
21 once a month, you know, couple times a month.

22 Q. The next time that you had any contact with
23 Michael Jackson was more than two years after the dance
24 competition, in or around January or February of 1990;
25 correct?

1 MR. FINALDI: Calls for speculation.

2 THE WITNESS: Yeah, I believe so.

3 Q. BY MS. KLEINDIENST: And to your knowledge
4 Michael never made any efforts to contact your family
5 between the time that you saw him at his hotel suite in
6 1987 and the time that you went to Los Angeles in or
7 around January of 1990; correct?

8 A. Not that I know of, yeah.

9 Q. The trip that you took or that your family took
10 to Los Angeles in 1990, beginning of 1990, part of that
11 trip was for you and your sister to perform at
12 Disneyland I believe; correct?

13 A. Yes.

14 Q. But from the beginning your family always
15 intended to stay longer than what was required for those
16 performances; correct?

17 A. Yes.

18 Q. And I understand that your family intended to
19 try to get in touch with Michael Jackson again when you
20 visited the United States in January and February of
21 1990; correct?

22 A. Correct.

23 Q. In fact, your mother brought videotapes, VHS
24 videotapes of you dancing for the purposes of showing
25 them to Michael Jackson; correct?

1 A. I don't know what her purposes were. I know
2 that she had them because when we met Michael we showed
3 them to him. That's all I know. You know, I don't know
4 her, what her intent was from the beginning, you know.

5 Q. Had your family talked, before you went to the
6 United States in January of 1990, had you talked as a
7 family about potentially seeing Michael again?

8 A. I don't remember.

9 Q. Do you have knowledge of how your family
10 ultimately got in touch with Michael Jackson in January
11 or February of 1990?

12 A. What generally I've learned from, from my
13 mother, is that she -- I believe she possibly called
14 that publicist that I think was the one who, you know,
15 contacted Michael which enabled us to end up in his
16 hotel suite in '87. I believe that was maybe one of her
17 first calls as far as, you know, asking how to go about
18 getting in touch with Michael. And I think she got
19 bounced around to a bunch of different places and
20 somehow ended up with MJJ Productions and talking to
21 Norma Staikos.

22 Q. Were you involved in that process or are you
23 relying on what your mother has told you?

24 A. Well, first, I wasn't involved. Yeah, I wasn't
25 involved in that process, yeah.

1 Q. Do you remember Norma Staikos?

2 A. Yes.

3 Q. How many times did you meet her?

4 A. Yeah, I can't say exactly. Many times. I
5 would have to say maybe in, like, the ten to twenty
6 times range.

7 Q. When was the first time you met her?

8 A. I, I'd be guessing. I don't remember.

9 Q. Was it before you moved to the United States?

10 A. I believe so.

11 Q. Was it before or after -- well, strike that.

12 Was it during your first trip to the United
13 States or one of the subsequent visits?

14 MR. FINALDI: Calls for speculation.

15 THE WITNESS: I believe it would have been
16 within my first two trips to the United States.
17 Probably the first but I don't know for sure.

18 Q. BY MS. KLEINDIENST: Where did you first meet
19 her?

20 A. I don't know.

21 Q. How many places can you remember seeing her?

22 A. I remember seeing her, I believe, at the
23 Hide-Out, Michael's Westwood condo. I believe I
24 remember seeing her at, at Neverland. I believe I
25 remember seeing her on the set of the few music videos

1 that I did with Michael, Black or White. I believe
2 that's it.

3 Q. When did you see her at the Westwood condo?

4 A. It would have been within those first two trips
5 to the United States.

6 Q. Who else was present?

7 A. I don't know for sure. I mean, could have been
8 Michael, myself, my mother, possibly my sister.

9 Q. How long do you remember seeing her at the
10 Westwood condo?

11 A. Like, from what length of time she was there
12 you mean?

13 Q. Yeah. I mean, you were there and she was
14 there, how long were you there together?

15 A. I don't know if I can get to that sort of
16 detail. I remember being in those same spaces with her
17 at times. I don't remember length of times.

18 Q. Do you remember what she was doing there?

19 A. Organizing Michael's life, meaning, you know,
20 you've got to be here, you got to do this, here's these
21 papers to sign, those sort of things. You got to get on
22 this phone call. And/or, you know, he was asking her to
23 organize things, you know, that sort of stuff.

24 Q. Is it your understanding that Norma Staikos was
25 Michael Jackson's secretary?

1 A. Yeah. Personal assistant, yeah.

2 Q. So, she was doing the kinds of things that a
3 secretary or personal assistant do?

4 MR. FINALDI: Vague and ambiguous.

5 THE WITNESS: Yeah. I mean, she did everything
6 for him.

7 Q. BY MS. KLEINDIENST: How do you know?

8 A. Because beyond seeing her, I mean, so, in the
9 times that I saw her she was doing all those sorts of
10 things that I mentioned. And then, you know, Michael
11 was often talking to her on the phone while I was with
12 him, having him, you know, having her, you know,
13 organize so many things. Lots of personal things, too.

14 I mean, also, all my -- she was always
15 organizing most everything that he and I did together,
16 meaning, when we were going to get together, where we
17 were going to meet, how I was going to get there,
18 meaning, either sending a car to pick me up or just
19 organizing the details of where I, where I needed to be
20 at a certain time in order to be with Michael.
21 Organizing my flights when I was coming from Australia
22 to Los Angeles.

23 Q. Was most of that done over the phone?

24 A. Do you mean relation to me, me and my mother
25 and her or --

1 Q. Sure. I mean, you said that she was organizing
2 your flights and organizing where and when you would be.
3 I mean, was she physically present a lot of the time or
4 was she doing a lot of the organizing over the phone?

5 MR. FINALDI: Vague as to time.

6 THE WITNESS: Yeah, do you mean all time or --

7 Q. BY MS. KLEINDIENST: Well, if it changed over
8 time, let me know.

9 A. Right. I think it was a combination. I mean,
10 so, yeah, there was a lot of communication. This
11 happened over the phone, over fax. And then, there was
12 a decent amount that was in person as well, meaning, the
13 times that I was with Michael, like, there was no real
14 boundary between his, his work life and his personal
15 life from my experience. You know, he was kind of -- he
16 was always on the phone either with Norma or other
17 people, business stuff, while we were, you know,
18 together.

19 He would stop enough to take breaks, whether we
20 were at Neverland or Hide-Out or Record One, to take
21 meetings. So, often, you know, I'd be going places with
22 him where Norma would be there as well and then some
23 more organization in relation to, you know, where
24 Michael and I were going to go or meet up would happen
25 in person and that sort of thing as well.

1 Q. So, how many times do you remember seeing her
2 at the Westwood condo?

3 A. I would say in the range of four to seven,
4 something like that.

5 Q. And how many times did you see her at
6 Neverland?

7 A. It would be the same sort of range.

8 Q. Was there ever a time when you stopped seeing
9 Norma Staikos?

10 A. Yeah, when she wasn't working for him anymore.

11 Q. Do you remember when that was?

12 A. I don't. Not exactly. I believe that it was
13 around, like, '93 or '94.

14 Q. So, the time frame that you would have seen her
15 was approximately three, four, five years, in that
16 range?

17 A. Yeah. Like, from the early 1990 range til '93,
18 '94.

19 Q. Do you remember what she looks like or looked
20 like at that time?

21 A. Yeah.

22 Q. Can you describe her for me?

23 A. Yeah, I remember her as being on the shorter
24 side, like, I mean, I don't know. I was short. I was a
25 kid. So, but she was shorter than most adults. And I

1 remember her being a little more on the heavyside side.
2 I remember her hair being dark. At least some of the
3 time it being short, her hair. I remember her, you
4 know, having a Mediterranean sort of look. I mean, sort
5 of olive skin, slightly darker skin, dark eyebrows.
6 Yeah.

7 Q. Do you remember if her hair was curly or
8 straight?

9 MR. FINALDI: Vague as to time. What day?

10 THE WITNESS: Yeah, like as I said, it changed.
11 I mean, sometimes it was short, sometimes it was long.
12 I do have, I remember it at some point seeming more
13 straight, more on the straighter side, when it was
14 short. It might have gotten curlier when it was longer,
15 I don't know.

16 Q. BY MS. KLEINDIENST: When you said it was
17 short, how short do you remember it ever getting?

18 A. Like, in the, like, two- to five-inch realm.

19 Q. And how about long, how long do you remember
20 her hair getting during the period of time that you saw
21 her?

22 A. It's foggy but maybe around no more than, like,
23 a shoulder length sort of thing.

24 Q. Did you ever have any long conversations with
25 her, I mean, more than a few words?

1 A. I don't remember.

2 Q. It's my understanding that once your family got
3 in touch with Norma Staikos, you were invited to Record
4 One Studios; is that right?

5 A. Yes.

6 Q. And your whole immediate family that was in the
7 United States, and by that I mean your mother, your
8 father and your sister and you, all went to the Record
9 One meeting; correct?

10 A. Yes. I'm -- I was wondering if my grandparents
11 were there, too, but I don't think so. They were there
12 on the trip with us, I don't think they came to the
13 Record One meeting.

14 Q. And that was your mom's parents?

15 A. Yeah.

16 Q. And while you were at the Record One meeting
17 with Michael, do you remember who else was in the room
18 apart from your family?

19 A. I remember there was -- when we came in to
20 Record One Michael was in the midst of doing a photo
21 shoot, some sort of -- I don't know for what. So, I
22 remember he was taking a photo with some sort of older
23 white guy who was kind of balding, I don't know who he
24 was. So, I remember a photographer and that guy. That
25 is -- that's all I can remember.

1 Q. While you were at that Record One meeting,
2 Michael asked your family if they wanted to come to
3 Neverland; correct?

4 A. Correct.

5 Q. So, he personally invited your family?

6 A. Yes.

7 Q. And your whole family agreed to go?

8 A. Yes.

9 Q. And you and your sister and your parents and
10 your mother's parents all went and stayed at Neverland
11 that weekend; correct?

12 A. Yes. I -- Michael asked if myself and my
13 sister wanted to drive with him in his car and, and we
14 did. And so we drove with him to Neverland while my
15 parents and grandparents followed behind.

16 Q. So it was just you and your sister and Michael?

17 A. Yeah, in the car.

18 Q. Do you remember that specifically or is that
19 something that you've been told since that time?

20 A. No, I remember that.

21 Q. The first night that you were at Neverland, you
22 and your sister asked to stay in Michael's bedroom;
23 correct?

24 A. I don't remember how that went down, how that
25 came up. I find it hard to believe that I did because I

1 was a really sort of shy, reserved kid. So, but I don't
2 remember how that went down. I don't remember, you
3 know, who asked who.

4 Q. Okay. If you could turn to page 22 of Exhibit
5 573.

6 A. Okay.

7 Q. On the top of page 22 you wrote, "It came time
8 to go to bed and my sister and I asked if we could
9 'Please, Please' stay with Michael. Michael said it was
10 okay with him if it was okay with my parents."

11 A. I see that.

12 Q. Do you remember writing that?

13 A. I don't.

14 Q. Do you remember, or, do you know whether that
15 came from your own recollection or it was told to you by
16 someone else?

17 A. I don't know. You know, what these writings,
18 like as I talked about, the original intention of how
19 they started, which was just for the sake of my
20 processing, right, and then it became for the purpose of
21 a book. You know, this reprocessing of my entire life
22 for me through this healing process, you know, has been
23 and will continue to be, I imagine so, for the rest of
24 my life, meaning, you know, my perspective on things, my
25 understanding of things, is constantly evolving as I

1 remove the clutter from it all, remove the, the
2 emotional and perspective repression of it all that I
3 had compartmentalized for 22 years. So, all that to say
4 that, you know, this process evolves as far as what I,
5 what I remember, what comes clear and my perspective on
6 things.

7 Q. So, have your memories changed as you've gone
8 through that process?

9 A. They've evolved.

10 Q. What do you mean by "evolved"?

11 A. Yeah, I mean, not changed in a sort of
12 black-to-white sense. Like, I thought it was this
13 thing -- well, I mean, they have as far as prior to the
14 healing process, right. Prior to disclosing. But post
15 disclosing the abuse in 2012 and beginning that healing
16 journey, they've evolved as far as I remember more
17 details about scenarios. As it goes along, you know, it
18 evolves, details get added to.

19 Q. It's my understanding that you are not claiming
20 that you ever repressed any memory of the abuse; is that
21 correct?

22 A. Yeah, I never forgot what happened between
23 Michael and I.

24 Q. Okay.

25 MR. FINALDI: Calls for legal conclusion.

1 Belated objection.

2 Q. BY MS. KLEINDIENST: So, you never forgot the
3 facts or events as they occurred, you just gained a
4 different perspective on them?

5 A. Yeah. I never forgot the facts of what
6 occurred. I had completely -- I never thought about it
7 until May of 2012. I just constantly, it was just this
8 thing that I completely compartmentalized and put away,
9 you know. As far as any sort of perspective on it, any
10 sort of intellectual or emotional perspective on it, you
11 know, I thought I was just absolutely fine with it and
12 it was something I never needed to speak about or deal
13 with until, you know, I had no choice but to deal with.

14 Q. But you're not claiming that you forgot any of
15 the details; --

16 A. No.

17 Q. -- is that right?

18 A. I'm not claiming that.

19 Q. Okay. You testified, I think, that you, as you
20 go through this process and your memories evolve, you
21 remember more. What do you mean by that?

22 A. I don't know how clearer I can make that. I
23 remember more details of, of what went on.

24 Q. So, are you saying that there are things that
25 you had forgotten and that if someone had asked you, you

1 know, in 2010 or 2011, you would say that you didn't
2 remember, but now, if they ask you now, you do remember?

3 MR. FINALDI: Misstates testimony.

4 MS. KLEINDIENST: I'm just asking you if that's
5 what you're saying.

6 MR. FINALDI: And assumes facts not in
7 evidence.

8 THE WITNESS: That's a tough question to ask
9 because if you're, if you're referring to the abuse in
10 any way, shape or form, if anyone asked me, and many
11 people did, prior to May of 2012, you know, if any abuse
12 ever happened between Michael and I, no matter what I
13 remembered or didn't, I never would have, never could
14 have, disclosed anything about it. So, you know what I
15 mean? In that case I don't know how to answer your
16 question.

17 Q. BY MS. KLEINDIENST: But if they had asked
18 you -- well, strike that.

19 You are not saying that before 2012 you didn't
20 remember what happened; correct?

21 MR. FINALDI: Asked and answered.

22 THE WITNESS: I'm not saying that before 2012 I
23 didn't remember what happened, but I am saying that I
24 didn't understand it whatsoever. I didn't understand it
25 as abuse.

1 Q. BY MS. KLEINDIENST: Okay. It's my
2 understanding that your whole family was at Neverland
3 that first weekend that we've just been discussing;
4 correct?

5 A. Yes.

6 Q. And after that weekend did anyone stay at
7 Neverland?

8 A. So, after that weekend the original plan was
9 that my whole family was going to go -- you know, this
10 was the part of the vacation plan in general, the
11 timing. My whole family was going to go on some sort of
12 R.V. trip, I believe to the Grand Canyon. So, after
13 that weekend we were all supposed to leave and go do
14 that.

15 The night before we were supposed to leave,
16 which I believe is the first night that the abuse
17 started, but this is after the abuse, middle of the
18 night at some point, I believe my sister was sleeping in
19 the upstairs bedroom, I mean, the upstairs bed in
20 Michael's bedroom, I was sleeping in the downstairs bed
21 with Michael. I woke up in the middle of the night and
22 Michael wasn't in the bed and I could hear him crying.
23 And I couldn't see where he was at first, and then, at
24 some point I figured out he was kind of, like, off in
25 the corner, kind of like fetal position, against the

1 wall sobbing. And it scared me. I didn't understand
2 what was going on.

3 So, I remember going upstairs to get my sister,
4 Chantal, to sort of, you know, come down and check it
5 out. And we were both kind of looking at him and he's
6 crying and -- yeah, sort of speaks to my perspective at
7 the time. So, like, I was 7 and I remember being afraid
8 that he was going to turn into the werewolf from, you
9 know, like in his Thriller music video as far as where
10 my state of mind, my child state of mind was.

11 And, you know, as we're asking him, like,
12 "Michael, are you okay?" or "What's going on?" at some
13 point, you know, he ended up, through, like, sobbing,
14 being able to utter that, you know, he just didn't want
15 us to leave the next day. We were supposed to leave the
16 next day and being really sad about that. That he was
17 going to be lonely and all of this stuff.

18 So, combined with -- so, the next day, combined
19 with I didn't want to leave, now I remember also having
20 like all of this, I don't know, just this heaviness of
21 experiencing his kind of desperation and sadness towards
22 the idea of me leaving, that I wanted to stay. I wanted
23 to stay with him and he wanted me to stay with him.

24 I don't remember the exact details of, of how
25 that was asked to my, to my parents, but it was and they

1 were okay with it and, and so my mother, father,
2 grandparents and sister, left to go on this R.V. trip
3 and I stayed with Michael for, I believe, somewhere
4 around a week, and sexual abuse continued every night.

5 I believe it's possible that the pornography,
6 showing me the pornography started in that first week as
7 well. And the, you know, and the sexual abuse started
8 with fondling from him, over my pants, and then he was
9 under my pants, and, you know, it contained --

10 Q. I don't want to cut you off and we're going to
11 get to all of that, but I want to, before we go on to
12 all that, you've just given me a lot of information, I
13 just wanted to follow up with something if that's okay.

14 A. Okay.

15 Q. So, you mentioned waking up to Michael sobbing
16 in the corner of his room.

17 A. Yes.

18 Q. And you said that that was on the second night
19 that you were there, I think?

20 A. I believe so.

21 Q. And your sister Chantal was I think you said at
22 that point upstairs in the mezzanine level?

23 A. Of his bedroom, I believe, so, yeah.

24 Q. And I think that you said that you had been,
25 already the abuse started before the sobbing; is that

1 right?

2 A. I believe so, yeah.

3 Q. So, your sister had been there in the room with
4 you downstairs at some point in the evening; correct?

5 A. I believe so.

6 Q. And then, at some point she went upstairs to
7 the mezzanine level?

8 A. Yeah. At some point she said to me, I don't
9 know why but she said, she said "I think" -- because the
10 first night, the night prior we both slept in the bed
11 with Michael.

12 Q. Uh-huh.

13 A. And at some point that second night she said to
14 me, "I think we should," you know, "you and I should
15 sleep upstairs." I don't know why. I mean, I don't
16 know why she said that or why she thought that, but I
17 didn't want to. So, yeah, so I then, whenever it was
18 bedtime, you know, she went upstairs and Michael and I
19 stayed in the bed downstairs and I believe at some point
20 that night the abuse started.

21 Q. Do you remember how long after your sister went
22 upstairs it started?

23 A. No.

24 Q. And I think that you said you woke up and
25 Michael was sobbing in the corner. Is it your memory

1 that you, your sister went up, at some point the abuse
2 happened, and then you went to sleep, and then you woke
3 up and saw Michael crying?

4 A. I believe so, yeah.

5 Q. And you said that you went up and got Chantal
6 when Michael was crying?

7 A. Yeah.

8 Q. Do you remember what her reaction was to
9 Michael crying?

10 A. I remember that we were both -- what's the
11 word. I mean, concerned, weirded out, you know. She
12 didn't know what to make of it either, you know.

13 Q. Do you remember if she said anything?

14 A. I don't remember.

15 Q. Can you turn to page 23 of Exhibit 573. At the
16 bottom of the page, the last paragraph, you say, "At one
17 point during the night, I was awoken by the sound of
18 crying. I looked to find that Michael was no longer in
19 the bed. I then realized that Michael was in a far dark
20 corner of his bedroom, sobbing." Do you see that?

21 A. Yep.

22 Q. Is this paragraph describing the incident that
23 you were just telling me about?

24 A. Yeah. Let me read it again to be sure. I just
25 want to see where it goes to make sure.

1 Q. Sure. So, you're looking on page 24 now?

2 A. Yeah.

3 Yes, this is the scenario that I was just --
4 this is about the scenario that I was just speaking of.

5 Q. And it says after that, "I don't believe
6 anything out of the 'ordinary' happened that night."

7 Is that consistent with your recollection?

8 A. Yeah, I don't really remember.

9 Q. On page 25, you just, you say, "My Mother,
10 Father, Sister, Grandmother and Grandfather were now
11 gone and it was just Michael, I and Neverland: 2,700
12 acres of impenetrable Michael Jackson country governed
13 by one man only, Michael Jackson." You see that?

14 A. I see that.

15 Q. Did you write that?

16 A. I believe so. That line speaks to my then
17 understanding when I wrote it, you know, so that's one
18 of the examples of my growing understanding of how this
19 all went down.

20 Q. Can you turn to page 26. The first paragraph
21 that's not in italics, you write, "Michael had already
22 become quite affectionate with me over the first two
23 days of our Neverland trip. I would curl up in his arms
24 to go to sleep. He would kiss me on my head and tell me
25 he loved me and I would tell him I loved him back; all

1 seemingly innocent at the time."

2 Am I correct in assuming that in that paragraph
3 you're describing your first trip to Neverland over that
4 weekend with your family?

5 A. Yes.

6 Q. You continue:

7 "Now that Michael and I were all alone, the
8 rest of my family far away in an RV at the Grand Canyon,
9 the nights became a very different experience. No
10 longer your 'average' kids sleepover."

11 "I believe the first night after my family had
12 left, Michael began to fondle my penis over the top of
13 my pajama pants."

14 Do you see that?

15 A. I see that.

16 Q. Did you write that?

17 A. I believe so.

18 MR. FINALDI: It's 1:15.

19 MS. KLEINDIENST: Okay, let's go off the
20 record.

21 THE VIDEOGRAPHER: The time is 1:15 p.m. and we
22 are off the record.

23 (The lunch recess was taken at 1:15 P.M.,
24 and the deposition reconvened at 2:24 PM.,
25 with all parties present as before.)

1 THE VIDEOGRAPHER: The time is 2:24 p.m. and we
2 are back on the record.

3 Q. BY MS. KLEINDIENST: Can you pull out Exhibit
4 573 again, which is the book.

5 A. Okay.

6 Q. And turn to page 35.

7 A. Do you want me to read it?

8 Q. So, looking at the second, or, the first full
9 paragraph, you say, or, you write:

10 "Think about how huge this level of unconscious
11 endorsement by my parents was of whatever was to go on
12 inside of that lion's den. A child's parents are a
13 child's gods. What they say is right, is right. What
14 they say is wrong, is wrong. Who they say to trust, the
15 child trusts.

16 "My Mother and Father unequivocally showed me,
17 by way of allowing me to sleep in his bed and by leaving
18 me alone with him for five days, that Michael Jackson
19 was a man to trust."

20 Do you see that?

21 A. I see that.

22 Q. Did you write that?

23 A. I believe so.

24 Q. Your mother and father made the decision to
25 allow you to sleep in Michael Jackson's bed; correct?

1 A. Yes.

2 Q. And your mother and father made the decision to
3 leave you alone with Michael Jackson for five days after
4 that first trip to Neverland; correct?

5 A. Yes.

6 Q. Can you turn to page 38. In the first full
7 paragraph at the top of the page you wrote, "My Mom
8 tells me that when we were on our way back to Australia,
9 my Dad said to her, 'We shouldn't tell anyone that Wade
10 was sleeping in Michael's room.'"

11 When did your mom tell you this story?

12 A. I don't remember exactly, but it would have
13 been very close to before writing this, you know, so,
14 which means I imagine somewhere in 2012, post
15 disclosing.

16 Q. Do you remember where you were when she told
17 you that story?

18 A. I don't.

19 Q. Did you ask her how she responded?

20 A. Sorry? Oh, to Dad saying that?

21 Q. To your dad.

22 A. I imagine so but I don't remember.

23 Q. Do you remember anything else about that
24 conversation?

25 A. No.

1 Q. Do you have any idea why your dad would have
2 said that?

3 MR. FINALDI: Calls for speculation.

4 Don't speculate, just say what you know.

5 THE WITNESS: Yeah, I don't know why. All I
6 could do is speculate and I won't, so.

7 Q. BY MS. KLEINDIENST: Turning to page 39.
8 There's a paragraph near the bottom of the page that
9 starts with "Cause = Happiness." Do you see that
10 paragraph?

11 A. Yeah.

12 Q. In the second sentence you say, "I now had a
13 major secret to bear and therefore was learning to
14 become a master of deception." Do you see that?

15 A. I don't. Sorry, where is that?

16 Q. It's the second sentence --

17 A. After that "Cause"?

18 Q. Yeah, it's that paragraph that starts "Cause =
19 Happiness."

20 A. Uh-huh.

21 Q. The second sentence.

22 A. Okay. Yes, I see that.

23 Q. When you say "a major secret to bear," you're
24 talking about Michael Jackson's sexual abuse of you?

25 A. "I now have a major secret to bear." Yes.

1 Q. You refer to yourself as "a master of
2 deception"; correct?

3 A. Here, yes, in the writing.

4 Q. Do you believe that you're a good liar?

5 A. I believe Michael Jackson taught me how to lie
6 really well about the abuse that I suffered at his
7 hands.

8 Q. And you did consistently, you're claiming now,
9 lie about the abuse from when it started when you were 7
10 years old until May 8th, 2012; correct?

11 A. Say that one more time.

12 Q. Sure. You consistently lied, it's your claim
13 now that you consistently lied about the abuse from the
14 time you were 7 until May 8th, 2012; correct?

15 A. Yeah. I told the story that Michael taught me
16 to tell until May 8th, 2012.

17 Q. And when people pressed you on that story or
18 asked you questions, you consistently said that Michael
19 had not abused you; correct?

20 A. Correct.

21 Q. And you denied specific aspects. For example,
22 do you remember your mother asking if you had ever
23 showered with Michael Jackson?

24 A. I don't remember.

25 Q. Do you remember people ever asking you specific

1 questions about whether certain factual things had
2 happened, for example, showering with him or whether he
3 had kissed you on the lips, anything like that?

4 A. I remember those sort of questions from, you
5 know, the official situations, meaning the, you know,
6 '93 deposition and the 2005 deposition, or, testimony.

7 Q. You don't remember your mother asking you any
8 of those types of questions, for example, around the
9 time that the Jordan Chandler allegations came out?

10 A. I don't remember her asking me any specific
11 questions in relation to details. I remember she asked
12 me if Michael ever did anything inappropriate, if
13 Michael ever did anything wrong to me, anything sexual
14 to me, but I don't remember any more detailed questions
15 beyond that.

16 Q. Do you deny that she did ask you those
17 questions or do you just not remember?

18 A. I don't remember.

19 Q. And certainly if she did ask you those
20 questions or if anyone asked you those specific
21 questions before May 8th, 2012, you would have denied
22 them; correct?

23 A. Yeah. I couldn't do anything else.

24 Q. And when you were testifying in the Jordan
25 Chandler case, you denied those types of, you denied

1 those types of allegations; correct?

2 A. Could you just clarify, what type of
3 allegations?

4 Q. Sure. Specific questions about particular
5 factual things that had occurred such as showering with
6 Michael Jackson or whether he kissed you on your lips,
7 that type of question.

8 A. I don't remember the specifics, you know. I
9 know I denied that he touched me sexually or
10 inappropriately or anything like that. I don't know if
11 I denied showering with him or anything like that.

12 Q. And it was your understanding that people
13 believed you. For example, during the 1993 or 1994
14 testimony that you gave in connection with the Jordan
15 Chandler case, was it your understanding that people
16 were believing what you were saying?

17 MR. FINALDI: Objection; vague and ambiguous,
18 calls for speculation, assumes facts not in evidence as
19 to "people," so.

20 THE WITNESS: Yeah, what people are you
21 referring to?

22 MS. KLEINDIENST: Like, for example, the
23 lawyers in the room.

24 MR. FINALDI: Calls for speculation. Which
25 lawyers, Mr. Weitzman?

1 THE WITNESS: Yeah, I don't, I don't know
2 whether they believed me or not.

3 Q. BY MS. KLEINDIENST: Have you had conversations
4 since then with your mother about whether they believed
5 you?

6 A. I don't recall.

7 Q. Can you turn to page 45. In the middle of the
8 page you write, "During these trips I was still wetting
9 the bed. When this would happen, Michael would wake up
10 while I was still sleeping, remove all of my wet
11 clothes, underwear and all, wipe me down with a towel,
12 put dry pajamas on me, lay a clean towel underneath me
13 and then go back to sleep. He told my Mother that he
14 would do this."

15 Do you see that?

16 A. I see that.

17 Q. Did you write that?

18 A. I believe so.

19 Q. When did your mother tell you that Michael had
20 told her that he would change you when you wet the bed?

21 A. I don't remember specifically. I mean, I
22 remember knowing that he did that then, I mean, when it
23 was happening, because, you know, the next morning I
24 would be changed, my clothing would be changed and, you
25 know, I don't know, maybe a towel next to me or a towel

1 under me, that sort of thing. So, I knew then myself
2 because I think he was doing it while I was still
3 asleep. But I knew that he had done something like that
4 then.

5 Q. And that wouldn't wake you up?

6 A. I don't remember waking up. I was always a
7 really heavy sleeper.

8 Q. But it's your understanding your mom knew that
9 he would do that as well; correct?

10 A. That's my understanding, yeah.

11 Q. And when did you reach that understanding?

12 A. I don't know.

13 Q. Was it before May 8th, 2012?

14 A. I don't know. Possibly, but I don't know.

15 Q. Have you talked to your mom about the fact that
16 she knew that Michael was undressing you?

17 A. Yes.

18 Q. What did you say to her?

19 A. I don't remember specifics. I remember it in
20 the sense of, you know, post disclosing in 2012 and
21 starting to process all of this stuff, that it naturally
22 for me brought up a lot of questions towards my mother
23 and, and resentment and anger towards my mother as to
24 why she didn't have seemingly more awareness about what
25 was going on or possibly going on or more concern. So,

1 I don't remember exactly when, but post 2012 and
2 disclosing, you know, beginning to ask my mom those sort
3 of questions, like, you know, how did you know that and
4 not think that was strange.

5 Q. And what did she say?

6 A. I can't remember exact words, but in general
7 that, you know, she was, she was so manipulated by him.
8 She believed that he was, you know, this person he
9 portrayed himself to be. This kind of perfect, angelic
10 figure that would never hurt a fly let alone children.
11 So, she was wrapped up unfortunately in that perspective
12 of him as was I, as were so many people.

13 Q. Are you familiar with someone named Victor
14 Gutierrez?

15 A. I believe so.

16 Q. Who is Victor Gutierrez?

17 A. I think he is maybe an author, a writer of some
18 sort.

19 Q. And are you aware that Mr. Gutierrez told your
20 mother that people had told him that Michael Jackson was
21 a pedophile and that you were one of the people that he
22 was abusing?

23 A. I don't remember that specifically. I remember
24 they had some interaction at some point and that he had,
25 you know, negative things to say about Michael in that

1 direction, like, as a pedophile or as an abuser. I
2 don't remember the exact specifics of what he said to
3 her.

4 Q. But you're aware that she spoke to him and that
5 he told her that Michael was a pedophile?

6 A. Yeah. Possibly something like that, yeah.

7 Q. And obviously you and your family were familiar
8 with the allegations in the Jordan Chandler case;
9 correct?

10 A. Correct.

11 MR. FINALDI: Calls for speculation. Hang on.
12 Calls for speculation, assumes facts not in evidence,
13 vague and ambiguous, and vague as to time.

14 Q. BY MS. KLEINDIENST: You were aware of the
15 allegations; correct?

16 MR. FINALDI: Same objections.

17 THE WITNESS: Can you clarify more, which
18 allegations and when?

19 Q. BY MS. KLEINDIENST: Sure. You were aware that
20 there were allegations by Jordan Chandler that he was
21 abused by Michael Jackson as a child in the early 1990s;
22 correct?

23 A. At some point in 1993, yeah, I became aware of
24 that.

25 Q. And your mother was also aware; correct?

1 A. Yes.

2 Q. In fact, you and your mother spoke to police
3 officers about the allegations; correct?

4 A. Yes.

5 Q. Did you speak to them -- did you and your
6 mother speak to police officers on more than one
7 occasion about the allegations?

8 A. I don't remember. I know it was at least once.

9 Q. And do you remember what they told you about
10 the allegations?

11 A. The basics I remember is that, that there, you
12 know, was a child that was accusing Michael Jackson of,
13 of molesting him. Yeah, that's all I remember as far as
14 details about the allegations.

15 Q. And you had heard about allegations made by
16 Blanca Francia; right?

17 A. I don't remember.

18 Q. Do you remember ever hearing in the news that
19 Blanca Francia had told or was saying that she had seen
20 you in the shower with Michael Jackson?

21 A. Yes.

22 Q. When do you remember seeing those allegations?

23 A. I don't remember specifically seeing them, but
24 I remember knowing of them at some point around the, the
25 2005 criminal trial.

1 Q. Do you remember knowing about them in the early
2 1990s?

3 A. I don't remember.

4 Q. Do you remember a period of time when your
5 mother disassociated from Michael or stopped him from
6 communicating with your family?

7 MR. FINALDI: Vague and ambiguous, calls for
8 speculation.

9 THE WITNESS: I have a vague memory, I don't
10 even know if I remember exactly why, but it was
11 something around the Pepsi commercial/Super Bowl, that
12 Michael performed in the Super Bowl, which I think was
13 around, like, I don't know, could be '92 or '93, maybe.
14 So I feel like there was something to do with how those
15 situations went down that my mother was upset about and
16 there was some distance for a period of time.

17 Q. BY MS. KLEINDIENST: Do you remember how long a
18 period of time?

19 A. I don't.

20 Q. Did you have any conversations with your mother
21 at that time about why she was disassociating or keeping
22 Michael away?

23 A. I don't, I don't remember specific
24 conversations with her.

25 Q. Have you had any conversations with her more

1 recently, like in the last few years, about that period
2 of time?

3 A. I don't remember. I may have but I don't
4 remember.

5 MS. KLEINDIENST: I'm going to ask the court
6 reporter to mark this as Exhibit 574.

7 (Deposition Exhibit No. 574
8 was marked for identification.)

9 THE WITNESS: You want me to read through it?

10 MS. KLEINDIENST: Sure.

11 (Witness peruses exhibit.)

12 THE WITNESS: Okay.

13 Q. BY MS. KLEINDIENST: Do you recognize this
14 document?

15 A. Yeah.

16 Q. What is it?

17 A. Some thoughts I wrote at some point, 2012.

18 Q. What type of software is this written in?

19 A. I believe this is in that Evernote note-taking
20 software.

21 Q. How frequently do you write this type of
22 personal thought in the last -- since, for example,
23 since March 8th, 2012, how frequently do you keep this
24 kind of journal or written record of your thoughts?

25 A. May 8th I think you mean.

1 Q. May 8th, 2012, yeah.

2 A. Not so much anymore. It was more frequent at
3 this point when this was written, which varied. I mean,
4 not a consistent rate but it could be between, you know,
5 once a week to once a month, some months, you know,
6 then. Now, it's pretty rare.

7 Q. Why did you stop?

8 A. I don't know. I mean, here I'm at the very
9 beginning of my processing and healing process, you
10 know. So, there was more of a rapid intensity as to
11 what was, you know, what issues and emotional issues
12 were coming up for me in relation to just beginning to,
13 you know, process all the abuse for the first time. So,
14 that's one reason that it was more frequent then.

15 Q. There are two dates on the top left. There's a
16 created date, I assume that's when you created this
17 document; is that correct?

18 A. I assume, too. I don't know.

19 Q. And then there's an updated date. Do you know
20 what that represents?

21 A. I don't. It might have, this might have been
22 a, I'm speculating but it might have been --

23 MR. FINALDI: Don't speculate.

24 THE WITNESS: Okay.

25 Q. BY MS. KLEINDIENST: Is this something that you

1 can see, you can see when you're writing it in Evernote,
2 these dates?

3 A. I believe so.

4 MS. KLEINDIENST: I'm going to ask the court
5 reporter to mark this as Exhibit 575.

6 (Deposition Exhibit No. 575
7 was marked for identification.)

8 Q. BY MS. KLEINDIENST: It looks like this is
9 another sort of -- I don't know what you want to call
10 it, journal entry or --

11 A. Just writing thoughts, yeah.

12 Q. So it looks like this is another example
13 similar to Exhibit 574 of you writing down your thoughts
14 in November of 2012; is that correct?

15 A. Well, first I see November 14th -- oh, you
16 didn't say a date, right, you just said November 2012?

17 Q. Yeah.

18 A. Yeah, let me take a look over it real quick.

19 (Witness peruses exhibit.)

20 Yeah, looks like a similar sort of thing,
21 writing my thoughts.

22 Q. The first thing you say is, "What is the point
23 of getting together with Mom tonight?" Do you see that?

24 A. Yeah.

25 Q. Do you remember meeting with your mom on

1 November 14th, 2012?

2 A. If it's -- I believe so, if it's the one I'm
3 thinking of. If it's the get-together I'm thinking of.

4 Q. Do you remember a get-together at a place
5 called Fire -- hold on. Firefly?

6 A. Yeah.

7 Q. Where is Firefly?

8 A. I believe it's in, like, Studio City, North
9 Hollywood, on Ventura.

10 Q. Is it a restaurant? Bar?

11 A. Yeah, restaurant/bar.

12 Q. What was the purpose of getting together with
13 your mom that night?

14 A. So, since I disclosed in May of 2012, as I
15 explained a little earlier, my relationship was already
16 complicated with her but it started going to a whole new
17 level of complication with beginning to deal with the
18 abuse for the first time and all this emotions that were
19 coming up towards her, anger, resentment. So, as well
20 as, you know, once my wife learned of the abuse post me
21 disclosing to my therapist in May, that, you know, she
22 became just livid at my mother that, you know, that she
23 didn't see something and didn't do something about it
24 and enabled this to happen.

25 So, my wife was not willing to see her at all

1 for at that point, you know, an indefinite amount of
2 time. We didn't know when that was going to end. I
3 believe it is still, you know, my wife was still not
4 seeing her at this point. So, the complication of our
5 emotional, my mother and I's emotional relationship at
6 that point, and just being estranged, I mean, I just
7 wasn't seeing her much.

8 And so, the point was for me to get together
9 with her and, you know, be really honest with her about,
10 one, all of the feelings that I was going through in
11 relation to processing the abuse to my feelings
12 specifically towards her, my anger, my resentment, my
13 questions, my confusion. Yeah, that was -- I was trying
14 to sort of, you know, really take a step for a
15 relationship, hopefully, but, yeah, just to be honest
16 with her about what I was going through.

17 Q. Did you blame your mother for the abuse?

18 A. Not solely but I wasn't through phases of, you
19 know, her, putting some of the blame on her for not
20 being more aware and enabling it to happen.

21 Q. Do you still blame her for the abuse?

22 A. You know, I understand now that just as much as
23 Michael groomed me from day one with his entire persona,
24 with his lifestyle, and with gifts and promises of all
25 we were going to do together and how we were going to

1 change the world together and all of that shit, just as,
2 yeah, gifts, all of that stuff, just as much as he
3 groomed me, he groomed my mother as well, and he groomed
4 my sister as well.

5 And what I mean by that is, he went out of his
6 way to create a separate relationship with my mother as
7 well, to -- you know, at times, I mean, it was kind of
8 back and forth. Sometimes he really treated her like
9 shit as well as far as hiding me from her and things
10 like that, but making her feel special, you know, making
11 her part of this lifestyle, sending her gifts, all of
12 that sort of stuff.

13 So, all that to say, understanding that she was
14 brainwashed and manipulated a different way, in some
15 different ways but just as much as I was, so I have more
16 of an understanding about that now as to how much she
17 missed or how much her awareness wasn't at a level that
18 I wish it was as a parent.

19 Q. You claim that the abuse happened within a
20 couple days of you getting to Neverland; correct?

21 A. Within a couple days.

22 MR. FINALDI: Vague and ambiguous as to
23 "abuse."

24 MS. KLEINDIENST: The first time.

25 MR. FINALDI: Still vague and ambiguous.

1 THE WITNESS: Yeah, so, we, yeah, we got there
2 on the weekend and, yeah, I believe it started within a
3 couple of days.

4 Q. BY MS. KLEINDIENST: So, by that point the
5 exposure that you and your family had had to Mr. Jackson
6 was couple hours in 1987 and then a couple days at
7 Neverland Ranch in early 1990; correct?

8 A. Right.

9 MS. KLEINDIENST: I'm going to ask the court
10 reporter to mark this as Exhibit 576.

11 (Deposition Exhibit No. 576

12 was marked for identification.)

13 (Witness peruses exhibit.)

14 Q. BY MS. KLEINDIENST: This appears to be another
15 example of your written thoughts in November of 2012;
16 correct?

17 A. Yes.

18 Q. And in this document you're describing a
19 meeting that you had with your mother at Firefly Bar?

20 A. Let me look it over real quick.

21 Yes, it appears so.

22 Q. In the previous exhibit, Exhibit 575, you
23 mentioned two affairs that your mom had with your dad.
24 Do you know when those happened or has your mother told
25 you when those happened?

1 A. Let me look over that.

2 Yeah, I -- yeah, as far as I can remember, you
3 know, and what I was told, I believe that one of them
4 was around when, at some point when my oldest brother
5 Shane was young. I don't know when the other one was.

6 Q. Turning back to Exhibit 576, in the third
7 paragraph you say, "I talked a lot more about the
8 effects of the sexual abuse. I talked about sexual
9 abuse facts in general. Statistics."

10 Where did the statistics come from that you
11 were telling her about?

12 A. I believe mostly from that, the Victims No
13 Longer book, which was recommended to me by my
14 therapist, Dr. Shaw.

15 Q. On the second page on the second paragraph --

16 A. Of 76?

17 Q. Yes.

18 -- you write, "I told her about how so much of
19 it happened right under her nose. How there were times
20 when all that lied between her and the truth was a thin
21 blanket." What are you talking about there?

22 A. The "thin blanket" reference, I don't know what
23 I'm talking about there. The first thing that comes to
24 mind when I say "how much of it happened right under her
25 nose," first thing that comes to mind is when Michael

1 was sexually abusing me in the living room of our
2 Hollywood apartment, Hollywood condo, on the futon
3 downstairs, and mother was upstairs in her bedroom.

4 Q. And that was the time that Michael stayed the
5 night with you?

6 A. Yeah. I believe he stayed a couple nights,
7 but, yeah.

8 Q. And did that happen once or more than once that
9 he stayed with you at the Hollywood condo?

10 A. I believe it was just one time.

11 Q. And your mom was there when he stayed, stayed
12 for a couple nights?

13 A. She was there in the condo, yeah.

14 Q. And your sister was there?

15 A. I believe so.

16 Q. Was anyone else there?

17 A. I don't think so.

18 Q. And do you remember when that happened?

19 A. I believe that was some point in around 1995.

20 Q. And you're not sure what you mean by "How there
21 were times when all that lied between her and the truth
22 was a thin blanket"?

23 A. No, unless that's referring to the same
24 scenario.

25 Q. Uh-huh.

1 A. Meaning, you know, that we had a blanket, that
2 Michael and I had a blanket on top of us when he was
3 abusing me in the Hollywood condo.

4 Q. But your mom wasn't physically present in the
5 room when Michael was abusing you; correct? At any
6 point?

7 A. She was very close to being, meaning that in
8 that same scenario when he was abusing me in the
9 Hollywood apartment, at some point middle of the night
10 while it was going on she started coming down the
11 stairs, I think for a glass of water or something like
12 that. You know, as soon as she sort of got down the
13 stairs a bit and Michael realized she was there, he
14 stopped and, you know, we both pretended we were asleep
15 until she went back upstairs.

16 Q. And it's my understanding that you don't
17 remember any occasion when Michael was abusing you and
18 somebody else was in the room; is that correct?

19 A. I don't recall that happening, no.

20 Q. The last paragraph on that second page you
21 wrote, "When we first got there I said that Firefly
22 reminded me of an excessive time. Mom said, 'I miss
23 it.' I said, 'I don't.' She said, 'She misses not
24 having to worry about finances.' I said, 'It was an
25 excessive time.' Not something I would ever want to be

1 a part of again." Do you see that?

2 A. Yep.

3 Q. What is the excessive time that you're talking
4 about?

5 A. I believe I'm talking about within the range
6 of, I don't know, me being maybe, like, 18 to 22 or 23,
7 in that range.

8 Q. And what was excessive about that time?

9 A. I had started making a lot of money from both,
10 mostly music, music, writing songs and producing songs.
11 Well, music and the stage production stuff, I was doing
12 the directing. So, yeah, just, you know, made a lot of
13 money and, you know, started living in a big house and
14 spending money.

15 Q. Why is that not something you would ever want
16 to be a part of again?

17 A. Because it felt at that time, you know, it
18 didn't bring me any sense of happiness, that
19 excessiveness and that money, you know. And I think,
20 yeah, so, it didn't seem like there was anything -
21 what's the word - really meaningful in that time and
22 living that way.

23 Q. That was when you were working in the
24 entertainment industry?

25 A. Yeah.

1 Q. Were there other things you didn't like about
2 the entertainment industry?

3 MR. FINALDI: Vague as to time.

4 THE WITNESS: Yeah, do you mean ever or during
5 that time period?

6 MS. KLEINDIENST: During that time period.

7 MR. FINALDI: 18 to 23 talking about, age 18 to
8 23?

9 Q. BY MS. KLEINDIENST: Let's go with age 18 til,
10 which is, what year is age 18?

11 A. What year was it for me?

12 Q. Yeah.

13 A. I believe it was, like, 2000. 2000 maybe,
14 2000, 2001.

15 Q. So, 2000 to 2009.

16 A. There's a lot of changes there, yeah, and I've
17 got to delineate between my perspective on it now, you
18 know what I mean, or my perspective on it then. Do you
19 mean specifically my perspective on what I felt about it
20 then, in the moment?

21 Q. Yes.

22 A. Okay. Yeah, I mean, as far as certain aspects
23 of the entertainment business, there were times when it
24 felt like, you know, anyone I ever talked to it was just
25 always about work, it was always about how I could, you

1 know, maybe get them a job or put them in one of my gigs
2 or just that it, you know, often felt like it was always
3 about surface stuff like that and it felt hard at times
4 to have real genuine human connections with people and
5 believe that it wasn't about, you know, getting
6 somewhere as far as career goes, them getting somewhere.

7 Q. Are you aware that your mother still goes by
8 "Joey"?

9 A. Yeah.

10 Q. Do you know how she got that nickname?

11 A. I don't. I don't recall.

12 Q. Are you aware that Michael Jackson gave her
13 that nickname?

14 A. I'm aware that he used to call her that. I
15 wasn't sure if he was the one that, you know, coined it.

16 (Ms. MacIsaac leaves the proceedings.)

17 Q. BY MS. KLEINDIENST: All right, we've talked
18 already a little bit about some of the specifics of the
19 abuse, but can you just sort of run down a list of the
20 different types of sexual acts that Michael engaged in
21 with you?

22 A. Yeah. So, there was him fondling, you know,
23 fondling my penis, my crotch, over, like, over pants,
24 over PJs, over underwear. Then there was him fondling
25 underneath pants and underwear, fondling my penis and

1 butt. There was, you know, and then, doing that same
2 thing while me being completely naked, him being
3 completely naked. There was him kissing me on the lips,
4 sort of, you know, French kissing like with tongue
5 inside of my mouth.

6 He used to have me squeeze his nipples because
7 he liked that. He would, you know, starting at,
8 starting at 7 and all the way through to 14, he would,
9 he would suck on my penis. Also the same time period,
10 from the beginning, from 7, he would have me suck on his
11 penis. He would put me, with him being naked and me
12 being naked, he would put me on top of him, you know,
13 like crotch to crotch, chest to chest, and sort of
14 gyrate on me.

15 He used to have me go to, like, the far corner
16 of the bed on, starting from 7, and naked, and get on
17 all fours, have me get on all fours, and he, and, you
18 know, have me bend over so he could look at my anus
19 while he would, like, back on the bed behind me and
20 masturbate until he came, until he ejaculated. While he
21 was doing that, while he was masturbating while looking
22 at my anus, every now and then he would sort of crawl
23 forward and stick his tongue in my anus. At one point
24 when I was 14 he tried to penetrate my anus with his
25 penis and he did a little bit and then it was, it was

1 too painful for me so he stopped.

2 Q. Anything else?

3 A. That's all I'm remembering at the moment.

4 Q. Can you tell me every location that you can
5 remember where Michael Jackson abused you?

6 A. Um, at Neverland, in his bedroom, both beds,
7 the downstairs bed and the upstairs bed, many many many
8 times in both. I remember that in the Jacuzzi at
9 Neverland there was fondling of my penis and kissing,
10 sticking his tongue down my throat. I remember in the,
11 one of the beds in the theatre at Neverland, the beds
12 that were, you know, behind the seats, being abuse that
13 went on there.

14 I remember there was some -- there was fondling
15 so many places but there was some fondling in the dance
16 studio at Neverland, fondling my penis over clothes, I
17 think. And then, let's see if there was anything else
18 at the ranch. I know there would be fondling and maybe
19 kissing sometimes while, like, he would take me on
20 these, at the ranch on these golf cart rides that would
21 go out kind of far into the property to show me, you
22 know, how much he owned and there would be fondling of
23 my penis and that sort of thing during those rides.

24 And then, the, the Hide-Out, the Westwood
25 condo, in the, in the bedroom absolutely. I think some

1 other places as well in the condo, maybe the closet.

2 Q. When you say "the Hide-Out" you're referring
3 specifically to the Westwood condo?

4 A. The Westwood condo, yeah.

5 And as well as the Century City condo that he
6 had for a while, abuse there.

7 Q. Do you remember when he got the Century City
8 condo?

9 A. I don't. Somewhere in the, somewhere in the
10 '90s. Early '90s maybe, early to mid-'90s, possibly.

11 There was abuse at my condo, our condo in
12 Hollywood. There was multiple abuse scenarios in cars
13 with him. I remember at one point, he had a white
14 Bronco early on in our relationship. There was also
15 times when he was being driven by Gary Hearne, was his
16 driver for a long time. At one point he had a large
17 sort of black van that was tricked out, you know. There
18 was definitely fondling and stuff that went on in there.

19 Q. You mentioned Gary Hearne being in at least one
20 of the car scenarios. Is that something he would be
21 able to see?

22 A. Possibly.

23 Q. But you're not sure?

24 A. I'm not sure.

25 Q. Was anyone present in the white Bronco?

1 A. I don't believe so.

2 Q. Was anyone present in the large black van?

3 A. Yeah, that would have been the one that Gary
4 was driving.

5 Q. Oh, okay.

6 A. There were other limo scenarios with Michael.

7 Q. Was anyone present in the limo?

8 A. No one beyond a driver. A driver was.

9 Q. Do you know who the driver was?

10 A. At some point it could have been Gary. I don't
11 know for sure. Could have been someone else.

12 Let me think. Neverland, Century City,
13 Hide-Out, my apartment, cars. Oh, the Universal Hilton
14 in Studio City. That's when he penetrated me with his
15 penis.

16 Q. Was that just one occasion at the Universal
17 Hilton?

18 A. Yeah, I believe it was a one- or two-night
19 stay.

20 Q. Anywhere else?

21 A. That's all I'm remembering at the moment.

22 Q. We've talked about this a little bit but you
23 testified at the 2005 criminal trial; correct?

24 A. Yes.

25 Q. And prior to testifying, did you have

1 conversations with Thomas Mesereau?

2 A. I remember having one very short conversation.

3 Q. Approximately how long?

4 A. Like, five to ten minutes.

5 Q. How long before your testimony was that
6 conversation?

7 A. Within a day or two before my testimony.

8 Q. And it's, well, do you recall being subpoenaed
9 for the criminal testimony in 2005?

10 A. I do.

11 Q. Do you recall where you were when you were
12 subpoenaed?

13 A. I don't.

14 Q. Do you recall if you were with anyone when you
15 were subpoenaed?

16 A. I don't remember how I got the subpoena.

17 Q. Sorry, we have to go off the record to change
18 the tape.

19 A. Okay.

20 THE VIDEOGRAPHER: This marks the end of DVD
21 number two in today's deposition. Time is 3:18 p.m. and
22 we are off the record.

23 (A recess was taken.)

24 THE VIDEOGRAPHER: This marks the beginning of
25 DVD number three. The time is 3:25 p.m. and we're back

1 on the record.

2 Q. BY MS. KLEINDIENST: Okay, we were talking
3 right before we went off the record about your testimony
4 at the criminal trial. Other than Tom Mesereau, did you
5 speak to anyone else prior to testifying at the criminal
6 trial?

7 MR. FINALDI: Vague and ambiguous as to
8 "criminal trial."

9 MS. KLEINDIENST: About your testimony.

10 MR. FINALDI: '05 you're talking about?

11 MS. KLEINDIENST: Yes.

12 THE WITNESS: I remember speaking to Scott
13 Ross, who was I believe an investigator of some sort.

14 Q. BY MS. KLEINDIENST: How many times did you
15 speak to Scott Ross?

16 A. Once, maybe twice.

17 Q. For how long?

18 A. I don't remember, but, you know, wouldn't have
19 been longer than 30 minutes, maybe.

20 Q. Per time or all together?

21 A. Yeah, I feel like maybe there was one
22 conversation that may have been in the 30-minute range,
23 and then, maybe one other shorter one.

24 Q. What did you talk about?

25 A. I don't remember any specifics. I mean,

1 obviously the subject matter was, was about the case,
2 but I don't remember.

3 Q. Anyone else that you spoke to about your
4 testimony before you testified at the 2005 criminal
5 trial?

6 A. Anyone else that I spoke to about my testimony?

7 Q. Right. Or the fact that you were going to
8 testify.

9 A. The fact that I was going to testify. I mean,
10 yeah, my wife would have known about it, we would have
11 talked about it. I imagine I talked to my mother about
12 it. My sister.

13 Q. Do you remember those conversations?

14 A. I don't, not specifically.

15 Q. Did you want to testify in the criminal trial?

16 A. I didn't want to, no.

17 Q. Did you tell anyone that you didn't want to
18 testify?

19 A. I told Michael that I didn't want to testify.

20 Q. And what did he say?

21 A. I just remember him listening to me. I
22 remember I was saying reasons along the lines of, you
23 know, when I went through all of this before in '93 it
24 was so intense with the media and everything and I'm
25 trying to start a new life, I'm about to get married,

1 and I just don't want to go through all this shit again.

2 I remember this juxtaposition with him where on
3 one side, you know, he would listen and he would act as
4 if he was compassionate to my reasons and yeah, yeah,
5 you know, I understand, like, I understand it's intense
6 and you don't want to go through that, but then he would
7 flip into the same role-playing stuff that he did with
8 me when I was 11, so, and the Jordan Chandler case was
9 going on.

10 Q. Like a question/answer?

11 A. Yeah. He would just kind of slip into this
12 whole role thing, and that would always be preceded, or,
13 at some point he would remind me or say, both times,
14 when I was 11 and this time when I was 22, that, you
15 know, that they're listening, whoever "they" is, you
16 know, the bad guys, the other side, your phones are
17 tapped, they're listening to us. He'd always remind me
18 of that and then would dip into -- essentially, I mean,
19 my perspective on it now is like a rehearsal for the
20 stand, you know, where he would say they're saying we
21 did all these disgusting things together.

22 Q. So this was part of your conversation -- I
23 really want to focus on the conversation when you were
24 22.

25 A. Yeah, I am.

1 Q. And this was part of your conversation. Where
2 were you having this conversation?

3 A. I believe, I mean, on the phone, but I believe
4 I was in, you know, my house in Tarzana. These were
5 many conversations, but.

6 Q. How many conversations?

7 A. It depends, yeah, if we get specific. Like, as
8 far as me telling him that I didn't want to testify?

9 Q. Yes, yes.

10 A. I think that was one time that I told him that,
11 you know.

12 Q. Was that before or after you were subpoenaed?

13 A. Before.

14 Q. And after you were subpoenaed did you tell him
15 again that you didn't want to testify?

16 A. No.

17 Q. Did you talk to him at all about the fact that
18 you were going to testify?

19 A. Absolutely.

20 Q. But you didn't tell him, "Hey, Michael, I
21 really don't want to do this"?

22 A. No. I figured once I was subpoenaed I had no
23 choice anymore.

24 Q. Did you talk to Thomas Mesereau about the fact
25 that you didn't want to testify?

1 A. No.

2 Q. Did you ever express any hesitation about
3 testifying or, you know, desire not to testify to Tom
4 Mesereau at all?

5 A. No.

6 Q. How about to Scott Ross?

7 A. Yeah, I believe I told Scott Ross that I didn't
8 want to testify.

9 Q. On one occasion or more than one occasion?

10 A. I don't remember. At least once.

11 Q. And how did he respond?

12 A. I don't remember.

13 Q. You knew what the allegations were in the 2005
14 criminal trial; correct?

15 MR. FINALDI: Assumes facts not in evidence.

16 THE WITNESS: At the time you mean, like,
17 during?

18 MS. KLEINDIENST: Yes.

19 THE WITNESS: Yeah, the extent of it was that I
20 knew that there was another boy who was accusing that
21 Michael Jackson had sexually abused him.

22 Q. BY MS. KLEINDIENST: Do you know what he was
23 specifically accusing Michael Jackson was?

24 A. Like, the details of abuse?

25 Q. Sure.

1 A. I don't remember now. I don't know if I knew
2 then. Maybe I did, I'm not sure.

3 Q. It was a pretty-well publicized trial; right?

4 A. Yeah.

5 Q. And did you read some of the publicity in the
6 news or did you avoid it completely?

7 A. I remember avoiding a decent amount of it
8 before I testified. And then, after I testified I think
9 I kept up with it a bit more, the media.

10 Q. When you were 22 you knew that sexually abusing
11 a child was a crime; correct?

12 MR. FINALDI: Calls for legal conclusion, calls
13 for speculation, assumes facts not in evidence.

14 THE WITNESS: When I was 22 I understood that,
15 that pedophiles, you know, got in trouble, went to jail
16 for sexually abusing children, yes.

17 Q. BY MS. KLEINDIENST: Why did you lie when you
18 testified in the 2005 criminal trial?

19 A. I was in the same state of mind that I was,
20 very similar state of mind that I was when I was 11. In
21 all of the fear and manipulation and brainwashing that
22 Michael started putting into me right away, I mean,
23 right away when the abuse started when I was 7, which
24 was, you know, that both of us, both, if anyone ever
25 found out what we were doing together, that both of our

1 lives would be over, that both of us would go to jail
2 for the rest of our lives, that our careers would be
3 over, that, you know, everything would be over. That,
4 that level of fear, rational or not, stayed with me and
5 was with me at, you know, when I was 22 and testifying
6 then. So, that, that, those specific fears were still
7 there.

8 There was also, there was also me protecting
9 him, protecting Michael. I still loved him and I
10 understood that if, you know, the D.A., whatever, if
11 these people, the jury, believed that Michael was a
12 sexual abuser and doing, you know, really bad things to
13 children, that he would go to jail for the rest of his
14 life. And I was trying to, one of the pieces was that I
15 was trying to protect him from that.

16 Q. In your independent mental evaluation you
17 stated that you did not believe anymore when you were 22
18 that you would go to jail if you testified that Michael
19 Jackson had abused you. Is that true?

20 A. Yeah, well, that's why I just said rational or
21 not. To expand upon that, logical or not. At a
22 psychological level, whether I was thinking -- I don't
23 remember thinking specifically or not specifically, you
24 know, if, if they find out or if they think that, that
25 the sexual, that Michael did the sexual stuff to me that

1 I would go to jail when I was 22, I don't remember
2 specifically thinking that or not.

3 But what I remember in hindsight now is, again,
4 that fear, not being rational or logical but that same
5 level of fear being there and that, as we've stated, I
6 never forgot what happened between Michael and I, the
7 abuse, but I did not have any understanding that it was
8 abuse, that he was, unfortunately, the horrible dude
9 that he was.

10 I could not -- again, this is me speaking in
11 hindsight, this is what I know now. I know now that I
12 could not accept that then. I know now that I could not
13 accept that then because if I was to, that the whole
14 story of my life and everything that is intertwined with
15 my story with Michael, the false story with Michael, my
16 career, everything, my family, the dynamics of my
17 family, us moving, was all so intertwined with my story
18 of Michael that if that would have broken down, my whole
19 life would have broken down.

20 And I know now that psychologically I wasn't
21 able to do that. I wasn't ready for that. I couldn't
22 accept that. So, I didn't understand it as abuse. I
23 didn't think I had any problem with what happened, with
24 what Michael Jackson did to me. I didn't think it
25 bothered me at all. I thought I was fine with it.

1 So, therefore, if I was fine with it and it
2 didn't bother me, but I had an understanding that if
3 other people were to find out about it, namely, you
4 know, official people, D.A., jury, and I had fears my
5 wife, my friends, my career, you know, people in my
6 career, that if they -- I still had that fear that if
7 they were to find out about it, that, you know,
8 everything in my life would fall apart. But I -- so, it
9 was like, it didn't bother me I thought, I had no
10 problem with it, so what was the point. That was how
11 compartmentalized my emotional perspective towards it
12 was for me.

13 MS. KLEINDIENST: I'm going to ask the court
14 reporter to mark this as Exhibit 577.

15 (Deposition Exhibit No. 577
16 was marked for identification.)

17 Q. BY MS. KLEINDIENST: This is a transcript of
18 your testimony from the 2005 criminal trial; correct?

19 A. It appears to be that way.

20 Q. I'm going to ask you to turn to page 9097. On
21 line 18 you were asked, "Mr. Robson, did Michael Jackson
22 ever molest you at any time?" Well, let me hold on for
23 a second. You understood when you were testifying in
24 the criminal trial you were testifying under oath and
25 under penalty of perjury; correct?

1 A. Yes.

2 Q. Okay. On line 18 you're asked, "Mr. Robson,
3 did Michael Jackson ever molest you at any time?" and
4 you said, "Absolutely not"; correct?

5 A. Correct.

6 Q. And that was a lie; right?

7 A. That was a lie, yeah.

8 Q. Okay. Will you circle your answer on line 20,
9 please.

10 MR. FINALDI: You don't have to circle
11 anything. Don't circle anything.

12 MS. KLEINDIENST: All right, I'll circle it.

13 Q. On line 21 you are asked, "Mr. Robson, did
14 Michael Jackson ever touch you in a sexual way?" and you
15 responded, "Never, no"; correct?

16 A. Correct.

17 Q. And that was a lie; correct?

18 A. That was what I had rehearsed with Michael.

19 Q. And you now claim that that was a lie; correct?

20 A. That was not the truth, yeah.

21 Q. On line 24 you were asked, "Mr. Robson, has Mr.
22 Jackson ever inappropriately touched any part of your
23 body at any time?"; correct?

24 A. Correct.

25 Q. And your answer was, "No"; correct?

1 A. Correct.

2 Q. And you now claim that that was a lie; correct?

3 A. That was not the truth.

4 Q. Can you turn to page 9100. On line 14 you were
5 asked, "And at no time has any sexual contact ever
6 occurred between you and Mr. Jackson, right?" Do you
7 see that?

8 A. Yes.

9 Q. And your answer was "Never"; correct?

10 A. Yes.

11 Q. And you now claim that that was a lie; correct?

12 A. That was not the truth.

13 Q. On line 17 you were asked, "Have you ever taken
14 a shower with Mr. Jackson?" and you responded, "No." Do
15 you see that?

16 A. 17?

17 Q. Yeah, starting on line 17.

18 A. I see that.

19 Q. Do you now claim that was a lie?

20 A. That was not the truth, yeah.

21 Q. Can you turn to page 9101. On line 7 you were
22 asked, "Did anything inappropriate ever happen in that
23 Jacuzzi?" Do you see that?

24 A. Yes.

25 Q. And your responses was "No"; correct?

1 A. Correct.

2 Q. And you now claim that that was a lie; correct?

3 A. That was not the truth, yeah.

4 Q. On line 10 you were asked, "Has anything
5 inappropriate ever happened in any shower with you and
6 Mr. Jackson?"; correct?

7 A. Correct.

8 Q. And you said, "No. Never been in a shower with
9 him." Do you see that?

10 A. I see that.

11 Q. You now claim that that was a lie; correct?

12 A. That wasn't the truth.

13 Q. On line 13 you were asked -- never mind. Go
14 down to line 22. You were asked, "Do you know whether
15 or not Blanca Francia ever was in a room when you were
16 with Mr. Jackson?" Was that true?

17 A. Yeah, I see that.

18 Q. Is that true that you said, "Not that I can
19 remember"?

20 MR. FINALDI: Is it true that he said that at
21 the time or was it true when he said it?

22 Q. BY MS. KLEINDIENST: Do you see that your
23 response was, "Not that I can remember"?

24 A. I see that.

25 Q. Is that true?

1 A. Is that true that I said that or is that true
2 that statement?

3 Q. Do you remember Blanca Francia ever being in
4 the room when you were with Mr. Jackson?

5 A. I don't remember, no. Very possible that she
6 was but I don't remember.

7 Q. Turn to 9104. On line 10 you were asked, "Mr.
8 Robson, has anyone told you what to say in this
9 courtroom today?" Do you see that?

10 A. Yes.

11 Q. And your responses was "No." Do you see that?

12 A. I see that.

13 Q. Do you now claim that's a lie?

14 A. That's not the truth.

15 Q. On line 13 you were asked, "Is everything
16 you've said the complete and honest truth?" Do you see
17 that?

18 A. Yes.

19 Q. And your response was "Yes"; right?

20 A. Yes.

21 Q. You now claim that was a lie; right?

22 A. Yeah, that was not the truth.

23 Q. On line 16 you were asked, "Did Mr. Jackson
24 ever do anything wrong with you?" Do you see that?

25 A. Yep.

1 Q. And your response is "No." Do you see that?

2 A. Yes.

3 Q. And you now claim that was a lie; correct?

4 A. That was not the truth.

5 Q. Can you turn to page 91, 9112. On line 20 you
6 were asked, "Was there ever an occasion where you were
7 on the dance floor with Mr. Jackson and he was showing
8 you a routine and he grabbed your crotch in a manner
9 similar to how he would grab his own crotch while doing
10 those performances?" Do you see that?

11 A. Yeah.

12 Q. And you testified, "No, that's not true." Do
13 you see that?

14 A. Yes.

15 Q. Is that true that he, that never happened?

16 A. That's not true that that never happened.

17 Q. So, your response at line 25, "No, that's not
18 true," was a lie?

19 A. That's not the truth, yeah.

20 Q. Can you turn to page 9116. At line 19 you're
21 asked, "What you're really telling us is nothing
22 happened while you were awake; isn't that true?" and you
23 testified, "I'm telling you that nothing ever happened."
24 You now claim that was a lie; correct?

25 A. That was not the truth. Anything in here that

1 says I wasn't sexually abused by Michael Jackson was not
2 the truth.

3 Q. Can you turn to page 9129. On line 5 you were
4 asked, "Mr. Jackson would periodically kiss you, would
5 he not?" and you said "No." Do you see that?

6 A. I see that.

7 Q. You now claim that's a lie; correct?

8 A. That's not the truth.

9 Q. On line 12 you were asked if Michael Jackson
10 would put his hands through your hair and your response
11 was "No." Do you see that?

12 A. Yeah.

13 Q. You now claim that was a lie; correct?

14 A. Put his hands through my hair. Yeah, that's
15 not the truth. My answer is not the truth.

16 Q. Line 16 you were asked, "Did he ever kiss you
17 on the cheek?" and you responded "Yeah." I assume
18 that's true?

19 A. Yes.

20 Q. Then you were asked at line 18, "Did he ever
21 kiss you on the lips?" and your response was "No." You
22 now claim that was a lie; correct?

23 A. That was not the truth.

24 Q. Can you turn to page 9130. On line 27 you were
25 asked if you remember the last time you slept in his bed

1 and you responded, "The last -- I think it might have
2 been when I was about 14. It was at a Sheraton Hotel in
3 Los Angeles." Do you see that?

4 A. I do.

5 Q. You now claim it was at the Hilton Hotel;
6 correct?

7 A. That's what I remember, the Hilton Hotel.

8 Q. Are you sure?

9 A. That's what I remember.

10 Q. Do you know why you said it was at the
11 Sheraton?

12 A. I think they're right next to each other, so, I
13 think I just got confused between which one it was. And
14 right now I remember that it was the glass, the tall
15 glass building, which I'm pretty sure is the Hilton.
16 Like, it's mostly all glass.

17 Q. If you look at the bottom of page 9131, at line
18 27 you were asked, "On the occasions that you stayed in
19 bed with Mr. Jackson, would you ever cuddle in bed?" and
20 your response at the top of page 9132 was "No." Do you
21 see that?

22 A. Yeah.

23 Q. You now claim that that was a lie; correct?

24 A. That is a lie.

25 Q. Then you were asked on line 2, "Would you lie

1 next to one another?" and you responded "No." You now
2 claim that that was a lie; correct?

3 A. I just see how well he trained me, how diligent
4 I was in this testimony, but that "Would you lie next to
5 one another?" my answer is not the truth in this
6 testimony.

7 Q. You were asked at line 4 "Would you touch?" and
8 you responded "No." You now claim that was a lie;
9 correct?

10 A. That's not the truth.

11 Q. Can you turn to page 9133. At line 4 you were
12 asked, "Did Mr. Jackson ever encourage you to dress like
13 him?" and you responded "No." Do you now claim that was
14 a lie?

15 A. That's not the truth. I remember, I remember a
16 story about that, about him encouraging me to dress like
17 him, that it was after, I don't know, maybe within a
18 year of the January 1990 meeting and coming back to
19 visit him. And I had, before that I always dressed like
20 him in general and when I was around him. And when I
21 came back to visit him this time, me and my mother, I
22 had gotten into some other hip hop stuff or whatever and
23 I was -- long story short, I wasn't dressed like him at
24 all.

25 And I remember him being really kind of awkward

1 and uncomfortable and cold towards the way I was
2 dressed. And that night we went to bed, and I'm sure
3 abuse happened, as it did every night we were together,
4 and the next morning I woke up and I remember this
5 feeling of just, like, you know, like I was in trouble
6 with him. So I pulled my sideburns back down from
7 behind me ear and got dressed in my Michael outfit.

8 Q. In your non-Vanilla Ice outfit?

9 A. Yeah, I think it was MC Hammer, but, yeah.

10 Q. Could you turn to page 9143, please. On line 2
11 you were asked, "Where else have you been with Mr.
12 Jackson?" and you said, "Like I said, we covered Las
13 Vegas. Westwood apartment, Century City apartment.
14 Sheraton Hotel. He came and stayed at my place once."
15 And you were asked, "Where was that?" You said, "That
16 was in Hollywood. It was -- my mother and I had a
17 condo, and my sister." On line 9 you were asked, "Did
18 you see Mr. Jackson do anything inappropriate at any of
19 these locations?" and your response was "No." You now
20 claim that was a lie; correct?

21 A. That's not the truth.

22 Q. On line 15 you were asked, "Did Mr. Jackson
23 ever touch you inappropriately in any of these
24 locations?" and your response was "No." You now claim
25 that was a lie; correct?

1 A. That was not the truth.

2 Q. Can you turn to page 9159. On line 11 you were
3 asked if you believe that Mr. Jackson didn't really have
4 a sexual interest and you responded on line 13, "I
5 believe that he has a sexual interest in women." Is
6 that true?

7 A. That I said that or that he has, that I
8 believed he had a sexual interest in women?

9 Q. That you believed he had a sexual interest in
10 women.

11 A. I don't know. I believe he possibly did as
12 well, but his main sexual interest was children.

13 Q. Do you think his main sexual interest was male
14 children?

15 A. I don't know for sure. I assume because that
16 was my experience and, you know, it was mostly other
17 boys that were around him. But I know that's not it,
18 though. I mean, maybe it was mainly, but I know it
19 wasn't only --

20 Q. Why do you know that?

21 A. -- boys.

22 From this other woman that's come forward.

23 Q. Do you know who that woman is?

24 A. I don't. I never knew her. I don't know her.
25 I've heard of her now.

1 Q. Have you spoken to her?

2 A. No.

3 Q. Did you say that you've never met her?

4 A. Never met her, not that I know of.

5 Q. But you know who it is?

6 A. I've heard that maybe her name is Susan.

7 That's the bulk of, you know, what I know of her, who
8 she is.

9 Q. Have you heard her last name?

10 A. No. I mean, maybe, but I don't remember it.

11 Q. Could you turn to page 9164. On line 1 you
12 were asked, "When you were a young child, did Michael
13 Jackson ever show you any sexually explicit material?"
14 and your response was "No." You now claim that was a
15 lie; correct?

16 A. That was not the truth.

17 Q. Can you turn to page 9167. On line 13 it says,
18 "When you were at Neverland, did you ever see anything
19 that suggested pedophilia?" and your response was "No."
20 Do you see that?

21 A. Yeah.

22 Q. Do you now claim that was a lie?

23 A. "Did you ever see anything that suggested
24 pedophilia?" Well, I mean, what I saw was Michael
25 Jackson sexually abusing me.

1 Q. Did you see anything else at Neverland that
2 suggested pedophilia?

3 A. Myself personally, it's hard to tell. I mean,
4 it's hard to say, meaning that if I would have seen some
5 of the things that I saw now as an adult, even if this,
6 even if the sexual abuse hadn't happened to me, I would,
7 I would be concerned about the things, all the pictures
8 of boys everywhere, some half naked, paintings of
9 half-naked boys. Did I -- and so, if I saw this stuff
10 now as an adult would I be worried about it and think
11 that it would suggest pedophilia, absolutely. As a
12 7-year-old, no. I didn't understand. I didn't equate
13 those things. I didn't have that perspective.

14 Q. Where were these paintings or pictures that
15 you're describing?

16 A. All through the house. I mean, as far as
17 paintings, multiple places. In Neverland there were
18 paintings that depicted Michael with children and so
19 there was tons of those to begin with, and then, some of
20 them would have, you know, young children with their PJs
21 kind of falling off a bit and it would expose their
22 buttocks or that sort of thing, or shirts off, or just
23 in underwear. Things like that.

24 Q. Was there any -- do you remember any pictures
25 that were up in Neverland that depicted genitalia?

1 A. That depicted genitalia. Pictures I don't
2 remember. I remember statues, tons of statues of boys
3 around and some of them, I believe some of them were
4 naked and you would see penis and butt and that sort of
5 thing.

6 Q. So, when you say the pictures of half-naked
7 boys, the ones you're referring to are like what you
8 just described where a part of the buttocks was showing,
9 something like that?

10 A. Yes.

11 Q. On line 23 you were asked, "Mr. Robson, when
12 did you first learn that Michael Jackson possessed
13 material of the nature that's before you right now?" and
14 I understand that's referring to pornography. Do you
15 see that?

16 A. Yeah, is it -- I don't know what it's referring
17 to. Is there anywhere to see what that's referring to?

18 Q. Well, to the extent you were being asked if you
19 were first learning at the criminal trial if Mr. Jackson
20 possessed pornography and --

21 A. So, if that is that moment, I remember during
22 the testimony that they put some pornography magazines
23 in front of me. If this is that moment, yes, I remember
24 that. Sorry, what are you asking me about this?

25 Q. So, you were asked when you first -- assuming

1 that this is referring to the pornography that you were
2 shown at the 2005 criminal trial, you were asked, "When
3 did you first learn that Michael Jackson possessed
4 material of the nature that's before you right now?" and
5 your response is, "Right now I did." Do you see that?

6 A. Yeah.

7 Q. With the assumptions I've given you, are you
8 now claiming that was a lie?

9 A. I don't know. That just feels weird, like,
10 that we're assuming what I'm speaking about there and
11 not knowing for sure. I mean, because I know they
12 showed me different things. They showed me explicit
13 pornography in a magazine form and then they also showed
14 me some books that were considered more, and I say this
15 in quotes, "art books," that weren't, you know, explicit
16 pornography but had boys in them that were maybe half
17 naked fishing, doing things like that. So those are two
18 different answers.

19 Q. Sure. Let me ask you these two questions.
20 First, I think this is already in the record, but you
21 knew prior to your testimony in the criminal trial in
22 2005 that Michael Jackson possessed pornography; is that
23 right?

24 A. Yes.

25 Q. And the second question: You remember being

1 shown certain materials when you testified in the
2 criminal trial; correct?

3 A. Yes.

4 Q. Had you -- when you looked at those materials,
5 were there any of those materials where you thought,
6 "Oh, I've seen this before"?

7 A. Yeah. All of it.

8 Q. So, you had seen --

9 A. I mean, I don't know about, like, exactly that
10 magazine or exactly that book.

11 Q. Uh-huh.

12 A. But that type of thing, that type of material I
13 had seen before. Michael showed it to me when I was a
14 young boy.

15 Q. Can you turn to page 9168. On line 5 you were
16 asked, "And you had never, ever known that Mr. Jackson
17 collected sexually explicit material?" and your response
18 was "No." You now claim that was a lie; correct?

19 A. That's not the truth.

20 Q. You were asked, "This is something new that
21 you're learning just today; is that right?" and you said
22 "Yes." You now claim that was a lie; correct?

23 A. That's not the truth.

24 Q. Since you testified at the criminal trial in
25 2005, have you ever attempted to reach out to Gavin

1 Arvizo or his family?

2 A. No. Not that I recall, no.

3 Q. When you testified at the criminal trial in
4 2005, did you feel a sense of shame of what had happened
5 between you and Michael?

6 A. No. I didn't, I didn't have any, as I stated,
7 I didn't have any perspective on it. I didn't forget
8 about it, but I didn't think about it. I, I just didn't
9 let myself think about it. So, I know, and I may have
10 said this before somewhere else, and it may have been
11 misconstrued, I know now and I know post disclosing in
12 2012 and beginning that process of reprocessing and
13 understanding, I know now that I had, that I was dealing
14 with shame then, but I did not know that at the time. I
15 did not understand that at the time.

16 Q. Were you ever worried about disclosing the fact
17 that you had been abused because you thought that
18 everyone was going to think that you were wrong or
19 disgusting or gay?

20 MR. FINALDI: Assumes facts not in evidence.

21 THE WITNESS: I didn't know that at the time.
22 I didn't know that at any, at any time until post May
23 2012. I began then, May 2012, to understand that so
24 many of my symptoms of fear and anxiety in social
25 scenarios, in almost any scenario, related to this sort

1 of unconscious, subconscious, shame and guilt. But I
2 never understood that before May 2012 that that's what I
3 was feeling.

4 Q. BY MS. KLEINDIENST: You didn't have conscious
5 feelings of shame or guilt?

6 MR. FINALDI: Asked and answered,
7 argumentative. He's already answered that.

8 MS. KLEINDIENST: I'm just clarifying.

9 MR. FINALDI: You're not clarifying, it's the
10 same question.

11 THE WITNESS: I had feelings of shame and guilt
12 but I never related them, I never understood that they
13 had anything, any connection to, had anything to do with
14 the abuse. I thought that they were just always
15 connected to work life or just general social anxieties
16 or stuff within my family, but I never understood until
17 post 2012 why I had that, those feelings of shame and
18 guilt, which was relating to the abuse.

19 Q. BY MS. KLEINDIENST: Do you have any knowledge
20 of other people who claim they were abused by Michael
21 Jackson?

22 A. That's a pretty broad question. Like, do I
23 have knowledge of other people who have, is that the
24 question, who have claimed that they were sexually
25 abused by Michael Jackson?

1 Q. Sure. Let's start there.

2 A. The ones I know of that have, you know,
3 publicly claimed that are Jordan Chandler, Gavin Arvizo,
4 Blanca's son, I'm blanking on his name right now,
5 Blanca's son. James Safechuck. This other woman,
6 Susan. Those are the ones I'm remembering right now.

7 Q. When was the last time that you spoke to Jordan
8 Chandler?

9 A. It would have been somewhere in early, I
10 believe early 2003, before the, before the allegations,
11 before the accusations were made against Michael, before
12 his accusations.

13 MR. FINALDI: Did you say 2003?

14 THE WITNESS: Is that what I said? I meant
15 1993.

16 Q. BY MS. KLEINDIENST: So, just to clarify for
17 the record, you haven't spoken to him since before he
18 made the allegations?

19 A. Correct.

20 Q. Have you ever spoken to Gavin Arvizo?

21 A. I don't believe so.

22 Q. Have you ever spoken to Jason Francia?

23 A. I believe we may have had some quick
24 encounters. I mean, we definitely had encounters, but
25 quick communications when I was, you know, I don't know

1 the exact dates, when I was real young, somewhere in the
2 age range of, like, 9 to 11 or -- nothing, nothing
3 substantial as far as communication. And then, post
4 that, the only other time I saw him was when he was
5 deposed for this case. I was at the deposition.

6 Q. When was the last time you spoke to James
7 Safechuck?

8 A. I believe the last time we spoke would have
9 been sometime in early 2014.

10 Q. What did you talk about?

11 MR. FINALDI: Hang on. Object to the extent it
12 calls for attorney/client communications.

13 So if this was a conversation with attorneys
14 there, I'm going to instruct you not to answer.

15 Q. BY MS. KLEINDIENST: Did you have a
16 conversation without an attorney present with Mr.
17 Safechuck in 2014?

18 A. No.

19 Q. Prior to 2014, when was the next last time you
20 spoke to James Safechuck?

21 A. I believe I would have been 14 or 15 years old
22 and there was a, a weekend at the ranch that was
23 organized by Evvy Tavasci, and it was Michael, myself,
24 James Safechuck, there was another young man who was, I
25 don't remember his name but he was a burn victim that

1 Michael, you know, befriended at some point, and Robert
2 Weiss who was a film director.

3 And the purpose of the trip, of the weekend
4 trip, was to spend time -- both James and I and I guess
5 this other guy were interested in filmmaking, as was
6 Michael, and so spent the weekend having talks with
7 Robert Weiss.

8 Q. You said you were 14 or 15 at that time. Do
9 you remember if this was after the incident at either
10 the Hilton or the Sheraton when you were 14?

11 A. I'm not sure.

12 When you get a chance, too, I remember some
13 other locations that abuse went down.

14 Q. Sure. We can do that now.

15 A. We went on a trip to, my mother, myself and
16 Michael, went on a trip on Las Vegas.

17 Q. Is that the Mirage Hotel?

18 A. Yeah. Which was either in, I think it was in
19 1990. 1990 or '91. And I think we stayed for about a
20 week, and, at the Mirage Hotel, and Michael had, you
21 know, massive suite. I believe there was multiple
22 bedrooms. I stayed in the bedroom with Michael, in
23 Michael's bedroom, and my mother stayed in a different
24 bedroom, and abuses went on every night that we were
25 there.

1 Q. And your mother was there the whole trip?

2 A. There in Vegas, yeah.

3 Q. And there in the general suite?

4 A. Yeah.

5 Q. Any other locations?

6 A. In, in a shower at Neverland, we often took
7 showers together, and there would be fondling and
8 kissing that he would do that would go on in there.

9 And then, also at Record One, I believe it was
10 Record One, I know it was a recording studio, I think it
11 was Record One, but, yeah, you know, he had, like, a
12 little green room, like, his own room that he would, you
13 know, he had for him when he was not in the studio booth
14 recording. So, I remember going there a couple times
15 and, and so he was working and I would stay in his sort
16 of green room while he was in the, you know, recording
17 booth or whatever, and then he would come back into the
18 green room and abuse would go on there.

19 Q. Was that on one occasion or multiple occasions?

20 A. I'd say in the range of, like, one to three
21 occasions.

22 Q. And can you recall if anyone else was present
23 at Record One?

24 A. Oh, yeah. I mean, I don't know who they were,
25 but there was, it was, you know, a, a stocked recording

1 studio with studio engineers and assistants and that
2 sort of thing.

3 Q. Do you remember if anyone from your family was
4 there?

5 A. I don't believe so.

6 Q. Do you remember the first time you went to
7 Record One and abuse occurred?

8 A. You know, I believe it would have been within
9 those two trips that we took, in between the first trip,
10 you know, there was the January, I believe, 1990 trip
11 when we first met again and the abuse first started on
12 that trip, and then there was two trips, I believe,
13 after that, before we moved to America, to L.A. So, I
14 believe it was within those two trips, in the middle.

15 Q. And your mom was on both of those trips; right?

16 A. Yes.

17 Q. Do you remember if Chantal went on either of
18 those trips?

19 A. I don't believe so.

20 Q. Can you --

21 A. There's more locations.

22 Q. Okay, go back to -- what other locations?

23 A. There were multiple times when we were onset
24 together of work projects he was doing. One I believe
25 was the Pepsi commercial where I played him as a child.

1 And there was abuse that went on in his trailer. And
2 that was, I remember, Wayne Nagin, I guess how you say
3 his last name, Nagin or Nagin, the bodyguard, longtime
4 bodyguard.

5 Q. Do you know how it's spelled?

6 A. I think it's N-a-g-i-n.

7 Q. The first name was Wayne?

8 A. Wayne, yeah. I know he was around as the
9 bodyguard then.

10 Q. When you -- hold on. Sorry, I got a little
11 distracted. Where were you, that was onset?

12 A. Yeah, the set of the Pepsi commercial where I
13 played him as a kid.

14 Q. Okay. And was anyone else in your immediate
15 vicinity? I mean, do you think that there was someone
16 that was at the Pepsi commercial that witnessed abuse?

17 A. It's possible. I mean, I know he was, his
18 trailer was surrounded by his people, by bodyguards, I
19 believe his manager that I think was possibly Sandy
20 Gallin, was around at the time.

21 Q. When you say "it's possible," are you actually
22 aware of anyone who did witness the abuse?

23 A. No, I'm not.

24 Q. Were there any, other than the Pepsi
25 commercial, were there any other set locations where

1 abuse occurred?

2 A. That's the one I remember.

3 Q. Any other locations? I mean, if you remember
4 more later you can let me know.

5 A. Yeah, okay.

6 Q. Do you remember the last time you saw Michael
7 Jackson before he died?

8 A. I believe the last time was in Las Vegas, and
9 my wife and I went to visit him and the kids at the
10 house that he was living in Las Vegas, which would have
11 been, I believe, some point in 2008.

12 Q. And what happened? What were you going to see
13 him for?

14 A. So, I was in Vegas working, I was
15 choreographing a Cirque Du Soleil show, and he was
16 living there at the time. We were talking on text a
17 lot, which was a very new -- he never really had phones
18 or any -- like, wasn't able to communicate in that way,
19 that was a new thing, a new way for us to communicate.
20 So, we were just talking about catching up, seeing each
21 other.

22 And one of them -- there was a couple really
23 weird circumstances and details about that meeting. I
24 remember I had this idea that I really wanted it to be
25 super regular, meaning, I wanted it to be, like, you

1 know, super casual barbecue scenario without chefs and
2 without, you know, Michael's people around and all that
3 shit.

4 So, I remember talking about that saying, yeah,
5 let us just bring some food, and Michael being really --
6 he just kept asking me to make sure I bring alcohol,
7 which was also a really new, as far as to me, like, for
8 him to talk about that and want that. And he was really
9 kind of strange about it where, as it was getting
10 closer, as we were supposed to meet, he just kept kind
11 of telling me, "Make sure. You're going to bring
12 alcohol; right? You're going to bring alcohol; right?"
13 "Yeah, I'm going to bring alcohol." Really sort of
14 anxious about it.

15 We did, we brought some bottles and wine. And
16 we got there, my wife and I showed up with groceries to
17 barbecue, and he wanted to know where the wine was right
18 away and grabbed one of those, like, big red plastic
19 cups and just filled it to the top with white wine, I
20 believe, and was just downing it and didn't stop the
21 whole time we were there. And we -- there was still
22 kind of food that was prepared. We, like, watched some
23 Disney movie with him and the kids.

24 I remember feeling, it feeling, yeah, it was
25 just, it was strange. It was awkward. And then at some

1 point he disappeared as if, like, he just went up the
2 stairs for a moment and he never came back. Then it was
3 just me and my wife and the kids sort of playing video
4 games. And it was getting late and we were just sort of
5 asking the kids, like, "You guys all right?" like, "Can
6 we go?" I mean, "I don't know where, where your dad
7 is." And they're, like, "Yeah, this is fine," like it
8 happens all the time.

9 So then, you know, he just never resurfaced and
10 then I just left. And then I remember him the next day
11 being sort of, you know, shame about that and
12 apologizing and, I don't know, saying he passed out or
13 something. Yeah, that was it.

14 Q. Doesn't sound like a very positive memory; is
15 that fair?

16 A. It was strange, you know. It was, yeah,
17 awkwardness and it was strange, you know. It wasn't
18 like there was negativity that went on between us, it
19 was still nice and, you know, we laughed and things like
20 that, but it was, it was definitely awkward, strange.

21 MS. KLEINDIENST: I'm going to ask the court
22 reporter to mark this as Exhibit 578.

23 (Deposition Exhibit No. 578
24 was marked for identification.)

25 (Witness peruses exhibit.)

1 THE WITNESS: Okay.

2 Q. BY MS. KLEINDIENST: This is an e-mail from you
3 to Kenny Ortega on April 8th, 2009; correct?

4 A. Yes.

5 Q. And in the e-mail you say, "Heard you're doing
6 MJ's show." Do you see that?

7 A. Yes.

8 Q. And I think by that you're referring to This Is
9 It?

10 A. I believe so.

11 Q. Do you remember when you found out that Michael
12 Jackson had passed away?

13 A. Yeah.

14 Q. Where were you?

15 A. I believe I was in our condo in Santa Monica,
16 yeah.

17 Q. Was anyone else there?

18 A. I think my wife was there. I'm not sure.

19 Q. Do you know the date that he passed away?

20 A. June 25th, I believe, 2009.

21 MS. KLEINDIENST: I'm going to ask the court
22 reporter to mark this as Exhibit 579.

23 (Deposition Exhibit No. 579

24 was marked for identification.)

25 (Witness peruses exhibit.)

1 THE WITNESS: Okay.

2 Q. BY MS. KLEINDIENST: This is an e-mail that you
3 sent to Julie McDonald, Tony Selznick, Bobbi Thompson
4 and Todd Harris; correct?

5 A. Yes.

6 Q. Who is Julie McDonald?

7 A. Julie McDonald was my choreography and stage
8 director agent.

9 Q. Who is Tony Selznick?

10 A. Same.

11 Q. How about Bobbi Thompson?

12 A. Bobbi Thompson was my manager, mostly focused
13 on film directing.

14 Q. And who is Todd Harris?

15 A. Todd Harris was my film directing agent at the
16 time.

17 Q. This is a statement that you wrote within a day
18 of Michael Jackson passing away; correct?

19 A. Looks that way.

20 Q. Did anyone ask you to write this statement?

21 A. Yes.

22 Q. Who asked you to write this statement?

23 A. All of those people on the e-mail. I remember
24 soon after it happened, soon after he died, that, you
25 know, there was all sorts of requests coming through

1 from media, them wanting to talk to me, and I didn't
2 want to talk to anyone. I didn't want to do any
3 interviews of any kind. And I was really just kind
4 of -- and it was, you know, they were coming through
5 Julie, Tony, Bobbi, these people.

6 And I was just trying to push everyone off to
7 get off my back and leave me alone but they were just
8 really persistent, like, "If you're not going to do an
9 interview you've got to do something, you've got to do a
10 statement or something." So, so I gave into that and I
11 wrote this.

12 Q. Are you saying that you didn't want to write a
13 statement?

14 A. No, I didn't. I wasn't ready to. I mean, I
15 was so -- I was confused. That's really the best word
16 to describe it at the time. I didn't know how to feel.

17 MR. FINALDI: Take a quick break?

18 MS. KLEINDIENST: Sure. Let's go off the
19 record.

20 THE VIDEOGRAPHER: The time is 4:28 p.m. and
21 we're off the record.

22 (A recess was taken.)

23 THE VIDEOGRAPHER: The time is 4:34 p.m. and
24 we're back on the record.

25 Q. BY MS. KLEINDIENST: We were looking at Exhibit

1 579. The statement that you wrote was, "Michael Jackson
2 changed the world and more personally, my life forever.
3 He is the reason I dance, the reason I make music, and
4 one of the main reasons I believe in the pure goodness
5 of human kind. He has been a close friend of mine for
6 20 years. His music, his movement, his personal words
7 of inspiration and encouragement and his unconditional
8 love will live inside of me forever. I will miss him
9 immeasurably, but I know that he is now at peace and
10 enchanting the heavens with a melody and a moonwalk. I
11 love you Michael." Is that right?

12 A. That's what I wrote, yeah.

13 MS. KLEINDIENST: I'll ask the court reporter
14 to mark this as Exhibit 580.

15 (Deposition Exhibit No. 580
16 was marked for identification.)

17 (Witness peruses exhibit.)

18 THE WITNESS: Okay.

19 Q. BY MS. KLEINDIENST: This is an e-mail that you
20 wrote to Jeff Thacker on June 26, 2009; correct?

21 A. Yeah.

22 Q. And you mention "show." Is the show that
23 you're referring to in the last, second-to-last
24 sentence, or, second-to-last line, you said, "I wanted
25 to write you now so if you guys are thinking of doing

1 any dance tribute to MJ on the show, I would like it to
2 be me who does it." Do you see that?

3 A. Yeah.

4 Q. Is the show So You Think You Can Dance?

5 A. Yeah, I believe so.

6 Q. Is Jeff Thacker associated with So You Think
7 You Can Dance?

8 A. Yeah, he's a producer.

9 It speaks to my compartmentalization at the
10 time.

11 MS. KLEINDIENST: I'm going to ask the court
12 reporter to mark this as Exhibit 581.

13 (Deposition Exhibit No. 581
14 was marked for identification.)

15 Q. BY MS. KLEINDIENST: By the way, before we get
16 to that, did you have some sort of involvement with So
17 You Think You Can Dance in June of 2009?

18 A. In June of 2009. Yeah, I believe I was doing
19 some choreographing some numbers for them then.

20 Q. On an ongoing sort of basis or --

21 A. Yeah. I mean, yeah, I, my involvement with
22 them goes back to, I believe, 2006 choreographing for
23 them, but, yeah, at that time I was doing some for that
24 season, you know.

25 Q. Okay. So, turning to Exhibit 581. This is an

1 e-mail that you sent to yourself on June 28th, 2009;
2 correct?

3 A. (Witness peruses exhibit.)

4 Looks that way.

5 Q. And the subject line is "Texts from Mj. Part
6 1"?

7 A. Yes.

8 Q. "Mj" I assume is Michael Jackson?

9 A. I believe so.

10 Q. And is it your understanding that these are
11 text messages that Michael Jackson had sent to you and
12 the corresponding dates?

13 A. Let me look over real quick.

14 Yes, I believe these are text messages from
15 Michael to me.

16 Q. It says "Part 1." Do you know if there was a
17 Part 2 or 3?

18 A. I don't know. I'm not sure. It's the same
19 kind of speech.

20 Q. Why did you e-mail these text messages to
21 yourself on June 28th, 2009?

22 A. I think so, like, not knowing that they would
23 stay, you know, on my cell phone so just, like, as
24 making sure I still had a copy of them.

25 MS. KLEINDIENST: Going to ask the court

1 reporter to mark this as Exhibit 582.

2 (Deposition Exhibit No. 582
3 was marked for identification.)

4 Q. BY MS. KLEINDIENST: This appears to be an
5 e-mail from you to kpoon@dancemedia.com on June 29th,
6 2009. Do you see that?

7 A. Yeah.

8 Q. Do you know someone named Kpoon?

9 A. Kpoon. I don't, I don't know. I don't recall.

10 Q. Do you know what dancemedia.com is?

11 A. I may have heard of it but I don't know what it
12 is.

13 Q. Do you know where you got this e-mail address,
14 kpoon@dancemedia.com?

15 A. I don't remember sending this e-mail.

16 MS. KLEINDIENST: I'll ask the court reporter
17 to mark this as Exhibit 583.

18 (Deposition Exhibit No. 583
19 was marked for identification.)

20 THE WITNESS: You want me to read this through?

21 Q. BY MS. KLEINDIENST: That's all right. This is
22 an e-mail that you sent to Jeff Thacker, a copy to
23 Ashley Landers, on June 29th, 2009; correct?

24 A. Yeah.

25 Q. And who is Ashley Landers?

1 A. She was an associate producer maybe on So You
2 Think You Can Dance.

3 Q. You're looking at the second page. Do you
4 remember or do you know if you were the author of that
5 document which is attached to the e-mail?

6 A. I believe so.

7 MS. KLEINDIENST: I'm going to ask the court
8 reporter to mark this as Exhibit 584.

9 (Deposition Exhibit No. 584

10 was marked for identification.)

11 (Witness peruses exhibit.)

12 THE WITNESS: Okay.

13 Q. BY MS. KLEINDIENST: This is an e-mail exchange
14 and the last e-mail in time at the top of the page is
15 from you to your brother Shane on July 5th, 2009;
16 correct?

17 A. Yes.

18 Q. And this is an e-mail exchange related to the
19 memorial service at the Staple Center?

20 A. I believe so.

21 Q. Did you attend the memorial service for Michael
22 Jackson at the Staple Center?

23 A. Yeah.

24 Q. And did your family members who are listed
25 under "THE ROBSON FAMILY" in the middle of the page also

1 attend the memorial service at the Staple Center?

2 A. Yeah, I believe they all did.

3 Q. Is there anyone from your family who is not
4 listed here who also attended?

5 A. No. I don't think so.

6 Q. Did you cry at the memorial service at the
7 Staple Center?

8 A. I might have. I don't remember for sure.

9 Q. Do you remember who you were sitting next to?

10 A. I imagine my wife, but I don't remember for
11 sure.

12 Q. How about on the other side, anyone else?

13 A. I don't remember.

14 Q. Were you aware that there was another private
15 service for Michael Jackson?

16 A. Yeah, I became aware of that at some point.

17 Q. Do you remember when you became aware of that?

18 A. I don't remember when. Yeah, I don't know.

19 Q. Do you remember how you became aware of the
20 private service?

21 A. I remember one of the ways I learned about it
22 was a friend of mine was one of the dancers in the This
23 Is It show and they were going to be a part of it, like,
24 being ushers or something like that.

25 Q. Which friend?

1 A. Charles Klapow. So, I don't know if he was,
2 you know, the first way that I learned about it, I'm not
3 sure, but I know I learned some details about it from
4 him.

5 Q. Were you upset that -- well, strike that.
6 Were you invited to the private memorial?

7 A. I don't believe so.

8 Q. Were you upset that you were not invited to the
9 private memorial?

10 A. Yeah, I was hurt.

11 Q. Why?

12 A. Because at that point, you know, I still
13 thought that we were, that Michael and I were, you know,
14 were close friends for a very long time, had a long
15 relationship, that, you know, that I would have been
16 included in something like that.

17 MS. KLEINDIENST: I'm going to ask the court
18 reporter to mark this as Exhibit 585.

19 (Deposition Exhibit No. 585
20 was marked for identification.)

21 MS. KLEINDIENST: This is an e-mail from you to
22 Kenny Ortega on July 21st, 2009; correct?

23 A. July 21st, 2009, yep.

24 Q. And you say to Kenny Ortega, "I know that you
25 are working on how to bring Michael's last vision to

1 life in new form." What are you talking about there?

2 A. I don't remember. There was maybe some talks
3 about there being, like, them doing some version of the
4 show that they were going to do with Michael, obviously
5 now without him. Possibly what that was about.

6 Q. Do you know whether Kenny Ortega was involved
7 in the production or creation of the video This Is It
8 after Michael passed away?

9 A. The film?

10 Q. Right.

11 A. Yeah, I know that he was involved in that.

12 Q. Do you think that's what you're referring to or
13 was it something else?

14 MR. FINALDI: Calls for speculation.

15 THE WITNESS: Yeah, I don't know. It would be
16 as I answered before.

17 MS. KLEINDIENST: I'm going to ask the court
18 reporter to mark this as Exhibit 586.

19 (Deposition Exhibit No. 586
20 was marked for identification.)

21 (Witness peruses exhibit.)

22 THE WITNESS: Okay.

23 Q. BY MS. KLEINDIENST: This is an e-mail from you
24 to Lisa Coppola, copying a number of people, on August
25 24th, 2009; correct?

1 A. Correct.

2 Q. Do you know what this e-mail, the subject
3 matter of this e-mail is?

4 A. I believe it's referring to Janet Jackson's
5 performance on the VMA's in '99. '99, sorry, in 2009.
6 Yeah, where she wanted to have a bunch of us well-known
7 choreographers perform with her as a Janet tribute to
8 Michael.

9 Q. Did you perform in that tribute?

10 A. Yeah.

11 MS. KLEINDIENST: I'll ask the court reporter
12 to mark this as Exhibit 587.

13 (Deposition Exhibit No. 587
14 was marked for identification.)

15 (Witness peruses exhibit.)

16 THE WITNESS: Okay.

17 Q. BY MS. KLEINDIENST: This is an e-mail from you
18 to your mother on September 11, 2009; correct?

19 A. Correct.

20 Q. And you refer to, or, you say, "I want to wear
21 MJ's Bad Gloves that you have on the red carpet for
22 VMA's." Is that referring to the same Janet Jackson VMA
23 tribute that Exhibit 586 refers to?

24 A. I believe so, yeah.

25 Q. Who is Brian?

1 A. Brian is another choreographer who was
2 performing in it as well.

3 Q. Coming from L.A.?

4 A. Yeah.

5 MS. KLEINDIENST: I'll ask the court reporter
6 to mark this as Exhibit 588.

7 (Deposition Exhibit No. 588
8 was marked for identification.)

9 (Witness peruses exhibit.)

10 Q. BY MS. KLEINDIENST: This appears to be an
11 e-mail that you sent to a number of people on September
12 14th, 2009, attaching a series of photographs. Do you
13 see that?

14 A. Yep.

15 Q. And the people that you sent this to, are these
16 the people that danced in the VMA tribute?

17 A. Yes.

18 Q. And are these pictures that you took during the
19 VMA tribute?

20 A. I believe so.

21 MS. KLEINDIENST: I'll ask the court reporter
22 to mark this as Exhibit 589.

23 (Deposition Exhibit No. 589
24 was marked for identification.)

25 (Witness peruses exhibit.)

1 THE WITNESS: Okay.

2 Q. BY MS. KLEINDIENST: This is an e-mail that you
3 sent to jordansommers12@aol.com and someone named Matt
4 Allen on October 2nd, 2009; correct?

5 A. Correct.

6 Q. Do you know who Jordan Sommers is?

7 A. Not specifically. I believe that he had to do
8 with a book that was being created that I think ended up
9 being called Michael Jackson Opus. It was a really
10 large format book, tribute book to Michael, so he was
11 involved in creating that.

12 Q. And did you end up being involved in that book
13 tribute?

14 A. Yes.

15 Q. And this attachment, do you know who authored
16 this attachment?

17 A. Yeah, I believe -- well, the way it went down
18 was, I had -- I don't know if it was with Jordan,
19 possibly, either Jordan or Matt I guess, that I spoke to
20 on the phone and we did, we did a phone interview. And
21 then, I believe either Jordan or Matt wrote this up
22 based on our phone conversation, and then, as I said in
23 the e-mail, I made some revisions to it. I don't know
24 or not, I guess this is the version that I made, you
25 know, with my revisions.

1 Q. Do you remember any of the particular revisions
2 you made?

3 A. No.

4 Q. And Matt Alan I assume is someone who was also
5 involved in that book?

6 A. Yeah.

7 MS. KLEINDIENST: I'll ask the court reporter
8 to mark this as Exhibit 590.

9 (Deposition Exhibit No. 590

10 was marked for identification.)

11 (Witness peruses exhibit.)

12 THE WITNESS: Okay.

13 Q. BY MS. KLEINDIENST: This is an e-mail that you
14 sent to Kenny Ortega, copy to James Phares, on October
15 8, 2009; correct?

16 A. Correct.

17 Q. And who is James Phares?

18 A. I believe he was Kenny Ortega's personal
19 assistant at the time.

20 Q. And in this e-mail, the original e-mail at the
21 bottom of the page, you say, "I was wondering if there
22 was anyway for my Mom and Grandma to also come to the MJ
23 premier?" Are you referring to the This Is It premier?

24 A. I believe so.

25 Q. And when you're referring to your grandma, is

1 that your mother's mom?

2 A. Yes.

3 Q. And you were already going to go to the This Is
4 It premier; is that correct?

5 A. It looks that way.

6 Q. Do you remember how it ended up being that you
7 went to the This Is It premier?

8 A. I don't. I was, I was working with Kenny
9 Ortega at the same -- I think it was around the same
10 time he was getting ready to direct Footloose film and
11 he wanted me to choreograph it so, you know, I think we
12 were around each other at that time. Maybe that's the
13 way it happened but I don't know.

14 Q. But do you remember if he invited you or if you
15 asked if you could go?

16 A. I don't remember.

17 Q. Your son Koa was born on November 10, 2010;
18 correct?

19 A. Yes.

20 Q. Do you also have a daughter?

21 A. No.

22 Q. Do you have another son?

23 A. No.

24 Q. You have one child?

25 A. Yeah.

1 Q. In the beginning of 2011 I understand that you
2 were working on Step Up 4; is that correct?

3 A. Beginning of 2011, yes.

4 Q. Do you remember when you first started working
5 on Step Up 4?

6 A. I believe in, possibly in December of 2010.

7 Q. Do you remember how you got the job?

8 A. I, I pitched myself and got the job. I mean, I
9 got, you know, an opportunity to go in for a meeting as
10 the director and did, I think, three pitch meetings
11 pitching my, you know, vision for the film as a director
12 and then I got the job.

13 Q. At that point had you ever directed a film
14 before?

15 A. Not a full-length feature. I directed short
16 films and music videos and commercials but not a
17 full-length feature.

18 Q. And it is fair to say that you didn't have any
19 professional training in directing films?

20 A. No, it's not fair to say.

21 Q. Okay. What professional training did you have
22 in directing films?

23 A. Directing short films and music videos and
24 commercials.

25 Q. So, you had done that before, you had

1 experience; correct?

2 A. Yeah.

3 Q. But did you have any formal training in that or
4 was that something that you --

5 MR. FINALDI: Vague and ambiguous as to "formal
6 training."

7 THE WITNESS: Yeah, what do you mean by "formal
8 training"?

9 Q. BY MS. KLEINDIENST: Had you ever taken, sort
10 of, classes in that?

11 A. Yeah, I had taken film classes before, yeah.

12 Q. Where did you take film classes?

13 A. UCLA.

14 Q. When?

15 A. I believe it was some point in -- well, it was
16 multiple times. UCLA was some point in 2009, I believe
17 the second half. And then, I had taken some screen
18 writing film courses in, I believe, 2004/2005, guy named
19 Robert McKee, famous story author. And then, other than
20 that, all of my training was, you know, being on sets
21 and being part of film productions of all kind from, you
22 know, 5 years old up.

23 Q. What did your role at Step Up 4 involve?

24 A. So, I was hired as the director of the film.

25 And the first part of that job description was to

1 oversee, be involved with the development of the story
2 and the script. And then, you know, design every aspect
3 with the producers of the film; who was going to be in
4 it, what it was going to look like, who the crew members
5 were going to be, you know.

6 Q. How many hours a week on average were you
7 working on Step Up 4 while you were involved?

8 MR. FINALDI: Vague as to time.

9 Q. BY MS. KLEINDIENST: If it changed over time,
10 let me know.

11 A. I would say 30, maybe around 30 hours a week.

12 Q. Were you working on anything else during that
13 time from December 2010 til April 2011?

14 A. Yeah. We were also in some level of early prep
15 for -- I think it was one of the first iterations of
16 what was going to be the Michael Jackson Vegas Show and
17 they wanted me to choreograph it. So, we were in some
18 early stages of prep there.

19 Q. Were you working on anything else?

20 A. I know I had some other jobs that came in and
21 out that weren't long-term. I was working on, I
22 believe, a video game that I was the choreographer for,
23 a dancing video game that was going to be, I believe,
24 with Activision. What else. I think I was possibly
25 still doing some post work on Happy Feet 2, which I did

1 some choreography for, post music work. That's all I'm
2 remembering right now.

3 MS. KLEINDIENST: I'm going to ask the court
4 reporter to mark this as Exhibit 591.

5 (Deposition Exhibit No. 591
6 was marked for identification.)

7 (Witness peruses exhibit.)

8 THE WITNESS: Okay.

9 Q. BY MS. KLEINDIENST: This is an e-mail that you
10 sent to Meredith Milton, Matt Smith, Erik Feig and
11 Jennifer Gibgot on April 26, 2011; correct?

12 A. Yes.

13 Q. In the first sentence you refer to a script.
14 Is that the script of Step Up 4?

15 A. Yes.

16 Q. And are these people, Meredith, Matt, Erik and
17 Jennifer, people who were involved in Step Up 4?

18 A. Yeah, producers.

19 Q. Do you remember the day that you quit Step Up
20 4?

21 A. I believe it was close to this. I think it was
22 around, somewhere around the end of April 2011.

23 Q. You're not sure the exact date?

24 A. The date 28th comes to mind, of April. I'm not
25 positive but possibly then.

1 MS. KLEINDIENST: I'm going to ask the court
2 reporter to mark this as Exhibit 592.

3 (Deposition Exhibit No. 592
4 was marked for identification.)

5 (Witness peruses exhibit.)

6 Q. BY MS. KLEINDIENST: Before we get to 592, when
7 you quit Step Up 4, how did you do it?

8 A. I called, I believe it was Erik Feig, or Feig,
9 I don't know how you say his last name, and told him. I
10 also called Matt Smith and told him.

11 Q. What did you say to them?

12 A. I said that I was so overwhelmed and that I, I
13 remember talking about my son, that I was looking at --
14 telling them that I'm looking at my son and, but I can't
15 see him, meaning that I was so overwhelmed that I wasn't
16 able to be there with him and be present with him and
17 that I didn't -- what I told them was that I didn't feel
18 that I could do this.

19 Q. Did they try to change your mind?

20 A. Absolutely.

21 Q. Were these separate phone conversations?

22 A. Yeah.

23 Q. How long approximately was each?

24 A. I would say they were in, like, the 30-minute
25 range, both of them. And I remember that it was an

1 absolute shock to them, to Erik, Matt, all of them on
2 this e-mail list. You know, they thought that I was
3 fine and that I was doing amazing and everything was
4 going great and this came as, like, a complete left blow
5 to them. They couldn't understand, you know. They
6 hadn't seen any signs, you know. So, yeah, they really
7 tried to talk me out of it.

8 Q. Did you tell them that your decision was final
9 on those conversations? I mean, was there any more
10 back-and-forth after those conversations about you
11 remaining on the film?

12 A. Yeah, there was a back-and-forth. Yeah, those
13 first conversations, yeah, they were trying to convince
14 me to stay on. If I remember correctly, I tried to. I
15 tried to sort of, you know, get back in the saddle with
16 it, like, over the course of a night, and, and I think
17 we were supposed to have a meeting, a physical meeting
18 the next day after these phone calls. And then, yeah, I
19 was falling apart. I couldn't do it. So I -- so, the
20 final removal after those -- so, that was my first
21 attempt, the phone calls. And then, I believe my final
22 removal from the film was done via my, my film agent at
23 the time.

24 Q. In Exhibit 592 you list a number of books. Do
25 you see that?

1 A. Yep.

2 Q. Do you remember where you found these titles?

3 A. I don't.

4 Q. By this point, on April 29th, 2011, had you
5 started seeing a therapist?

6 A. April 29th you're saying?

7 Q. Yeah.

8 A. No, I don't believe so. I had no idea what was
9 going on with me so I remember I was looking for any
10 possible thing, you know.

11 Q. When you quit Step Up 4, had you already backed
12 out of the Michael Jackson Cirque show?

13 A. Yes, I believe so.

14 Q. Approximately how long before?

15 A. I believe it was a couple months before I, I
16 removed myself from Step Up.

17 Q. After you quit Step Up 4 you saw Dr., I think
18 it's David Fogelson; is that right?

19 A. Yes.

20 Q. How did you find him?

21 A. I don't remember.

22 Q. Dr. Fogelson prescribed you some medication;
23 correct?

24 A. Yes.

25 Q. And do you remember what medication he

1 prescribed you?

2 A. I don't know if I remember the exact, what they
3 were called. I remember the purposes were, one was
4 supposed to be a sort of more immediate short-term
5 antianxiety medication, which was possibly Ativan, that
6 rings a bell. And then, he also prescribed, it was
7 either Prozac or something like it, for a sort of more
8 long-term sort of treatment.

9 Q. So, was it an SSRI?

10 A. I'm not sure.

11 MR. FINALDI: Calls for medical opinion.

12 Q. BY MS. KLEINDIENST: But it's your
13 understanding it was an antidepressant?

14 MR. FINALDI: Calls for expert opinion.

15 THE WITNESS: I don't remember. I remember it
16 was Prozac or something like it, whatever that is.

17 Q. BY MS. KLEINDIENST: So, he prescribed you an
18 anti-anxiety medication and the other medication which
19 you think was something like Prozac. Did he tell you
20 what it was for?

21 A. I imagine he did, but I don't remember.

22 Q. Did you take either of those medications?

23 A. I was very nervous to take any of them. I
24 didn't want to take any of them. I remember it took me
25 a long time to even fulfill the prescription. I did

1 fulfill the prescription and what he had told me about
2 the Ativan was that it would -- because at that point I
3 wasn't sleeping at all. So he had told me that it would
4 maybe help me get some sleep. So, I took the Ativan
5 periodically, one, once to three times max. And I
6 remember that specifically because he told me that
7 after, after three, after you take three, that you can
8 become addicted to it.

9 Q. So you're saying you took one to three doses;
10 is that right?

11 A. Yeah. Three pills. I don't know how that
12 would -- you know what I mean?

13 Q. So, on one occasion or one to three different
14 occasions?

15 A. One to three different occasions, yeah.

16 Q. And did you ever take the other drug that he
17 prescribed?

18 A. Never took the other one.

19 Q. And did you ever take a larger dose than he
20 recommended?

21 A. No.

22 Q. I think you only saw Dr. Fogelson once; is that
23 right?

24 A. I believe so.

25 Q. After Dr. Fogelson, who was the next person

1 that you saw with regard to your, I guess you call it a
2 breakdown?

3 A. Yeah.

4 I believe the next person I saw was Dr. Michael
5 Cameron.

6 Q. Do you remember how you found him?

7 A. Possibly through, you know, just Google
8 searching. It may have been my wife that found him,
9 too. But I think it was through Internet research.

10 Q. Internet research that you conducted?

11 A. I'm not sure. I wasn't operating very well so
12 it's likely that my wife might have found him.

13 Q. And how many times approximately did you see
14 Dr. Cameron?

15 A. I think I saw him for a period of time that was
16 maybe around two months, about once a week.

17 Q. Do you remember how long after you saw Dr.
18 Fogelson you had your first appointment with Dr.
19 Cameron?

20 A. I don't remember exactly. It would have been I
21 imagine within a couple weeks, I believe. A week to a
22 couple of weeks.

23 Q. After you quit the Cirque show, you weren't --
24 were you working on anything else during that period of
25 time when you were seeing Dr. Fogelson and Dr. --

1 A. You mean after I quit Step Up?

2 Q. Oh, sorry, Step Up, right.

3 A. No, I wasn't, while I was in therapy.

4 Q. What were you --

5 A. Well, sorry. About maybe halfway through my
6 sessions with Dr. Cameron my, Julie McDonald, my
7 choreography stage directing agent at the time, made me
8 aware that they hadn't replaced me on the, on the Cirque
9 and they hadn't found another choreographer yet and that
10 there was maybe, if I wanted to, she just came out of
11 the blue with that, I wasn't asking for it, but if I
12 wanted to there was maybe a possibility for me to, you
13 know, to get that job back.

14 Q. Okay.

15 A. And then, at some point that -- I had talks
16 with them and I got involved in that show again.

17 Q. Okay.

18 I'm going to ask the court reporter to mark
19 this as Exhibit 593.

20 (Deposition Exhibit No. 593
21 was marked for identification.)

22 (Witness peruses exhibit.)

23 THE WITNESS: There it is.

24 Q. BY MS. KLEINDIENST: This is an e-mail exchange
25 that you had with Julie McDonald on May 16, 2011;

1 correct?

2 A. May 16th, yep.

3 MS. KLEINDIENST: I'm going to ask the court
4 reporter mark this as Exhibit 594.

5 (Deposition Exhibit No. 594
6 was marked for identification.)

7 MS. KLEINDIENST: Can we go off the record
8 quickly to change the tape.

9 MR. FINALDI: Yeah.

10 THE VIDEOGRAPHER: This marks the end of DVD
11 number three. The time is 5:21 p.m. and we are off the
12 record.

13 (A recess was taken.)

14 THE VIDEOGRAPHER: This marks the beginning of
15 DVD number four in today's deposition of Mr. Wade
16 Robson. The time is 5:27 p.m. and we're back on the
17 record.

18 Q. BY MS. KLEINDIENST: So, we were looking at 594
19 when we went off the record. This is an e-mail from you
20 to Francois on May 21st, 2011; correct?

21 A. Yes.

22 Q. Who was Francois?

23 A. He was the director at the time of what was
24 going to be the Las Vegas Michael Jackson Cirque Du
25 Soleil show.

1 Q. In the, call it the third paragraph, you said,
2 "I always wanted to do this MJ show, badly." Do you see
3 that?

4 A. I do.

5 Q. Is that how you felt at the time?

6 A. I know I felt that way at some point. I don't
7 think that's how I felt at the time. I think at the
8 time I was still having a really hard time going through
9 this first breakdown and I had gotten to the point
10 where -- you know, nothing of any substance was really
11 going on in therapy, meaning I wasn't starting to talk
12 about the abuse or anything like that, and I, you know,
13 wasn't planning on it.

14 That -- all I knew to do was -- all I learned
15 from Michael was all I knew to do was get back to work
16 so I figured that's what I had to do. So, you know, I
17 think I was saying that in this e-mail because this was
18 something what would maybe, you know, help, in this
19 e-mail, me getting back involved. I felt that way at
20 some point but I don't know if I did here.

21 Q. In the middle of the page there's a paragraph
22 that starts with the word "Look." Do you see that?

23 A. Sorry, in the middle of the page. Yeah,
24 "Look," yeah.

25 Q. And you said, "Look, the Directing gig didn't

1 work out. It was consuming me in an unhealthy way that
2 I wasn't ok with being a brand new father. Maybe it
3 just wasn't the right time. Maybe I just wasn't ready
4 to direct a studio film."

5 Is that how you felt on May 21st, 2011?

6 A. The first part of it, "It was consuming me in
7 an unhealthy way that I wasn't ok with being a brand new
8 father. Maybe it just wasn't the right time," that was
9 definitely how I felt at the time that I wrote this.
10 "Maybe I just wasn't ready to direct a studio film"; I
11 don't know that I felt that way. I mean, that was a
12 question that was in my mind at this point, before I
13 understood what was really going on.

14 MS. KLEINDIENST: I'm going to ask the court
15 reporter to mark this as Exhibit 595.

16 (Deposition Exhibit No. 595
17 was marked for identification.)

18 (Witness peruses exhibit.)

19 THE WITNESS: Okay.

20 Q. BY MS. KLEINDIENST: This is an e-mail that you
21 sent to Erik Feig, Meredith Milton, Jennifer Gibgot,
22 Matt Smith and Adam Shankman on May 22nd, 2011; correct?

23 A. Correct.

24 Q. And in this e-mail you attempt to explain what
25 happened and why you quit Step Up 4; correct?

1 A. Correct. What this speaks to is my limited
2 understanding at the time of what was going on with me.

3 Q. In May of 2011 I think that you had mentioned
4 trying to reengage in the MJ Cirque show; correct?

5 A. In May of 2005.

6 Q. 2011.

7 A. Yeah. Did I say -- I don't remember exact, I
8 mean, I know it was in 2011.

9 Q. Sometime after you quit Step Up 4?

10 A. Yeah.

11 Q. You attempted to reengage with the Michael
12 Jackson Cirque Du Soleil show?

13 A. Yes.

14 Q. And how long were you reengaged in that show?

15 A. I believe it was in the range of a month to two
16 months, because what happened was, all of a sudden the
17 director was fired, which I think was somewhere in
18 August of 2011. The director was fired and therefore
19 the show kind of crumbled for a minute. They were going
20 to, you know, re-assess the whole thing so the whole job
21 got put on hold indefinitely.

22 Q. And did you ever talk about getting engaged in
23 it again after that point?

24 A. Yes.

25 Q. How long after?

1 A. I believe it was somewhere early 2012, in that
2 range. There was a new director onboard and, you know,
3 they rebuilt it and now the new director also wanted me
4 to be the choreographer.

5 Q. How would you describe the state of your
6 finances in May to June of 2011?

7 MR. FINALDI: Vague and ambiguous as to state
8 of finances. You mean -- if you're asking about his
9 income, that's fine, but if you're asking about his
10 savings and stuff like that, I'm going to instruct him
11 not to answer on financial privacy grounds because I
12 don't think you're entitled to that. I think you're
13 entitled to know what his pay was before, during, after,
14 I think that's all fair game, but...

15 Q. BY MS. KLEINDIENST: Okay, let's start your
16 income. What was your income from January until April
17 of 2011?

18 A. January until April of 2011. I believe I had
19 some money coming in in relation to the -- there was
20 some video game jobs in that time period. You said
21 January to May, yeah?

22 Q. January, yeah, to the end of April.

23 A. Yeah, there was, there was one or two video
24 game jobs, choreographing video games. You're asking
25 about numbers?

1 Q. I'm looking for an approximate total, if you
2 can.

3 MR. FINALDI: You can approximate. If you
4 don't know exact numbers, that's fine.

5 THE WITNESS: I have to go back. I was doing
6 post conventions, which were, like, ten grand a weekend.
7 So, maybe in the range of, like, 50 to 100 grand came in
8 in that time period.

9 Q. BY MS. KLEINDIENST: From January to the end of
10 April?

11 A. Yeah.

12 Q. In 2010, so the prior year, do you know
13 approximately what your total income was for that year?

14 A. I don't.

15 Q. Can you estimate it at all? Was it over a
16 hundred grand?

17 A. I believe so.

18 Q. Was it over 200 grand?

19 A. Let me think about what went on in 2010.

20 I would say it was probably in, like, the 150
21 to 200 grand range.

22 Q. And your counsel has indicated that he's going
23 to instruct you not to answer any questions about your
24 savings at that time period. Are you going to follow
25 his instruction?

1 A. Yes.

2 MS. KLEINDIENST: I'm going to ask the court
3 reporter to mark this as Exhibit 596.

4 (Deposition Exhibit No. 596
5 was marked for identification.)

6 Q. BY MS. KLEINDIENST: Before we talk about that,
7 did you have any form of income after you quit Step Up
8 4, so, from the beginning of May of 2011 through the end
9 of the year?

10 A. Through the end of the year of 2011?

11 Q. Yes.

12 A. Yeah, because I got back to work around August
13 of 2011 doing a bunch of stage direction work.

14 Q. Okay. How about from May until August when you
15 got back to work?

16 A. I don't believe any active income. There's
17 probably, as there always, as there has been for a long
18 time, passive income, meaning, royalties and things like
19 that, but I don't believe there was active income in
20 that time period.

21 Q. So, looking at Exhibit 596, this is an e-mail
22 between you and your mother on June 27th, 2011.

23 A. June 27th, 2011.

24 Q. Is that correct?

25 A. Yes.

1 Q. And in this e-mail there is mention of an
2 auction.

3 A. Let me read it.

4 (Witness peruses exhibit.)

5 Okay, sorry, what was the question?

6 Q. There's a mention of an auction, do you see
7 that?

8 A. Yes.

9 Q. Do you know what auction your mother was
10 referring to?

11 A. Oh, I see, I see the reference being from me.
12 Oh, there's one from her, too. "I saw the results of
13 the auction." And this is June. Yeah, I believe it was
14 Julian's auction, like, a memorabilia auction.

15 Q. And how many things did you have in that
16 auction?

17 A. I think I had two to three items.

18 Q. Do you recall what they were?

19 A. I think it was the shirt that Michael wore in
20 his Motown 25 performance, which he had given me a long
21 time ago when I was young, and, and I believe the hat
22 that he wore in the Smooth Criminal video, which he gave
23 me a long time ago.

24 Q. Do you think that was it or do you think there
25 was a third item?

1 A. I think, I think that was it for that auction,
2 and I think, as is referenced here, that there was a
3 third item later.

4 Q. Do you recall how much total you were paid for
5 those two items?

6 MR. FINALDI: What they sold for or what he got
7 paid? Vague and ambiguous.

8 Q. BY MS. KLEINDIENST: What you got paid.

9 A. I don't remember exactly. I think --

10 Q. Do you remember approximately?

11 A. I think maybe in, like, the 50 grand range.

12 Q. Total?

13 A. I think so.

14 Q. Did you ever auction off any other items that
15 relate to Michael Jackson?

16 A. Yeah, the Bad gloves. The gloves that he wore
17 in the Bad music video.

18 Q. Any others?

19 A. I think that's it.

20 Q. Do you recall how much you received for the Bad
21 gloves?

22 A. I think it was somewhere in the range of, like,
23 six to eight grand.

24 Q. And was that also in 2011?

25 A. I don't remember. '11 or -- I think so. I

1 don't remember though.

2 Q. Was it prior to May 8th, 2012?

3 A. Was it prior to May 8th, 2012. I believe so.

4 Q. You've described having a second breakdown; is
5 that correct?

6 A. Yes.

7 Q. Do you recall when that happened?

8 A. So, the symptoms -- so, you know, I got back
9 to, as I stated, got back to work after the first
10 breakdown. Most notably I joined, rejoined the Cirque
11 show prep so I think somewhere in July, I believe, of
12 2011, and then started doing stage directing work for
13 other people, other artists, I think around August of
14 2011. So, I did a bunch of that work, multiple artists,
15 and then I was sort of, you know, I had, I had sewed
16 myself back up. I was just sort of, like, operating,
17 right, pushing hard.

18 And then, around, I believe around January of
19 2012 some of the, you know, symptoms started kind of
20 bubbling up. Fears and anxieties over, you know, the
21 kind of work I had been doing for ten, fifteen years.
22 You know, so, there was no external reason that I knew
23 of as far as the work or something like that that all of
24 a sudden this was scary or should be harder for me to
25 do.

1 So, these symptoms started bubbling up around
2 January, they were getting worse and worse and worse,
3 until I believe somewhere in March 2012 was when, you
4 know, I was really falling apart again and I wasn't -- I
5 was beginning to not operate well and I think around
6 March removed myself from several jobs that I was
7 involved in.

8 Q. Do you remember if it was early or late March
9 that you removed yourself from those jobs?

10 A. I don't. Don't remember.

11 Q. You started seeing Dr. Larry Shaw around that
12 time; right?

13 A. I believe in April of 2012.

14 Q. Do you recall how long it was after you removed
15 yourself from those jobs before you started seeing Dr.
16 Shaw?

17 A. Not exactly but it's in the range of a month.

18 Q. How did you find Dr. Shaw?

19 A. I was -- I had started going to yoga at Exhale
20 in Venice around that time, once I removed myself from
21 the jobs, somewhere in late March maybe, and my sister
22 was going with me. And one of the other, one of the
23 teachers there, who I didn't take from but that my
24 sister knew, was a therapist of some kind, like, more of
25 a, kind of holistic somatic therapist. Anyway, my

1 sister asked her for any recommendations for me for any
2 therapist and she recommended Dr. Larry Shaw. I looked
3 him up online and called him, and then started with him.

4 Q. How long after you received the recommendation
5 did you first see Dr. Shaw, approximately?

6 A. I would say within a two-week range. Sorry,
7 did you say did I see Dr. Shaw?

8 Q. Yes.

9 A. Two- to three-week range.

10 Q. Did you look for any other therapist or did you
11 just go with Dr. Shaw?

12 A. I can't remember.

13 Q. Do you recall the name of the person who
14 recommended Dr. Shaw?

15 A. No, I don't. I didn't know her. Someone my
16 sister knew.

17 Q. By the time you stopped, you started seeing Dr.
18 Shaw, had you stopped working completely?

19 A. I believe so. Hold on. I'm not sure. I
20 believe so. I mean, I definitely wasn't doing any sort
21 of active jobs. The only thing I'm questioning in my
22 mind is that the prospect of me doing the Michael
23 Jackson Vegas Cirque show with the new director, I'm not
24 sure if that was still, the prospect of me doing it was
25 still lingering, possibly, once I started with Dr. Shaw.

1 I don't remember that exact timing. I think it was
2 around this range that I officially, you know, pulled
3 out of that again. Not sure the exact timing.

4 MS. KLEINDIENST: Going to ask the court
5 reporter to mark this as Exhibit 597.

6 (Deposition Exhibit No. 597
7 was marked for identification.)

8 (Witness peruses exhibit.)

9 Q. BY MS. KLEINDIENST: And my only question about
10 this document is whether this is your handwriting.

11 A. Yes, I believe so.

12 Q. So this is a document that you filled out?

13 A. Yes.

14 Q. Your father's name was Dennis Robson; correct?

15 A. Correct.

16 Q. And he killed himself; correct?

17 A. Correct.

18 Q. What date did he kill himself?

19 A. I don't remember the exact date. I believe it
20 was in July of 2002.

21 Q. Do you recall it being around the time that
22 your brother Shane moved to Los Angeles?

23 A. Yes.

24 Q. How close in time?

25 A. Like, within two to three days, I think.

1 Q. Do you remember how you found out that your
2 father had killed himself?

3 A. I was finishing up a late session in a
4 recording studio, I was producing a song for some
5 recording artist, can't remember who, and, yeah, I was
6 leaving the studio and got to my car and, you know, I
7 think there was some, a message from Mom on my phone
8 and, yeah, and I called my mother. She was sobbing and
9 she told me.

10 Q. Do you remember your reaction?

11 A. I remember as I was calling, because I think
12 she left me a message first that was obviously emotional
13 and just something along the lines of, you know, "Call
14 me." I don't know if she said "it's about your dad" or
15 if she just said "call me." Either way, I had a
16 feeling, when I was calling her I had a bad feeling that
17 it was something like that, about Dad.

18 And, and when she told me, you know, I, I think
19 my initial reaction was just as Michael taught me to be,
20 to shelf -- to numb it and to sort of shelf my feelings.
21 Not like I was acting like it didn't happen, but, yeah,
22 I just was initially relatively numb to it and just
23 started driving home because I knew that Mom and my
24 sister and my brother were at home, you know, and we
25 were going to be together and it was going to be

1 whatever it was going to be, an emotional time. But I
2 remember just trying to keep it together and just
3 feeling sort of, I mean, sad, yeah, but numb.

4 Q. You said initially you felt numb. Did that
5 wear off at some period of time?

6 A. In small bouts. I don't feel like I really
7 began to deal with my father's death until I began to
8 deal with processing Michael's sexual abuse. I feel
9 like, yeah, over the last whatever it's been, since May
10 2012, that I've also finally done a lot of that
11 processing and had a lot of emotional experiences over
12 it. But, but prior to that, yeah, again, you know,
13 Michael really taught me to shelf my feelings and to
14 just kind of be, to be invincible. And so, that's what
15 I tried to do and I tried to just gain a, within
16 relation with my father, I tried to just gain
17 intellectual perspective about it and move on.

18 Q. Did your father leave a suicide note?

19 A. I believe so.

20 Q. Did you read it?

21 A. I've never seen it.

22 Q. Has anyone ever read it to you?

23 A. No.

24 Q. Has anyone ever told you what it said?

25 A. No.

1 Q. Your mother has, I believe since 2000, May of
2 2012, told you that your father was a victim of
3 childhood sexual abuse; is that correct?

4 A. Well, I don't think it came from my mother. I
5 think it came from his sister.

6 Q. Is that Sandra?

7 A. I believe so.

8 Q. Do you remember when she told you?

9 A. I don't know for sure. I believe it was at
10 some point post me beginning the process, the abuse.
11 Some point post May 2012.

12 Q. I'm sorry, that's Sandra Keller; right?

13 A. Yeah.

14 Q. She's in Australia?

15 A. Yeah.

16 Q. Do you recall that conversation?

17 A. I don't remember if it was over, if it was over
18 phone or e-mail. I think it was over phone but I don't,
19 no, I don't recall that.

20 Q. Do you remember Sandra Keller telling you
21 anything else about your father or the childhood sexual
22 abuse or the reason she thought that he killed himself?

23 A. Well, first part is super broad; anything else
24 about my father?

25 Q. I guess about his, either his mental health or

1 the abuse he had suffered, anything. I mean, I'm trying
2 to get to anything you remember about this conversation
3 because you've indicated that Sandra Keller -- who is
4 your brother, or, your dad's sister?

5 A. Yeah.

6 Q. You think was the person that told you that
7 your father had been abused and that it happened, that
8 this conversation happened sometime after May 2012?

9 A. Right.

10 Q. Do you remember anything else about that
11 conversation at all?

12 A. That conversation specifically, no. I mean, I
13 remember other things which may have been in that
14 conversation or may have been other conversations that
15 she's told me, you know, about Dad, about, about his,
16 his emotional state or his mental state, yeah.

17 Q. Is it Sandra Keller who told you that she
18 thought that your dad was haunted, or, I don't know if
19 that's the word. Strike that.

20 Did Sandra Keller ever talk to you about the
21 idea that your father thought that you were possibly
22 abused by Michael?

23 A. I believe so.

24 Q. What did she say?

25 A. I remember her saying something along the lines

1 of, you know, "The possibility that you, Wade, were
2 sexually abused by Michael Jackson was something that
3 was on your dad's mind and something that caused him a
4 lot of distress."

5 Q. Is that something that she's told you since May
6 8th, 2012?

7 A. I believe so.

8 Q. Did anyone from --

9 A. Yeah, definitely, I think so.

10 Q. Did anyone from your family or your extended
11 family or your dad's family ever tell you before May
12 8th, 2012, that your dad thought that you might be, have
13 been abused by Michael Jackson?

14 A. I don't remember.

15 Q. Do you recall if Sandra Keller had this
16 conversation with you about your dad thinking that you
17 might have been abused by Michael Jackson prior to you
18 filing a lawsuit in May of 2013?

19 A. I'm not sure. I'm not sure when it was.

20 Q. Do you have any understanding of the primary or
21 main reasons that your father committed suicide?

22 MR. FINALDI: Calls for expert opinion.

23 THE WITNESS: No, I don't know, you know.

24 There was --

25 MR. FINALDI: Speculation.

1 THE WITNESS: -- supposedly a note. And I
2 never saw it, so I don't know what he was going through
3 at that time.

4 Q. BY MS. KLEINDIENST: Did you ever ask anyone
5 what the note said?

6 A. I believe -- no, I don't think so, because,
7 because I believe the only person, as far as within my
8 family, that ever saw it were his parents.

9 Q. Do you know of anyone outside of your family
10 who has seen the note?

11 A. I don't know of anyone. I imagine, you know,
12 maybe police or something like that who came to the
13 scene, but I don't know.

14 Q. You started therapy with Dr. Shaw, it looks
15 like by April 12th, 2012; is that fair?

16 A. Yeah, I believe it was somewhere in April.

17 Q. And you first told Dr. Shaw that you had been
18 abused by Michael Jackson on May 8th, 2012; correct?

19 A. I believe so, yes.

20 Q. Do you recall approximately how many times you
21 saw Dr. Shaw between April 12th, 2012 and May 8th, 2012?

22 A. I think it was about a three-week range and I
23 believe I was seeing him two times a week, so, maybe
24 about six times.

25 Q. Do you recall how it came up in the May 8th,

1 2012 session that you had been abused?

2 A. I don't. I remember it had been on my mind
3 through the preceding sessions, you know, leading up to
4 going to Dr. Shaw in the first place. You know, once I
5 removed myself from work and once I thought that I
6 needed to start therapy again in 2012 I'm talking about.
7 You know, I thought I had, I thought I had fixed myself
8 in 2011 with Dr. Cameron and so on. Obviously I hadn't.
9 I thought I'd gotten to the bottom of whatever the hell
10 was going on with me.

11 So, in this second breakdown in 2012, once I
12 decided I need to go to therapy again, was coinciding
13 with me having these visions of, you know, similar sort
14 of abuse that happened to me happening to my son Koa.
15 And my, my feelings towards that idea of that sort of
16 abuse, those sort of things that happened to me with
17 Michael happening to my son, were so clear and visceral
18 and painful and made me angry.

19 But then I would think about, you know, that
20 those things, those same things that you're envisioning
21 with your son, happened to me and I still at that point
22 didn't feel anything towards that. Didn't have any
23 emotional or intellectual perspective on them. But just
24 from an intellectual point that was kind of like a first
25 realization for me that that's probably weird that I can

1 have those clear visceral emotional feelings towards the
2 idea of that happening towards my son and not toward the
3 idea of it happening to me.

4 So, I thought if I'm going to go into therapy
5 and try to figure out what's going on with me, I've got
6 to throw it out, you know. I've got to throw these
7 details of what Michael did to me out on the table. And
8 at that point I was still so compartmentalized
9 emotionally that I really swore that I would throw it
10 out on the table in therapy and we'd talk about it and
11 realize that it wasn't a problem like I thought, didn't
12 bother me, and we'd move on to figuring out what was
13 really going on with me.

14 But I just knew that if I was going to go into
15 therapy, I had to throw everything out this time. I
16 mean, I didn't know. I was questioning that for the
17 first time in my life. You know, can you really do this
18 without talking about this this time. Talking about the
19 abuse. So, through those first three weeks of sessions
20 I'm going to kind of visualize it like this ping-pong
21 that was kind of floating, like, this idea, like, talk
22 about it, you got to talk about it, you know, trying to
23 work up the courage to talk about it in therapy.

24 And then, in hindsight I realize that what --
25 the day, May 8th, that I actually disclosed it, that one

1 of the things that prompted it happening that day was
2 that Dr. Shaw had told me the week prior, the week prior
3 to May 8th, or the session prior to May 8th, that I
4 should watch this speech called, I believe, "The Power
5 of Vulnerability," on TED, by this woman Brené Brown. I
6 hadn't done it yet so on the way to that session on May
7 8th I put it on in the car just so I could listen to the
8 audio.

9 And I remember the whole thing really hitting.
10 It was all about shame and vulnerability and -- but
11 there was one particular section where she spoke about
12 how we can't -- that through her research she's found
13 that, you know, we all have things in our life that we
14 try to numb and that the problem is that we can't
15 selectively numb. That when we numb, we try to numb the
16 so-called bad things in our life, that we also numb the
17 joy.

18 And I remember that really hitting me because I
19 felt like it had always been difficult for me to fully
20 experience joy, or for a long time in my life, and I
21 thought, shit, what if. What if this is part of -- what
22 if it's that piece that I've been numbing and what if,
23 if I get it out and I start healing from it, that I
24 could start actually really experiencing joy in life.
25 So, I say in hindsight because at some point I realized

1 that that was the, that was, you know, that May 8th was
2 the day that I listened to that speech on the way in.

3 And then, I, I don't remember, I don't remember
4 how, you know, what, what exactly preceded me saying it
5 in the session. I think that was your initial question,
6 you know.

7 Q. Do you recall how long into the session it came
8 up, like, beginning of the session, middle of the
9 session, end of the session?

10 A. I don't.

11 Q. Do you recall Dr. Shaw's reaction? Well, hold
12 on. Strike that.

13 Do you recall specifically what you said to Dr.
14 Shaw?

15 A. I don't.

16 Q. Do you recall generally, you know, if you went
17 into the details of the abuse?

18 A. I don't believe I went into any details in that
19 first session. I'm pretty sure I didn't. So, I don't
20 believe that there was, I mean, as far as details go,
21 that there was much said beyond -- I don't remember
22 exactly what I said. I don't believe that I said
23 "Michael Jackson abused me, sexually abused me," because
24 I still, I didn't have that understanding yet. It was
25 more just about, like, the facts. Like, I didn't

1 understand what to call it yet.

2 Q. So, do you remember how you described it to him
3 at all?

4 A. I think I possibly used the word "molested,"
5 because that was kind of more of the -- to me it's still
6 kind of a sugar-coated word, it's sort of a euphemism.
7 So, I think, I believe that's what I may have said,
8 that, that, you know, that it's true that Michael
9 Jackson did actually molest me.

10 Q. And do you recall his response?

11 A. I remember him just being, you know, holding
12 the space really well, being super present with me,
13 looking me right in the eyes and listening, and with his
14 body language, with subtle words, just letting me know
15 that he was hearing me and that he believed me and that
16 he had a feeling that was the case. Because we had been
17 talking about Michael prior to me disclosing the abuse.
18 We had been talking about, you know, my, the other
19 aspects of my relationship with Michael, the sort of
20 surface aspects of my relationship with Michael, the
21 linear story as far as the surface one, up until that
22 point, so.

23 Q. In that session or in previous sessions?

24 A. In previous sessions. So, I mean, he knew that
25 I had a relationship of some kind with Michael Jackson

1 and this sort of, you know, what the public knows, what
2 I've said in interviews, like, that version of the
3 story, of Michael and I's past, and, and based on that
4 and, you know, he had told me he had a feeling, after I
5 told him, that that was the case.

6 Q. He had a feeling prior to you telling him that
7 you were abused that you had been abused?

8 A. Yeah.

9 MS. KLEINDIENST: I'm going to ask the court
10 reporter to mark this as Exhibit 598.

11 (Deposition Exhibit No. 598
12 was marked for identification.)

13 Q. BY MS. KLEINDIENST: Do you recognize this
14 document?

15 A. No, not yet.

16 (Witness peruses exhibit.)

17 Yeah, I believe this is a document that, that
18 Sandra, my brother's sister, wrote and sent to me at
19 some point. I'm not sure when.

20 Q. Do you have any idea when she sent it to you?

21 A. I don't.

22 Q. Do you know --

23 A. Definitely post me disclosing the abuse in 2012
24 but I don't know beyond that.

25 Q. Do you know if it was after you filed the

1 lawsuit on May 1st, 2013?

2 A. I don't know.

3 Q. Is this something that she sent to you by
4 e-mail?

5 A. I believe so.

6 MS. KLEINDIENST: I'm going to ask the court
7 reporter to mark this as Exhibit 599.

8 (Deposition Exhibit No. 599
9 was marked for identification.)

10 Q. BY MS. KLEINDIENST: Before we get to 599,
11 going back to 598, do you, did you ever have any
12 conversations with your Aunt Sandra about whether or not
13 she was writing a book?

14 A. Not that I recall.

15 Q. Did she ever tell you what Exhibit 598 was?

16 A. It's foggy but I believe it was just some
17 writing of thoughts, you know, just for her own
18 personal, just to write it down as far as I know.

19 Q. Okay, turning to Exhibit 599. Do you recognize
20 this document?

21 A. I do.

22 Q. What is it?

23 A. I've never read it, but I believe it is from a
24 guy who was an old friend of mine named Dean Madden.

25 Q. Who is Dean Madden?

1 A. He was a friend of mine. He's an Australian
2 guy who lives in Los Angeles, works on film productions.

3 Q. Is he your age?

4 A. No, he's older.

5 Q. Do you know how much older?

6 A. Probably in the, like, ten-year-older range.

7 Q. Did Dean ever have a relationship with your
8 mother?

9 A. A friendship, yeah.

10 Q. Did he ever have a relationship, romantic
11 relationship with your mother to your knowledge?

12 A. Not that I know of. I highly doubt it.

13 Q. How did you receive a copy of this document?

14 A. I believe he e-mailed it to me.

15 Q. And it says "Wade in my morning Meditation at
16 lake Shrine - July 7th, 2016" at the top. Do you see
17 that?

18 A. Yeah.

19 Q. So is it your recollection that he e-mailed it
20 to you sometime within the last six months?

21 A. July 7th, 2016. Yeah, I imagine so.

22 Q. Do you know if you've deleted the cover e-mail
23 to this document?

24 A. I don't know.

25 Q. Do you have any specific recollection of

1 deleting it?

2 A. No.

3 Q. Is Dean somebody that managed you at some
4 point?

5 A. No.

6 Q. How close a relationship do you have with Dean?

7 A. Not very close at all now. You know, we will
8 talk over text maybe once or twice a year, always
9 initiated by him.

10 Q. Did you have a close relationship with him at
11 some point?

12 A. Yeah. When I was probably in the range of,
13 like, 14 to 16, somewhere in there.

14 Q. How about after you were 16?

15 A. What after that; what kind of relationship --

16 Q. Yeah.

17 A. -- you mean?

18 Yeah. I mean, I think we -- yeah, 16 to maybe
19 17 range, and then we really, we kind of lost contact
20 for a lot of years and I, I believe, I believe we didn't
21 have contact again until probably around 2013, somewhere
22 like mid-2013.

23 Q. Do you remember how that contact happened in
24 mid-2013, who contacted who?

25 A. The contact I remember is him texting me, but

1 he would have had to get my number somehow. So, I don't
2 remember exactly. There possibly was like a, like a
3 Facebook communication or something just prior to, to
4 there being text conversations mid-2013.

5 Q. You said you've never read this; is that right?

6 A. Right.

7 Q. Why not?

8 A. Because Dean is an interesting cat. Yeah, I
9 mean, I think that's why I didn't have contact with him
10 for a really long time. I think he was always a really
11 good guy at heart, but he would -- kind of super
12 opinionated and would have his own, you know, ideas
13 about what I should be doing with my life or what I
14 should be doing in my career and he kind of -- and he
15 sends me a document this long that -- it's kind of like
16 I don't jump at the chance. Just kind of, like, not
17 really interested in reading it.

18 Q. Can you turn to page 55 of Exhibit 573, your
19 book.

20 MR. FINALDI: 55?

21 MS. KLEINDIENST: Yes.

22 THE WITNESS: Okay.

23 Q. BY MS. KLEINDIENST: In the first full
24 paragraph, four lines down in the middle of the line you
25 wrote, "He had such a God complex," and you're referring

1 to Michael Jackson, "He had such a God complex that in
2 order to have a relationship with someone, I believe
3 they had to find him infallible. They had to want to be
4 like him. For if they wanted to be like someone else,
5 that would mean he was not the only manifestation of
6 perfection. And if they were to seemingly find a fault
7 in Michael, he would erase them from his life."

8 Do you see that?

9 A. I do.

10 Q. Did you write that?

11 A. Yes, I believe so.

12 Q. Your mother also testified to the effect that
13 if you did something that would upset Michael, he would
14 cut you out. Is that how you felt as well?

15 A. Yeah, there was definitely a feeling of Michael
16 wanted everything his way. So, if -- I felt that in
17 many different scenarios. So, for example, on being on
18 the phone with him, all times being on the phone with
19 him, I remember the feeling of if the conversation, if
20 he wasn't guiding it, if it wasn't going the way he
21 wanted it to go, all of a sudden he had to go and the
22 conversation would be over.

23 Like the other story I told, if I wasn't
24 dressing like him, if I wasn't, you know, interested in
25 the same sort of things he was interested in, he didn't

1 have as much time for me. He didn't want me around as
2 much. If I wasn't doing the kinds of things he wanted
3 me to do, he didn't want me around so much.

4 Q. Then he'll cut you out?

5 A. Yeah.

6 Q. Can you turn to page 57. At the bottom of the
7 page you wrote, "At some point, my Mother decided that
8 we were going to move to America." Do you recall when
9 your mother decided to move to America?

10 A. Not beyond it being some, I believe some point
11 in '91.

12 Q. That you moved or that the decision was made?

13 A. The decision was made, yeah.

14 Q. You can set that aside.

15 Can you tell me every name of a person that you
16 recall who worked for Michael Jackson?

17 A. Norma Staikos, Evvy Tavasci I believe is her
18 last name, Bill Bray, Wayne Nagin or Nagin, however you
19 say it. The question was any name that I know of that
20 ever worked for Michael Jackson; right?

21 Q. That you recall.

22 A. That I recall, yeah.

23 Sandy Gallin, Gary Hearne, Gail, I'm not sure
24 of her last name. She worked at Neverland for a really
25 long time as a maid and/or head, head housemaid.

1 Q. Is that someone whose been deposed in this
2 case?

3 A. I believe so.

4 Blanca Francia. The Quindoys, Mark was the
5 man, I'm not sure if I remember the female's first name,
6 but they were chefs and possibly managers at Neverland
7 at some point. They were when I, the first time I went
8 to Neverland. I remember another one of the chefs,
9 Bucky was his first name. I don't remember his last
10 name. He was a chef at Neverland. I remember Grace, I
11 don't know if it's Rwaramba.

12 Q. Rwaramba?

13 A. Yeah, I think.

14 I remember Al, his nickname was Big Al, he ran
15 the amusement park at Neverland for many years. I don't
16 remember his last name. I remember Manuel who was a
17 security card I believe at some point and also worked at
18 Neverland and also worked in the theme park. Bill Bray.

19 Q. Anyone else?

20 A. Frank Dileo. There may be more that comes
21 forth for me. This is what I'm remembering at the
22 moment.

23 Q. Let me know if you think of anyone else.

24 A. Okay.

25 Q. You mentioned Evvy Tavasci or Tavasco?

1 A. Yeah. It's either Tavasci or Tavasco, I'm not
2 sure.

3 Q. Do you know what her role was?

4 A. She, like Norma, ran everything in Michael's
5 life. She was the boss along, along with Michael.

6 Q. Do you know what her position title was?

7 A. Evvvy?

8 Q. Yeah.

9 A. I imagine it was at least personal assistant or
10 secretary, possibly some sort of executive at MJJ as
11 well.

12 Q. But you're not sure?

13 A. Not sure.

14 Q. Do you remember how many times you met Evvy?

15 A. Maybe in the range of six to ten times.

16 Q. Do you remember what she looks like?

17 A. My memory of her is having hair that was in the
18 shorter range, meaning, you know, like, five- to
19 seven-inch range, a sort of shorter do. Her hair color
20 being brownish to almost sort of auburn, maybe. I
21 remember her being on the taller side. I remember her
22 being white. Yeah.

23 Q. How about her age?

24 A. I remember her being in the -- not supposed to
25 say this about a woman; right? I would say fifties

1 range.

2 Q. In the '90s?

3 A. In the year, in the '90s?

4 MR. FINALDI: Calls for speculation.

5 THE WITNESS: When I was around her, which I
6 believe was in the range of, you know, around '93, '94.
7 I mean, I think all the way until he died. So, being in
8 the fifties range which could go either side on that
9 scale.

10 Q. BY MS. KLEINDIENST: How about her height?

11 A. Yeah, I remember her being what seemed like
12 taller, taller side for a woman which, I don't know,
13 maybe in the, like, maybe in the five-ten, five-nine,
14 range.

15 Q. Do you know what Bill Bray's position was?

16 A. I believe he was head of security for Michael
17 Jackson.

18 Q. How about Sandy Gallin?

19 A. I believe he was his manager, Michael's
20 manager.

21 Q. Grace Rwaramba?

22 A. She had multiple roles. I believe she started
23 working underneath Norma Staikos, I believe, in the
24 office, MJJ Productions' office, for a while. And then,
25 at some point she became, like, the nanny of Michael's

1 children.

2 Q. Do you remember when she started working in the
3 office?

4 A. No.

5 Q. Any idea?

6 A. No. I mean, she may have been there before I
7 met Michael in 1990, I don't know.

8 Q. How about Frank Dileo?

9 A. What about him?

10 Q. What was his position?

11 A. Michael's manager.

12 Q. So, you've named a number of people that we
13 just talked about. Do you believe that any of those
14 people could have prevented Michael Jackson from
15 sexually abusing you when you were a child?

16 A. Yes.

17 Q. Which person?

18 A. Any and all of them.

19 Q. You think all of them could?

20 A. Yeah.

21 Q. How?

22 A. Because they were in a scenario all the time
23 that they worked for Michael where Michael had me and
24 many other children around him, them knowing that he,
25 first of all, just was having little children with him

1 all the time.

2 Second of all, a certain amount of them, I
3 believe possibly all of them, knew that he was having me
4 and other children sleep in his bedroom with him, sleep
5 in his bed with him, buy them gifts, do all of this
6 stuff, have them with him, have me with him all the
7 time, and others with him constantly, that there's no
8 question in my mind now, as an adult, which they were
9 during all the time that they worked for Michael
10 Jackson, that that is very strange, inappropriate
11 behavior.

12 And my question would be, what the hell is
13 going on with Michael Jackson and these children. So,
14 instead of maybe putting themselves and their job ahead
15 of the interest of a child, they could have done
16 anything. They helped, you know, especially Norma
17 Staikos and Evvy Tavasc -- do we know if it's Tavasci or
18 Tavasco?

19 Q. I know. Do you?

20 A. I'm not sure.

21 Q. Okay.

22 MR. FINALDI: It's Tavasci.

23 THE WITNESS: Tavasci?

24 MR. FINALDI: Yeah.

25 Q. BY MS. KLEINDIENST: So Evvy Tavasci --

1 A. I'm not done. Norma Staikos, Evvy Tavasci,
2 were organizing all of these meetings between myself and
3 Michael, organizing the details, organizing the details
4 to pick me up, to take me, drop me off at Michael's, to
5 fly me to Michael. Michael was like a child in a lot of
6 ways. Michael was like a child in a lot of ways, like,
7 he could do his work, he could do his art, right, but
8 beyond that, everyday life stuff, I mean, he could
9 heartly work a microwave. So, Michael wasn't organizing
10 any of that stuff, they were helping to facilitate all
11 of that stuff.

12 So, at some point, you know, they had the, they
13 all had the ability to either help in the facilitation
14 of this weird shit that was going on between Michael and
15 I and many other kids, or not help, say something to an
16 authority that, you know, we believe something weird is
17 going on here. There's so many things they could have
18 done. They could have said something to Michael.

19 Q. There's a lot to unpack there. Do you know or
20 do you have any personal knowledge that any of these
21 people knew that Michael Jackson was sexually abusing
22 children?

23 A. I believe they had a very good idea that that
24 was going on.

25 Q. I asked a slightly different question. Do you

1 know whether any of these people knew that Michael
2 Jackson was sexually abusing children?

3 MR. FINALDI: Asked and answered,
4 argumentative. He just answered your question.

5 THE WITNESS: I, I mentioned Blanca Francia on
6 that list; right?

7 MS. KLEINDIENST: You did.

8 THE WITNESS: Yeah. I know that she saw
9 explicit stuff.

10 Q. BY MS. KLEINDIENST: How do you know that?

11 A. From her testimony.

12 Q. Any other way that you know that?

13 A. No.

14 Q. Anyone else?

15 A. Do I know for sure that they saw anything, any
16 explicit sexual abuse, and when I say explicit sexual
17 abuse I mean, you know, oral sex, all of that, do I know
18 that they explicitly saw any of that; no, I don't know.

19 Q. And you are aware that Michael Jackson was
20 criminally investigated by the police in the early 1990s
21 for childhood sexual abuse; correct?

22 A. Yes, I'm aware of that.

23 Q. Okay. So the authorities were contacted;
24 correct?

25 A. The authorities got involved. I know that.

1 Q. After the authorities got involved you
2 continued to sleep in Michael Jackson's bed; is that
3 correct?

4 A. That is correct.

5 Q. And your mother allowed you to sleep in Michael
6 Jackson's bed after he had been criminally investigated
7 for childhood sexual abuse; correct?

8 A. Unfortunately, yes.

9 Q. Do you believe that any of the people that
10 you've listed that worked for Michael Jackson were in a
11 better position to know that or to suspect that
12 something was happening with you in particular than your
13 mother?

14 A. Yeah.

15 Q. Who?

16 A. Who on that list?

17 Q. Yes.

18 A. At least Norma, at least Evvy, at least Wayne
19 Nagin, Blanca Francia. At least them.

20 Q. Why do you believe that Norma Staikos was in a
21 better position to suspect that you were being sexually
22 abused than your mother?

23 A. Because Norma Staikos had been working for
24 Michael for a long period of time and had been helping
25 to facilitate every one of these relationships and,

1 therefore, I believe sexual abuse, first, of many other
2 children, and most importantly of me. So, she had been
3 witness to so many more things than my mother and a real
4 pattern at the very least.

5 Q. How do you know that; is it because she had
6 worked for Michael Jackson?

7 A. Yeah.

8 Q. Is there any other reason that you think that?

9 A. Because I know all that she organized for my
10 and Michael's relationship. All the meetings and all
11 the gifts. And I know and I believe that she did that
12 for many others.

13 Q. Why do you believe that?

14 A. Because he had relationships with many other
15 young boys, and maybe girls as well, that, you know, I
16 know that that's the reason he had those relationships.
17 She would have been facilitating the same kind of stuff
18 with them as she did with me.

19 Q. How do you know about those relationships; is
20 it because you saw those kids at Neverland or other
21 places around Michael Jackson?

22 A. Yeah, some of it is that. There was often when
23 I was around other kids that he had relationships with,
24 like Brett Barnes, like Macaulay Culkin, like Jordan
25 Chandler. So, yeah, that. And then, it was also,

1 Michael was seen even beyond that, beyond my immediate
2 knowledge, with other children all the time.

3 Q. The first time that you were, or, that you
4 claim that you were sexually abused by Michael Jackson
5 happened on your first trip to the United States;
6 correct?

7 A. Yes.

8 Q. And it happened at Neverland?

9 A. Yes.

10 Q. At that time, the first time that you were
11 sexually abused, were there any concrete actions that
12 Norma Staikos could have taken to prevent that?

13 A. Yeah. She could have not facilitated the trip.
14 She could have at any time before that, at any time
15 during that, she could have called the authorities on
16 Michael if she wanted to.

17 Q. Okay, so --

18 A. If she had the guts to.

19 Q. As of January 1990, the concrete actions that
20 you claim that Norma Staikos could have taken to prevent
21 you from being abused are not set up your meeting with
22 him at Record One?

23 A. Right.

24 Q. Or call the authorities?

25 A. You talking specifically just about that first

1 trip?

2 Q. Yes.

3 A. Yeah. Not set up the meeting, call the
4 authorities, say something to Michael.

5 Q. Do you think that if Norma Staikos said
6 something to Michael, that would have prevented the
7 abuse?

8 MR. FINALDI: Calls for speculation.

9 THE WITNESS: I have no idea.

10 Q. BY MS. KLEINDIENST: Okay, so, you believe that
11 Norma Staikos should not have set up the meeting between
12 you and your family and Michael at Record One; correct?

13 A. Correct. She was the first line of defense,
14 meaning, you know, it was Norma that my mother got in
15 contact with first, right, that led to me meeting
16 Michael again. I don't know exactly how long she had
17 worked for him.

18 Q. At that time, that point?

19 A. At that point. I believe it was at least a
20 year or more, maybe several years.

21 Q. But you don't know?

22 A. I don't know for sure exactly what amount of
23 time. But it wasn't, you know, a couple weeks prior or
24 a couple months prior, it was definitely more than that.
25 So, there's no question in my mind that she had been,

1 again, privy to all of his patterns with children and
2 any sensible adult who was that close, knowing almost
3 everything about what Michael did with his every single
4 day because she scheduled it, she told him to be there,
5 she told him to get on one phone call, where to be, at
6 what meeting, everything, for her to then be the
7 gatekeeper, the one that sent me by setting up this
8 meeting into a pedophile's hand.

9 Q. So, it's your testimony that Norma Staikos, who
10 was Michael Jackson's secretary, should not have
11 scheduled the meeting between your family and Michael
12 Jackson at Record One --

13 MR. FINALDI: Assumes facts.

14 Q. BY MS. KLEINDIENST: -- and that would have
15 prevented the abuse?

16 MR. FINALDI: Assumes facts not in evidence,
17 asked and answered, argumentative.

18 THE WITNESS: There's a lot of things in there.
19 First, she was at least his personal
20 assistant/secretary. I believe she may have had a one,
21 a bigger title than that, like, sort of an executive of
22 some level of MJJ Productions, or the executive. I
23 believe she did. Even if not, that's what she was
24 doing. She wasn't I think the -- the, the title of
25 secretary or personal assistant doesn't speak to the

1 ability and the power that she had over Michael's life,
2 organizing all the details of Michael's life. So,
3 that's the first point in that statement.

4 And then, what else did you say, that if --
5 sorry.

6 Q. BY MS. KLEINDIENST: It was a yes-or-no
7 question, so, unless you have more to your answer.

8 A. You also asked do I believe that it would have
9 prevented the abuse if she didn't set up the meeting.
10 Well, yeah, because I never would have met with him. He
11 didn't know about me again until she made the
12 connection.

13 Q. Who do you think is more responsible for the
14 abuse that happened that weekend, your mother or Norma
15 Staikos?

16 MR. FINALDI: Calls for legal conclusion,
17 invades the provence of the jury.

18 Answer.

19 THE WITNESS: Responsible in what way; just as
20 a human matter?

21 MS. KLEINDIENST: I'll withdraw the question.
22 Can we take a quick break?

23 MR. FINALDI: Sure.

24 THE VIDEOGRAPHER: The time is 6:44 p.m. and
25 we're off the record.

1 (A recess was taken.)

2 THE VIDEOGRAPHER: The time is 6:55 p.m. We're
3 back on the record.

4 MS. KLEINDIENST: I'm going to ask the court
5 reporter to mark this as Exhibit 600.

6 (Deposition Exhibit No. 600
7 was marked for identification.)

8 Q. BY MS. KLEINDIENST: And my only question about
9 this document, which was produced by Dr. Koziolas, is
10 this your handwriting and is this -- is this a document
11 you filled out?

12 MR. FINALDI: So, it's vague and ambiguous
13 because it looks like there's different handwriting on
14 here.

15 THE WITNESS: Uh-huh.

16 Q. BY MS. KLEINDIENST: Do you recognize your
17 handwriting on this document?

18 A. Yeah, I'm just looking through it. It looks
19 like some of the handwriting is mine.

20 MS. KLEINDIENST: Mr. Finaldi, other than his
21 income are you going to object to any questions about
22 his financial state in 2013?

23 MR. FINALDI: I didn't object to the questions
24 about his income.

25 MS. KLEINDIENST: Other than income I'm saying.

1 If I ask him questions about his financial state when he
2 filed the lawsuit in May of 2013, are you going to
3 instruct him not to answer?

4 MR. FINALDI: Well, I'm not going to let him
5 answer questions about his savings, retirement, stuff
6 like that. That's just, you know, protected by his
7 right to financial privacy. But, you know, I will allow
8 him to answer questions that are probative of his
9 financial claims here, loss of earnings.

10 MS. KLEINDIENST: Okay. But if I ask him, for
11 example, if he was, had to sell his house prior to
12 filing this lawsuit because of money concerns --

13 MR. FINALDI: I don't see how that's relevant
14 to anything.

15 MS. KLEINDIENST: So you're going to instruct
16 him not to answer?

17 MR. FINALDI: Yeah, I would. I don't see how
18 that's relevant and it's protected by his right to
19 financial privacy.

20 MS. KLEINDIENST: Okay.

21 Q. And, Mr. Robson, would you follow your
22 counsel's instruction?

23 A. Yes.

24 Q. Do you believe that your mother knew, prior to
25 May of 2012, that you were being or that you had been

1 sexually abused by Michael Jackson?

2 A. I don't believe she knew.

3 Q. Do you believe she ever suspected prior to your
4 disclosure?

5 A. I don't know.

6 MS. KLEINDIENST: Going to ask the court
7 reporter to mark this as Exhibit 601.

8 (Deposition Exhibit No. 601
9 was marked for identification.)

10 (Witness peruses exhibit.)

11 Q. BY MS. KLEINDIENST: Do you recognize this
12 document as a personal, or, one of the notes of your
13 thoughts, written notes of your thoughts from February
14 8, 2013?

15 A. It looks that way, yeah.

16 Q. And you authored this document?

17 A. Just look through it.

18 Yeah, it looks as though I authored this.

19 Q. Do you recall what Amanda had said to you that
20 sparked this entry?

21 MR. FINALDI: Assumes facts not in evidence.

22 THE WITNESS: Any particular part of it or the
23 beginning of it?

24 Q. BY MS. KLEINDIENST: You say, "Amanda cannot
25 stop me from doing what I want to do. Makes me think

1 about divorce. That is how angry it makes me. I have
2 dedicated the last 7 months of my life to this idea of
3 the book. This path. Now, now trying to ask me if it's
4 the right thing to do?"

5 Do you remember that conversation that
6 triggered this entry?

7 MR. FINALDI: Assumes facts not in evidence.

8 THE WITNESS: I don't.

9 Q. BY MS. KLEINDIENST: You don't remember
10 anything about it?

11 MR. FINALDI: Assumes facts not in evidence.

12 THE WITNESS: I don't.

13 Q. BY MS. KLEINDIENST: Do you remember a time
14 where you were thinking about divorcing Amanda?

15 A. Nothing beyond -- you know, nothing -- never
16 seriously. Nothing beyond, like, in a moment of being
17 emotional, angry, the thought crossing my mind for a
18 split second, but never beyond that.

19 Q. Do you ever remember Amanda vocalizing the idea
20 of potentially divorcing you?

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

22 Q. Do you remember it ever coming up at all that
23 Amanda had any thoughts about divorcing you?

24 A. I don't ever remember anything, you know,
25 relating to that word, relating to that word "divorce."

1 The only thing I remember that comes close to that
2 concept, I believe, if my memory serves me correctly,
3 that the time period was within the breakdown, the
4 second breakdown in 2012.

5 And at some point in that breakdown, me, not
6 doing well emotionally, having the thought and I guess
7 expressing the thought that maybe, something in relation
8 to the idea of me getting back to work again like I did
9 the breakdown before. And my wife and our family had
10 been through so much, was going through so much with
11 these breakdowns, that, you know -- I'm saying this
12 speaks to her reaction. The first breakdown, when I did
13 that small amount of therapy with Dr. Cameron and then
14 relatively quickly ended up getting back to work, seemed
15 like I was all good, right, and then, within a year,
16 right, or by March or whatever, in 2012, another
17 breakdown happens, right.

18 So then, post that, some point in that second
19 breakdown something was expressed about, from me, about
20 the idea of me going back to work, and based on what my
21 wife had just been through the last time I went back to
22 work and then here we are again in a breakdown, she was
23 so stressed out, understandably, that she, you know,
24 expressed something along the lines of, like, if you are
25 going to do the same thing again, like, meaning not get

1 to the bottom of and start healing what's going on with
2 you and just kind of go back to work, are we going to
3 end up in this same sort of cyclical thing again.

4 And in tears and in extreme stress, you know,
5 she expressed something along the lines like, "I don't
6 know if I can do that. If that's what you're going to
7 do, not get healed, you know, not really work on
8 yourself, I don't know that we can keep going through
9 that. I don't know if I can keep, you know, Koa, if I
10 can stay around, if I can keep Koa around for that."

11 And, you know what, thank God she did that
12 because that was -- it scared the hell out of me. And
13 so, that was one of the moments that really gave me even
14 more of an impetus to, you know, jump all the way into,
15 to healing, into therapy, and to, yeah, into healing.

16 Q. But did you take that as actual threat that she
17 was going to leave you?

18 A. A threat. I mean, yeah, that's what it said.
19 She said, you know, "If you're going to do this again,
20 if you're going to go back to work and maybe we're going
21 to end up in this same sort of cyclical thing, I don't
22 know if I can stay around for that."

23 Q. And you think that was sometime around March or
24 April of 2012?

25 A. I believe so.

1 Q. What's your father's birthday?

2 A. I'm not remembering it right now.

3 Q. Is it May 1st?

4 A. Yes, it is.

5 MS. KLEINDIENST: I'm going to ask the court
6 reporter to mark this as Exhibit 602.

7 (Deposition Exhibit No. 602
8 was marked for identification.)

9 Q. BY MS. KLEINDIENST: This is something that you
10 wrote on August 7th, 2013; correct?

11 A. Looks that way, yep.

12 Q. And it says, "Personal Wade notes are in
13 Italics." Do you know where the non-italicized portion
14 comes from?

15 A. Yeah, this was -- so, it says at the top "VEDA
16 4," so it was the fourth, yeah, one of, one of four
17 courses that I took that where the study of the Vedas,
18 which are an ancient body of knowledge from India, five
19 to 10,000 years ago, spiritual life knowledge. So these
20 are notes from that course.

21 Q. And then you added the text in italics?

22 A. Yeah. I believe that what -- yeah, that what
23 you see is -- what's not in italics is from the actual
24 course and the stuff that's in italics are my, my
25 personal thoughts.

1 Q. Can you turn to the page that's marked 4319 at
2 the bottom. At the top of the page, the second bullet
3 point, which is an italicized note that you added, it
4 states, "My story of abuse and its effects will make me
5 relatable/relevant." Why do you think that your story
6 of abuse makes you relatable and relevant?

7 A. I believe that it, in relation to -- in the
8 course of studying this -- this knowledge came from my
9 meditation teacher. So, I learned and practiced and
10 still practice Veda meditation. And before I took this
11 course I became interested in the idea of becoming a
12 teacher of Vedic meditation myself.

13 I believe what that's referring to is where the
14 teacher was talking about how as teachers of meditation,
15 you know, not everybody wants to learn meditation from
16 the same kind of person with the same life story.
17 Meaning, you know, people who are surfers more than
18 likely would love to learn meditation from a guy or a
19 girl who is also a surfer. They can relate to them.

20 And so, that's in relation to me having gone
21 through trauma in my childhood and there being a lot of
22 people who have gone through trauma in their childhood
23 and that, in relation to being a Vedic meditation
24 teacher, that's one of the pieces of my life that would
25 make me relatable to a certain amount of people who have

1 been through similar things in childhood as I did.

2 MS. KLEINDIENST: I'm going to ask the court
3 reporter to mark this as Exhibit 603.

4 (Deposition Exhibit No. 603
5 was marked for identification.)

6 Q. BY MS. KLEINDIENST: And do you recognize this
7 as another example of your written thoughts, this one
8 from October 18th to 27th, 2013?

9 A. Just give it a scan.

10 (Witness peruses exhibit.)

11 Yes, this looks like writings of my thoughts.

12 Q. From October 18th to 27th, 2013?

13 A. Yep.

14 MS. KLEINDIENST: I'm going to ask the court
15 reporter to mark this as Exhibit 604.

16 (Deposition Exhibit No. 604
17 was marked for identification.)

18 Q. BY MS. KLEINDIENST: And this is another
19 example of your writings of your thoughts, this one from
20 April 13th, 2015; correct?

21 A. Going to scan it.

22 (Witness peruses exhibit.)

23 Yes, looks like writings of my thoughts from
24 April 13, 2015.

25 Q. Have you had a chance to basically review what

1 you were writing about?

2 A. No. Really quickly. Let me give it a better
3 read.

4 (Witness peruses exhibit.)

5 Yep.

6 Q. The last sentence says, "It's time for me to
7 get mine!" Do you know what you meant by that?

8 A. I don't.

9 Q. You don't remember?

10 MR. FINALDI: Asked and answered.

11 THE WITNESS: I don't.

12 MS. KLEINDIENST: I think we're at our seven
13 hours so I'm assuming that you're not going to
14 voluntarily allow us to go more than seven hours; is
15 that correct?

16 MR. FINALDI: I don't think it's necessary.

17 MS. KLEINDIENST: And you're not going to;
18 correct?

19 MR. FINALDI: Do you think it's necessary?

20 MS. KLEINDIENST: I mean, I have plenty more
21 questions.

22 MR. FINALDI: You can ask questions all day
23 but, no, I don't see any justification for it.

24 MS. KLEINDIENST: Okay, so, my question is,
25 you're not going to stipulate for us to go more than

1 seven hours; correct?

2 MR. FINALDI: No.

3 MS. KLEINDIENST: All right.

4 MR. FINALDI: Do you need more?

5 MS. KLEINDIENST: I have plenty of questions.

6 MR. FINALDI: The question is not whether you
7 can ask questions forever.

8 MS. KLEINDIENST: I mean, I have plenty of
9 things I would love to ask.

10 MR. FINALDI: That's not my question. You
11 know, I think you've wasted a lot of time asking
12 questions about e-mails which are obviously written by
13 him which we would have, you know, agreed to
14 authentication of most of those. I mean, that could
15 have saved, you know, plenty of time. But you do with
16 your time what you wish.

17 MS. KLEINDIENST: Well, we can talk about it
18 off record. For now we'll enter into a stipulation that
19 the court reporter is relieved of her duties. We'll
20 have the original transcript sent to your office, Manly
21 Stewart Finaldi. We'll stipulate that Mr. Robson will
22 be given 30 days from your receipt of the transcript to
23 review, make any corrections, sign the transcript and
24 notify defendants of any changes.

25 If the transcript is not signed within the

1 30-day period, the transcript can be used for all
2 purposes as if it had been signed and a certified copy
3 of the transcript can be used in place of the original.

4 Do you have anything else to add?

5 MR. FINALDI: I'm not going to stipulate that
6 you can use it as if it's been signed. He'll sign it
7 within 30 days, we'll get you any changes, you know, and
8 signature, you know, by the end of those 30 days. If
9 the original is lost, misplaced, stolen, or otherwise
10 unavailable, a certified copy may be used in lieu
11 thereof for any and all purposes including the trial.
12 But that's a signed one. But if it's not signed I'm not
13 going to agree that it can be an unsigned one. It has
14 to be a signed one.

15 MS. KLEINDIENST: So you're going to agree that
16 he'll sign it within 30 days?

17 MR. FINALDI: Yeah. And if that signed one
18 becomes unavailable, we can use a certified copy, but,
19 you know, for some reason he doesn't sign it under
20 penalty of perjury, I'm not going to agree that that is
21 a signed one.

22 MS. KLEINDIENST: All right, I think we can
23 stipulate.

24 MR. FINALDI: And we do want a copy of the
25 transcript, on the record, and a video sync'd, on the

1 record. I guess I have to say it on the record. I
2 don't know, does that work?

3 MS. KLEINDIENST: All said.

4 THE VIDEOGRAPHER: So, that marks the
5 conclusion then of today's deposition of Mr. Wade
6 Robson. We used a total of four DVDs. The time is 7:14
7 p.m. and we are off the record.

8 (The deposition was adjourned at 7:14 p.m.)
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1 I declare under penalty of perjury under the
2 laws of the State of California that the foregoing
3 is true and correct.

4 Executed on _____, 2016, at
5 _____, California.

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9 _____
10 WADE JEREMY WILLIAM ROBSON
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1 STATE OF CALIFORNIA) ss:
2 COUNTY OF VENTURA)
3

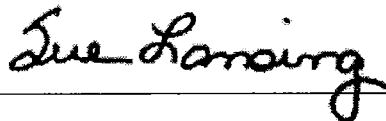
4 I, SUSAN E. LANSING, C.S.R. No. 6355, a Certified
5 Shorthand Reporter for the State of California, do
6 hereby certify:

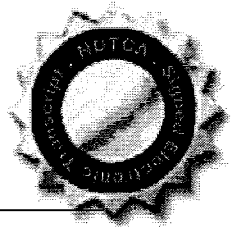
7 That, prior to being examined, WADE JEREMY WILLIAM
8 ROBSON, was by me duly administered an oath to tell the
9 truth, the whole truth, and nothing but the truth;

10 That the deposition of the witness in this
11 proceeding was taken down by me in stenotype at the time
12 and place therein named and thereafter reduced to
13 typewriting by computer-aided transcription under my
14 direction.

15 I further certify that I am neither counsel for nor
16 related to any party to said action nor in any way
17 interested in the outcome thereof.

18 WITNESS my hand this 15th day of December, 2016, at
19 Newbury Park, California.

20
21 
22



23 SUSAN E. LANSING, CSR NO. 6355
24
25

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