

Rough Draft - 1

1                   IN THE CIRCUIT COURT OF THE  
2                   NINTH JUDICIAL CIRCUIT IN AND  
                    FOR ORANGE COUNTY, FLORIDA

3 ZENAIDA GONZALEZ,

4           Plaintiff/Counter-Defendant,

5 vs.                   CASE NO.: 08-CA-24573

6 CASEY ANTHONY,

7           Defendant/Counter-Plaintiff.

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9   ROUGH DRAFT \*\* ROUGH DRAFT \*\* ROUGH DRAFT

10           The videotaped deposition of ANNIE DOWNING  
11 taken pursuant to Notice on behalf of the  
12 Plaintiff/Counter-Defendant on Thursday, May 21, 2009,  
13 beginning at 1:00 p.m., at the law firm of Morgan &  
14 Morgan, 20 North Orange Avenue, 16th Floor, Orlando,  
15 Florida, before Laura J. Landerman, R.M.R., C.R.R.,  
16 F.P.R., and Notary Public, State of Florida at Large.

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CENTRAL FLORIDA REPORTERS, INC.  
ORLANDO, FLORIDA

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1 A P P E A R A N C E S:

2 JOHN B. DILL, ESQUIRE  
KEITH R. MITNIK, ESQUIRE  
3 Morgan & Morgan, P.A.  
20 North Orange Avenue -- 16th Floor  
4 Orlando, Florida 32801

5 For the Plaintiff/Counter-Defendant,

6 No appearance on behalf of the  
Defendant/Counter-Plaintiff,

7

WARREN LINDSEY, ESQUIRE  
8 Kirkconnell, Lindsey, Snure & Yates  
1150 Louisiana Avenue -- Suite 1  
9 Winter Park, Florida 32789

10 For the Witness.

11 THE VIDEOGRAPHER: Lee Fouraker of Ron Fleming  
Video Productions

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1                    I N D E X

2 TESTIMONY OF ANNIE DOWNING

3     Direct Examination by Mr. Dill

4 CERTIFICATE OF OATH (not in rough)

5 CERTIFICATE OF REPORTER (not in rough)

6 ERRATA SHEET (not in rough)

7 WORD INDEX

8                    E X H I B I T S

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S T I P U L A T I O N S

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It is hereby stipulated and agreed between counsel

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for the respective parties and the witness that the

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reading and signing of the deposition be reserved.

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THE VIDEOGRAPHER: Good afternoon. The date

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is May 21st, 2009. This is the deposition of Annie

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Dowling being taken in the matter of Zenaida

4

Gonzalez versus Casey Anthony. It's 1:03 p.m. and

5 we're on record.

6 Will counsel please introduce themselves for

7 the record?

8 MR. DILL: John Dill along with Keith Mitnik

9 representing plaintiff.

10 MR. LINDSEY: Warren Lindsey representing

11 Annie Downing.

12 THE VIDEOGRAPHER: Court reporter please swear

13 in the witness.

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1 ANNIE DOWNING

2 having been first duly sworn testified as follows:

3 DIRECT EXAMINATION

4 BY MR. DILL:

5 Q Good afternoon.

6 A Hi.

7 Q Could you please state your name?

8 A Annie Downing.

9 Q I think we had it spelled wrong on the --

10 A D-O-W-N-I-N-G.

11 Q And you live here in Orlando?

12 A Uh-huh.

13 MR. LINDSEY: You have to say yes or no.

14 A Yes.

15 Q I'm going to be asking you some questions

16 today. Okay? My name's John Dill.

17 Do you know Casey Anthony?

18 A I do.

19 Q All right. And why don't you tell us when you

20 first -- when you first met her?

21 A My sophomore, junior year of high school. I

22 knew about her, knew of her.

23 Q What high school was that?

24 A Colonial High School.

25 Q Sophomore, junior, do we know what time frame  
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1 that would have been?

2 A I graduated in '03, so 2000 -- 2002.

3 Q And when you say you knew about her, she was

4 an acquaintance from high school?

5 A Yes.

6 Q Were you on any sports teams with her or

7 anything like that?

8 A No, not with her.

9 Q And were you guys friendly socially back in

10 high school?

11 A I didn't hang out with her outside of school.

12 Q Did there come a time when you became a little

13 bit better friends and acquaintances?

14 A Yes.

15 Q And kind of direct me to when that was.

16 A It would have been 2006. 2005, 2006.

17 Q And you had already graduated high school?

18 A Yes, I was in college. 2006.

19 Q Where were you going to school?

20 A UCF.

21 Q And at that point in time, 2006, how was it

22 that you guys became, I guess, reacquainted and became

23 better friends?

24 A She started dating a friend of mine, and we

25 started hanging out because of that.

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1 Q I see. And your friend was?

2 A Brandon Snow.

3 Q And during this time period, where were you

4 living?

5 A Sawgrass Apartments.

6 Q And I believe you were living there with

7 somebody; is that correct?

8 A My ex-boyfriend, Dante Salati.

9 Q I'm going to ask some questions about when you

10 moved in there and how long you lived there. Do you

11 remember when it was you moved in with Dante at Sawgrass

12 Apartments?

13 A October, November of 2005, I do believe.

14 Q Do you remember -- I think you had had a lease

15 there or you --

16 A Yes, I did.

17 Q -- reupped the lease; is that right? Is he

18 the one that signed the lease or did you both sign?

19 A We both signed the lease.

20 Q Do you remember what apartment you were in by

21 any chance?

22 A 218.

23 Q And did Dante Salati, do you know if he

24 continued living in the Sawgrass Apartments after you

25 left?

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1 A Yes. He still lives there.

2 Q And he currently lives there?

3 A He currently lives there.

4 Q And when you and -- I guess you knew Brandon

5 Snow?

6 A Yes.

7 Q And did Casey and Brandon and then Dante and

8 you socialize?

9 A Yes.

10 Q Did you ever socialize over at the Sawgrass

11 Apartments?

12 A Yes.

13 Q And did Casey become friends with Dante?

14 A They'd known each other since high school.

15 Q They're all --

16 A Yeah, we were all friends in high school.

17 Q Are you still in contact with Dante?

18 A Yes.

19 Q And do you know where he works?

20 A Not currently. I don't know where he works

21 now.

22 Q But you know that he still lives over at the

23 Sawgrass Apartments?

24 A Yes.

25 Q Do you know anybody else -- I'm going to start

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1 now and kind of move backwards -- anybody else who

2 currently lives at the Sawgrass Apartments?

3 A Dante's girlfriend. I don't know her name,

4 though, but I know his girlfriend lives there.

5 Q They live together there or do you know?

6 A He's moving in with her.

7 Q I see. But they both are living --

8 A They both live there currently in two

9 different apartment apartments.

10 Q Do you know if she knows Casey Anthony or knew

11 her?

12 A I don't think she does.

13 Q Have you ever known anybody who works at the

14 Sawgrass Apartments?

15 A No.

16 Q I asked about currently, but let's say moving

17 back a few years focusing again on Sawgrass. Did you

18 ever know anybody who else who lived there at one time

19 but no longer lives there that you're friendly with?

20 A I had a friend, a family friend that lived

21 there.

22 Q Would that -- would that be somebody that was

23 friendly with Casey or do you know?

24 A No.

25 Q So Danti Salati, then, your ex-boyfriend,  
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1 lived there during, I guess, from '05 through today?

2 A To current, yes, sir.

3 Q And was -- does he still live in 218; do you  
4 know?

5 A I think that's the apartment number. If  
6 that's the apartment number, then that's where it is.

7 Q First floor or second floor; do you remember?

8 A Second floor.

9 Q Did Casey ever bring Caylee over to the  
10 Sawgrass Apartments, to your knowledge?

11 A Yes.

12 Q And tell me about that.

13 A She'd come over to hang out with me after --  
14 after I got off school. She'd come over and hang out,  
15 bring Caylee all the time.

16 Q And would you guys do stuff there at the  
17 apartment, play around?

18 A Just watch TV, play with Caylee, play with my  
19 dog. Caylee loved my dog.

20 Q What type of dog did you have?

21 A Miniature long-haired Dauschand.

22 Q Do you know if Casey ever befriended or met  
23 anybody who worked there at the Sawgrass Apartments?

24 A Not to my knowledge.

25 Q Kind of orient me as to time frame here. When  
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1 Casey used to bring Caylee over to Sawgrass Apartments,  
2 how long was Caylee at that time?

3 A Year and a half because her second birthday  
4 was -- her second birthday was 2007 because 2008 she  
5 would have been three, so a year and a half.

6 Q And let me ask this. At the Sawgrass  
7 Apartments, while you were living there or any time  
8 subsequent, did you ever know anybody lived there named  
9 Zenaida Gonzalez?

10 A No, sir.

11 Q I'm going to get to this in a moment a little  
12 more in detail, but when was the first time you ever

13 heard the name Zenaida Gonzalez?

14 A On the news.

15 Q You never met a Zenaida Gonzalez?

16 A No, sir.

17 Q And when you and Casey became good friends,

18 did you also meet kind of her group of friends as well?

19 A Her group of friend was my group of friends.

20 Q And is it a small group or large group or do

21 you know?

22 A It was bigger then than it is now.

23 Q And as far as your kind of social group of

24 friends back during that time period, is it fair to say

25 you all were -- everybody kind of knew each other?

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1 A Yes.

2 Q And you would talk to Casey's other friends

3 even when Casey wasn't around just to kind of catch up?

4 A Yes.

5 Q Did you ever hear anybody in that group of

6 friends ever mention the name Zenaida Gonzalez?

7 A No, sir.

8 Q Did you ever hear any of her friends mention

9 the name Zanny?

10 A No, sir.

11 Q All right. Have you ever met a Zanny, a

12 person named Zanny that has been described as a ten that

13 was friends, long-time friends with Casey?

14 A No, sir.

15 Q Do you believe that person even exists?

16 A No, sir.

17 Q Now, I'm going to kind of loop back here as

18 far as Caylee a little bit. Did you ever baby-sit

19 Caylee?

20 A No, sir.

21 Q Do you know if anybody ever received money or

22 was paid to be a nanny or baby-sitter for Casey --

23 Caylee, sorry?

24 A I had never met that person, no.

25 Q And did you ever hear about Casey hiring a

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1 nanny for Caylee?

2 A She would talk about it, but I've never seen,

3 met, talked to that person.

4 Q When you -- when you first heard about a  
5 nanny, was that back during this time period or was it  
6 closer to 2008 when Caylee went missing?

7 A I might have heard it once or twice before  
8 this, I mean, maybe once or twice.

9 Q But did you ever see this person?

10 A No. I've never seen --

11 Q Never seen the nanny?

12 A Never seen --

13 Q Any nanny?

14 A Never seen any nanny.

15 Q When you say that she would talk about it,  
16 what would she say? What kind of stuff would she --

17 A Oh, just where's Caylee? And she'd say, oh,  
18 she's with the nanny. I've got to go pick Caylee up from  
19 the nanny.

20 Q You don't remember, again, any more specifics  
21 about who the nanny was or --

22 A (Shakes head.)

23 Q -- where they were?

24 A The only other thing that I remember was that

25 at one point the nanny, the baby-sitter, lived in  
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1 MetroWest, then moved over by UCF. That's it.

2 Q And that's according to Casey?

3 A That's according to what Casey said.

4 Q Did any of your other group of friends say

5 that they met this nanny or any nanny?

6 A Not to my knowledge.

7 Q Now, subsequent, I guess you guys have, I

8 would imagine, have talked about --

9 A Yes.

10 Q -- about this? Has any of your group of

11 friends that you had in common with Casey ever said to

12 you that they met any nanny?

13 A No, sir.

14 Q Has any of them ever said that they've ever

15 met or seen anybody named Zanny that was a nanny?

16 A Not to my knowledge.

17 Q And has any of them ever said that they've met

18 or seen a Zenaida Gonzalez?

19 A Not to my knowledge.

20 Q Now, during the time period, I'm sorry to jump  
21 around a little bit, but during the time period when she  
22 was -- when Casey was dating Brandon, is it --

23 A Yes.

24 Q -- and you guys became a little bit closer as  
25 far as friends, you and Casey?

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1 A Yes.

2 Q Would you e-mail, IM, text message, that type  
3 of thing?

4 A Yes.

5 Q And were you fairly, as far as girlfriends,  
6 were you fairly close?

7 A We were best friends for a short period of  
8 time.

9 Q And you would characterize it, again, in your  
10 words, as being best friends?

11 A Uh-huh, yes, sir.

12 Q So would you -- did you get the impression  
13 that she was comfortable confiding in you --

14 A Yes.

15 Q -- and talking to you?

16 A Yes.

17 Q Of that -- during that time period when you  
18 were best friends, on average, how much time would you  
19 spend together, let's say, daily or weekly?

20 A Like physically together?

21 Q Well, let's start with that and then we'll go  
22 how often you talked as well.

23 A I would say a couple hours every other day.

24 Q And then you would also communicate via the  
25 different -- talk on the phone?

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1 A Text messaging, phone, Internet.

2 Q E-mail, that type of thing. So it's fair to  
3 say you were in pretty constant contact with her?

4 A Yes.

5 Q The message as far as the text messaging,  
6 e-mail, would it be a chat like on IM?

7 A No, Instant Messenger.

8 Q And was that a fairly constant thing --

9 A Yes.

10 Q -- during that time period?

11 A Yes.

12 Q Now, again, during all this time period, did

13 she ever mention the name Zanny?

14 A No, sir.

15 Q And so would you also -- back during this time

16 period when you would see each other, would you also go

17 around to her house and be at her house?

18 A Occasionally.

19 Q Had you met George and Cindy?

20 A Yes.

21 Q And did you ever have conversations with them

22 or talk to them back during this time period when you

23 were best friends?

24 A Through in passing, yes.

25 Q And did they ever mention to you, George and

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1 Cindy ever mention to you a nanny of any type?

2 A No, sir.

3 Q Did they ever mention the name Zanny?

4 A No, sir.

5 Q Was that something that was in common

6 conversation that you heard around their house?

7 A No, sir.

8 Q You know Lee as well?

9 A Yes.

10 Q And how do you know Lee? Through Casey?

11 A Through high school, in high school.

12 Q Has Lee ever told you that he has met anybody

13 named Zanny the nanny?

14 A No, sir.

15 Q Has he ever said to you I know Zenaida

16 Gonzalez?

17 A No, sir.

18 Q And has he ever mentioned to you the existence

19 of a nanny, whether one existed or not?

20 A Not to my knowledge, no.

21 Q I guess because Caylee used to come over to

22 the house or to the Sawgrass and you used to interact,

23 did you ever -- did you play with her and take care of

24 her, that type of thing?

25 A Well, Casey was always there.

1 Q I understand. But when the three of you guys  
2 together --

3 A Yeah, I'd play with her.

4 Q -- did Caylee ever mention the name Zanny?

5 A No, sir. She didn't really talk then.

6 Q But she never talked about a puppy or anything  
7 like that that you heard, puppy belonging to Zanny?

8 A No, no. I mean, they have their own dogs,  
9 but --

10 Q The times that Casey would have talked about  
11 before that the nanny had her, did she ever attach any  
12 name to that nanny?

13 A No, sir, just baby-sitter.

14 Q So this would -- again, the baby-sitter,  
15 nanny, never had a name attached to it at any time?

16 A No official name, no, sir.

17 Q During the time that you knew her and  
18 became -- were closer friends, let's say, when you were  
19 best friends, was Casey working, to your knowledge?

20 A So she told me.

21 Q You say that like that you found out something

22 different.

23 A Yes.

24 Q But she told you she was working?

25 A Yes, sir.

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1 Q And what did she say?

2 A She said she worked at Sports Authority and

3 then she went back to work for Universal.

4 Q And did you ever, again, see her going to work

5 or coming from work?

6 A No, sir. She -- I mean, there are times that

7 I'd see her. She said I just got off work, and she'd be

8 dressed up, but never saw anything else other than that.

9 Q Did you come to find out that she was not, in

10 fact, working?

11 A No, sir.

12 Q Now, there was a time -- as you said, there

13 was a time when you were fairly close friends. During

14 that time period, did you ever find her to be untruthful

15 about anything to you?

16 A Yes.

17 Q Can you give me some examples?

18 A Just about reasons why she couldn't go out.

19 She'd say I'm working. Obviously, she wasn't working.

20 Q Right.

21 A Basically, just things like that. I've never

22 caught her like lying to me, but, I mean, there are

23 things that I just doubted. Anything specific other than

24 her working I can't -- I can't remember things

25 specifically.

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1 Q When you say you doubted it, is this because

2 it didn't seem to make any sense?

3 A She had the ideal job. She could work from

4 home at any time. I mean, I'd love to have a job like

5 that, but --

6 Q Do you have an opinion in your mind as to why

7 she lied to you about those things?

8 A I don't know why.

9 Q As far as her reputation kind of in the

10 community among your group of friends there, are you

11 familiar with her reputation as far as her truthfulness?

12 A I mean, we all kind of assumed the same

13 things.

14 Q Which was?

15 A But never really caught her lying to us. You

16 know, we never -- we all kind of assumed -- like I said,

17 she worked from home all the time. Nobody at that age

18 can work at home at that time and work for a major

19 corporation. To me, it's impossible.

20 Q And so as far as her telling fibs or telling

21 lies, did some of your other friends ever mention the

22 same type of thing that either she had lied to them or

23 she had exaggerated or told things that weren't true?

24 A Can you clarify?

25 Q Sure. When you're talking to your other

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1 friends, did they ever give any instances of her

2 telling --

3 A No, not that I can remember, nothing specific.

4 Q Now, how about as far as her taking money or

5 taking things that didn't belong to her? Among your

6 group of friends, did you ever have conversations about

7 that?

8 A I don't know that she's ever taken anything

9 from any of my friends.

10 Q Did you come to learn that she had taken

11 something from her parents?

12 A That's what I've heard.

13 Q And how did you hear that?

14 A The news.

15 Q All right. Was there a time that there was

16 a -- I guess a graduation that Casey was going to?

17 A My college graduation.

18 Q Tell me about that.

19 A We were on our way to my graduation, and Casey

20 got a phone call from her mom. And Casey told me at the

21 time that her mother was mad at her. She had to go home

22 because she didn't sign up for college classes at

23 Valencia. Well, after speaking to Cindy after all of

24 this come to find out Cindy had just gotten a credit card

25 bill where Casey had spent their money on a phone bill, I

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1 think it was. I'm not certain.

2 Q So you actually talked to Cindy about it?

3 A Yes.

4 Q And Cindy told you what, that --

5 A That she had found a credit card statement  
6 that Casey had spent a lot of their money. I never saw  
7 the statement or anything.

8 Q But that was something Cindy told you --

9 A Yes.

10 Q -- subsequently or when was that?

11 A After -- after Caylee went missing.

12 Q When you talked to Cindy about that, what was  
13 her demeanor? Did she appear upset about the fact the  
14 money had been taken?

15 A I mean, it was a year later.

16 Q Right. Did she say that she had been upset at  
17 the time --

18 A She said she was furious.

19 Q And I guess the context -- what was the  
20 context of how that came up? Was Cindy talking about  
21 graduation --

22 A We were -- no. We were just kind of like

23 talking about things trying to get Casey's lies out in

24 the open about things.

25 Q Right.

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1 A I was really upset that she had missed my

2 college graduation. I wanted her to be there, and so I

3 asked Cindy about that, and she said, no, this is what

4 really happened.

5 Q And what really happened was there a credit

6 card bill, an issue about that --

7 A Yes.

8 Q -- where Casey had taken money from the

9 family?

10 A That's what Cindy said, yes.

11 Q Were there other lies and those type of

12 conversations you that had with Cindy about Casey?

13 A Her not having a high school diploma.

14 Q Tell me about that. Did she tell you she had

15 a high school diploma?

16 A Yeah, she told me she was enrolled in college.

17 Q And what did you find out about that?

18 A Cindy said she didn't even have a high school  
19 diploma.

20 Q And that was -- as somebody who was your best  
21 friend, she was telling you that she was enrolling in  
22 college?

23 A Yes.

24 Q When, in fact, she hadn't even graduated high  
25 school?

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1 A Yes.

2 Q At the time that you were having that  
3 conversation after Caylee went missing, I mean, why was  
4 it that you and Cindy -- why was it that Cindy was  
5 telling you that or why was it that the two of you were  
6 having that conversation? Was that having to do with  
7 whether Casey might have done something to Caylee or --

8 A We were trying to track down Caylee.

9 Q And as part of that, that's how this came up  
10 about --

11 A Yes, yes.

12 Q -- the earlier lies and inconsistencies that

13 she told?

14 A Yes, sir.

15 Q During those conversations there, tell me

16 everything that you can remember about Cindy trying --

17 exactly what you were talking about when you say you were

18 trying to find out where Caylee was. Tell me a little

19 bit more about what Cindy was saying about what Casey had

20 said and the lies she had told.

21 A Those were the two things that I -- the one

22 conversation about my college graduation, how I said

23 that, you know, I was upset because Casey had to leave

24 and I was mad at Cindy. I told Cindy I was mad at you

25 because you pulled her out of my graduation. She said

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1 well, you know, she stole a bunch of money from me. I

2 said I thought it was because she wasn't registered for

3 school. She said she doesn't even have a high school

4 diploma. So those two are tied together.

5 Q Right.

6 A Anything else was just us trying to trace down

7 Casey during the times where Caylee was missing.

8 Q Now, during that time when Caylee was missing  
9 and you were having this conversation with Cindy, was  
10 there discussion or talk about Zanny at that point?

11 A We were trying to figure out who she was.

12 Q And what did Cindy -- tell me a little bit  
13 more about that as far as Cindy and your conversations  
14 about trying to figure out who this person was.

15 A She didn't -- she didn't have any more clue  
16 than any of us did.

17 Q And tell me a little bit about that. Was  
18 it -- when you had the conversations, I mean, because as  
19 you may know, Cindy has said that Zenaida or Zanny was a  
20 common name that they had heard and they knew all about  
21 her. Was that impression that you got?

22 A That's what she said that Casey had talked  
23 about it, you know, the nanny, but they had never met her  
24 as far as what they told me.

25 Q And did they ever say to you, hey, we had her

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1 phone numbers or anything like that?

2 A Not that I -- not that I can remember.

3 Q And so certainly during the time when Caylee  
4 was missing, there were some questions about whether this  
5 person was even real or existed?

6 A Yes.

7 Q And these were questions Cindy had as well --

8 A Yes.

9 Q -- to your knowledge?

10 A She wanted to know if any of us knew her, and  
11 none of us do.

12 BY MR. MITNIK:

13 Q Just on the conversations with Cindy. Was  
14 Cindy saying things to you that indicated she doubted  
15 whether this person, Zanny the nanny, existed?

16 A No, because she was -- I mean, she always knew  
17 that Caylee was safe, but, I mean, her blatantly coming  
18 out and saying I don't think this person existed, those  
19 words never came out of her mouth.

20 Q Actually, tell me what she would say to you in  
21 this -- you-all are both trying to get to the bottom of  
22 this. I'm just trying to figure out what Cindy was  
23 saying you to. I don't expect you to remember exactly

24 but --

25 A Yeah, I don't remember word for word.

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1 Q -- what was the gist of what she was saying?

2 A Just that she's talked to her about, you know,

3 her and Casey talked about the nanny before. I don't

4 think that Cindy's ever talked to the nanny herself. But

5 she, I mean, to me seemed like that this person did

6 exist.

7 Q That Cindy was acting as if she thought she

8 existed?

9 A Yes, that Cindy felt this person existed.

10 Q And then what was she saying about -- what did

11 she say to you, the gist of it, in trying to find this

12 person?

13 A Just trying to figure out who she was hanging

14 out with at the time, you know, who her friends were. It

15 was a long time ago, and there was so much going on.

16 I --

17 Q When you say trying to find out who her

18 friends were, are you talking about Casey?

19 A Casey -- yeah, like who Casey was hanging out  
20 with because nobody knew this person, none of my friends.  
21 My friends are Casey's like core group of friends. She  
22 had friends outside of us, but we -- you know, we really  
23 didn't hang out with all those other friends that she  
24 had. She'd go from group to group and we didn't hang out  
25 with them. But it was like a work friend or someone who

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1 baby-sat someone she worked with kids.

2 Q And how was the name, this Zanny the nanny  
3 name, even coming up that you-all were trying to talk  
4 about who she might be? How had it come up at all?

5 A We had all met at their house to like make a  
6 time line to see, you know, try to trace Casey's steps to  
7 figure out, you know, where Caylee was.

8 Q And what time frame. This is after --

9 A This is after July 15th.

10 Q Is Casey in jail at the time?

11 A Yes.

12 Q And you say we were altogether. Who's we?

13 A We and my friends. Me, Shawn Daley, Chris

14 Stutts, Christina -- I don't know Christina's last name.

15 I think Stephanie was there. There were a couple people,

16 but I don't remember who they were.

17 Q And Cindy?

18 A And Cindy.

19 Q Was George there?

20 A I don't think so. I think he was at work or

21 he was out doing something. I don't -- I don't recall

22 him being there.

23 Q And where were you-all?

24 A At their house.

25 Q And so at this time, Casey's in jail, but she

Rough Draft - 29

1 has told this story of that Caylee is with this Zanny the

2 nanny or Zenaida Gonzalez, and you-all are trying to

3 figure out who she is so you can try to help find her.

4 Is that the gist of it?

5 A Yes.

6 Q And in that setting, no one had a clue who she

7 was?

8 A No, sir.

9 Q And in that setting, Cindy Anthony gave no  
10 indication that she had any way of contacting this  
11 person?

12 A No, sir.

13 Q Do you think in the context of that  
14 conversation if Cindy had had addresses or phone numbers  
15 on Zanny the nanny that that would have likely come out?

16 A Absolutely.

17 Q And it did not?

18 A It did not.

19 Q And she didn't say anything about having  
20 address books or phone numbers or anything written down  
21 and having turned them over to the police or anything  
22 like that for Zanny the nanny?

23 A Not that I could remember.

24 Q Would you likely remember that if she had  
25 said --

Rough Draft - 30

1 A I -- because I would have wanted to know.

2 MR. MITNIK: Thanks.

3 BY MR. DILL:

4 Q Since we're talking about Zenaida, was there a  
5 time right around before the 15th, I think it might have  
6 been July 8, when you saw Casey out with a new boyfriend  
7 of hers?

8 A July 5th.

9 Q And how do you remember that it was July 5th?

10 A Day after the 4th of July.

11 Q Where'd you see her?

12 A Buffalo Wild Wings at Waterford Lakes.

13 Q Who all was there?

14 A Lots of people there. We were watching the  
15 USC fight.

16 Q And she showed up without Caylee?

17 A Yes.

18 Q And who was she with?

19 A Tony.

20 Q And is it Lazzaro or -- whatever --

21 A Tony.

22 Q You used him as Tony?

23 A Tony, yes.

24 Q And was that first time you met him?

25 A Yes.

Rough Draft - 31

1 Q Did she introduce him as her boyfriend?

2 A Yes.

3 Q And did she tell you on that date, July 5th,  
4 where Caylee was?

5 A She said that she was at the beach.

6 Q And did she say with whom?

7 A Nanny.

8 Q And did she say anything else besides that?

9 A No. I asked her about -- my dad had seen her  
10 a few days before, week before, at a liquor store, and  
11 she was with a couple friends. My dad didn't recognize  
12 the friends but recognized her. Didn't say anything to  
13 Casey, didn't see Caylee.

14 My dad -- I asked her about that. And she  
15 said that -- she's like -- she got baffled at the fact  
16 that I asked that my father -- that I asked if Caylee was  
17 with her. She said, of course, I didn't bring Caylee to  
18 the liquor store with me.

19 Q Casey got baffled --

20 A Yes, Casey.

21 Q -- that you asked her about that?

22 A Yes.

23 Q Why did you ask her? Was there a reason?

24 A I said my dad said he ran into you. He saw

25 you, but he didn't say anything. I was just making  
Rough Draft - 32

1 conversation. I hadn't seen her in a while.

2 Q I gotcha. Okay. So right around this time,

3 though, around the 5th, though, did you ever come to find

4 out or get a message from Lee or anybody else?

5 A Yes. Lee sent me a message on Myspace maybe a

6 week and a half, two weeks before that, sometime between

7 the beginning of June and the middle of July, that they

8 hadn't seen Casey or Caylee -- their parents hadn't seen

9 Casey or Caylee, hadn't really heard from them, wanted to

10 make sure everything was okay. Asked if I heard from her

11 or she was staying with me. I text message Casey

12 immediately and asked if everything was okay. She said

13 everything is fine.

14 Q She sent you back a text?

15 A Yes.

16 Q And do you remember what she said, what the  
17 text said?

18 A Not word for word, but the gist of it was that  
19 everything's okay. Everything's fine. We're fine.  
20 Caylee's fine. You know, my parent are crazy. I talk to  
21 them all the time.

22 Q So then do you know if your father had seen  
23 her subsequent to your getting that message?

24 A I don't know when it was that my dad saw  
25 them -- saw her. She just got back from a trip, but I --

Rough Draft - 33

1 when that -- when that message I got on Myspace was and  
2 when my dad saw her I don't --

3 Q When you saw Casey at Buffalo Wild Wings  
4 around the 5th and she said that Caylee was at the beach,  
5 did you mention the Lee message at that point or did she  
6 bring up the fact that you had text her?

7 A No, no. I don't think she brought it up.

8 Q In your mind you thought that --

9 A Everything was fine.

10 Q She was telling the truth --

11 A Yes.

12 Q -- that her daughter was at the beach and all

13 that?

14 A Yes.

15 Q Did she say anything more at that point about

16 the nanny, whether this was -- who this person was or any

17 identity of the nanny at that point?

18 A No, sir.

19 Q Out of that group of friends that were there

20 at Buffalo Wild Wings, did any of you guys subsequent to

21 when all -- when Casey went in jail, did you guys talk

22 again about that meeting and what she might have said to

23 one of them?

24 A I think we all always asked, you know, where's

25 Caylee, how's Caylee, and she always told us she's fine.

Rough Draft - 34

1 Q And would say that she was somewhere else

2 or --

3 A The beach or a theme park or just at the

4 nanny's.

5 Q Now, during this time period around July 5th,

6 did you still have the impression then that she had had

7 this dream job and was still working --

8 A Yes.

9 Q -- and obviously now come to find out that was

10 not true?

11 A Yes.

12 Q When you saw her at Buffalo Wild Wings, did

13 Casey appear to be, you know, under duress or acting any

14 differently when you saw her?

15 A Absolutely not.

16 Q And describe for me how she was, you know, her

17 demeanor?

18 A Happy go lucky like nothing was wrong.

19 Q Were you able to see if she was drinking or

20 not when you were at the Buffalo Wild Wings?

21 A I think she might have had a couple drinks,

22 but not -- I mean, maybe two.

23 Q Did she appear, her demeanor, the way she

24 acted, any different than she had back when you guys were

25 hanging out more?

Rough Draft - 35

1 A No, sir, not at all.

2 Q As you said happy go will you lucky like

3 nothing was wrong?

4 A Yes.

5 Q Was that the only time between the time you

6 got that message from Lee and then when she -- July 15th,

7 let's say, was that the only time you saw her?

8 A On July 5th?

9 Q Yes.

10 A To my knowledge, yes.

11 Q And how about other IMs or text messages

12 during that time period, if you remember?

13 A Not really, not really, because at that point

14 we really weren't that close anymore. We saw each

15 other -- we saw each other, you know, randomly. I'd seen

16 her at a party in May, but that's it.

17 Q And you weren't as close because I guess you

18 weren't dating the same people that you had been dating

19 before or --

20 A She was dating a new guy and was hanging out

21 with them a lot.

22 Q And do you know if that was the guy that

23 showed up at the Buffalo Wild Wings?

24 A No, it's not the same person.

25 Q Do you know who it was?

Rough Draft - 36

1 A Ricardo, Ricardo Morales.

2 Q Are you friendly with him or do you know him?

3 A We used to work together.

4 Q Have the two of you ever discussed where

5 Caylee was during this time period or anything of this?

6 A When everything first happened, yeah, we

7 talked about it because both of us were baffled. We

8 couldn't believe that this person we thought we knew was

9 lying to us about basically everything. We discussed

10 that. He had said he was very upset because she had

11 stayed the night -- Casey and Caylee had stayed the night

12 at his house sometime in early June, I don't remember

13 exactly the day he had said, that he was upset about that

14 because he's saying what if that was the last time

15 anybody saw Caylee alive. So he was very upset about

16 that. But other than that, no.

17 Q Did he ever say anything to you about a nanny

18 or Zanny the nanny, anything like that?

19 A Not to my knowledge. Not that I could

20 remember.

21 Q So after Lee sends you the message, did you

22 ever reply to Lee?

23 A Yeah, I told him I just talked to Casey and

24 she said everything's fine. Short and sweet.

25 Q Was that basically the last of that series of  
Rough Draft - 37

1 conversations --

2 A Yes.

3 Q -- between you and Lee?

4 A Yes.

5 Q Then after the 5th, after Buffalo Wild Wings,

6 how long was everybody there? Was it during the duration

7 of the fight?

8 A Yeah, we got there pretty early. I would say

9 between 7:00, 7:30. I think -- I went out afterwards, so

10 I think -- I want to say I left 11:00, 11:30'ish, maybe

11 12.

12 Q Was she still there; do you remember?

13 A I do believe she was.

14 Q With Tony?

15 A Tony.

16 Q And that was the first time, I guess, you had

17 talked to Tony or met Tony?

18 A I didn't really even talk to him.

19 Q Have you subsequently talked to him or seen

20 him around or anything like that?

21 A No, sir.

22 Q I'm going to get to July 15 in a moment here,

23 but I want to backtrack before we get into July 15

24 forward kind of to orient you.

25 Did you ever observe any tension or fights

Rough Draft - 38

1 between Casey and Cindy ever?

2 A Before July 15th 1234.

3 Q Sure. We're going back?

4 A I never observed them, no. Casey would call

5 me upset my mom this, my mom that, my dad this, my dad

6 that.

7 Q What were the issues with her mom concerning

8 Caylee specifically?

9 A The biggest one was on her second birthday.

10 Q Tell me about that.

11 A Caylee was, you know, opening her presents and

12 Cindy was doing a lot of the work for her and Casey got

13 upset. We had discussion about it. You know, she was

14 upset that Cindy was helping Caylee when it was Casey's

15 daughter. Casey wanted to be the one helping.

16 Q And did she say that was an issue between the

17 two of them or a problem?

18 A I think that it's -- it was an ongoing battle

19 with the two of them.

20 Q Because you said -- during that time period

21 would have been the time she would have confided in you?

22 A Yes, yes.

23 Q So were there times that she would call you

24 and e-mail you and vent about that situation?

25 A Absolutely.

Rough Draft - 39

1 Q And when you say the ongoing battle, I just

2 want to be a little more specific. Describe what you  
3 mean.

4 A She'd called me before about it, you know, my  
5 mom, you know -- I can't -- I remember her second  
6 birthday specifically because there's videos of it, there  
7 are pictures of it. But I mean anything specific, any  
8 dates, any times as to when she called saying they had  
9 problems, I just remember her talking about it.

10 Q And when you say the problems, was that that  
11 ongoing thing about Cindy being more either involved or  
12 trying to be more of the mom?

13 A Trying to be more of the mom.

14 Q And that that was something that was upsetting  
15 to Casey?

16 A To Casey, yes.

17 Q Did she describe why that was upsetting or  
18 how?

19 A She just -- because Casey was Caylee's mom,  
20 Cindy's her grandmother. It's her daughter.

21 Q Did Casey ever say to you anything during  
22 those time periods about plans to try to move out of the  
23 house or anything like that?

24 A Absolutely.

25 Q Tell me about that.

Rough Draft - 40

1 A She just wanted to get a place on her own,  
2 but, you know, she had it good at her parents' house.  
3 She never specifically said any specific place, but she  
4 wanted to. But, I mean, it was going to be like years.

5 Q Years forward?

6 A Yes.

7 Q Did she ever mention Sawgrass as one of the  
8 potential places?

9 A No, sir.

10 Q As far as that ongoing problems or fights, I  
11 guess, between Casey and Cindy, did Casey ever tell you  
12 that she was having some sort of a breakdown or problems?

13 A Yes.

14 Q Tell me about that.

15 A She'd come to my work one day for lunch, and  
16 she was really, really upset. She was in professional  
17 clothes like she had just gotten off work. She had  
18 Caylee with her. We went to go grab something to eat,

19 and she said I just feel like I'm having a breakdown. I  
20 feel like I'm losing it. You know, I need to get away.

21 I said you want to go away for the weekend?

22 She said, no, like I have to go somewhere. I didn't

23 understand what she was saying. She said she wanted to

24 like go to an institution for a little bit, get

25 everything off her mind or whatever. She never said

Rough Draft - 41

1 anything specific. And I asked her what she would do

2 with specific. She said she would give her to her

3 grandparents, to Cindy and George.

4 Q And do you remember about what time frame

5 we're talking about that this happened?

6 A Absolutely not. Caylee's second birthday for

7 sure. I know that.

8 Q So before August of, what is that, '07?

9 A 2008. Oh, no, 2007, you're right.

10 Q Okay. And was that -- the subject of the

11 tension or problems between Cindy and Casey, would those

12 come up during conversations with the two of you often

13 moving forward?

14 A Not often, but we did talk about it before,  
15 before her second birthday. That wasn't the only time.

16 Q So is it fair to say it was sort of an ongoing  
17 issue?

18 A Yes.

19 Q Now, let me ask some questions, and you may  
20 remember this from the interview with the police. I just  
21 want to ask some questions about -- particularly about  
22 Xanax so I'm going to ask about that.

23 I believe there was an e-mail or an IM where  
24 Casey said that she could get a Xanax from her friend  
25 Annie. Do you remember?

Rough Draft - 42

1 A Yes.

2 Q You know what I'm talking about? That's  
3 obviously -- tell me about that is that true or --

4 A Completely untrue.

5 Q Do you know why she would have said that or --

6 A I have no clue.

7 Q Do you know if she was -- had you ever been  
8 around her when she had taken Xanax?

9 A Absolutely not.

10 Q Had you ever -- have you ever heard the term  
11 Xanax refers -- or Zanny the nanny refers to Xanax given  
12 to a kid? Have you heard that?

13 A People on the Internet have said that. I've  
14 heard on the news.

15 Q Right. But did you hear it among --

16 A Friends, no.

17 Q So this -- this e-mail, I guess --

18 A Instant Messenger.

19 Q -- saying that she could hook up -- my friend  
20 Annie could hook up, you don't know anything about that?

21 A I don't know anything about that.

22 Q Is that another example of her making up --

23 A Yes.

24 Q -- making up a story?

25 A Yes, sir.

Rough Draft - 43

1 Q When you used to hang out with her, did you  
2 ever see her -- I mean, obviously, she drank.

3 A Yes.

4 Q Did you ever see her use any other type of  
5 drugs?

6 A No, sir. She barely -- and she barely drank.  
7 She usually is the one who drove all of us when she did  
8 go out.

9 Q That's when you guys were close?

10 A When we were closer, yes.

11 Q Now I think you may have seen some more  
12 frequent photographs?

13 A Yes.

14 Q Were you in any of those parties from the  
15 pictures like during the time period when --

16 A Not when Caylee was missing. There's one  
17 picture -- there's a set of pictures that people say is a  
18 July 4th party. It wasn't a July 4th party. It was from  
19 May. It was the end of May. It was around this time.  
20 It was Memorial Day weekend.

21 Q And is there another set of pictures that you  
22 don't recognize or you're not sure when they were taken?

23 A Yeah, there's one she's wearing a purple  
24 dress, I think. I think so. She's wearing a dress.

25 It's at Fusion.

Rough Draft - 44

1 Q Fusion being over there on Lake Underhill?

2 A I'm not sure. I know it's behind Waterford

3 Lakes. I've never been there. I have no clue where it

4 is.

5 Q That wasn't one of the places you frequented?

6 A No, I've never been there.

7 Q Did you find out from your group of friends or

8 anything that Casey was hanging out there or --

9 A She tried to get me to go out there because

10 she was doing some kind of promotions for them.

11 Q When was that? June?

12 A June, July, yeah.

13 Q So she was doing promotions for Fusion and

14 tried to get you to go out there to go to the parties?

15 A Yeah, she wanted me to go out.

16 Q And when she called you or tried to get you to

17 come out, again, was she acting like she was under

18 duress?

19 A No, sir.

20 Q Or being directed by somebody to do that?

21 A No, sir.

22 Q There came the point in time, I guess it was

23 around the 15th, that all of this first happened. Did

24 Casey ever call you or talk to you after she was

25 arrested?

Rough Draft - 45

1 A When she came home from jail.

2 Q About when was that?

3 A If I knew what time -- when she got out of

4 jail, I could tell you specifically.

5 Q I understand.

6 A Before my birthday.

7 Q When she came home from the jail the first

8 time?

9 A When she came home from jail the first time.

10 And then I believe she got arrested and -- she got

11 rearrested for the check charges and then got out of jail

12 again.

13 Q So when she came home from jail the first

14 time --

15 A Yes.

16 Q -- kind of take me through this now. Did she

17 call you or --

18 A No.

19 Q How was it you that ended up talking to her?

20 A I had -- a good friend of mine was the one

21 making the shirts for Caylee, and I had to go pick some

22 of them up on a Friday for George. He couldn't make it

23 so he wanted me to go get them from my friend. So I went

24 and got them. They couldn't -- they went out of town.

25 They had something to do.

Rough Draft - 46

1 I ended up meeting up with them on a Monday

2 night to get the shirts from them -- or get the shirts to

3 them. And I had been going through something, and me and

4 Cindy and George were just talking. I was like this is

5 one of those times I would need Casey and I can't have

6 her. They said get in the car. We'll take you to her.

7 Q And where did they take you?

8 A To the house.

9 Q When you saw her in the house, did the two of

10 you have a conversation at that point?

11 A Yes.

12 Q Tell me about it.

13 A She just -- we just kind of caught up a little

14 bit, talked about my house. I asked how she was doing.

15 She -- she had told me that -- I wish I remember word for

16 word. Just that everything -- that Caylee -- it was

17 before Caylee's second birthday -- or third birthday and

18 that Caylee was going to be home before her third

19 birthday, and that she knew she was going to be home

20 before her third birthday, and that Caylee was close;

21 that she's like, you know, when this is said and done, I

22 have so much to tell you.

23 Q What did you think of that in the context of

24 what was going on?

25 A I didn't want to know anything because I

Rough Draft - 47

1 wouldn't want to be put in a situation where I'm the

2 person who knows, so I kind of just left it at that

3 and --

4 Q When she said -- when you said you wouldn't

5 want to know or didn't want to know, did you get the  
6 impression that Casey might have -- was going to tell you  
7 something that --

8 A At that point, no. Like I didn't think she  
9 was going to say anything to me at that point, but I  
10 think that she wanted to talk to me.

11 Q Because, again, this was somebody that  
12 confided in you?

13 A Yes.

14 Q And you confided in her?

15 A Yes.

16 Q Now, how about this when she was saying that  
17 she knew that Casey was going to be -- sorry -- that  
18 Caylee was going to be home by her third birthday, did  
19 you ask her about that in light of the fact that she's  
20 missing?

21 A Again, I didn't -- I didn't really want to get  
22 into it with her. It's just one of those things that  
23 I -- I had so many questions I could have asked her.

24 Q Right.

25 A And I just -- for my safety, I just didn't --

1 I didn't ask anything.

2 Q Did she at that point ever say to you, well,

3 this Zanny the nanny has her or took her?

4 A No.

5 Q So here now she's home from jail. She's

6 already told the police about the Zanny the nanny?

7 A Yes.

8 Q And you're her best friend. Did she say to

9 you that? Did she tell you that story?

10 A No, sir.

11 Q Did that seem odd to you in light of what you

12 know now?

13 A That she didn't say someone specific?

14 Q Yeah.

15 A It's all odd. Every bit of it is. Again,

16 when she would start saying something, I would back out

17 of it. I wouldn't -- I really didn't want to know. I

18 didn't want to be that person that knew everything.

19 Q Was it just the two of you?

20 A Yes. We were in her room talking.

21 Q And when she said when this is all said and

22 done, I have so much to tell you, you took that to --

23 A When this was all said and done, she had so

24 much to tell me.

25 Q Exactly. How long was that conversation you  
Rough Draft - 49

1 had with her in her room?

2 A I was with her for a couple hours.

3 Q You also talked about your situation?

4 A My stuff. It's just things that she wanted to

5 know about her friends, what was going on outside of, you

6 know, the jail.

7 Q Okay. Anything else that she told you at that

8 point about the circumstances of how her daughter was

9 missing?

10 A She -- no. Like I said, I stayed away from

11 it. I really -- I told her if there is anything I can do

12 for you, let me know, but, again, I didn't want to be

13 that person that knew.

14 Q Now, at this point you had heard this Zanny

15 story?

16 A Yes.

17 Q Did you believe it at that point?

18 A I believed Caylee was alive until they

19 confirmed that she wasn't.

20 Q And now in light of everything that you've

21 learned, what Casey had told you about the nanny, do you

22 believe that to be true?

23 A I think that there was somebody that watched

24 Caylee. Whether it was male or female, I don't know, but

25 I believe there was somebody that watched Caylee.

Rough Draft - 50

1 Q And why do you say that?

2 A Just a gut feeling. There's no reason why.

3 Nothing that anybody said, but I just have a feeling that

4 there's somebody.

5 Q But certainly this Zanny the nanny and her

6 being a ten, her name being Zenaida Gonzalez, based on

7 what you know and what you've talked to all your friends,

8 do you have any information that's true?

9 A I have no information about that. I had not

10 heard that name until it was on the news.

11 Q All right. Now, after that, when you went and

12 met with her on that day --

13 A Yes.

14 Q -- did you talk to -- first of all, we'll talk

15 about Casey and then talk the other folks as well, George

16 and Cindy and Lee, but did you ever talk to Casey again

17 after you met with her in person on that day?

18 A Yeah. We -- we would talk. She would text me

19 from her mom's phone or from her dad's phone just saying

20 little things, hey, hang in there.

21 Q How about a face-to-face conversation?

22 A I saw her again before she went to jail for

23 good.

24 Q Okay. And during that either the text

25 messages or the time when you saw her again before she

Rough Draft - 51

1 went to jail for good, did she ever talk to you about

2 Zanny the nanny?

3 A No, sir.

4 Q Anything about that -- about the abduction of

5 her child?

6 A No, sir.

7 Q About Blanchard Park?

8 A No, sir.

9 Q Did you ever hear anything about that?

10 A I know she used to run at Blanchard.

11 Q But did she ever tell you that this Zanny

12 person had taken her kid away to punish her, to teach her

13 a lesson?

14 A No. She did say that whoever had her child,

15 they were telling her to say everything that she said.

16 Q She told you that?

17 A She told me that.

18 Q When did she you that?

19 A When she was out of jail the first time I saw

20 her.

21 Q Back the first --

22 A When she was first out of jail before Caylee's

23 third birthday.

24 Q So when she first got out of jail, she was

25 comfortable enough to tell you that somebody was telling

Rough Draft - 52

1 her -- telling her --

2 A To say what she said, yes.

3 Q And did she expand on that at all?

4 A No.

5 Q Did that seem odd?

6 A Again, I didn't want to know. I really,  
7 really didn't want to know.

8 Q Did that seem like something that was  
9 realistic to you?

10 A I -- no, but, I mean, I don't know.

11 Q That next time that you saw her, were there  
12 more conversations about what?

13 A That was less involved with Caylee than the  
14 first visit.

15 Q What was it involving?

16 A We just hung out. I mean, me her and her mom  
17 hung out. George was at work. We hung out, watched a  
18 movie.

19 Q When -- you told us before about the group of  
20 friends had gotten together to put together a time line.

21 A Yes.

22 Q Was that before she came home from jail the

23 first time?

24 A Yes. I mean, this was right after she had

25 gotten arrested.

Rough Draft - 53

1 Q Now, did you ever talk with George or Cindy or

2 Lee, any one of them, again about the things you had

3 talked to about during that time line?

4 A Several times.

5 Q And tell me, did the name Zanny the nanny ever

6 come up with them?

7 A No.

8 Q First of all, with Cindy, I mean, how many

9 times -- how often would you talk to her about where

10 Caylee might have been?

11 A I would talk to them on a fairly daily basis

12 until my name got drug into things, and then I quit

13 talking to them.

14 Q We'll get to that in a second about your name

15 being brought in, but when you talked to them on a daily

16 basis, meaning George or Cindy, did they ever again say,

17 hey, we've got to find this Zanny or Zenaida --

18 A No.

19 Q -- because Zenaida took our child or

20 grandchild?

21 A No.

22 Q Never heard that?

23 A No.

24 Q And when -- I guess you were involved a little

25 bit in the search as well?

Rough Draft - 54

1 A Yes.

2 Q And during all that time period, did you ever

3 have any conversations with George, Cindy or Lee about

4 Zanny the nanny or Zenaida?

5 A Just basically all three of them asked did you

6 know this person? Do you know who this person could be?

7 Is this this person's name? Who is this person? They

8 all asked once, and after I said no, it kind of was

9 dropped.

10 Q But you never heard them again talking amongst

11 themselves about a game plan to find Zenaida?

12 A Not that I can remember.

13 Q Now, when you see --

14 A Besides one of the times. I know for sure one  
15 of the times that we met up and talked that we tried to  
16 figure out if it was somebody else.

17 Q Did you ever see the investigators that they  
18 had hired or meet them?

19 A The private investigators?

20 Q Right.

21 A I went to one of the vigils, a couple of  
22 vigils at their house, in front of their house, and they  
23 were there so, obviously, I apparently have seen them,  
24 but who they were.

25 Q Did they ever come up to you and interview as  
Rough Draft - 55

1 the best friend of Casey --

2 A No.

3 Q -- about trying to find this person --

4 A No.

5 Q -- who was the baby-sitter?

6 A No.

7 Q Never did that?

8 A No, sir.

9 Q Now, when you say your name was dragged into  
10 it, tell me what you mean by that, that your name being  
11 dragged --

12 A Instant message.

13 Q The instant message about the Xanax?

14 A Yes.

15 Q Did Lee actually call you at some point in  
16 time?

17 A Yes.

18 Q And what was that? Lee called you and --

19 A Lee called me after Melina had been  
20 interviewed by the sheriff's office.

21 Q His girlfriend?

22 A No. Melina is one of Casey's friends --

23 Q I'm sorry.

24 A Melina was one of Casey's friends from middle  
25 school. Melina called Lee, and she had told Lee about

Rough Draft - 56

1 the interview saying they were asking Melina that she

2 knew that I sold drugs or I did drugs. Lee said tell

3 them tell the truth. They're going to talk to you.

4 They're going to want to talk to you. Just tell them the  
5 truth.

6 Q Do you know how that -- how that all came into  
7 it. Was it the instant message?

8 A Yes. I'm assuming that's what they asked  
9 Melina. They asked Melina about the instant message  
10 because they asked her if she knew that I sold drugs or  
11 anything.

12 Q Again, that's all --

13 A Completely untrue.

14 Q Did Cindy -- or did you ask Casey at any time  
15 about chloroform? Do you remember that?

16 A Yeah, I did the first time that we were over  
17 there. I did ask her that, Casey.

18 Q Tell me about that.

19 A What is it they're saying about the chloroform  
20 in her car? What is it? She said they're cleaning  
21 supplies in the back of my cars, which I believe because  
22 that family cleans 24/7. Like everything they have is  
23 spotless, and it wouldn't surprise me if there was  
24 cleaning supplies, something in the back of her car.

25 There always was.

Rough Draft - 57

1 And she just said, you know, that there were  
2 cleaning supplies back there, whatever chloroform is,  
3 whatever it's made up. I think it's ammonia and bleach.  
4 I didn't know what it was. I looked it up on the  
5 Internet.

6 Q As far as the -- did the conversation ever  
7 come up with George or Cindy or Lee about the smell from  
8 the car? Did you ever --

9 A I've never talked to them about that.

10 Q Never heard them say that?

11 A No. On the news -- just recordings on the  
12 news.

13 Q But what they said you to in any of these  
14 conversations?

15 A I never talked to them about that.

16 Q Did Casey ever explain it or say anything to  
17 you about that when you talked to her?

18 A No, no.

19 Q I saw something in the interview, and I just

20 want to follow up on it as well about Casey catching

21 Cindy with the e-mails or being on the computer. Do you

22 remember that?

23 A (Nods head.)

24 Q Is that something you saw or something you --

25 A I was there -- I think it was the second time

Rough Draft - 58

1 I was there. She had -- Cindy had signed an e-mail Case.

2 That's what Casey signed everything, Case. And Cindy was

3 acting like Casey talking to somebody who said they had a

4 lead about Caylee, and she had signed an e-mail Case,

5 like she was -- like Casey was writing it, and Casey kind

6 of freaked out about it.

7 Q Was that something you saw or observed?

8 A I heard it. I was in the living room. They

9 were in the computer room.

10 Q They were yelling. So it's my understanding

11 you had -- when you're saying freaked out, be a little

12 more -- tell me what happened.

13 A She screamed and yelled at her.

14 Q What kind of things was she saying?

15 A You're an idiot. You're stupid. What do you  
16 think you're doing? Things like that.

17 Q And what was Cindy's response?

18 A I'm trying to find Caylee.

19 Q When they were -- when you were there and you  
20 heard those guys interacting or talking, did you ever  
21 hear them talking about Zanny or anything like that?

22 A No, no.

23 Q I just want to make sure in my mind after she  
24 was arrested the first time, it looks like you met with  
25 her twice in person?

Rough Draft - 59

1 A Yes.

2 Q Is that right?

3 A Uh-huh.

4 Q And then you said you would get text messages  
5 on George or Cindy's phone. How would you know it was  
6 her?

7 A I would just -- things that somebody might age  
8 would say versus something her parents would say.

9 Q I gotcha. How about the e-mails or instant

10 messages?

11 A Never. I never got those.

12 Q After she'd been arrested?

13 A She would send me text messages. She could --

14 from her instant messenger could text message my phone

15 and she would say thinking of you, love you, be strong,

16 be careful.

17 Q Anything else about this, her either being

18 directed about what to say or anything else about the

19 nanny?

20 A No, sir.

21 Q No mention of that?

22 A Just that one time.

23 Q Let me clarify something else. I guess you

24 got a traffic ticket at some point in time?

25 A I've had a couple.

Rough Draft - 60

1 Q Was there one around Memorial Day last year or

2 May 24th or so?

3 A Of last year?

4 Q Yes. I'm just looking at some things here,

5 that you got, I guess, a traffic ticket.

6 A The last one I got was a speeding ticket and  
7 seat belt violation. When it was I don't know. I know  
8 where I was, but --

9 Q Was anybody with you?

10 A No.

11 Q You were by yourself?

12 A I was by myself.

13 Q So traffic ticket and speeding violation. Was  
14 Casey around following you?

15 A I was actually talking on the phone to her,  
16 ironically, but I don't think it was last year. I think  
17 it's been a year.

18 Q Oh, has it?

19 A A good year.

20 Q That may be. I'm just trying to see when --  
21 that you actually got a seat belt --

22 A I got a couple speeding and seat belt  
23 violations. One was on Moss Park Road and one was on  
24 Curry Ford.

25 Q Do you know if Casey ever used a fake ID or

1 had a fake ID?

2 A Not to my knowledge.

3 Q Because I guess would you have known her after

4 she --

5 A After she was 21.

6 Q After she's of drinking age?

7 A Yeah, I -- I don't --

8 Q So you didn't hang out with her back in high

9 school?

10 A No. We didn't socialize outside of high

11 school.

12 MR. DILL: Let's take a break for a second.

13 THE VIDEOGRAPHER: Time is 1:58. We'll go off

14 the record.

15 (A 2-minute recess was had.)

16 THE VIDEOGRAPHER: The time is 2:00. We are

17 back on record.

18 BY MR. MITNIK:

19 Q I've got just a few follow-up questions. When

20 you were describing the situation where -- after Cindy

21 had -- I'm sorry -- after Casey had gotten out of jail

22 and she caught her mom signing her name to e-mail or a

23 text or something?

24 A Yes.

25 Q She said she screamed at her and said you're

Rough Draft - 62

1 an idiot and you're stupid. Was that from your

2 experience of her relationship with Cindy a pretty

3 volatile relationship?

4 A What do you mean?

5 Q I guess I never screamed at my mom or dad and

6 said you're an idiot or stupid.

7 A I never did either, and I told her that is no

8 way to talk to your mother.

9 Q How was Cindy reacting when she did that?

10 A She just accepted it.

11 Q Was it your impression either from your

12 experience with her or from that interaction that that

13 was not out of the ordinary that she would talk to her

14 mom like that?

15 A I don't think it was normal. To me Cindy

16 doesn't seem the type of person that would stand for  
17 that, especially from her child. I don't think that she  
18 would stand for that, but given the situation I know -- I  
19 mean, I'm not a mom. I'm not a grandma. But I think at  
20 that point I would do anything, listen to anything that  
21 it would take to get my grandchild back, get my child  
22 back.

23 Q In the past when there were -- for example,  
24 you said there was an ongoing battle between Cindy and  
25 Casey over the issue of Cindy kind of overstepping her

Rough Draft - 63

1 bounds playing mother as opposed to letting Casey be the  
2 mother.

3 Do you know when -- in those situations when  
4 they would battle over it whether it would escalate?

5 A Not to my knowledge. I mean, Casey had never  
6 said to me my mom, you know, touched me or my dad touched  
7 me. You know, they never -- I don't know of anything  
8 that's ever happened.

9 Q Well, actually that's part of the question.

10 Not just physical but do you know whether they hollered

11 each other and got hot even --

12 A I never witnessed it besides that one time.

13 Q Over the phone when this ongoing -- how long a

14 period of time do you think the ongoing battle went on?

15 A I think her whole life. I think Caylee's

16 whole life.

17 Q Caylee's whole life Cindy would -- is it fair

18 to characterize the way Casey would describe to you that

19 her mom was acting, like she was really the mom of Caylee

20 and that was upsetting to her, like overstepping her

21 bounds rather than being the grandma, you're stepping on

22 my toes as the mother; is that fair?

23 A I wouldn't say that it was always like that.

24 Again, I was very rarely around Cindy, Casey and Caylee

25 all at the same time.

Rough Draft - 64

1 Q When it happened, was that -- is that a fair

2 characterization what --

3 A Yes.

4 Q -- what Casey would be griping to you about on

5 the phone?

6 A Yes.

7 Q You said other times she would call, Casey

8 would call you and talk about she was in a fight with

9 her, an argument with Cindy. What other kind of things

10 did they have problems with?

11 A Her wanting to move out, not registering for

12 school. That's what she told me.

13 Q And "she" being Casey?

14 A Casey, yes.

15 Q And Casey would -- in other words, Casey would

16 tell you that she was in an argument with her mom because

17 her mom did not want her to move out and Casey wanted to

18 move out?

19 A Yes.

20 Q And why -- why wouldn't her mother want her to

21 move out? What was Casey telling her? Was it over

22 Caylee?

23 A Yeah, I'm assuming that's what it was. I

24 don't remember exactly, but my -- my assumption would be

25 that because then Cindy would never see Caylee. Cindy or

1 George, for that matter.

2 Q While you don't remember the specific word for  
3 word, is it fair the gist of what you recall about it was  
4 Cindy didn't want Casey to move out because -- because of  
5 her wanting to have Caylee in the home?

6 A Yes.

7 Q How about you had said also she had called --  
8 if I heard right -- that there were times that Cindy  
9 would call and she'd be having arguments with her dad,  
10 George. What would they argue about?

11 A You mean Casey call?

12 Q I'm sorry. I said Cindy. When Casey would  
13 call that she would also have arguments with her dad  
14 George, do you remember what that would be about?

15 A They just didn't get along from what Casey  
16 told me. She -- I don't remember her ever saying  
17 anything specific. She would say that her parents were  
18 getting a divorce. They were fighting. And her dad --  
19 she would just say her dad was just hateful, just not  
20 nice to her.

21 Q To her?

22 A To Casey. But never anything specific. She

23 was more specific about the arguments with her mom.

24 Q And the stuff about George being hateful, is

25 that kind of an ongoing deal to?

Rough Draft - 66

1 A Not so -- not so much.

2 Q When she -- how often would you hear that from

3 her?

4 A I think I maybe heard that twice, three times

5 maybe.

6 Q What about her relationship with Lee?

7 A They were like best of friends.

8 Q Just going back for a minute about when you

9 went over to the house with some of the other group of

10 friends while Casey was in jail and you were kind of

11 trying to piece together who this baby-sitter could be or

12 where she could be and Cindy was there --

13 A Yes.

14 Q -- at any time during that gathering, did

15 Cindy say anything about indicating, well, I know the

16 baby-sitter's for real because --

17 A No.

18 Q -- because Caylee would talk about Zanny's

19 puppy or dog, anything like that?

20 A No. The one thing Cindy did say is that there

21 was a list, a list of items that she found on a piece --

22 like on a notepad that had -- like if you were packing

23 for like the beach or something, that had like those kind

24 of items, like things you need to get at the store, juice

25 and Caylee's favorite snacks. What they -- I don't

Rough Draft - 67

1 remember what they were, but those were on the list. And

2 like things that Caylee would need if Caylee was going to

3 the beach.

4 And I think she had mentioned that there was

5 like a dog leash, dog bone, dog treats, something like

6 that on the list as well.

7 Q Now, this list that Cindy told you about,

8 would that have been during this meeting we were just

9 talking about?

10 A She had mentioned it, yes.

11 Q Was it something that she had found recently,

12 in other words, indicating it looked like she was packing

13 up to go to the beach when we last saw her now that I've

14 seen the list?

15 A I think she just found the list. I don't know

16 if she knew when it was from, though.

17 Q Was the context of her bringing it up, she may

18 have been planning to go to the beach when she was last

19 here?

20 A Like Casey was planning to go to the beach.

21 She wanted us to go to the beach and like put fliers

22 around and stuff.

23 Q So she thought that was a lead as to

24 potentially where Caylee was?

25 A Yes.

Rough Draft - 68

1 Q In the conversation that you actually had with

2 Casey after she got out of jail, I heard you say that

3 when she would start to talk about any of the kind of

4 hotter issues about what was going on, you would back up.

5 You didn't want to be getting information?

6 A No.

7 Q Can you remember the things, again, not exact

8 words, but the gist of times she would start into a  
9 subject where you would back out of it what those things  
10 she would start to bring up were?

11 A I've mentioned them. The trunk, the  
12 chloroform in the trunk. Her saying when everything is  
13 all said and done I have so much to tell you, and that  
14 someone had been telling her to say what she's been  
15 saying, but nothing more than that that I can remember.

16 Q And when she said someone has been saying to  
17 say what she's been saying, say what she's saying about  
18 what?

19 A Everything, I'm assuming -- I'm assuming she  
20 meant everything.

21 Q And did she act scared or what was the  
22 setting? I mean, what was her demeanor when she's  
23 telling you that?

24 A She did seem a little like on edge, I guess,  
25 you could say. She wouldn't like sit near her window.

Rough Draft - 69

1 She would not sit near her window at all. She didn't  
2 want me to sit near her window. But that's really like

3 the weirdest thing to me.

4 Q And when she said someone was telling her to

5 say everything she said, she didn't give any indication

6 who?

7 A Again, it's just "they."

8 Q And when she said -- but it was a plural

9 "they"?

10 A Yeah.

11 Q And it wasn't in any way, shape or form a

12 Zenaida Gonzalez?

13 A That name was not said.

14 Q Or Zanny the nanny or anything like that?

15 A That name was not said.

16 Q And when she said that she believed Caylee

17 would be home by her third birthday, did she say anything

18 else about why she thought that?

19 A Just a gut feeling.

20 Q Did she say that or --

21 A (Nods head.)

22 Q She said it's a gut feeling she'll be there by

23 her birthday?

24 A (Nods head.)

25 Q Nothing else?

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1 A Nothing else.

2 Q And then she said she thought she was close.

3 Was your impression she meant close geographically?

4 A That was what I took from it, yes.

5 Q And what led you to think that?

6 A Nothing specific. Just I wouldn't -- I

7 wouldn't know what, you know, what other way she was

8 talking.

9 Q Did she -- as she said I have a gut feeling

10 that she'll be home by her third birthday, did she give

11 you any reason why she thought she was close or say gut

12 feeling or anything like that?

13 A No, no. In her heart she knows. In her gut

14 she knows. But it was just a feeling.

15 Q That she's close?

16 A It wasn't anything concrete like this is the

17 reason why.

18 Q What was, at this time when she's now home

19 from jail, the relationship with her and Cindy? Is it  
20 tense? Is it real warm? How would you describe it?

21 A That first time I just went over there and I  
22 spent time with Casey, I didn't -- I mean, I had seen  
23 George and Cindy and they took me back to my car, but I  
24 spent my -- the entire time I was there with Casey.

25 The second time Cindy was there that one  
Rough Draft - 71

1 little tift and that was it.

2 Q Rest of the time how were they?

3 A Fine.

4 Q How about were you ever there after she got  
5 out of jail when George was there?

6 A I don't think -- I know George came home that  
7 night that I had stayed the night there, but we were  
8 sleeping.

9 Q So you didn't see any interaction?

10 A I don't -- I don't -- I don't remember seeing  
11 anything, interaction.

12 Q From talking to any of your other friends,  
13 were you able to piece -- did anyone else see or have

14 information about where she was out and about during that

15 about 30 days that --

16 A None of my friends, no.

17 Q -- Caylee was missing?

18 A I know that a group of my friends they all

19 went out to Ale House one night from what I've read, what

20 I've heard, that Casey had stopped by, but I don't know

21 when that was. It was between those time periods.

22 Q If I want to find out any more about that, do

23 you have any names of people that would have been there?

24 A I know Casey was there. I don't know why they

25 went up there because I guess that was the day that she

Rough Draft - 72

1 saw Jeff Hopkins, the guy that went to high school with,

2 but I don't know who was there. I don't even know why

3 they were there. I know I wasn't there. That's all I

4 know.

5 Q All right. Now, she had got kind of a new

6 group of friends at some point?

7 A Yes.

8 Q About when would that have been?

9 A Well, after -- the beginning of 2008 -- I  
10 would feel confident saying the beginning of 2008. I  
11 don't know when she started dating Ricardo. As soon as  
12 she started dating Ricardo, she hung out with them a lot.  
13 And then from Ricardo's group of friends, she went to  
14 dating Tony.

15 Q Now, everyone's seen because you can't turn  
16 the TV on and not see a whole bunch of party pictures  
17 with her and people hands on her and hanging over the  
18 toilet and, you know, looks like a big wild party scene.

19 A Those are like four different occasions.

20 Q I guess my question is do you know that after  
21 your group, which sounds like that would not have been an  
22 act or be the of kind of day-to-day life when she ran  
23 with your group?

24 A The one hanging over the toilet was her 21st  
25 birthday, 21st birthday. The one of her in the American

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1 flag was Memorial Day last year, so this was all before  
2 any of this happened. The pictures -- the other ones I  
3 don't know when those were taken, her dancing in boots.

4 I don't know when those were taken because I wasn't  
5 there.

6 Q But I guess what I'm getting at is do you know  
7 whether or did you hear through any of your friends that  
8 when she started hanging out with the new group, that it  
9 was a wilder crowd or she had turned some corner and  
10 gotten wilder or do you know?

11 A I don't think that Casey's ever been wild,  
12 not -- not around me she hasn't been. Like I said, when  
13 she went out with me, she most of the time drove.

14 Q That's what I'm getting at. It sounds like --  
15 I get the description of when you hung out with her, and  
16 what I'm trying to get is once the switch and she hung  
17 out with a new group of friends do you know one way or  
18 the other if she changed some.

19 A I heard that she had smoked pot for the first  
20 time and that that's what that group of friends did, but  
21 I can't --

22 Q So it was a little more --

23 A -- confirm that.

24 Q -- party group in that regard?

25 A I guess. I don't know. I don't know them. I

Rough Draft - 74

1 don't know what they do. I don't know where they go. I

2 don't know where they hang out.

3 Q I don't want to drag people in.

4 A I don't want to say something about people

5 that I don't know. I don't know for sure.

6 Q If you would rather not, it's okay, but I'll

7 ask you, if you don't mind, who you heard that from?

8 A I have no clue.

9 Q You don't remember who it was?

10 A Whether it was people's statements that I've

11 read online, you know, I don't know.

12 Q That's fine. I don't want to put you in an

13 uncomfortable position anyhow.

14 MR. MITNIK: That's all I have.

15 MR. DILL: Just one more actually quick

16 follow-up on something you just said.

17 BY MR. DILL:

18 Q Jeff Hopkins, you were friends with him from

19 high school?

20 A I knew him, yes.

21 Q Do you know if he has a kid named Zachary?

22 A Not that I know of.

23 Q So the Jeff Hopkins --

24 A Not that I know of.

25 Q -- and Zachary and kids were playing together,  
Rough Draft - 75

1 you never heard about that?

2 A About it being true?

3 Q Yeah.

4 A No. I don't know that that is true, but she

5 would say that somebody she worked with who she got the

6 baby-sitter from also baby-sat someone she works with

7 kids. Specific name of that person I don't know.

8 Q This wasn't Jeffrey Hopkins or Jeff Hopkins?

9 A Not the one they went to high school with, no.

10 Q And did she ever tell you who Caylee's father

11 was?

12 A A guy named Eric that got into a car accident

13 the Sunday of Caylee's second birthday party and died.

14 Q And you never met this person?

15 A No.

16 Q And Eric who?

17 A (Witness shrugs.) I don't know.

18 Q Was he in the military or --

19 A He lived, I want to say in Georgia, she said.

20 He wasn't too far. Wasn't in the state of Florida but

21 wasn't too far. He had a wife and another child, a

22 brother, I think.

23 Q Was that her boyfriend or just kind of a --

24 A From what I understand, it was like a

25 one-night-stand type thing. Like they were friends and

Rough Draft - 76

1 they just hooked up and she got pregnant.

2 Q Apparently, she said this person was killed in

3 a car wreck?

4 A That's what she told me.

5 Q Do you know if he ever met Caylee?

6 A I don't believe so.

7 Q When did those conversations take place about

8 who the father was?

9 A She had called me the Monday after Caylee's

10 second birthday party upset because she said Eric, you

11 know, Eric, Caylee's father, he died in a car accident.

12 She had like a memorial thing on her Myspace thing, rest

13 in peace or whatever. And she was very, very upset about

14 it, but that's -- I had asked her because I thought Jesse

15 was the father, and she said, no, he wasn't. It was just

16 a friend that she had hooked up with.

17 Q Based on the married and had kid thing, was it

18 your understanding that the time of their relationship

19 that he was married and had a kid?

20 A No, I don't think so. I think that he had met

21 his -- the way Casey said that he had met the now wife --

22 yeah, I think she said that they got married after they

23 had the kid, that she had gotten pregnant and that's why

24 they got married.

25 Q Any idea who -- do you know if he -- did she

Rough Draft - 77

1 tell you or do you know if he knew he was the dad?

2 A I believe he was aware of it.

3 Q Did he --

4 A But never met --

5 Q Caylee, never paid support, to your knowledge?

6 A No.

7 Q Did she ever talk about anybody paying child

8 support for Caylee or --

9 A No.

10 Q Any mention from her as to, you know, why she

11 didn't make this person who was the father of her child

12 pay or do support?

13 A Nope, no reason why. I mean, she never really

14 talked about it.

15 Q Did you ever -- as being her best friend, did

16 that ever come up, especially when she was going through

17 financial issues?

18 A I never knew there were financial issues. She

19 always had money.

20 MR. DILL: Thank you.

21 THE WITNESS: Thank you.

22 THE VIDEOGRAPHER: Time is 2:18. We are off

23 the record.

24

25