

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

3 ZENAIDA FERNANDEZ-GONZALEZ,

4     Plaintiff/Counter-Defendant,

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

6 CASEY ANTHONY,

7     Defendant/Counter-Plaintiff,

8 -----

9     The rough draft videotaped deposition of LEE  
10 ANTHONY taken pursuant to Notice on behalf of the  
11 Plaintiff/Counter-Defendant on Friday, February 27,  
12 2009, beginning at Time                   , at 20 North  
13 Orange Avenue, Suite 1600, Orlando, Florida, before  
14 Sharon L. Tramonte, R.M.R., Notary Public, State of  
15 Florida at Large.

16  
17     A P P E A R A N C E S:

18             JOHN B. MORGAN, ESQUIRE  
              KEITH R. MITNIK  
              Morgan and Morgan, P.A.  
19             20 North Orange Avenue, Suite 1600  
              Orlando, Florida 32801

20

For the Plaintiff/Counter-Defendant.

21

THOMAS B. LUKA, ESQUIRE

22 Thomas B. Luka, P.A.

390 North Orange Avenue, Suite 1630

23 Orlando, Florida 32801

24 For the Defendant/Counter-Plaintiff.

25 ALSO PRESENT: Zenaida Fernandez-Gonzalez

Lee Fouraker, Videographer

ROUGH DRAFT

1                    I N D E X

2 TESTIMONY OF LEE ANTHONY

3        Direct Examination by Mr. Morgan                    3

4 CERTIFICATE OF OATH

5 CERTIFICATE OF REPORTER

6 ERRATA SHEET

7 WORD INDEX

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10                    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

25

reading and signing of the deposition be reserved.

ROUGH DRAFT

1           LEE ANTHONY,

2   having been first duly sworn, testified as follows:

3           VIDEOGRAPHER: Good morning. The date is  
4   February 27th, 2009. This is the deposition of Lee  
5   Anthony being taken in the matter of Zenaida  
6   Fernandez-Gonzalez verse Casey Anthony. The time  
7   is 9:04 a.m. We are on the record.

8           Counsel, please introduce yourself.

9           MR. MORGAN: My name is John Morgan, and I  
10   represent Zenaida Gonzalez. I'm here with my  
11   co-counsel, Keith Mitnik. And, of course, Zenaida  
12   Gonzalez is here in the courtroom with us today.

13          MR. MITNIK: And, also, for Zenaida, John Dill  
14   maybe in at some point, also, attorney for us.

15          MR. LUKA: Thomas Luka, attorney for Lee  
16   Anthony. Lee Anthony is present, Lee Anthony is  
17   the deponent in this matter.

18          VIDEOGRAPHER: Court reporter, please swear in  
19   the witness.

20           LEE ANTHONY

21 having been first duly sworn, testified as follows:

22 DIRECT EXAMINATION

23 BY MR. MORGAN:

24 Q Lee, my name is John Morgan. We've had an

25 opportunity to briefly meet here to this morning.

ROUGH DRAFT

1 Hopefully we can get through this this morning. I'm  
2 going to ask you some fairly straightforward questions.  
3 If you don't understand the question, please just ask me  
4 to elaborate or to repeat it and I'll be happy to do  
5 that for you.

6 The one thing, because she's taking this down,  
7 you can't really nod or say uh-huh, you have to answer  
8 yes or no so if you understand that.

9 A Yes.

10 Q Yes? Okay. As a practice question?

11 A Right.

12 Q Would you state your name, please, for the  
13 record?

14 A Lee Alexander Anthony.

15 Q And your address?

16 A 4937 Hope Spring Drive, Orlando, Florida,  
17 32829.

18 Q Okay. Now, do you live there with your  
19 parents?

20 A I do right now, yes.

21 Q All right. How long have you lived there?

22 A Recently?

23 Q Yes.

24 A Since the first week or so of January, just

25 moved back home.

ROUGH DRAFT

1 Q You just moved back home? Where did you live  
2 before that?

3 A I had an address, which was 4148 Eagle Feather  
4 Drive.

5 Q 4148 Eagle Feather?

6 A Eagle Feather, yeah. That's Orlando as well  
7 2829. It's like a mile and a half down the road.

8 Q Okay.

9 A So I lived with one roommate, and it was about  
10 two years.

11 Q What was the name of those roommates?

12 A Just one, Brian Lufkin. We had another  
13 gentleman on a lease, but he never actually ended up  
14 living with us.

15 Q Are you currently employed?

16 A Um-hum.

17 Q And where do you work?

18 A Yes. I already did it.

19 Q That's okay.

20 A Click and Park is the name of the company.

21 And it's just right here in downtown.

22 Q And what is Click and Park? It sounds like a

23 towing service. I hope not.

24 A No, it's a -- it's an on-line -- it's a

25 transportation company. We do parking management and

ROUGH DRAFT

1 things like that for special events. So, you know, I'm

2 a project manager for them so.

3 Q How long have you worked at Click and Park?

4 A It was December of, I want to say, 2006 that I

5 started with them, so it's been a couple of years.

6 Q What made you move back home?

7 A Help out my folks financially. And my lease

8 had ended at my old place, so they asked me to move back

9 home.

10 Q Who all lives there now with you, just your

11 folks?

12 A Yeah, just my mom and my dad and me.

13 Q Okay. All right. Did you grow up here?

14 A Um-hum.

15 Q Where did you go to school?

16 A I went from elementary school through -- we

17 moved down here when I was in second grade so this is

18 home. So high school, I went to Colonial High School

19 for my final three years. I went to Winter Park in

20 ninth grade.

21 Q Well, you're speaking to a Winter Park grad,  
22 class of '74.

23 A There you go.

24 Q I wish you'd finished there.

25 A I actually do, too.

ROUGH DRAFT

1 Q We're here today regarding a matter that we  
2 filed against your sister. And I know it's difficult --

3 MR. DILL: No none called. I just faxed a  
4 letter.

5 MR. MORGAN: Okay.

6 BY MR. MORGAN:

7 Q It's a defamation lawsuit that we filed on  
8 behalf of our client, Zenaida Gonzalez. And so we want  
9 to ask you some questions about that and maybe some  
10 other questions.

11 When was the, the first time that you ever  
12 heard the name Zenaida Gonzalez?

13 A During the -- it was after the phone call that  
14 my sister and my mother had when my mother heard -- I  
15 would imagine when she would have heard the name first  
16 when -- Casey has -- you know, she's been arrested at  
17 this point so --

18 Q Up until -- and we'll kind of back up and get  
19 into that. Up until that time, you had never heard the  
20 words Zenaida Gonzalez, the name Zenaida Gonzalez?

21 A No.

22 Q Okay. Now, tell me about this phone call, the  
23 phone call -- and a lot of things I'm going to be asking  
24 you, you probably talked about so many times, you may  
25 feel like I'm asking you, you know, questions that

ROUGH DRAFT

1 everybody knows the answer to. So forgive me if I -- if  
2 I am redundant or asking you the same thing over and  
3 over again that you've done before.

4 The phone call that you're referring to was  
5 what phone call?

6 A That was the -- it was my -- I'm just  
7 trying -- I can remember where I was in the house. My  
8 sister had already been put under arrest.

9 Q And the date was? Do you remember the date of  
10 this?

11 A Geez, July -- it would had to be -- it would  
12 would have had to be the 16th.

13 Q Okay. So July 16th you heard of a phone call  
14 that your mom had with your sister?

15 A Well, it was -- that's one of the -- that's  
16 the first phone call that my mother and my sister had  
17 after my sister was arrested. So she was in -- you  
18 know, then she called the house.

19 Q She was -- she called the house from jail?

20 A Casey did, yes.

21 Q Okay. And that phone call was recorded, I  
22 guess, by the jail authorities?

23 A Yeah, 'cause that's been released. And, you  
24 know, that was the frist time that I ever heard that  
25 name. And then, you know --

ROUGH DRAFT

1 Q Okay. Now, and what did you hear? How did  
2 you first hear the name Zenaida Gonzalez and that this  
3 was the nanny who had been taking care of Casey?

4 A After my mom got off the phone she, you know,  
5 just told me what -- you know, what Casey said.

6 Q What did -- what did she tell you?

7 A That she asked Casey, you know, who -- you  
8 know, who has Caylee, who took Caylee. And she said  
9 Zanny or, you know, Zenaida Fernandez-Gonzalez.

10 Q Okay. And -- but did she call her Zanny?

11 A Typically that's how I would have heard it  
12 was, was Zanny.

13 Q So when your mom got off the phone, you're  
14 sitting there waiting -- you all -- who all was there,  
15 you --

16 A Our house was pretty full at that point.

17 Q Who all was there at that time that day?

18 A Myself, my dad, my mom. I believe Casey's  
19 friend Christina was there. We probably had a bunch of  
20 people in the house. I couldn't even -- that's all I

21 can remember at this point.

22 Q So --

23 A Mallory was probably there, my girlfriend.

24 Q Is Mallory still your girlfriend?

25 A Yes.

ROUGH DRAFT

1 Q What's Mallory's last name?

2 A Parker.

3 Q Where does she live?

4 A With her parents. I don't know the address.

5 Q Okay. That's fine. So Casey's been arrested,  
6 you all are at the house, your mom has a conversation,  
7 you all -- it's a one-way -- you can only hear what your  
8 mom is saying. Are you listening to your mother talk  
9 back and forth or are you in the same room?

10 A Same room.

11 Q Okay. So you're hearing a one-sided  
12 conversation?

13 A Yeah.

14 Q And your mom hangs up the phone and she says  
15 what about Zenaida Gonzalez in particular?

16 A Just really -- just relays the last -- you  
17 know, relays the name because on the -- during the call,  
18 there was -- there was no other substance. You know,  
19 there wasn't any other real content at that point 'cause  
20 actually during that time, Casey got frustrated with my

21 mother.

22 I talked to her for a very short period of  
23 time, on that same phone call for a very short period of  
24 time, but our topic of conversation was not, you know,  
25 Zenaida. And then --

ROUGH DRAFT

1 Q What did you all talk about?

2 A We talked about -- actually we just talked  
3 about how she was talking to Mom. I was trying to get  
4 her to focus and say, you know, we're all on your team  
5 here. You can't be short with Mom and we're trying  
6 to --

7 Q Was she jumping mom?

8 A Oh, yeah, absolutely. Like, they were very  
9 combative when they were on the phone. So when I got  
10 the phone, it was more to try to -- it was more just the  
11 phone was forced to me that, here, talk to your  
12 sister --

13 Q Right.

14 A -- you know. So it was --

15 Q Deescalate?

16 A Exactly. So that was the attempt and that was  
17 not so -- I wasn't so successful.

18 Q Right.

19 A So she ended up talking to her friend  
20 Christina, and then I wasn't on the phone with her again

21 on that day so --

22 Q Okay. So your mom comes up and she says --

23 everybody says what did she say? And she says the last

24 that she saw Caylee was she was with Zanny?

25 A Yes.

ROUGH DRAFT

1 Q And then they said the word Zanny and Zenaida  
2 Gonzalez?

3 A My mom had claimed that she had heard the name  
4 Zanny before.

5 Q Okay. Your --

6 A Zanny. At least she has said that to me  
7 before. I have never -- had I never heard that name  
8 before.

9 Q But did your mom -- did your mom that night  
10 say that she had heard the word -- the name Zanny  
11 before?

12 A I don't think she said it particularly that  
13 night. I don't think she would have acknowledged that  
14 that.

15 Q That night it was a new name to everybody?

16 A That -- the whole thing Zenaida or Zenaida  
17 Fernandez Gonzalez, yes.

18 Q THat was new to everybody?

19 A Yeah, definitely new to me.

20 Q Was it your impression that that name was new

21 to your mom that night as well?

22 A Yeah.

23 Q Okay. Now, once you all heard this, obviously  
24 you had a conversation. What was that conversation like  
25 as it related to Caylee's with Zenaida Gonzalez? What

ROUGH DRAFT

1 did y'all say?

2 A Oh, the other person that may have been there  
3 was probably -- well, let me take that back. He wasn't  
4 a part of team yet.

5 Okay. Sorry if my days are all -- if I'm all  
6 off as well, but it would have been more of  
7 just -- because the police were supposed to be running  
8 down those, you know, those names and everything. And  
9 at this point Casey had already been with them and  
10 providing that information to them.

11 And that's kind of how -- you know, she was  
12 almost kind of reverifying to us that that's what she  
13 was telling them. So our discussions, which I  
14 really -- I'm trying to think back if I would have --  
15 'cause I was busy, like, building the website and doing  
16 things like that at that time.

17 Q Were you surprised when you heard her say that  
18 she's with this person, Zenaida Gonzalez? Did that come  
19 as a surprise to you?

20 A I would hope that she would have her with

21 somebody or thought she had her with somebody. So, no,  
22 I would not be surprised if she told me -- she could  
23 have told me that she was with anybody, you know, at  
24 that point.  
25 Q Was it your impression that night that she was

ROUGH DRAFT

1 making it up or did you believe that to be true?

2 A To this day I believe everything that my  
3 sister tells me.

4 Q Okay. I understand that.

5 When you heard -- when you had this -- about  
6 Zenaida Gonzalez and you heard this for the first time,  
7 was there a conversation in that room amongst family  
8 members or friends or about who is Zenaida Gonzalez?  
9 Has anybody ever heard of her? Has anybody ever met  
10 her?

11 A No. Our conversations with more -- because we  
12 had already had plenty of discussions with law  
13 enforcement so -- and I'm trying just to make sure that  
14 my folks maybe hadn't -- I don't know. I can't really  
15 speak for them, but that day -- which everything just  
16 runs together, so I really apologize if the dates are  
17 off.

18 Q No, that's fine. I understand.

19 A But during that day, if law enforcement wasn't  
20 present with us, if they came later -- 'cause they were

21 coming and going very frequently at that point, you  
22 know, Detective Melich and, you know, Sergeant Allen and  
23 a plethora of other officers were there. You know, but  
24 mostly Mr. Allen and Mr. Melich. And they talked with  
25 us almost every evening minimum about everything that

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1 was going on.

2 So that name would have been talked about with  
3 them, you know, immediately, as soon as we had that next  
4 opportunity. And they would have only just said, you  
5 know, that -- I remember them saying, you know, that  
6 name came up and, you know, we, we pulled up -- you  
7 know, whatever it is we pulled up and showed, you know,  
8 my sister --

9 Q They said --

10 A -- pictures --

11 Q I'm sorry.

12 A -- and all that -- you know, and all that  
13 great stuff.

14 Q They said that after the fact, though, after  
15 this phone call?

16 A If we would have -- we would have prompted  
17 them for that, yes.

18 Q But had you ever heard Zenaida -- had law  
19 enforcement ever mentioned Zenaida Gonzalez to you all?

20 A I don't believe so. Prior to that call and --

21 you know, of course not, not to me. I don't know if  
22 they may have had a conversation with my folks prior to  
23 then, you know, earlier that day or whatever. 'Cause it  
24 just -- the evening prior is when all -- when everything  
25 happened, you know, when my sister came home and all

ROUGH DRAFT

1 that kind of stuff. So there wasn't really a whole lot  
2 of time. That's why if it runs together, I apologize.

3 Q No, that's fine. I understand you've been  
4 through a lot, and I perfectly understand that.

5 Let's talk about just a little bit about, you  
6 know, child care in general. Had you ever known Casey  
7 to leave Caylee with any nanny, baby-sitter, child care?  
8 You had --

9 A Sure. I watched Caylee a couple of times. I  
10 know our next door neighbor at the time, whole she had  
11 watched Caylee a couple of times. My mother and father  
12 primarily were the baby-sitters, I mean, you know,  
13 depending on work schedules and things like that. I  
14 mean, they would typically take care of her for the most  
15 part. But they both were working. My father was  
16 working on and off. But my mother works Monday through  
17 Friday or, you know, worked at the time Monday through  
18 Friday.

19 Q Where did your mom work?

20 A It's called Gentiva. It's a health care,

21 like, a home health care providing company.

22 Q Okay.

23 A They're here in Orlando as well. But when

24 Caylee -- more when she was younger. Casey was engaged

25 to Jesse Grund at one point. So Jesse and his mother

ROUGH DRAFT

1 and father, you know, could have individually or  
2 collectively been baby-sitters.

3 One of her real good friends Lauren I know  
4 watched her, I know watched her. And her friend Downing  
5 had watched her. I have heard that her friend Christina  
6 watched her, although I've never seen -- you know, seen  
7 to know that. But over the past more or less two years,  
8 I had been living completely on my own in a different  
9 residence. And prior to that I lived on my own at a  
10 different residence as well.

11 So it was shortly after Caylee was born that I  
12 moved out. So I hadn't had a whole lot of opportunity  
13 to just kind of see that regular routine of, you know,  
14 how the baby-sitter situation would have worked.

15 Q To your knowledge, in the last two years, is  
16 it safe to say that the -- to your knowledge, that the  
17 only people that took care of Caylee were friends or  
18 family?

19 A Yeah.

20 Q Okay. And they weren't paid for this? They

21 did it as out of love and --

22 A Yeah. To my knowledge, no, but I don't -- I

23 don't know enough specifics to know if Casey ever

24 compensated anybody. I know she didn't compensate my

25 folks for it or me.

ROUGH DRAFT

1 Q Okay.

2 A But anyways --

3 Q They never do.

4 A Right.

5 Q Let's talk about the month of May, I guess,

6 2007.

7 A Okay.

8 Q Or 2008.

9 A 8?

10 Q 2008, I apologize. Let's start at like May 1.

11 Was -- to your knowledge, was Casey working anywhere in

12 May of 2008?

13 MR. LUKA: Objection, relevance, but go ahead

14 and answer.

15 A I really don't know. You know, it wasn't

16 really something that I kept tabs on, you know, having

17 my own life and not living at the house and kind of

18 seeing everyone, you know, once a week or so. It really

19 wasn't, you know, anything that I --

20 Q And how about the month of April, do you know

21 if she was working anywhere?

22 A I --

23 MR. LUKA: Same objection but --

24 MR. MORGAN: Yeah, and I'll explain the

25 relevance in a minute.

ROUGH DRAFT

1 MR. LUKA: Yeah, yeah. Go ahead and answer.

2 A Since my sister graduated high school, I do  
3 not keep tabs on my sister as far as work and job and,  
4 you know, all that kind of stuff. I figure if she has  
5 something to talk to me about, if she needs my help  
6 she'll come to me.

7 Q I understand. Is it safe to say that the  
8 month -- the year of January, in January '08 till now  
9 that you don't know if she worked anywhere or had a job?

10 A I have no idea.

11 Q Okay. 'Cause what I'm trying to, you know,  
12 get at is, you know, how would -- do you know how she  
13 would have had the money to have paid Zenaida to  
14 baby-sit?

15 A Provided if that person is my sister's  
16 friend -- and if we've talked about we don't know if my  
17 sister compensated any of her other friends or family  
18 that has watched her -- it would be safe to assume that  
19 that person never asked for anybody either or, you know,  
20 who knows.

21 Q I know. Now, since -- now, since you never  
22 heard of her before, to your knowledge Zenaida Gonzalez  
23 is not -- was not or is not a friend of your sister's,  
24 is that a fair statement?  
25 MR. LUKA: Objection. Can you clarify?

ROUGH DRAFT

1 A Yeah, I don't want to keep telling you I don't  
2 know.

3 Q No, that's fine. That's fine?

4 MR. LUKA: Are you referring to your client,  
5 the person that's in this courtroom?

6 MR. MORGAN: I'm talking about any Zenaida  
7 Gonzalez.

8 A Right.

9 Q To your knowledge, did she ever have a friend  
10 named Zenaida Gonzalez that you've heard of?

11 A I've never heard that name ever until all this  
12 happened in the middle of July.

13 Q July 16th?

14 A Yeah.

15 Q Now, I want to go back and leave this. When  
16 you said that on July 16th when they had that first  
17 phone call and everybody was at the house and that Casey  
18 and your mom were arguing.

19 A Yes.

20 Q Do you know what they were arguing about?

21     A   All that stuff has been released. I  
22   can -- I'm really trying to remember. It Was probably  
23   more just generic things like, you know, Casey talked to  
24   me, you know. Why won't you talk to the police, you  
25   know. 'Cause, I mean, at that point my sister has

ROUGH DRAFT

1 had -- the morning prior to that is when they took my  
2 sister to Universal Studios, you. Know, they had just  
3 you know put her under arrest. I'm sure -- I'm pretty  
4 sure that's when they went through photos and things of  
5 that nature. So at that point my mother was likely just  
6 continuing the interrogation --

7 Q Right.

8 A -- you know.

9 Q Of Casey?

10 A Right. So obviously that's why they would  
11 have been fighting.

12 Q Was your mother -- I guess part of the  
13 argument was that your mother was trying to get her to  
14 speak to the police?

15 A Sure.

16 Q And that was part of the argument?

17 A Oh, yeah. I mean, we've encouraged this whole  
18 time, if you have -- if you have anything, you need to  
19 share it, you know. There's nobody that can help you if  
20 you don't share what you know.

21 Q And what did you hear your mother saying to

22 her in that regard?

23 A Same, same thing, you know, who can we -- you

24 know, is there anybody that, you know, you want to talk

25 to, you know. But again, from what I remember -- if you

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1 wouldn't have the transcript of what it was to tell you  
2 for sure, but from what I remember, during that phone  
3 call, there was a lot going on in the room 'cause it  
4 still wasn't silent in the room, even during this phone  
5 call, if you can believe that, that's I'm sure how many  
6 folks were actually there at this point.

7       But it was more just my mother and my sister  
8 or my mother from what I could hear just kind of I don't  
9 want to says squawking back to her, but just trying to  
10 bring her back down and trying to get her to listen to  
11 whatever piont she was trying to make at the time. So I  
12 know they didn't get anywhere in that phone call as far  
13 as anything was really concerned.

14     Q   And you got on the phone with her, what did  
15 you say to her? And again, I know that this has been  
16 rehashed, but we have to do this.

17     A   Right.

18     Q   What did you say to her when you got on the  
19 phone?

20     A   It was, again, trying to bring her back down

21 to try to get her to, first off, understand that we're  
22 trying to help her. We're trying to understand what is  
23 going on. We're trying to do fact-finding so we can  
24 find Caylee. That's the whole -- that's the whole point  
25 of all of it, trying to bring her back down and bring

ROUGH DRAFT

1 her focus in.

2       Because it was a more of -- during the maybe  
3 30 to 40 seconds that I spoke to her, she was focused  
4 on, you know, you guys won't listen to me. No one's  
5 listening to me. I'm trying -- I'm telling you guys the  
6 truth and no one is listening to me. And, you know, me  
7 just trying to say, okay, well, you have to be clear,  
8 concise. You can't shut people out. You need to be  
9 very, you know, open.

10    Q   And when she was saying to you I'm telling the  
11 truth, nobody's listening to me, what truth was she  
12 referring to?

13    A   In general, just the truth about whatever she  
14 was trying to tell law enforcement at that time. So --

15    Q   Which was?

16    A   Again, 30, 40 seconds of a conversation, we're  
17 speaking in generalities. I didn't talk to her and say  
18 so how was your trip to Universal, you know what I mean?  
19 We didn't speak about anything specific during my and my  
20 sister's portion of that phone call. So --

21 Q Was one of the reasons that Casey was reacting  
22 so poorly on the other end is that your mom was accusing  
23 her of, of -- I don't want to use the word lying but --

24 MR. MITNIK: Not being truthful.

25 Q Not being truthful?

ROUGH DRAFT

1     A   I don't even think that's completely fair  
2 because we wouldn't even know how to grasp the truth at  
3 that point. Being forthcoming and being truthful were  
4 two completely separate things.

5     Q   Did y'all think she was being forthcoming?

6     A   I think it's felt to me that there was  
7 reluctance.

8     Q   So which -- why do you think that was?

9     A   At that time I wouldn't know. At this time --  
10 and also just through other conversations with Casey or  
11 through Casey through my parents, you know, and then  
12 relayed to me -- that she was fearful for Caylee, that  
13 she was instructed not to go to the authorities, not to  
14 say what she knew. So --

15    Q   Do you think her, her lawyer was giving her  
16 bad advice?

17    A   I don't even believe she had representation at  
18 that point.

19    Q   Who was telling her not to go to the police?

20    A   I'm saying that that would have been her

21 instruction from --

22 Q Who?

23 A From, from this Zanny person.

24 Q Oh, that the Zanny person said don't go to the

25 police?

ROUGH DRAFT

1 A Right.

2 Q But why?

3 MR. LUKA: I'm going to object. Calls for  
4 speculation.

5 BY MR. MORGAN:

6 Q You can -- I mean --

7 MR. LUKA: Yeah, if you can.

8 A I don't know. I mean, I don't know what  
9 someone would hold over someone else's head. There's  
10 nothing you could hold over my head for, for my niece.  
11 I've said multiple times I will trade places with  
12 anybody. I'd die right here for her. So, you know,  
13 I'm -- there's --

14 Q Did she ever --

15 A So I have no idea.

16 Q Did she ever indicate or say to you that, that  
17 Zanny or Zenaida was threatening her?

18 A Yes, threatening our family individually as  
19 well.

20 Q And tell me what that -- tell me -- elaborate

21 on that what did -- threatening how?

22 A This conversation, as far as the firsthand

23 conversation where I can speak more accurately --

24 Q Yes.

25 A -- would have been the very first time that my

ROUGH DRAFT

1 sister was released from jail. Can't remember when that  
2 was. I want to say was in August at some point.

3 Q Okay.

4 A I may be off. But the first time that she was  
5 released from jail, her and I had a conversation about,  
6 you know, everything. We had had little conversations  
7 here and there, you know, through like video visitations  
8 and things like that, you know, and jail phone calls at  
9 that point.

10 But when she got to the house is when she was  
11 more -- I think that she felt more -- she new that stuff  
12 wasn't being recorded, you know what I mean? She felt  
13 more --

14 Q She felt comfortable because there was no --

15 A Right.

16 Q -- phone being taped?

17 A Exactly.

18 Q So this was the first time that you were able  
19 to have a conversation with her where she could let her  
20 guard down and be forthright with you?

21     A   I would -- yes, you know, I definitely feel  
22   that way.  When she was at home, that was definitely  
23   our, our opportunity.

24     Q   And that's understandable.

25     A   Absolutely so.

ROUGH DRAFT

1 Q And she said to you at that time that Zenaida  
2 Gonzalez was threatening her and the family. In what  
3 way?

4 A Um-hum. She didn't elaborate more, just  
5 saying something to the extent of, you know, if, if  
6 you -- that this would have been the -- what was told  
7 from Zenaida to Casey was that if -- sorry.

8 If you go to the authorities, if you tell, you  
9 know, anybody, you know, that's -- you know, I could  
10 harm Caylee or I could, you know -- you know, we know  
11 where you live. We can harm you know your folks. We  
12 know where your brothers lives, we can harm him.

13 Q When you say "we", was Zenaida working with  
14 somebody else?

15 A I don't know. When we -- I mean, we is  
16 interchangeable at this point, you know. I'm just --

17 Q Yeah. Now, when she said to you, that had to  
18 blow you away.

19 A It wasn't blown away. It was -- if anything,  
20 I'd be more frustrated to say -- to reiterate, listen,

21 there's nothing that anybody can threaten any of us

22 with. 'Cause at this point --

23 Q 'Cause the threats we're talking about here,  
24 that you understood from your sister, is bodily harm?

25 A Or life threats, exactly.

ROUGH DRAFT

1 Q Or death? Or death?

2 A Exactly. There's nobody --

3 Q Hold on. Let me make sure. Death of Caylee?

4 A Um-hum.

5 Q Yes? Or death of you? Yes?

6 A (Deponent nods head).

7 MR. LUKA: You have to answer out loud.

8 A Yes, I'm sorry.

9 Q Or death of your mom and dad?

10 A Yes.

11 Q That if we -- that if you, Casey, go to the

12 authorities, we might -- I might kill Caylee? Yes?

13 A Yes.

14 Q Your brother Lee?

15 A Yes.

16 Q Yes? Or your mom and dad?

17 A Yes.

18 Q And when you heard that, that's when I say

19 blown away 'cause I'm trying -- you know, I'm trying to

20 put myself in your spot. Did you say -- what did you

21 say to her when you heard these threats?

22 A Right. And again, they were never specific to  
23 kill, but when I heard that there was -- that someone  
24 was -- I don't want to say blackmailing, but kind of  
25 holding over, holding something over, you saying that if

ROUGH DRAFT

1 you do such and such, I'm going to do this, you know.  
2 I'm going to, you know, go after, you know, your folks  
3 or your loved ones or whatever.

4 At that point it was frustrating to us to then  
5 tell Casey, you know, there's nothing that we can go  
6 through that we haven't gone through in the past,  
7 however long it had been at that point, and we can go  
8 through anything in order to get her back. So if you  
9 know or you're holding back anything, don't hold back  
10 just 'cause you think somebody is going to attack us  
11 because we're being attacked at this point.

12 Q Did you ask Casey why does Zenaida Gonzalez  
13 want our baby?

14 A Casey's explanation -- again, I'm sorry if it  
15 takes me a minute.

16 Q No, no.

17 A Casey's explanation on why Caylee would have  
18 been taken was to the extent of that Zenaida didn't  
19 think that Caylee should have been with Casey, for  
20 whatever reason, and that she was -- that she was taking

21 Caylee from her for a period of time to teach her a

22 lesson. I do remember that for sure --

23 Q Okay.

24 A -- that that was --

25 Q And you had to be just angry when you heard

ROUGH DRAFT

1 that.

2 A Again, more angry that these aren't things

3 that are being shared from --

4 MR. MORGAN: We should shut those doors.

5 A Things that aren't being shared fully with

6 whomever so they can be followed up on. I mean, even at

7 that point, if it had been a month, if this was in

8 August -- and, again, I'm sorry if I'm wrong on the

9 date, but when she's out, you know, I have been trying

10 to do everything that I can from July 15th to that

11 point, also. So it was also kind of like I could have

12 used all this information a month ago.

13 Q Of course. So you were frustrated?

14 A Right.

15 Q Now, what kind of lesson do you think she

16 was -- when she said she's trying to teach me a lesson,

17 did you say --

18 A I couldn't speculate. I have no idea.

19 Q Casey, what -- what lesson -- and, again, you

20 can speculate and your lawyer will instruct you -- you

21 know, can object. But when you were -- when you  
22 speculated then at that time, what did you think the  
23 lesson was?

24 MR. LUKA: Again, I'm going to object.

25 MR. MORGAN: Yeah.

ROUGH DRAFT

1 MR. LUKA: It calls for speculation, but if

2 you know.

3 A The -- here's, here's the -- here's

4 been -- and here's maybe an easy way to make some of

5 your questions.

6 Since all this happened I have focused -- had

7 been focused on an end result. Don't care who, what,

8 how, whatever. All I need to know is the nuts and bolts

9 of where she is and how I can find her and bring her

10 home, Caylee. So --

11 Q Do you believe as -- well, go ahead.

12 A No, go ahead. I lost my training of thought.

13 Go ahead.

14 Q What, what did -- did Casey ever tell you -- I

15 mean, you speculated about what you thought that this

16 meant. Did Casey ever tell you what she thought the

17 lesson was that was trying to be taught to her?

18 A No. Not that I can recall, no.

19 Q Okay. So you had this conversation, you've

20 heard about -- you've talked about for the first time

21 Zenaida Gonzalez without cameras rolling or tapes and  
22 being recorded and you're hearing about it. Did you at  
23 that time think to yourself there may not be a Zenaida  
24 Gonzalez?  
25 A No.

ROUGH DRAFT

1 Q I mean, did it -- there wasn't a doubt in your  
2 mind or any doubt?

3 A With everything that my sister was telling me,  
4 I was following it to the letter so -- as an  
5 investigator would do.

6 Q Not, not --

7 A You need to --

8 Q I'm not --

9 A -- listen, take everything in. And, yes, I  
10 believe what she was telling me was accurate.

11 Q And -- but the question is there wasn't a  
12 doubt in your mind that this just doesn't seem to be  
13 adding up?

14 A No.

15 Q Now, one of the things that I think that, that  
16 everybody has been watching this case from afar --

17 A Which case are you talking about?

18 Q The investigation of the disappearance of your  
19 niece is I think we all have -- you know, look at you  
20 and can commend you for everything that you've done and

21 before and after. And one of things I want to find out  
22 about is before this conversation that -- when she came  
23 home from jail, what, what, what all were you doing, and  
24 you've mentioned that you were conducting your own  
25 investigation.

ROUGH DRAFT

1     A   Absolutely. I was working hand-in-hand with  
2 law enforcement, FBI, private investigators. I mean, I  
3 was not working. My entire day and night was dedicated  
4 to, you know, running down anything and talking to  
5 anybody that I could talk to. So that's what I was  
6 doing.

7     Q   You were -- you took -- did you take a leave  
8 of absence from your job?

9     A   Um-hum.

10    Q   That's a yes?

11    A   Yes.

12    Q   Sorry. So you were working around the clock?  
13 Did you ever actually ever go out and search into the  
14 woods or --

15    A   There's no reason to search in the woods.  
16 Caylee was alive so we were looking for her alive.

17    Q   Yeah. You never -- in your investigation, you  
18 never thought there could be a chance that she was not  
19 alive?

20    A   No, never had any indication of that

21 whatsoever.

22 Q Because you believe she was with Zenaida?

23 A Or with somebody, and I was going to find her.

24 Q Prior to her coming home, can you tell me some  
25 of the people that you talked to by name when you were

ROUGH DRAFT

1 conducting this investigation?

2 A Wow. Tons. You know, I have probably  
3 hundreds of friends. My sister has hundreds of friends.  
4 I would have talked to anybody and anybody -- anybody  
5 and everybody that I could get ahold of. Have you seen  
6 my sister lately? What was her demeanor? Have you  
7 talked to her? Have you seen Caylee lately? Have you  
8 ever heard this name? I mean, you know, a month, I  
9 mean --

10 Q Let's talk about this for a minute and do it  
11 by -- in sequence of time so it's fair to you. When was  
12 the first date that you suspected that Caylee was  
13 missing?

14 A Not until July 15th when, you know, when my  
15 sister said I haven't -- you know, I haven't seen Caylee  
16 in 31 days. And, you know, I take it back. That was  
17 the first night that I heard Zenaida Fernandez-Gonzalez  
18 because. I remember writing it down on the --

19 Q I'm sorry?

20 A -- thing to the cops.

21 Q According to Casey, what date did she last

22 see --

23 A At the time she said -- she, Casey never gave

24 a date to me. She always said 31 days specifically, 31

25 days. My mother said June 9th. She was wrong. It was

ROUGH DRAFT

1 actually June 15th. My sister ended up saying June 9ing  
2 because she heard my mom say it probably 50 times that  
3 night. So that is why it just ran together. But even  
4 on a calendar, you can go back and you count 31 days,  
5 and it was the 15th of June.

6 Q Your mom at one time said the last time that  
7 anyone saw Caylee was June 9th.

8 A Yeah. She was mistaken on that. For a good  
9 like week or two she was wrong on that date.

10 Q Why do you think she was wrong? How did  
11 she -- how did she make that mistakes?

12 A She, like, screwed up her calendar or  
13 something. She had taken time off of work around that  
14 time, her birthday. She took time off work around that  
15 time they went and visited my grandfather. And she just  
16 got her weekends -- she just missed it. She got the  
17 weekends wrong so --

18 Q All right. Let me -- I'm going to -- let's me  
19 just do some logistics.

20 Where was Caylee and Casey living in May of

21 2008?

22 A Home with my folks.

23 Q Okay. How long had they lived there at home

24 with your folks?

25 A Casey has never lived anywhere other than

ROUGH DRAFT

1 their residence, same thing with Caylee.

2 Q Okay. So Caylee, Caylee was born and she came

3 home to that house --

4 A Yes.

5 Q -- on Hope Spring?

6 A Yes.

7 Q And she and Casey resided there?

8 A Yes.

9 Q Until -- okay.

10 A Until June.

11 Q Do you know who the father of Caylee?

12 A I don't know that 100 percent.

13 MR. LUKA: Objection. Certify. You don't

14 have to answer that question.

15 THE WITNESS: Okay.

16 MR. MORGAN: And the basis?

17 MR. LUKA: The basis is it's irrelevant to

18 this -- to the defamation suit.

19 MR. MORGAN: Well, the relevance would be, you

20 know, could that person have had something to do

21 with the disappearance.

22 MR. LUKA: Again, if you want to go before the

23 judge, you can go before the judge, but I'm

24 certifying the question because, again, I don't

25 think it has anything --

ROUGH DRAFT

1 MR. MITNIK: You're instructing him not to  
2 answer it?

3 MR. LUKA: That's correct.

4 MR. MORGAN: We respect that.

5 MR. MITNIK: We don't agree with it, but we'll  
6 take it to the judge.

7 MR. MORGAN: We don't agree with it, but we'll  
8 take it --

9 BY MR. MORGAN:

10 Q Because one of the things for us, and -- is,  
11 you know, we have a -- we have our burden to prove our  
12 case. But part of our burden, you know, this is the  
13 person who the police questioned, this Zenaida Gonzalez  
14 here.

15 And if we're able to prove who actually had  
16 the child, that's part of our case as well, that's part  
17 of our duty as well. And that's why I was asking that  
18 question, never to be offensive, but that there could be  
19 someone else out there.

20 A In all due respect, you -- you're not going to

21 be -- you're not going to find that answer from me. I  
22 would have kicked that door down a long time ago myself.  
23 Q Thank you.  
24 A That is as well as I can say it. If I ever  
25 had any indication who ever had Caylee, anybody, the

ROUGH DRAFT

1 President of the United States down, all I needed was a  
2 name. I would have kicked the door down.

3 Q Well, obviously, obviously the first place  
4 people would look with panes?

5 A Yeah.

6 Q And there's a mom, and there's a dad, and  
7 obviously there's a mom and a dad so that's, that I. So  
8 I -- and you've been instructed not to answer it and we  
9 understand.

10 Now, it's your understanding that the last day  
11 that Caylee was at your parents' house was on June 15th?

12 A That is my understanding or the -- excuse me,  
13 the morning of the 16th, whichever that Monday was. I'm  
14 pretty sure Monday was June 16th. So she would have  
15 left -- I believe my father remembers it was by noon.  
16 So that is always the information I go off of.

17 Q When was the last time you ever saw your  
18 niece?

19 A It would have been the week of my mom's  
20 birthday. So the first week of June, probably around

21 the -- probably around the 6th or so.

22 (Off-the-record discussion was had.)

23 BY MR. MORGAN:

24 Q The last time that you saw Caylee was the week

25 of -- the first week in June?

ROUGH DRAFT

1 A Yes.

2 Q Okay. And to your knowledge, the last time  
3 Caylee was at that home was either Monday the 16th or  
4 the day before the 15th?

5 A Monday the 16th.

6 Q Were your parents at the house those days?

7 A My father was at the house on the 16th, in the  
8 morning. And that's again what he has said. And my  
9 mother and Caylee were the ones that went to see my  
10 grandfather on the 15th. Casey did not go. I believe  
11 my dad was home on that date, too, or was working or  
12 something.

13 Q From the -- from the June 15th till July 15th,  
14 were, your mom and dad staying the night at that house?

15 A Yes, to my knowledge.

16 Q So they were there the whole time?

17 A To my knowledge, yes.

18 Q So when Casey -- when Caylee didn't come home,  
19 they knew that?

20 A Yes.

21 Q And when Casey didn't come home, they knew

22 that?

23 A Yes.

24 Q Because Caylee had her own bed and her own

25 bedroom?

ROUGH DRAFT

1 A Exactly.

2 Q Okay. So there's a month where -- did Casey  
3 come home at all to your knowledge during that month?

4 A My dad claims that she did one day, I want to  
5 say it was about a week after, maybe around the 22nd or  
6 23rd or so. He said that she came home for a short  
7 period of time. And I know through other folks that she  
8 had been to the house, like, when my folks weren't  
9 there, like, during the day or something like that  
10 with -- like, she came there with Tony Lazzaro.

11 Q During the time -- during this month that was  
12 going on, did you have conversations with your mom and  
13 dad about they're not showing up, we don't know where  
14 Caylee is?

15 A I never had heard from it at all.

16 Q The whole month?

17 A I had been -- nope. Again, living in a  
18 different residence. Actually at that time was very  
19 busy with my -- at work traveling and things of that  
20 nature so --

21 Q Now, that -- during that time you say you

22 never heard about it, you never --

23 A Right.

24 Q Okay. Ever since that time have you

25 ever -- now that you've talked to your parents, have you

ROUGH DRAFT

1 ever said were you worried? Did you wonder where she  
2 was? Were you looking for her during that month?

3 A Oh, sure. I mean, you know, my -- you know,  
4 we've had that conversation plenty of times. And, yes,  
5 they were worried. You know, my mom a claims that she  
6 talked to Casey every day. If not every day, pretty  
7 darn close to it. So, you know -- and was always told,  
8 you know, that they're coming home the next day or  
9 they're coming home, you know, a couple of days  
10 thereafter or whatever.

11 Q So you --

12 A So she was always appealing my mom to get to  
13 the next day or whatever.

14 Q So your mom told that you they were speaking  
15 every day?

16 A Yes.

17 Q Now --

18 A Or texting at minimum, yeah.

19 Q During this month period, you -- I want to ask  
20 you about a time that you may have gone out looking for

21 Casey. During this month --

22 A For Caylee?

23 Q No, Casey.

24 A Casey?

25 Q Let me -- let me ask the question

ROUGH DRAFT

1 and -- between the month of June 15th and July 15th,  
2 let's use that window, that month window. Isn't it true  
3 that there came a time that you went out looking for  
4 Casey and that you, in fact, found -- learned what she  
5 was downtown, at a bar downtown and, and -- let me get  
6 this out.

7 Q And you went -- and you went to that bar to  
8 see her?

9 MR. LUKA: I want to object. Again, I'm going  
10 to certify as irrelevant. This has nothing to do  
11 with the defamation case.

12 MR. MORGAN: Well, I'm going to -- I'm going  
13 to have to say it has everything to do with the  
14 defamation 'cause because if we can prove who had  
15 something to do with the disappearance of Caylee  
16 Anthony, that exonerates our client and it makes  
17 the fact that she could not have been the person  
18 who took the child.

19 MR. LUKA: Okay. Well, first of all, this  
20 case is -- defamation suit is, in fact, first of

21 all, that you have to prove that there was, in  
22 fact -- as I understand it, you must -- the  
23 elements have to do with making a public statement  
24 which causes harm.  
25 MR. MORGAN: Correct.

ROUGH DRAFT

1 MR. LUKA: So what does the fact that -- other  
2 than the statements that Ms. Anthony made or  
3 someone else made in regard to Ms. Gonzalez, what  
4 does this line of questioning have to do with that?

5 MR. MORGAN: Because if Zenaida Gonzalez did  
6 not abduct and kill this child and someone else  
7 did, it has direct bearing on this case.

8 MR. LUKA: Can actually it does not.

9 MR. MITNIK: Truth and falsity is the  
10 centerpiece of every defamation case. Falsity  
11 comes about by proofing someone else did, she  
12 didn't. If you want to instruct him not to answer,  
13 go ahead.

14 I will warn you, if you do, we're going to  
15 seek -- come back and we're going to seek fees and  
16 costs for having to come back because that -- it's  
17 our position that objection is not well found. But  
18 you do what you got to do. I just want to as a --  
19 give you a heads-up.

20 MR. LUKA: I understand. And like I said, if

21 it has to do with -- falsity, what you're saying --

22 MR. MITNIK: We don't need to discuss it  
23 anymore, honestly, because we're all trying to get  
24 done.

25 MR. MORGAN: And we are going to be seeking

ROUGH DRAFT

1 fees and costs if we have to go over there because

2 in -- this is very, very relevant.

3 MR. LUKA: I disagree but --

4 MR. MORGAN: Are you still instructing him?

5 MR. MITNIK: And by the way, relevance is not

6 a grounds to instruct someone not to answer. That

7 is clear under the rules. Anyway, take a position,

8 let's move forward.

9 MR. MORGAN: Can he answer that?

10 THE WITNESS: There's something I want to say.

11 MR. LUKA: If he wants to answer it, go ahead

12 and answer it.

13 BY MR. MORGAN:

14 Q Go ahead.

15 A First of all, I do need to correct -- my

16 mother did tell me of -- that Casey and Caylee had not

17 been home. She called me on July 3rd. She called me

18 probably about 8:00 o'clock at night. I totally forgot

19 about that.

20 Q Okay. And that is -- that is --

21 A That's when I --

22 Q Decided to go looking for her?

23 A I started looking on-line, figured out she was

24 supposed to be at a party, all that stuff. Now, I'm not

25 getting completely into that. There's something that I

ROUGH DRAFT

1 want to say that isn't related to the direct line of  
2 questioning, and this is the first time that I'm even  
3 going to address the woman across the table from me,  
4 Zenaida.

5 Q Zenaida?

6 A Zenaida, sorry, because everything prior to  
7 this has never been in regards to this Zenaida. This  
8 ma'am, I saw her MySpace page, which was forwarded to me  
9 anonymously or, you know, from tipsters and things like  
10 that during this process in July as well, you know,  
11 saying, you know, this is the Zenaida. Could this be  
12 the Zenaida? I got hundreds of those.

13 Because of the age and because of all other  
14 things that were -- that were listed out, the  
15 description that my sister gave my parents, the  
16 description that my sister gave the police. The fact  
17 that my sister said that this is not -- you know, that  
18 when they showed a picture of her and said, no, you  
19 know, all those things, that has never been -- you know,  
20 that has been poppycock the whole time, you know. It's

21 been -- if there was a chance that that was the -- that  
22 there was the Zenaida, her and I would have had  
23 conversations well prior to this so -- I don't know how  
24 I can be more cleaner than that.

25 Q Are you aware that your sister has said that

ROUGH DRAFT

1 she never looked at a picture of Zenaida and denied ever

2 looking at a picture of Zenaida Gonzalez?

3 A For, for this?

4 Q Yes.

5 A This lady right here?

6 Q Yeah.

7 A That's news to me.

8 Q Okay. Now your, your recollection has been

9 refreshed, you do now remember that your mom called you

10 and said --

11 A Yes.

12 Q -- Casey hasn't been home for two weeks, you

13 got on-line?

14 A It was even a little longer than that, yes.

15 Q You start looking, you start trying to track

16 her down?

17 A Um-hum.

18 Q You become worried?

19 A Oh, sure.

20 Q You then at some point in time did track Casey

21 down, didn't you?

22 A I never got to see her.

23 Q But you found out where she was?

24 A No, I never -- I tried to go where she said

25 she was going to be. She wasn't there.

ROUGH DRAFT

1 Q How did she say --

2 A I called her.

3 Q Now, let me ask you this question. Did she  
4 tell you where she was going to be?

5 A No. My sister had no idea that I was looking  
6 for her.

7 Q How did you -- who were you talking to about  
8 where she was?

9 A I didn't find out from anybody where she was  
10 going to be. I found out on-line through like FaceBook  
11 and MySpace where she was going to be at a party.

12 Q Right. 'Cause I've looked at that MySpace  
13 business, and you found out on MySpace that she was  
14 going to be at a party, correct?

15 A I actually found out on Facebook previously  
16 that she was, yes.

17 Q Excuse me. I'm not as good about FaceBook as  
18 you guys.

19 A That's all right.

20 Q But you found out she was going to be at a

21 party and you went to that party, correct?

22 A Yes.

23 Q And when you went to that party, where was

24 this party?

25 A The Dragon Room downtown.

ROUGH DRAFT

1 Q Okay. And when you went to the party, you  
2 went -- did she know you were coming?

3 A She ended up finding out from a friend of hers  
4 prior to showing -- you know, prior to when she would  
5 have showed up. She never did so --

6 Q So a friend he told -- a friend tipped her off  
7 that you were on your way to the Dragon Room?

8 A Yeah, or that I was there, yeah.

9 Q And when you went there, she wasn't there?

10 A No. I did not see her at all.

11 Q Did you wait there for her at the Dragon Room?

12 A I was there and downtown in the greater  
13 downtown area probably till 3:00 in the morning.

14 Q And she never showed up?

15 A I never saw her. I went multiple places.

16 Q Is that the only time between, let's say, June  
17 9th and July 15th ing that you ever went looking for  
18 Caylee and/or Casey?

19 A Yes, yes.

20 Q Can I ask you a question 'cause I'm -- being

21 old you don't know what all -- do you have -- have you

22 ever been used the word Xanax used to describe -- you've

23 heard of Xanax called a Zanny?

24 A A Xanax called a Zanny? No.

25 Q Yeah. Is that a street slang?

ROUGH DRAFT

1 A I don't think I'm plugged into the street  
2 lingo, to be honest with you. I'm probably the last  
3 person you would ask for that.

4 Q But you've never heard of the word Xanax to --

5 A No, I never heard that.

6 Q By a Zanny?

7 A I never heard of that before.

8 Q Or a Zanny nanny where you take a Xanax and  
9 you pass out?

10 A No, I've never heard of that before.

11 Q Okay.

12 A That is actually the first time I've ever  
13 heard that.

14 Q So for that month, the only time you really  
15 went looking for either one of them was --

16 A The night of the 3rd, morning of the 4th, yes,  
17 exactly.

18 Q To the Dragon Room?

19 A Exactly.

20 Q And when you didn't find her, did you continue

21 your search for the two of them?

22 A No. When I spoke with my mother, she said

23 I'll handle it, don't -- you know, don't -- I don't need

24 you to, you know --

25 Q And your mom said --

ROUGH DRAFT

1 A Continue.

2 Q She was speaking to her every day anyway?

3 A Exactly. They were fighting on the phone, you  
4 know, while I was calling my mom trying to give her  
5 updates anyway so --

6 Q Let me -- now, and your mom -- did your mom  
7 tell you what she -- where Caylee -- Casey was telling  
8 her she was?

9 A No. At that point my sister was telling me  
10 and my mom that she was in Jacksonville, which I knew  
11 was wrong I knew she was in Orlando --

12 Q You knew that, yeah.

13 A -- somewhere, you know, just based on the  
14 conversations on-line so.

15 Q So you knew that was false?

16 A Absolutely.

17 Q Yeah. Let me ask you a question -- let me  
18 return to something and come back here in a minute.

19 Have you ever been to Sawgrass Apartments?

20 A After July 15th I went there, yeah.

21 Q Okay. Before July 15th, had you ever been to

22 Sawgrass Apartments?

23 A Never even heard of it. Wouldn't even have

24 known where it was.

25 Q Did you know if, if Casey had ever been to

ROUGH DRAFT

1 Sawgrass apartments?

2 A Not to my knowledge. I couldn't confirm it,  
3 you know. I want to say that she claimed that she had a  
4 friend there, like a friend that lived in that you know.

5 Q When did she tell you?

6 A In that complex.

7 Q When did she tell you she had a friend at  
8 Sawgrass?

9 A Sometime in July during a, a -- whether it was  
10 a phone call conversation, you know, she was in jail or  
11 a video visitation. I mean, during that time is when  
12 you know, I don't want to say I interrogated my sister  
13 but, you know, when I would ask her, you know, any  
14 fact-finding questions you know, it was during -- and  
15 all that stuff has been you know, released at this point  
16 any way so.

17 Q Who was her friend at Sawgrass?

18 A Shoot. The name alludes me. I want to say it  
19 would have been a guy instead of a girl, but.

20 Q Let me --

21     A    I don't think it was somebody she was close to  
22 or anything.

23     Q    Did he work there or live there?

24     A    I would think live there. I don't think I  
25 ever heard of her knowing anybody that worked there.

ROUGH DRAFT

1 (Off-the-record discussion was had.) 10 oh

2 two. Opened opened ten 13.

3 BY MR. MORGAN:

4 Q I want to go back to the Dragon Room that  
5 night. When you got to the Dragon Room, you asked  
6 people had Casey been there that night?

7 A (Deponent shakes head).

8 Q You did not ask anybody that?

9 A Nope. Didn't ask anybody, no.

10 Q You just walked in and look for her and you  
11 didn't see her?

12 A I showed up very early with a friend of mine,  
13 and I was looking actually for anybody that I recognized  
14 you know, any of her friends that I would have  
15 recognized, as well as her. And didn't see anybody like  
16 that.

17 Q What had you -- that party did you -- did you  
18 discover was going to be going on that night? Who was  
19 having the party?

20 A Someone that I had met before, an acquaintance

21 or someone of my sister's. It was like a birthday party

22 or something so -- but like you said I never heard her

23 seen that person.

24 Q But you stayed out that entire time till 4:00

25 in the morning?

ROUGH DRAFT

1 A Till about 3:00

2 Q Looking for her?

3 A Yes.

4 Q When you didn't find her did you call your mom

5 the they can day or dad?

6 A Oh, no. I was on the phone with my mother

7 that night. I was on the phone with my sister later on

8 that night.

9 Q And what did you --

10 A You know like maybe midnight or so you speak

11 to Casey that night.

12 A Yes.

13 Q And what did you -- what did you say to her

14 that night?

15 A Where are you? You know, Casey says -- or

16 excuse me mom says that you and Caylee haven't been

17 home. You know, mom wants you and Caylee to come home

18 at a minimum Caylee to come home you know. Where are

19 you? We need to meet up, you know, we need to make this

20 happen and --

21 Q What did she say?

22 A I'm in Jacksonville. I said no, you're not.

23 You're here, you know, you're in Orlando, I don't know

24 if you're downtown but you're in Orlando.

25 MR. LUKA: I'm sorry, I'm getting a call from

ROUGH DRAFT

1 the judge.

2 MR. MORGAN: Off the record.

3 (Off-the-record discussion was had.) ten 15.

4 Opened opened ten 15.

5 BY MR. MORGAN:

6 Q So you, you actually spoke to her that night

7 around 12:00 o'clock?

8 A Or so, yeah. 12:00 until maybe about 2:00 or

9 so yeah.

10 Q Have you ever been discover later where she

11 was that night?

12 A She was -- she was downtown. She was like on

13 the other side of the, of downtown who he cause I

14 was -- I just stayed off of, is it Church Street that

15 all those are off of.

16 Q Yeah.

17 A I stayed on Church and she was over on Orange,

18 probably like where Wall Street, you know where those

19 other areas are.

20 Q Across the street from me right here?

21 A Exactly.

22 Q So, so that night that she was telling you

23 that she was in Jacksonville, you've learned

24 subsequently that she was actually downtown?

25 A Yeah, but she -- she eventually end up admit

ROUGH DRAFT

1 to go me that she was downtown.

2 Q When did she admit that to you?

3 A August or so when he she was out.

4 Q That night, that night -- the day had you that

5 conversation without the press and?

6 A Oh, yeah. I mean, there were -- every day we

7 would, we would talk but yeah it would have been in

8 August much I don't think it was prior to -- I don't

9 think was to prior to that during any -- wasn't relevant

10 to finding Caylee, where she was that night you know it

11 never really came up.

12 Q After that night -- that night when you had

13 the conversation with Casey, she said to you I'm in

14 Jacksonville?

15 A Um-hum.

16 Q Did you say that are you doing in

17 Jacksonville?

18 A I didn't use those words.

19 Q Tell me everything you talked about with her

20 that night.

21       A    It was more just again saying, you know, mom  
22   says that you -- you know, that you guys haven't been  
23   home. You know, where are you? She was -- she wasn't  
24   willing to take my call for a while. The -- we were  
25   actually, I was trying to Mallory ended up showing up

ROUGH DRAFT

1 later on in the evening, too.

2 Q Who's Mallory?

3 A My girlfriend.

4 Q Oh, okay. I'm sorry.

5 A That's fine. So I had her text my sister

6 around midnight cause I was getting very impatient. I

7 had been there for a couple of hours at that point. And

8 texted her to find out if she, hey I'm downtown with a

9 friend, you know, what are you up to. And Casey was

10 obviously wise to, wise to that she'd already been

11 tipped off that I was trying to find her. So, so that

12 kind of started my sister texting back you know I know

13 you're with Lee you know, you know whatever.

14 So that's when stated trying to call her. And

15 when her and I talked, it took probably a huge amount of

16 voice mail, you know, attempts for me to -- until she

17 finally even called me back or pick up by accident or

18 whatever and it was always to leave me alone, now I'm in

19 Jacksonville I'll be home tomorrow.

20 What I could imagine she was telling, the same

21 thing that she had been telling my mom, at least that's  
22 what it -- you know, after any mom gave me a quick  
23 briefing you know that that might.

24 Q Did you tell her that night I know you're not  
25 in Jacksonville?

ROUGH DRAFT

1 A Oh, yeah, point blank. I said you're not  
2 Jacksonville of. I told her I found it on face book you  
3 were going to be at Dragon Room and you know I mean I  
4 laid it out all for her and said I'm not an idiot.

5 Q Right.

6 A And -- but she, she kept it up saying nope  
7 this is where I'm at so.

8 Q Did, did you ask her that night why she left  
9 home, why she went to Jacksonville?

10 A No, I don't think I ever asked her why, no. I  
11 can't recall that.

12 Q Can she -- did she -- did you ever ask her  
13 that night why she wasn't talking to your mom?

14 A No.

15 Q That night when you were talking to her from  
16 the Dragon Room, did you ask her where's Caylee?

17 A Yes, I did do that. Sorry, I knew that is  
18 where you were going to go. Casey -- 'cause I did, I I  
19 asked her I said, well if you're out -- you know, she  
20 said she was in Jacksonville she was out in Jacksonville

21 cause I can hear voice in the background. I said I know  
22 you're out somewhere, where are you? And she said she's  
23 at this bar or club or something in Jacksonville.  
24 And I said, well, then who's you know then  
25 where's Caylee? She's like oh well you know someone's

ROUGH DRAFT

1 watching her up here. Okay, well you know then I ended  
2 um saying -- she didn't say who I didn't even ask her at  
3 that point.

4 Q Did you ask her is Caylee all right?

5 A I don't think I ever asked her that, no.

6 Q That night, were you worried about Caylee's  
7 safety?

8 A No. I was more just extremely frustrated that  
9 my sister was -- I felt like my mother and my sister  
10 were putting them in between them, that they were  
11 fighting about something or.

12 Q Your mom and your sister were fighting about  
13 something?

14 A They were obviously not agreeing about  
15 something, you know, if -- I would deducing my sister  
16 hadn't been home. That's my mind set. So.

17 Q Can your -- when you were talking to your mom,  
18 did she ever tell you why Casey left the house?

19 A No, even to this day my mother has no  
20 knowledge of why Casey would have been prompted to go,

21 if she was prompted to go or, or what. That's still a  
22 mystery.

23 Q So to this day, your mother's never told you  
24 here's why I think she left the house?

25 A No, I don't think my mom knows at least that

ROUGH DRAFT

1 she's relayed to me anyway.

2 Q Now, when you -- when you finally got to meet  
3 with Casey later, did she ever tell you why she left the  
4 house?

5 A No.

6 Q And went to Jacksonville?

7 A I don't think she is ever in Jacksonville.

8 Q Well, did you ever -- did you ever ask her  
9 when you final had had a private conversation in August,  
10 did you say to her why did you leave?

11 A Well --

12 Q Because that seems like the most -- that would  
13 be my first question to my sister, why did you leave,  
14 what happened?

15 A Well, and see that's not -- she wasn't -- she  
16 didn't leave. She says --

17 Q I mean the house, left the house.

18 A Well, she left the house on the morning of the  
19 16th, and Caylee was taken from her that, that day. She  
20 comes back to get Caylee that night and she's not there.

21 And then from that point on she can't -- she doesn't go  
22 home is he she never left the house op purpose, you know  
23 what I mean? Like that's -- it's not -- that wouldn't  
24 have been my lining of questioning because that's note  
25 what was going on.

ROUGH DRAFT

1 Q When you questioned her later in that August,  
2 did you say the last time you, -- she told you the last  
3 time I saw Caylee was June 15th?

4 A June 15, 16th, that Monday.

5 Q June 16th?

6 A Yes.

7 Q Did you ask her what did you do the whole 30  
8 days?

9 A That had been well documented at this point  
10 that she claimed what she had been out searching, that  
11 she had been you know, trying to do whatever she could  
12 to track, to track her down by her own means, by  
13 following -- and also by following had a she was told by  
14 not going to the authorities and you know, and just to  
15 follow along or whatever.

16 Q And did not she tell you that she'd actually  
17 been having cell phone conversations with Zenaida?

18 A She said that she had attempted multiple  
19 times. She did say that she got -- the most of the  
20 communication that she got was through like the

21 Internet, through like a, like a MySpace or something,  
22 but didn't she actually tell you that, I think the  
23 conversation has been recorded, that she -- that Zenaida  
24 had called her from a 321 area code number.  
25 A Well, I had asked my sister has, what he she

ROUGH DRAFT

1 ever you know, had a numbers -- I mean, at this point  
2 I'm trying to get anything out of her you know. Had a  
3 number would she have or had a number you know, and  
4 yeah, I think she rattled off a couple of different  
5 areas code that is it could have been it was.

6 Q She told you the last thing what she told you  
7 was that the last dime she had hear from Zenaida  
8 Gonzalez was a private number with a area code 954 is  
9 that correct?

10 A Sure. I don't know when are you reading over  
11 of.

12 Q It was a -- it's a transcript of a  
13 conversation between you and Casey?

14 A Which would have been? You know what I mean I  
15 don't -- there's been hundreds ever conversations and  
16 numerous settings so I want to be accurate for you.

17 Q I appreciate that. But Casey told you that  
18 during this month period, that she had been having cell  
19 phone conversations with Zenaida Gonzalez, one from an  
20 area code 321, and one from an area code 354 -- or 954?

21 A 954.

22 Q Yeah.

23 A If that's -- if that's what was said in the  
24 transcript, then that's correct. If, if I'm previously  
25 said that, I can't recall to you at this point in Casey

ROUGH DRAFT

1 has said it, I physically spoke to, spoke to her.

2 Q Had you ever heard -- did your mother ever  
3 threaten to go to court and try to take custody of  
4 Caylee from Casey?

5 A Not to my knowledge.

6 Q Have you ever heard that?

7 A After the fact?

8 Q Yes.

9 A Not directly from like the horse's mouth not  
10 from my mother or not from my party.

11 Q What horse did you hear it from?

12 A Bull crap horses, excuse my French, but media  
13 and friends and, you know, and people that I wouldn't  
14 put any stock into what they're saying.

15 Q Did you ever ask your parents, your mom or  
16 your dad,?

17 A If.

18 Q Did you all ever say to Casey, look, your  
19 lifestyle is such we're going to have to go and try to  
20 to get custody of this child?

21     A   No, because that's her lifestyle wasn't such  
22   where that would warrant that to my -- you know in my  
23   opinion and you know, no.

24     Q   Did you ever -- did you ever in the months  
25   leading up to let's say June 15th, did you ever break up

ROUGH DRAFT

1 a physical altercation, and you no I'm tracking down

2 things and so I apologize?

3 A I understand.

4 Q A physical altercation between your mom and

5 Casey?

6 A No, I've never broken up a physical

7 altercation between my sister and anybody.

8 Q Okay. So you've never -- well, how would you

9 describe your mom's relationship with Casey prior to

10 June 15th?

11 MR. LUKA: Objection relevant, but go ahead

12 aspect answer.

13 A Strong. You know, it's, it's a

14 mother/daughter relationship so I mean, there's you know

15 you've got your things that you fight over just like a

16 father and son fight, you know, a mother and a daughter

17 fight. I mean it's the -- that's just kind of the

18 normal -- the normalcy. I mean my mom's the caregiver

19 and she wants to do everything had a she can and a lot

20 of times she is just -- she's a little overbargain she

21 does too much but she's the best he because that have

22 so -- but you know they love each other unconditionally

23 I mean that's very obvious.

24 Q When you were having this MySpace

25 communication regarding Zenaida, you said had you some

ROUGH DRAFT

1 MySpace communication?

2 A I have.

3 Q Regarding Zenaida?

4 MR. MITNIK: No, I think he said Casey said  
5 that her communications were through MySpace.

6 Q Oh, yeah?

7 A Either like MySpace or like via, via E-mails  
8 she used to always refer to it as like the Internet you  
9 know had a she'd had communications through the  
10 Internet.

11 Q So Casey told you that she had communications  
12 with Zenaida through either MySpace or the Internet?

13 A Yes.

14 Q And that was from June 15th through July 16th?

15 A Yeah, that's, exactly or -- yeah  
16 leading -- July 15th leading up to all this going on,  
17 yes I don't know the, you know, how frequent and all  
18 that kind of stuff.

19 Q And what was the -- what was the content and  
20 the nature of those communications?

21       A    To my knowledge, it was more of you know, let  
22 me think here. Okay. There was actually something  
23 that's worth mentioning prior to, to getting into this  
24 cause it'll just explain it, hopefully.  
25           Casey's password on MySpace and I believe

ROUGH DRAFT

1 Yahoo at the time, like her, her e-mail address, was

2 Timer 55, T-i-m-e-r 5 5.

3 Q What did that mean?

4 A Well, that was foreign to me, too it just

5 sealed like a weird password. I had asked Casey what

6 that meant.

7 Q What did she say?

8 A Now, Casey said eventually she always -- she

9 just kind of -- I asked her originally I believe either

10 in lining a jail house call or something, I've asked her

11 in a forum once and she just kind of wrote it off. I

12 later asked her in in August or it was had he she was

13 out she told me that that was when -- or I was able to

14 find out that that was the amount of time that like

15 someone reset Casey's password to Timer 55. Someone put

16 that as her password.

17 Q Who?

18 A She's claiming whomever had Caylee, the Zanny

19 would have done that.

20 Q How?

- 21     A   I don't know.  Would have had access to her  
22   account previous to that.  I don't know.  But had reset  
23   her password for her e-mail and for her high space to  
24   Timer 55.  And told her --
- 25     Q   And told her she had done this?

ROUGH DRAFT

1 A You know, that this was your new cause she  
2 still need to do check she still had access to her page  
3 and stuff.

4 Q Zenaida told her she had reset the password?

5 A Yeah, or some somehow -- right somehow that's  
6 how -- I don't know the logistics and how that you know  
7 how that conversation would have happened. But that her  
8 password is Timer 55. Casey says that the person that  
9 took.

10 Q Can I ask you a quick question?

11 A Shoot.

12 Q What did Timer 55 mean? What did she tell you  
13 later?

14 A I'm getting ready to tell you that right now.

15 Q Okay, okay.

16 A Casey said that Timer 55 was the amount of  
17 time that this person as going to have Caylee before she  
18 return her. This is creepy it gave me chills the first  
19 time if you count 55 days from July 15th, you get August  
20 ninth and that's, that's -- or excuse me from June 15s

21 you get August ninth and that was Caylee's birthday. So

22 I don't think.

23 Q Was, was, was Casey' password Timer 55 before

24 or are you saying to me that Zenaida Gonzalez changed it

25 to Timer 55?

ROUGH DRAFT

1       A   Casey says that -- I don't even think Casey  
2 even said specifically that Zenaida changed her password  
3 to Timer 55. She said it was change to do Timer 55. I  
4 think I more or less just assumed that it was whomever  
5 had Caylee and Casey always said that Zenaida did.  
6 However, one other person knew about Timer 55 as her  
7 password, and that was Jesse Grund. And how had a came  
8 up was I was tracking down all of Casey's like photo  
9 websites and she has like three or four of them that she  
10 was on. And one of them was brought do my attention.

11           And I couldn't for the life of me figure out  
12 what the password is because I wanted to go in there and  
13 delete her account, 'cause at that point everybody was  
14 sensationalizing it, the media and it was out of hand,  
15 and I was trying to get that stuff out of there?

16       Q   When you went to that iste, were you readings  
17 some the communications between her and Zenaida  
18 Gonzalez?

19       A   I've never been able to find any communication  
20 between anybody that I would think was --

21 Q When you went into the MySpace to cleaning it  
22 up?

23 MR. LUKA: I object can you just answer the  
24 question I don't think he answered it fully did he.

25 Q Yeah. When you went into the MySpace to clean

ROUGH DRAFT

1 up?

2 A Yeah.

3 Q You were obviously looking for communications  
4 between Zenaida?

5 A Yeah.

6 Q And Casey, correct?

7 A Yeah. Everything had been deleted from the  
8 middle of -- or the middle or the beginning of April  
9 until -- or I'm sorry it was the end of April, from the  
10 end of April all the way until July 3rd had he my sister  
11 realized that night on July 3rd that that's how I  
12 tracked her down was through the face book and MySpace,  
13 the neck day everything like that whole page, comments  
14 were deleted, messages were deleted. I mean, there's  
15 nothing, it looks like there was no activity, which is  
16 you know you know that it's not the case.

17 Q Did, did Casey delete it?

18 A She claims that she did not, she claims that  
19 someone else did.

20 Q Okay. Now, but you did get to get inside and

21 see everything from July 3rd going forward correct?

22 A Yeah.

23 Q When you got in there, you were obviously?

24 A Provided nothing was deleted from that point

25 exactly.

ROUGH DRAFT

1 Q Exactly. And so when you were doing that,  
2 first thing I would have been doing and probably the  
3 first things you were doing is looking for communicates  
4 between Zenaida and Casey, correct?

5 A Anything that seemed you know, out of the  
6 ordinary suspicious found nothing.

7 Q Did you see -- there was no communication  
8 between Zenaida and Casey from, on the MySpace from July  
9 3rd going forward?

10 A I have found nothing that -- I have found  
11 nothing at all from anybody that would lead me -- for  
12 like a Zenaida or anything as it relates to Casey, I  
13 found nothing.

14 Q Did Casey -- I'm sorry D Casey tell that you  
15 she spoke to Caylee while she was missing?

16 A She did. She said that she never told me  
17 directly but she said it, I believe she said it to law  
18 enforcement and she said it again to my -- to my folks,  
19 excuse me, later on that it was very brief, it was like  
20 a ten or 20 second call or something, that it was that

21 private phone number call that -- or maybe one of them,  
22 I don't know that she would have had, but that she got a  
23 private call and that Caylee was the other person on the  
24 line you know. Something -- really short like you know  
25 mom and.

ROUGH DRAFT

1 Q When you -- when you were talking to Casey  
2 about the my space communications, what did she tell you  
3 the conversation was like back and forth between her and  
4 Zenaida?

5 MR. LUKA: Objection to form, but go ahead.

6 Q I'm sorry.

7 A She said that -- that and there was  
8 also -- she also claimed that there were text message  
9 conversations as well so this would have been -- this is  
10 the same answer for both.

11 Q Okay.

12 A That it would have been more of just updating  
13 her 20 days left, whatever, like giving her an update on  
14 this whole Timer 55 deal as well as telling her where  
15 she needed to go.

16 Q Where?

17 A Like for the day. To say you need to be here  
18 at this time.

19 Q For example, where?

20 A This is just it be I'll just randomly pick

21 something, be at target by 3:00 o'clock.

22 Q Did Casey tell you that had he she would be

23 told to do that by Zenaida that she would do it?

24 A Absolutely that is what she said she would do

25 hope that that you would -- she would be able to see her

ROUGH DRAFT

1 or see Caylee or something like that but she later said  
2 that I think she was being told that had that that so  
3 that person fell like Casey was there, she wasn't like  
4 talking to the police or you know what I mean? They  
5 were like surveilling her watching her or something.

6 Q And I think I the know answer to this question  
7 but I want to ask it anyway. Why did Casey go to no to  
8 lease place that Zenaida was instructing her to go on  
9 MySpace or on text message as soon as why did she  
10 go -- why would she go to Target?

11 MR. MITNIK: What did she tell you why?

12 A No, she -- she wouldn't tell -- she didn't  
13 tell me why that's not a question I would answer -- ask  
14 because it's a really he's eye answer for anybody with.

15 Q What is that answer?

16 A If somebody has your child and somebody is  
17 telling you to do something, you if you can doing it.  
18 You know what I mean? It's pretty -- it's  
19 pretty -- it's pretty easy, like so if -- if that's her  
20 mind set and I believe that was her mind set that's what

21 she told me it was, I mean there's no reasoning do ask

22 had a question so I never did. So.

23 Q Did you ever ask her why didn't you call the

24 police mine that's?

25 A This is again going back to she was told,

ROUGH DRAFT

1 explicitly not to because it was being held over her  
2 head that Caylee could be had your, that you you know  
3 myself or my father or my mother, you know, someone that  
4 she cares about could be hurt you know if she did.

5 Q So you never asked Casey why she was doing  
6 what she was instructed on MySpace or text he is  
7 marriages because you just assume it's because she  
8 feared for her life?

9 A Yeah, she is following the directions.

10 Q Your life?

11 A Absolutely.

12 Q Casey's life and Cindy and George's life?

13 A And Caylee's lives yes.

14 Q And Caylee? And that is the reason you  
15 assumed that she would go it's day their, it's day 20  
16 you know?

17 A Right, exactly.

18 Q And that is why you never asked her why did  
19 you do this?

20 A No exactly, exactly, yeah, you're right.

21 Sorry.

22 Q Did you ever try to get -- when you saw there

23 was nothing on MySpace, July 3rd going back, you saw

24 there was nothing from Zenaida July 3rd going forward,

25 did you ever try to get ahold of the text messages that

ROUGH DRAFT

1 were going -- and I'm sure you did.

2 A Yeah.

3 Q Going back and forth between her and Zenaida  
4 Gonzalez?

5 A Yeah. I mean, had I her phone records for,  
6 wow, probably dating back into May and June you know all  
7 way through you know had he she was arrested in July.  
8 And actually I may have even had them prior to that of  
9 the and you know, there's still a lot of phone numbers  
10 to this day where I still don't know who owns the phone  
11 number.

12 Q Were you ever able to look and read any of the  
13 texts going back and forth?

14 A No. You know what, I've never had the text  
15 content. I have -- I know numbers that was texted, that  
16 were texted and the frequency and the time and all that  
17 stuff, I've never seen the content I would love to see  
18 the content law enforcement's never shared that with me  
19 and I've asked Lee peedly.

20 Q Did you try to get the content?

21 A Yeah. I've asked for that repeatedly. We've  
22 asked for that repeatedly and we've never gotten it  
23 so -- .

24 Q Oh?

25 A We've always had to get it on our own.

ROUGH DRAFT

1 A It's terrible.

2 Q All right. The night -- we're jumping all

3 over place --

4 A That is fine.

5 Q -- so we can get you out of here.

6 A I appreciate that.

7 Q The night that you talked to her that

8 you -- from Jackson -- when you she would you she was in

9 Jacksonville?

10 A July 3rd, yeah.

11 Q You're at the Dragon Room, and I know my

12 sister and my family, I can tell when they're -- did she

13 seem to be under the influence or drinking or not

14 herself?

15 MR. LUKA: Objection to the form. Go ahead

16 and answer, if you know.

17 A No. That would not have been my impression at

18 all, no.

19 Q Did she -- did she to your knowledge

20 ever -- did she drink? Did she drink alcohol?

21       A    She's, she's a normal person, my too. I mean,  
22   we -- I will definitely have our -- have our booze much  
23   I think I've seen my sister physically drunk twice in  
24   her life. So if that helps to you know let you know of  
25   how hard someone parties or something like that, you

ROUGH DRAFT

1 know, it's nothing like you're, you know, drinking  
2 yourself stupid PEUDZ or anything like that. That's not  
3 anything anyone in my family does that's just not our  
4 nature.

5 Q When you finally had the conversation or any  
6 conversations with Casey about Zenaida Gonzalez, had a  
7 all did she tell you? How did she describe Zenaida  
8 Gonzalez to you?

9 A Early 20's, five six, five seven, 120 pounds,  
10 100 something like that. A little bit of a lighter  
11 complexion, but would get tanned regularly like would do  
12 tan regularly. Had darker hair, typically kept did  
13 shoulder length and kind of like permanent or curly.  
14 Very attractive. Even though she was five six and 120,  
15 100 or so pounds she was slender, but she was just more  
16 filled out, you know.

17 Q When did she tell you about this,  
18 about -- when did she describe Zenaida to you?

19 A Actually she described it to my folks on like  
20 a video visit -- one of the video visitations, that's

21 when she kind of went you know at length of what the  
22 description was.

23 Q Did you ask her if she had any children?

24 A I never asked her that myself. Most of this

25 stuff my folks or other people asked her but she said

ROUGH DRAFT

1 that no Zenaida did not have any children.

2 Q She told you that?

3 A Or I know that that was -- that's

4 Casey's -- that's been -- she's been very consistent on

5 that.

6 Q That's her story?

7 A Oh, yeah, absolutely, that Zenaida she does

8 not have any children.

9 Q Did she tell you when she would speak to

10 Zenaida on cell phone hashes she got to speak to Caylee

11 at the same time? Would Zenaida put Caylee on the

12 phone?

13 A No, not to my knowledge, no, not to my

14 knowledge at all. I don't remember anything like that.

15 I don't think that was the case.

16 Q Did that raise suspicions with you that maybe

17 wow?

18 A Well see, remember a lot of the -- had he

19 weigh talking about actual physical phone call like

20 conversations, to my knowledge, everything had a Casey's

21 told me is that everything has been very -- it's almost  
22 everything has just been done decks or everything's been  
23 done you know Internet. Yes she will get like she got  
24 that private call when Caylee was on the line, but I'm  
25 really having a harder time trying to remember when, had

ROUGH DRAFT

1 he Casey would have talked to Zenaida physically over  
2 the phone that I'm an area of I don't know.

3 Q How did Caylee end up on the phone?

4 A Dial the number and putting it right to  
5 her -- you know putting it right to her ear I zone what  
6 did she say that Caylee said to her on the phone.

7 A Something real short like -- oh, hi mommy, you  
8 know, I miss you, something like that. Casey you know,  
9 interrupted her you know, as quick youly as she could to  
10 say Caylee put an adult on the phone. And.

11 Q Who said that?

12 A Casey says, you know, Caylee put an adult on  
13 the phone.

14 Q Why would she?

15 A That's when the phone --

16 Q Why wouldn't she say put Zenaida on the phone?

17 A I don't know she used the word adult. I mean,  
18 if she's -- you know, if Zenaida supposedly has a -- I  
19 just -- and I say supposedly because I haven't been able  
20 to find this person. Has been able to -- or excuse me,

21 has a, you know, like has siblings you know, has a like

22 a sister that also supposedly could -- like in person

23 has kids. So.

24 Q Zenaida had a sister with kids?

25 A Has a sister that has kids, two younger sister

ROUGH DRAFT

1 I'm sorry or would younger kids sorry I forget the name  
2 now, but I mean for Al intents and purposes that persons  
3 could have been watching Caylee at that time I mean who  
4 knows? So it wouldn't make sense that Caylee would say  
5 the word adult instead of Zenaida because if Zenaida's  
6 not there.

7 Q So there could have been another person there?

8 A Sure.

9 Q In other words, maybe she wasn't speaking to  
10 Zenaida but Zenaida's sister as well.

11 A Sure. You could -- she could have been  
12 talking to you know anybody.

13 Q Did ever tell you she was speaking to  
14 Zenaida's sister?

15 A Not to my knowledge.

16 Q When she told you about talking to Zenaida or  
17 an adult, and talking to Caylee at that time, had he she  
18 would hang up the phone, what did she do next after  
19 having those conversations?

20 A I guess whatever would have been normal for

21 her. That conversation, I'm almost positive happened  
22 earlier in the day on July 15th, which is also the day  
23 that my mom you know found out where she was and you  
24 know went and got Casey.  
25 So you know, that time frame and everything I

ROUGH DRAFT

1 don't know -- I don't know if she ever had a  
2 conversation with, with Caylee or with any you know  
3 specifically like a physical phone conversation prior to  
4 then. So I don't -- you know what I mean I don't know  
5 is there at the times that she did speak to Caylee had a  
6 would she do after those conversations.

7 A I've never been in the report with my sister  
8 had he Caylee wasn't there where I would have seen that  
9 you know what I mean? I don't know. I don't know what  
10 a typical response for her would have been because I've  
11 never been in that situation.

12 Q But you don't know -- did she every tell you  
13 when Casey -- when Zenaida had Caylee and I would speak  
14 to Caylee did you say, well, what would you do when you  
15 hung up?

16 A No, I -- maybe I don't completely get your  
17 question because.

18 Q I'm trying to figure out what did Casey do?

19 A On July 15th when she got the call?

20 Q Your child's gone.

21 A Okay.

22 Q They're giving kind of a countdown --

23 A Right.

24 Q -- till Timer 55. She's moving from place

25 to -- she's being instructed by text or by ply space to

ROUGH DRAFT

1 move from location to locaqtion to location?

2 A Right.

3 Q To location, so she's doing this. Sometimes  
4 she actually speaking to Caylee during this period of  
5 time?

6 A Apparently just that time in July is the only  
7 time that I know of again.

8 Q Okay that is the only time you know of?

9 A Yeah.

10 Q What did she do after she spoke to Caylee that  
11 day?

12 A I have no idea. I mean, whatever she did the  
13 day prior to what or earlier to that. I mean, I  
14 couldn't tell you be probably try to find a way not to  
15 freak out. I, I have no idea.

16 Q Did she tell you how long, when she first met  
17 Zenaida Gonzalez?

18 MR. LUKA: I'm sorry.

19 Q I'm sorry.

20 MR. LUKA: Let me object to the form.

21 Q Okay.

22 MR. LUKA: Go ahead if you can just rephrase?

23 A Yeah sorry.

24 Q When you first -- when you first sat down with

25 Casey and started saying all right let's talk about you

ROUGH DRAFT

1 know?

2 A Right.

3 Q The Zenaida Gonzalez story let's call had this

4 the Zenaida Gonzalez story, did she tell you when she

5 first met Zenaida Gonzalez?

6 A To my recollection, it would have been when

7 she -- had he Caylee was just maybe six months old or

8 something. She met her through a mutual friend, someone

9 that she worked with at the time, that she sat for his

10 child so you know that is just kind of how that was

11 prompted. But I would say that it would have been had

12 he she was still kind of young she would have been less

13 than a year I would think.

14 Q Do you know that mutual friend was?

15 A She claims it was someone named Jeff Hopkins

16 that lives in Jacksonville, Florida. It is not a Jeff

17 Hopkins that I know that I went to school with here in

18 Orlando, Florida. What's the same age as my sister it's

19 not him.

20 Q Did you -- is there a Jeff Hopkins that -- she

21 said she met Zenaida through Jeff Hopkins?

22 A I've never found had a person.

23 Q In Jacksonville, Florida?

24 A Yeah I've never been be a to find who that

25 persons is.

ROUGH DRAFT

1 MR. MITNIK: Did you try?

2 A Oh, yeah.

3 Q I'm going to get to that. But there is a Jeff  
4 Hopkins that you went to high school with?

5 A Yeah, that was -- I think he was kind of  
6 between -- he was a grade below me, so two.

7 Q Did you contact him?

8 A Oh, absolutely.

9 Q And did you say hey did you ever introduce  
10 Zenaida Gonzalez to my sister?

11 A Well and that was the first question I said to  
12 my sister. I said that the Jeff I know that she went to  
13 school with. No no no that's a different one so.

14 Q Did you try to locate Jeff Hopkins in  
15 Jacksonville, Florida?

16 A Oh, absolutely.

17 Q How -- what did you do to find him?

18 A The only -- you know, you would do you know  
19 those different searches, I mean at this point you know,  
20 I've got help from whomever I can, I can gets it and you

21 know, we we rang -- you know like we had different  
22 perform Is and things like that so they would run the  
23 name or you know whatever. And there was only one match  
24 for Jeffrey Hopkins up in Jacksonville and it was in  
25 like Jacksonville Beach or something like that.

ROUGH DRAFT

1 Q Who were the PI's that were running the  
2 investigation?

3 A The primary one is Dominick Casey, and  
4 actually I really never went -- I personally never  
5 talked to anybody else. He was always the guy, if I  
6 needed something that I -- if I didn't know you how to  
7 look it up he can typically help she with that so.

8 Q Did you ask her -- so she said -- did she say  
9 that she actually took care of Casey at age six months?

10 A Caylee?

11 Q I mean Caylee at six did I soak, Caylee at six  
12 months?

13 A I don't remember if it was told had a that was  
14 exactly when. If, if you -- if I had to put an educated  
15 guess on when that would have happened, based on you  
16 know just what I remember, it would have been probably  
17 around that time. Before she was a year old, just from  
18 the time lining that I can remember so --

19 Q So -- but from the time of six months till  
20 today, you never met a Zenaida Gonzalez?

21 A I never have, no.

22 Q And your mom never met a Zenaida Gonzalez to

23 your knowledge?

24 A Not to my knowledge, no.

25 Q Did anyone in your family ever speak to

ROUGH DRAFT

1 Zenaida Gonzalez to your knowledge?

2 A No.

3 Q But she was still baby-sitting her off and on  
4 from age six months until June 15th?

5 A Yes, that's, that's my -- that would be my --

6 Q Did you -- did she say Zenaida Gonzalez to  
7 baby sit.

8 A I have never heard that she did. I've never  
9 heard of any arrangements one way or the other. I've  
10 never heard any concrete thing.

11 Q Do you know the approximate number of times  
12 what she baby-sat?

13 A You can tell me two or 3,000 I have no idea.

14 Q You wouldn't know?

15 A I wouldn't know.

16 Q Did she say she would drop her off in  
17 Jacksonville?

18 A No, this person would have resided here,  
19 the -- she lived in Orlando.

20 Q She met them in -- met them through Jeff

21 Hopkins in Jacksonville?

22 A He lives in Jacksonville currently. He lived

23 in Orlando when Casey and him you know were co-workers

24 and you know when they were friend and had a not. He's

25 refered to as Jeff Hopkins in Jacksonville because

ROUGH DRAFT

1 that's apparently where he was supposed to reside had he

2 all this originally happens so.

3 Q When, when you're speaking to Casey about

4 dropping her off the last time?

5 A Yeah.

6 Q Where did she drop her off?

7 A Casey said that she dropped or -- she went

8 with Caylee to, to Jay Blanchard Park, and she met up

9 with, you know, Zenaida there, cause that is where you

10 know she told her to meet you know to get Caylee for the

11 day. And Zenaida was there, as well as Zenaida's

12 sister, which I can't remember her name right now. And

13 her two --

14 Q But she told you --

15 A Daughters.

16 Q Okay. But she told --

17 A Or children.

18 Q Casey told you this?

19 A Yes.

20 MR. MITNIK: When?

21 Q When?

22 A When she was out of jail, so if August is

23 right the first time she was out of jail it was that --

24 during that time.

25 Q Okay. Did that story ever change?

ROUGH DRAFT

1 A Since that time, no. It's a different story  
2 that she gave the police on had he she was arrested  
3 cause she was told Sawgrass Apartment when she was  
4 arrested.

5 Q Did you -- let's me ask you this. What did  
6 she tell the police about the last -- when she dropped?

7 A She told police -- well she originally said, I  
8 think she said the 9th, but she was wrong on the the  
9 date we already talked about that because my whom had  
10 her date wrong and it was really the 16th, but -- of  
11 June but she told the police that she gave Caylee to  
12 Zenaida at the bottom of the steps of her apartment at  
13 the Sawgrass apartments.

14 Q Why do you call if her apartment?

15 A Zenaida's apartment.

16 Q Okay. She told that you Zenaida lived?

17 A She told police this is the story to the  
18 police, which she's later said that -- I mean she's gone  
19 on record saying that x-ray I lied to you about that.

20 Q Yeah, yeah.

21 A So.

22 Q But the initial story was Zenaida lived at

23 Sawgrass?

24 A Right.

25 Q She took Caylee there?

ROUGH DRAFT

1 A Yes.

2 Q Dropped her off, and where was she going that  
3 day? Why she drop her off?

4 A She claimed work but.

5 Q Okay. Now, we found out that's not -- and  
6 where was she going to work?

7 A I would minimum inshe was probably  
8 saying -- probably Universal I mean I don't know what.

9 Q Did she work at Universal?

10 A I know she can at one time. I haven't been  
11 able to -- that really has had no bearing on what I've  
12 been trying to find out where she's worked and all that  
13 stuff. It didn't matter to me finding Caylee where  
14 she's worked you know so much. So.

15 Q Can I ask kind of a tricky question? And I  
16 hope you don't take this the wrong way.

17 A Shoot.

18 Q Because she's given so many stories and  
19 inconsistencies, even to you, did you start to doubt  
20 that you're tracking these leads do you think at a

21 really -- that she's leading you on a wild goose hunt

22 yourself?

23 MR. LUKA: I'm going to object to the form but

24 go ahead and answer if you.

25 A No I know what you're getting at. No you

ROUGH DRAFT

1 know, I don't believe that I've been on a wild goose  
2 hunt. I believe that there's probably more information  
3 that I could be given, whether it's being withheld from  
4 me or purpose or she just doesn't know do share it or  
5 what's relevant to share on that sworn else hasn't  
6 shared something with me but you do believe that there's  
7 truth to a lot of what I've been told so I followed it.

8 Q Now let me let me -- all right she tells the  
9 police she goes to Sawgrass. Then she gets with you  
10 after she guess out of jail and she says look here's had  
11 a -- here's had a really happened?

12 A Yeah.

13 Q What really happened was I went to plan  
14 charred park yes?

15 A Yes.

16 Q I went to Blanchard Park, I met Zenaida  
17 Gonzalez there?

18 A Yes.

19 Q She was there with her sister?

20 A Why he.

21 Q And her two children?

22 A Yes.

23 Q And I dropped her off -- and I dropped Caylee

24 off and everything was fine everyone?

25 A No.

ROUGH DRAFT

1 Q No?

2 A When she -- when she came to plan charred and  
3 saw, and saw them,.

4 Q Have you given this statement to the police  
5 had a you're telling me now?

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

7 Q Okay. Go ahead.

8 A I don't know. I don't think so.

9 Q Okay. Well the truth is the truth?

10 A They'll.

11 Q The truth is the truth?

12 A Right, exactly. Casey said that she  
13 was -- that she sat down on a bench with Zenaida kind  
14 ever watching the kids play and what not. Zenaida and  
15 Casey, like Zenaida and Casey were kind of in a  
16 conversation at one point. And she remembers Zenaida  
17 grabbing Casey's arm, like forcefully almost to kind of  
18 like kind of hold her down in a way.

19 And that is when she told her you know, I'm  
20 going to take Caylee from you. You know I will give her

21 back to you, you can -- I will give her back to you, but  
22 you know, you need to -- you know you need to follow my  
23 instructions and that is where she made her you know her  
24 threat had a you know if you go to the police, I will you  
25 know I will hurt you know your parents I'll hurt your

ROUGH DRAFT

1 brother, I'll hurt you know Caylee, you know I'll do

2 whatever don't us know don't do that.

3 And it was at that point when you know and

4 Casey saw whomever the sitter whatever her name was,

5 with the kids walking over you know briskly walking over

6 to where their vehicle was parked to leave. And then

7 from that point, then you know Zenaida left also but.

8 Q And did Casey tell you why Zenaida was taking

9 her and?

10 A She just said to teach her a lesson.

11 Q What lesson?

12 A I don't know what that lesson is. I don't

13 know. I don't think she did if that was ever relayed to

14 high sister she never relayed that to me.

15 Q Did she tell you then why she told the police

16 a different story than the truth she was now telling

17 you?

18 A She thought that if she would tell the police

19 something else, that she was still following the, the

20 had a she was told not to do from Zenaida from this

21 whole Timer 55 thing, about not, not telling the police  
22 that you're going to get Caylee back, if you listen to  
23 my instructions, no one's going to get hurt you'll get  
24 her back so she's still you know.

25 Q So the reason she lied to the police, your

ROUGH DRAFT

1 understanding, because she feared for Caylee's life yes?

2 A Yes.

3 Q Your life?

4 A Yes.

5 Q Her life?

6 A Yes.

7 Q Your mom and dad's life?

8 A Yes.

9 Q And that is why? Okay?

10 A Yes.

11 Q Now, -- now, when you -- when she told you

12 these, these stories, did you -- did you say to

13 her -- did you say to her, Casey here's something that

14 doesn't make sense to me? What difference does it make

15 if you told the police it was Zenaida Gonzalez at the

16 Sawgrass apartments or Zenaida Gonzalez at the plan

17 charred park? Cause I could tell you were a guy, you're

18 a thinker. And that had to cross your mind?

19 A Sure.

20 Q You say Casey, why -- had a difference did it

21 make?

22 A Right.

23 Q Did you ask her that question?

24 A Not maybe that exact thing but I would ask her

25 the same line of questioning.

ROUGH DRAFT

1 Q And what did you ask -- and what did she say?

2 A Well, it wasn't -- it's hard to answer had a  
3 question cause I never.

4 Q You see what I'm saying?

5 A Yeah, but I never really asked her that  
6 directly so it's hard -- I can't -- I can't give an  
7 answer that she told me because we never had that  
8 conversation.

9 Q Did you say why -- if I'm you and my antenna's  
10 gone up, 'cause what difference does it make --

11 A Right. You don't have to put yourself there  
12 my shoes from that. My antenna were up from July 15th.  
13 I mean everyone do this day because obviously, obviously  
14 I have no idea who took Casey or.

15 Q I thought you earlier said you believe Zenaida  
16 Gonzalez took Caylee.

17 A I believe what my sister is telling me.

18 Q Do you believe that -- do you believe Zenaida  
19 Gonzalez has anything to do with the -- with the  
20 disappearance of --

21 A This Zenaida Gonzalez?

22 Q Any Zenaida Gonzalez.

23 A I believe that is a possibility, absolutely I

24 also -- there's a possible it could be an um teen amount

25 of people. My point is that you know, I will take

ROUGH DRAFT

1 everything that somebody tells me and until I can prove

2 something, until I can see it for myself.

3 Q Can I ask you a very difficult question?

4 A Shoot.

5 Q When you're going through these possibilities,

6 and I know, I late to ask it but I have to, is one of

7 the possibilities that has gone through your mind is

8 that your sister was the one responsible for the

9 disappears?

10 MR. LUKA: I'm going to object and certify

11 that question. Don't answer.

12 Q Are you instructing him not to answer?

13 MR. LUKA: Yes, I'm instructing you not to

14 answer that question.

15 BY MR. MORGAN:

16 Q I was kind ever putting worded in your mouth

17 and I didn't mean to be cause you said you don't it you

18 didn't ask her the way I did.

19 A No.

20 Q But when you finally -- whatever way you ask

21 it, had he ever you said, hey, you know, Casey, doesn't  
22 really make sense, either which way, why tell the police  
23 a different story, what did she say to that to your  
24 question there?  
25 A Again, we never had that -- we never had

ROUGH DRAFT

1 that -- I never did the whole this doesn't make sense,  
2 why you would tell them this story and that that story.  
3 That, that conversation never happened. So I can't  
4 answer that question. But I know what you're trying to  
5 say, to try to find out you know, if you're being  
6 instructed to not say something about somebody you know,  
7 whatever.

8 And, you know, Casey said that she told them  
9 had a she told -- what you know she said what she said  
10 in order to -- she felt like she wasn't breaking had a  
11 she was instructed to do by telling you know whatever it  
12 was. So I don't know.

13 Q Did you follow up on did you just -- did you  
14 just let it just -- cause you seem like -- I mean you  
15 seem like a detective to me?

16 A Yeah.

17 Q Did you follow up and did that satisfy you,  
18 that explanation?

19 A There's nothing in this world at this point  
20 that can satisfy me in regards to any of this. I mean,

21 there's -- pointblank, if, if Caylee was brought home

22 safe is the only thing that could ever satisfy me ever

23 so that's.

24 Q Did you ever follow up on -- push her though

25 and say wait a minute come on you told police this and

ROUGH DRAFT

1 now you're telling me this but it doesn't really matter?

2 A Casey has been steady in telling me that  
3 Zenaida Fernandez Gonzalez, by the person that I  
4 described, is the person that took Caylee. And I'm  
5 together that from her, I'm following that. It does not  
6 mean that I'm not, not following my own gut instincts on  
7 things or not following what other people are telling  
8 me, or whatever. At that time and to this day in  
9 order -- you know it was to find my niece, I'm willing  
10 to hear anybody's side if it made sense.

11 Q I don't want to beat a dead horse and only  
12 ask -- but did you ever push her on the issue of why did  
13 you -- had a difference do it make will at Sawgrass?

14 A I never made that -- I never said that, no.

15 Q Let me ask a quick -- another question that's  
16 easy. That day that she was going to Blanchard Park,  
17 where did she -- while she was dropping her off, request  
18 was she going -- where did she tell you she was going  
19 that day?

20 A Like after she drop her off?

21 Q Yeah. What were her plans prior to you know,  
22 her grabbing her by the arm and -- what were her plans  
23 that day?

24 A I just assumed going to work I never really  
25 asked her had a she was planning on doing prior to that

ROUGH DRAFT

1 day.

2 Q What time did she drop her off at Blanchard

3 Park?

4 A Around lunch time like between 12 and 2:00 at

5 some point I can't remember the time.

6 Q Would her work start after lunch?

7 A It could you know there's -- I would think

8 that there could be plenty of you know potential job or

9 shifts that could do that.

10 Q Did you ever ask -- did you ever ask Casey --

11 and I don't want to guess into what she told you, but

12 did you ever ask Casey, look, if something happened as

13 an accident, and that you accidentally or something

14 happened to Caylee and she accidentally passed away,

15 tell us that? Did you ever ask her that question?

16 MR. LUKA: I'm going to object.

17 Q You can answer. Go ahead. Did you ever ask

18 that question?

19 MR. LUKA: No, I would instructing you not to

20 answer that question at this time.

21 Q And again, we think these are --

22 MR. LUKA: If you want to go before Judge

23 Rodriguez you can and you can argue it out but at

24 this time I'm going to.

25 Q I understand. I respect that.

ROUGH DRAFT

1 MR. MITNIK: Well, I don't think because I  
2 think it's proper but go ahead.

3 A Well, I'm not answering ing that question  
4 because I don't think it's relevant at all period.

5 MR. MITNIK: Well that's not for you to decide  
6 but look go ahead. Let's move forward.

7 Q I think the fact that you're not answering  
8 answers it.

9 MR. MITNIK: Let's just move on.

10 BY MR. MORGAN:

11 Q So she's at Blanchard Park, and she's  
12 told -- she's telling her I'm talking your child until  
13 you hear from me again?

14 A You know, I don't even she gave her the time  
15 at that point but it was more just, you know, I'm taking  
16 her, you know to teach you a lesson, you will get her  
17 back, just you know follow my instructions. And then  
18 you know I don't know.

19 Q But she door -- and that's the time, that's  
20 the the time that she told her and if you tried to find

21 me?

22 A Exactly or, you know, if, if -- no no. If

23 you -- not if you try to find me. If you, if you go to

24 the police or you know if you go to the authorities,

25 then that is when she threatened her.

ROUGH DRAFT

1 Q So Casey knew there at Blanchard Park that

2 Caylee would not be coming home that night?

3 A Sure. I mean, she could probably -- she could

4 have assumed -- I don't think how long she thought that

5 she was going to be gone at that point. I have no idea

6 I don't think if they had that conversation about this

7 while Timer 55 at the time.

8 Q Did she tell you that she tried to stop side

9 Zenaida from taking the child?

10 A Well, that was a question that I asked her. I

11 said -- I said I would think I would know you and you'd

12 probably be physician fighting personal you know, I

13 would be.

14 Q In the park?

15 A Right, and Casey said that you know,.

16 Q Did she have a gun?

17 MR. LUKA: Well objection.

18 Q I'm sorry?

19 MR. LUKA: Can he answer?

20 A Are you going to let me answer?

21 Q I apologize.

22 MR. LUKA: Answer the first question, then you

23 can answer the second one.

24 A Right. Casey said that she was so shocked of

25 what was happening, and that she, she didn't know how to

ROUGH DRAFT

1 react and what she thought this just was -- it was like  
2 surreal to her you know, that that moment was even  
3 happening. So.

4 Q What did she say the sister was doing while  
5 shelves going on?

6 A Taking the kids to the vehicle, if not you  
7 know getting into the vehicle at that point.

8 Q So you're telling us today that she told you  
9 she did absolutely nothing to stop Zenaida Gonzalez from  
10 taking Caylee that day from the park?

11 MR. LUKA: Is that a.

12 A Yes yes that's what was relayed to me yes.

13 Q Did she try to say to her please don't take my  
14 baby she try to talk her out of it?

15 A I'm sure.

16 Q Did she tell you that?

17 A No.

18 Q You don't know that?

19 A I don't know.

20 Q Did you ask her, did you say please don't take

21 my baby?

22 A I did not ask her that, no.

23 Q Cause you know, you said a minute ago and we

24 all know our sisters, I know my sister, and I

25 think -- you know you try to take one of my sisters's

ROUGH DRAFT

1 kids yours probably going to have to do it with a 44  
2 revolver and you said that the Casey that you know, you  
3 would have envisioned in a physician fight?

4 A Yeah.

5 Q Before she'd have let this person take her  
6 child away. But she nothing that day?

7 A That's what I said was correct.

8 Q Did you ask her why didn't you?

9 A I already answered that. She said it was is  
10 your -- it felt surreal to her that she didn't know how  
11 to react, she didn't know had a to do.

12 Q Knowing your sister the way you do, did is  
13 that make sense to you?

14 A Yes and no. I mean, I don't know -- see  
15 that's the thing. When I say I know my sister, I can  
16 say that because I know how I would react. I'm a lot  
17 like my sister as far as how we would react.

18 Q I can tell.

19 A And the fact is from an outside perspective, I  
20 will think that I had be fighting to the death at that

21 very moment.

22 Q I agree?

23 A And I assume that you know I would assume that

24 my sister would do the same thing but I've never been

25 this that situation, I pray that no one gets into that

ROUGH DRAFT

1 situation. I can have reacted -- I could react the  
2 exact same way if I was put in that situation and just  
3 be in stasis and not nose what to do or how to move and  
4 just be in shock. That could definitely be the  
5 situation if I was put had in that perspective. So I  
6 can't judge that because I've never been there you know  
7 what I mean? So I didn't -- this whole time it's about  
8 trying to make my sister feel comfortable so she can  
9 remind -- remember everything, tell me everything so I  
10 can find my niece. So I will placate to everything and  
11 anything that I need to do, and if it doesn't make sense  
12 to press, I'm sure as held not going to press.

13 Q Did you ask her, cause obviously didn't make  
14 sense to you, and you weren't pressing but then you had  
15 to ask this question, cause I know the question I would  
16 ask my sister. Did Zenaida Gonzalez have a gun?

17 A I didn't ask that question and I have no  
18 reason done what she did.

19 Q Did you -- did she have any kind of weapon?

20 A I, I have no reason to think that. I have not

21 been told anything like that.

22 Q The only thing she had was the threat?

23 A Could have been. I don't know I don't know.

24 Q You never heard -- she never told you that?

25 A I've never been told that, no.

ROUGH DRAFT

1 Q The only thing she had to stop her child from  
2 leaving and getting in another car was the threat?

3 A Was the -- was the threat.

4 Q Recessed 11 1111 -FPT opened opened 1129.

5 BY MR. MORGAN:

6 Q I want to come back to Sawgrass Apartments.  
7 Not much on it, other than when you spoke to Casey, did  
8 she ever tell you -- other than the story she told the  
9 police is that she'd never been to Sawgrass aspects  
10 before?

11 A Well, that is why I, I think what she had a  
12 friend there or something like that, but she  
13 didn't -- it never came out of her mouth directly so no  
14 she they ever told niece had a she was there, but I  
15 think I ended up finding out like through the PI and  
16 stuff that she knew somebody that lived in that complex.  
17 So I think I'm -- you know, I can probably assume that  
18 she's been there once, but I've never heard directly  
19 from her so.

20 Q Did you -- have you ever heard of the names of

21 in connection with Sawgrass Apartments Annie Downing?

22 A Not with Sawgrass to my knowledge.

23 Q Do you know Annie Downing?

24 A I do know Annie Downing. No, not for Sawgrass

25 no.

ROUGH DRAFT

1 Q How do you know Annie Downing?

2 A She went to school with my sister, same grade.

3 Mine shy sister and I have a lot of mutual friends I

4 many we're only three and a half years apart so.

5 Q How old are you?

6 A I'm 26.

7 Q And Casey?

8 A Just turned.

9 Q Is?

10 A She's 22 she's going to be 23 here in March

11 so.

12 Q Okay.

13 A So we have lot of mutual friends. So I've

14 known and me for I mean many many years.

15 Q Did and niece live at Sawgrass?

16 A Dot to my knowledge. I don't believe so. I

17 who I thought she lived at a did like an adjacent

18 complex or somewhere close if I'm not mistaken, but I

19 don't believe she lived at Sawgrass.

20 Q What about Dante Salaiti, D-a-n-t-e,

21 S-a-l-a-i-t-i.

22 A I've hear the name before. Never met the

23 person. Don't even know.

24 Q It's a man?

25 A Sure. I don't even know what he looks like.

ROUGH DRAFT

1 Yeah, I don't know, but I -- that was probably the name  
2 that alluded me earlier that you no, it was like  
3 someone -- an acquaintance or a friend of somebody that  
4 Casey knew at a lived there and that was -- I think that  
5 that might be him and I could be wrong on that but I've  
6 herd that name before, and that it was lick lie probable  
7 by her is there where did you hear that from.

8 A From the PI because the PI would -- Dominick  
9 would say things likes do you know such and such, do you  
10 know such and such or have you heard this name and a lot  
11 of times it was no because a lot of Casey' friends  
12 over -- well more or less since the beginning part of  
13 this year were kind of new friends to me you know. Most  
14 of Casey's friends I had known for a long time but it  
15 seems like she'd been expanding some of her friends from  
16 not just people from high school you know, over the past  
17 year or so so -- .

18 Q That night when you -- when you were it he  
19 dragon report and she was somewhere downtown, did  
20 you -- when you later had the opportunity to, to

21 question her freely in the confines of your own home or  
22 anywhere, did you ever ask her -- and I -- did you ever  
23 ask her did Zenaida tell her to go downtown that night?

24 A No, I never did actually, but probably would  
25 have been a good one to ask but you know I never asked

ROUGH DRAFT

1 her that one.

2 Q So we don't know if Zenaida told her to go

3 downtown had a night?

4 A I have no idea.

5 Q What is your understanding now of everywhere

6 she was between June 15th and July 15th? Casey sorry?

7 A Casey. My understanding was she.

8 Q For re -- I'm talking about where she really

9 was. We know these wasn't had Jacksonville?

10 A Exactly, that's what -- exactly.

11 Q We know that week all agree?

12 A So.

13 Q Where was she?

14 A In the greater Orlando area. From more or

15 less the UCF area over she was staying with Anthony

16 Lazarro. And he lives --

17 Q Tell me all places that you now know what she

18 was during that 30-day window.

19 A UCF area as far as like the Waterford lakes

20 area.

21 Q With who Anthony Lazarro?

22 A Anthony Lazarro.

23 Q Who is he?

24 A He was a boyfriend at the time like a new

25 boyfriend from May I think he -- she met him in like

ROUGH DRAFT

1 February or something, I might be wrong on when she met  
2 him but, but she would have gone out with him I know,  
3 and she -- most of was by UCF but I know what she had  
4 been over by like the you Mall of Millenia area. She  
5 had also been.

6 Q When you say been, staying the night?

7 A Oh are you trying to say I stay the night I  
8 apologize if that's what you were going for.

9 Q Yeah I really -- you're not -- that's my bad?

10 A No she was staying with Anthony what senior  
11 row.

12 Q The whole time?

13 A To my knowledge, yeah. Because there was a --  
14 the only thing in question was there's a -- and that's  
15 coming from him, that's corroborated from him. The only  
16 other thing was he was gone for about a week in I want  
17 to say like the first part of July, and it's not known  
18 for sure -- reason why for sure if she stayed there. I  
19 got a hunch that she did. He claims what she couldn't  
20 have she didn't have a key but I'm pretty sure that she

21 did. 'Cause I don't know where else she would have went

22 I couldn't figure out where else she would have went. I

23 think she spent one night at her friend Will's houses on

24 the fourth of July cause he had a party on the 4th of

25 July, the night of the 4th before the 5th.

ROUGH DRAFT

1 Q But to your knowledge --

2 A I think that's the only thing she's stayed

3 anywhere other than -- during that period of time that

4 I'm aware of.

5 Q And I don't mean to jump around but since you

6 bought up keys, did she ever tell you how Zenaida got a

7 key to the house? Or didn't -- first of all --

8 MR. LUKA: Yeah, rephrase. Object.

9 A Cause I was like we got a part I'm not sure.

10 Q Did she it ever tell what you she given

11 Zenaida or that Zenaida had a key your parents' home?

12 A She never told me specifically, but I did hear

13 my sister you know mention it before like with -- to my

14 folks or to my dad, that you know, same question. Well

15 how did she did he tell in the house? Well, mom I had

16 given her a Kia long time ago. And that was the -- and

17 that was the extent of that.

18 Q Did she have different set of keys or did she

19 have one made for her or?

20 A I would assume she would have had one made I

21 don't know of I mean that's, that is the most that I've

22 ever even heard of that hole scenario so.

23 Q But Casey had a key to the house obviously she

24 lived there?

25 A Right.

ROUGH DRAFT

1 Q But she -- but she then told your mom -- you

2 heard her tell your mom I gave Zenaida --

3 A Yes.

4 Q -- a key to the house?

5 A And most.

6 Q What did your mother say when she heard that?

7 A I don't think she thought it was too out of

8 the realm of -- was too crazy if you know cause she was,

9 had been baby-sitting you know, if she had been

10 baby-sitting Caylee, you know, that's, that

11 seems -- that seem reasonable I guess to her. I don't

12 know I mean that's probably a good question for her.

13 Q Did your mom said but we've never met her?

14 A Yeah, I've never -- to my knowledge, my folks

15 had never heard the name Zenaida either.

16 Q When you heard her -- when you hear her

17 telling, hey, mom I gave her a key to the house, did

18 your mom say -- What did your mom say? Hey, we

19 never -- did your mom say anything like how can that be?

20 A If she did, I don't remember what the con ten

21 was. I really don't know, that is a better question

22 pore her probably.

23 Q I want to do just a little bit of clean-up

24 here. Well, first all, let me get some -- just some

25 easy things out of way for you.

ROUGH DRAFT

1 Have you ever spoken to the media about

2 Zenaida Gonzalez?

3 A Absolutely, gave her description, you know,

4 all that, all had a great stuff absolutely.

5 Q How many times do you think you spoke to the

6 media about that?

7 A Half a dozen times or notice mean, on

8 different, different days I mean, it will be each

9 station you kind of have to re, redo it each time.

10 Q Did you -- did you -- when you spoke to the

11 media about Zenaida, did you -- have you ever told any

12 of them about the abduction?

13 MR. MITNIK: How it happened.

14 Q How it happened?

15 A That, that of what my sister told me about Jay

16 Blanchard Park.

17 Q Either which way. When you told -- when

18 you've spoken to the immediate are a about Zenaida

19 Gonzalez?

20 A Did I use Sawgrass while that was -- while

21 that was the story until I got the right story or you  
22 know what I believe now is the right story for my  
23 sister. I had always provided the Sawgrass story  
24 because that's the story that I had. Which is a story.  
25 Q Have you ever -- have you ever until today

ROUGH DRAFT

1 told anyone in the media about Blanchard Park?

2 A No.

3 Q Have you ever --

4 A Enjoy.

5 Q Have you ever told -- have you ever told

6 anyone before today about the story of Blanchard Park?

7 MR. MITNIK: Excluding your lawyer.

8 Q Excluding your lawyer, I'm sorry?

9 A Yes.

10 Q Who have you told that to?

11 A Sadly Leonard Padilla, I say sadly cause I

12 late him. Our private investigator Dominick Casey.

13 Obviously talked to my folks.

14 Q You're the one that she told about?

15 MR. MITNIK: Let him finish the answer.

16 Q Okay.

17 A I don't think it ever really came up in

18 conversation with Mr. Baez but you know, within that,

19 that tight circle is what it would have been. I mean,

20 that has not been common knowledge. Mallory would know,

21 high girlfriend malry would know. But I don't believe

22 it will have been out of that tight circle until now.

23 Q Have you ever told the police about Blanchard

24 Park?

25 A No.

ROUGH DRAFT

1 Q Why not?

2 A I don't believe so.

3 Q And why not?

4 A Don't think the time ever really even came up.

5 Q Well, let me ask you this?

6 A 'cause -- and here's why I think this is why

7 you're going to -- why you're going to TPOUPL. During

8 the time when I was given this story or, you know, when

9 I was told of the, of the change, it was almost like

10 a -- the police were -- it was very obvious that they

11 were not interested in hearing anything as it related to

12 what comes out of my sister's mouth.

13 Q Right.

14 A So you know, not to I guess put a bad light on

15 it, but you know, if they weren't did he -- they were

16 not willing to hear anything they just would

17 automatically dismiss anything that my sister said.

18 They were more interested in trying to, to be very

19 blunt, to find a dead Caylee and just go -- and just put

20 a an end out case and their quickest way to do that was

21 to pains my sister in the worst light possible and  
22 continue that, and not to follow up on anything else.  
23 And for that reason, and because they never followed up  
24 on things that I provided to them or never thoroughly  
25 replied to anything, I didn't -- I wasn't -- it wasn't

ROUGH DRAFT

1 like they weren't on my speed dial anymore and they were  
2 for a highly.

3 Q All right. Let me, let me ask about that  
4 Blanchard Park. When did she tell you about Blanchard  
5 Park? This was the first time she came home from the  
6 jail?

7 A Yeah, it would have been -- because she told  
8 me when -- and the only reason I can put it together is  
9 that way is because that's had he Leonard Padilla was  
10 here and he was the one that bailed her out the first  
11 I'm.

12 Q Did Leonard hear it too?

13 A I'm sorry.

14 Q Did Leonard hear the story?

15 A No no I had told him a second -- lit my after  
16 wars.

17 Q All right. Let me ask you this question. Who  
18 was present in the room when she told you about how this  
19 really happened?

20 A Casey and I.

21 Q Just you two?

22 MR. MITNIK: When.

23 Q I know. I think we -- I keep asking it, he's

24 trying to answer.

25 Q Had he to down that took place?

ROUGH DRAFT

1 A Whenever she was released the first time I'm  
2 really sorry if August is wrong.

3 Q But the answer is the first time she was  
4 released?

5 A The first time that she was released had he  
6 she was at home it was like sometime during that span.

7 Q And where did it take place?

8 A In our living room.

9 Q Okay. Now, you have stated earlier and  
10 I'm -- some of these questions?

11 A Hey we're jogging like eight months of memory  
12 so, or more.

13 Q Right if I -- right. You stated in the very  
14 beginning of this deposition that you believe everything  
15 your sister has told you. Do you remember saying that?

16 A Yes.

17 Q Okay. So you believed and you believe today,  
18 the story of the abduction in plan charred park?

19 A I have to.

20 Q Well that's, that's not -- I understand but

21 less not -- we can't quarrel over words because this is

22 very important?

23 A Right.

24 Q This is very important?

25 A I believe there's more to every story but do I

ROUGH DRAFT

1 believe that there's some -- there is -- there is a  
2 truth in that story so in that respect, I believe that  
3 story.

4 Q When you say I have to is because she's your  
5 sister and even?

6 A No.

7 Q If she's lying you have to believe her?

8 A No.

9 Q All right but you said earlier I believe  
10 everything ply sister has told me?

11 A Right.

12 Q Is it because you believe it or because you  
13 have to?

14 A Had he, when you say you have to,.

15 Q No you said that.

16 A When someone says they have to, they mean, or  
17 I mean, that if somebody is telling you something and  
18 you need to get information out of them, you have to not  
19 fleetly say you're a liar, unless that's -- unless that  
20 is your strategy and that works four but that's

21 not -- it's not been mining.

22 Q Did you say your 82 I?

23 A I'm sorry.

24 Q When she said that you say you're a liar?

25 A I said that wasn't my strategy.

ROUGH DRAFT

1 Q What is your strategy, just go along get  
2 along? When she told you about Blanchard Park?

3 A Get ever bits of information that I can.

4 Q When she?

5 A It's another lead for she.

6 Q When she told you about blank charred park  
7 double it at the time?

8 A Yes.

9 Q Okay. How here comes the hard question. And  
10 the thing I'm having trouble with. If you believed it  
11 at the time, we're talking about August of 2008, don't  
12 you rush out the door and call the police and say,  
13 listen, this is where she was taken?

14 A Apparently I don't react the way that you do.

15 Q But to this point, August, September, October,  
16 November, December,?

17 A I don't, I don't get your point.

18 Q All of these months you have nerve gone  
19 forward to the police and said, listen, I have the most  
20 important information in this entire case?

21 A They already have had it.

22 MR. LUKA: Hold on.

23 A Go ahead.

24 MR. LUKA: Go ahead and finish your question.

25 Q Okay.

ROUGH DRAFT

1 MR. LUKA: You were in the middle of it.

2 Q They -- this is where -- this is where my  
3 niece was taken?

4 A Yeah.

5 Q Did you do that?

6 A I have never gone to the police the police  
7 know about did. I have never gone.

8 Q How do they know about it?

9 A Through Leonard pad I what through whom  
10 everybody that information was shared.

11 Q Do you know what or do you assume that?

12 A I, it's not like I've had a conversation with  
13 you arery or John do say did you ever -- did you  
14 know, -- I would be extremely surprised if they -- if  
15 they did not know that.

16 Q But as we sit here today, you don't know  
17 whether the police nor oh don't mow you assume they  
18 might?

19 A I assume with the most certainty that I could  
20 every swear to yes.

- 21 Q I don't want to be -- I don't want to juice
- 22 the with you because you're good at it. But here today
- 23 under oath, you do not know will the police know about
- 24 Blanchard Park?
- 25 A Again, I have been working under the

ROUGH DRAFT

1 assumption for the longest time that they have all the  
2 information.

3 Q I No, that I do, including that.

4 Q You're very good but I'm going going to have  
5 to be a little bit persistent. You don't know as we sit  
6 here today, whether the police know about planning  
7 charred park or not?

8 A I don't know if John Allen does, Uri Melich,  
9 whomever.

10 Q You don't know, I want to get to you staple  
11 PA. You don't know as we sit here today whether the  
12 police know about this Blanchard Park story or not do  
13 you?

14 A I don't know.

15 Q Okay. And you don't -- and you know for a  
16 hack that your mom and dad do know about the Blanchard  
17 Park story, correct?

18 A Yes.

19 Q And you know for a fact that they've never  
20 told the the police about Blanchard Park?

21     A   I can't tell you that without any certainty  
22   that they haven't shared that.  Actually I'm almost  
23   positive that they have.

24     Q   How do they -- did you tell them -- who told  
25   your family about the Blanchard Park story?

ROUGH DRAFT

1 A I told my mom.

2 Q What did she say?

3 A She was kind of taking at all in.

4 Q Did she say she's lying?

5 A No she never.

6 Q What did he say?

7 A She actually never gave a reaction to anything  
8 particular to that story.

9 Q When you told your mother about Blanchard  
10 Park, when did you tell your mother?

11 A Probably later on that evening or that first  
12 thing that next morning, like the next opportunity that  
13 I would have will to see or talk to her about.

14 Q Did you tell your mom and dad together?

15 A No I just told my mom.

16 Q What was her reaction?

17 A You know, she kind of was just taking the  
18 information. When me think I'm trying to make sure  
19 that.

20 Q Cause that's blockbuster, isn't it?

21 A Yeah.

22 Q This is a blockbuster?

23 A It was but help again it almost like -- I'm

24 drying to remember back to the he pile because then it

25 almost seemed like it wasn't.

ROUGH DRAFT

1 Q Do you know why it would be a block to me and  
2 tell me me funCtion that I'm on a wrong -- because she  
3 lied to the police, that's why if I was you, that would  
4 be a blockbuster to me. Mom, she lied to the police  
5 about Zanny.

6 A We just went over -- we went over the reason  
7 are she did earlier.

8 Q I know we did but I'm talking about when you  
9 first find out wasn't that -- wasn't that -- didn't that  
10 knock you off your feet when you heard I lied to the  
11 police? This is where she really was is that that's a  
12 blockbuster deal, isn't it?

13 A Well, yeah I mean obviously that is a big  
14 deal, but you know I understand how it -- how it came  
15 down.

16 Q So when you went to your mother tell me  
17 everything your mother said when you told her, look this  
18 is what really happened. I've got a blockbuster for us.

19 A Again, it wasn't that.

20 Q Okay.

21 A I'm trying to -- hold on, it's just -- it's

22 going to take a minute. I'm trying to remember.

23 Q I perfectly understand.

24 A It's just been a while. I honestly can't

25 remember, and it just -- and it -- I can't remember

ROUGH DRAFT

1 because it didn't stand out to me. I almost, it would  
2 have either been because it wasn't like it was new  
3 knowledge to my mom, like she had already told me mom  
4 or, or something. I don't -- I don't know. I  
5 can't -- for life of my I can't figure out why that  
6 doesn't standing out to me.

7 Q Cause as I sit here today,?

8 A So I play not are been the first person that  
9 my sister confide that had information to is what I'm  
10 telling you. I don't know that for a fact if I was the  
11 first person to get that information.

12 Q 'cause when you?

13 A Which is maybe why it may not be a blockbuster  
14 is what I'm trying tell you, I don't -- cause it's  
15 bugging me.

16 Q You meaning now or?

17 A Well no I like to remember.

18 Q Oh yeah.

19 A I'd like to be able to remember and I can't.

20 Q Did you -- did you ever talk your dad about

21 this change of story?

22 A No.

23 Q To this day you've never talked to your dad

24 about the change of story?

25 A No. I mean, it's you know, pretty much if, if

ROUGH DRAFT

1 you know, obviously my dad knows you know. My -- you  
2 know.

3 Q Have you -- you know and we Al got procedures  
4 and sisters and we got family so we kind of know how  
5 they all -- how they all operate. Have you and your mom  
6 and dad ever had questions or conversations about  
7 Casey's truthfulness?

8 MR. LUKA: I'm going to object.

9 MR. MORGAN: And certify?

10 MR. LUKA: And certify?

11 MR. LUKA: I'd like -- well.

12 Q This is a defamation lawsuit. High God, I  
13 can't imagine?

14 MR. LUKA: I take that bark well if  
15 you -- regarding the route fullness.

16 Q In general just her general truthfulness.

17 MR. MITNIK: About she is stories.

18 Q Well, in first about this, about her -- let  
19 me -- let me -- about this -- your truthfulness in  
20 general?

21 A Gentlemen and no. You can.

22 MR. LUKA: Wait eight hold on, hold on. I'm

23 going to object for the record, but I'm going to go

24 ahead and answer as to the first question your,

25 which was the.

ROUGH DRAFT

1 A Have we ever in my 26 years of living yes.

2 Q Did Casey -- and some people do and some  
3 people don't we all got these people. Did Casey this  
4 the family have kind after reputation as a Februaryer?

5 A Casey, sure, I think -- went through had a,  
6 too real bad, and like middle school, like elementary  
7 school, middle school I went through real bad just like  
8 white lies.

9 Q Just lie when you don't even need to lie?

10 A Exactly you know, about things like that. So  
11 that is all -- that's been -- that's been mine.

12 Q What about -- what did Casey?

13 A And I think -- and Casey hit that too but she  
14 hit it more like in high school.

15 Q And they were like she's got you though she's  
16 got a truthfulness problem?

17 A Same things just like little height lies and  
18 things like that. So.

19 Q How about as adult? I mean cause she hasn't  
20 been an adult that long?

21     A   Right. I mean, obviously we know that she's  
22    lied 'cause she lied about the Jacksonville thing you  
23    know what I am.

24     Q   I'm talking about in general we're going get  
25    to what. I'm talking about in general as a person cause

ROUGH DRAFT

1 I -- you know I got people in my family?

2 A Right.

3 Q I got a -- well I better not call -- I better

4 not say his name, but who we just don't believe anything

5 he says any time?

6 A Right. Well, it's not that.

7 Q There's people that have a reputation had a

8 kind ever tell height lies or Februaries or lie when the

9 truth is easier did she have what kind of reputation? I

10 know I'm being general but I think you get it?

11 A Right and yeah I think you're, you're right

12 to -- but you're good to be general with it. I mean,

13 it's -- it's do a point, I can even say I know people --

14 or people that know me know that you know you can

15 exaggerate or you know a exaggeration, a lie you know

16 what I mean? So it's almost kind of your definition of

17 it. But it's not like you have that thing to say I

18 never can believe anything that that person says no I

19 don't believe that she would have this Lthat

20 representation, at least within my family to me, no

21 she's never had that rep-, representation.

22 Q What type of lies -- I'm sorry what type of

23 did she tell in high school like an example?

24 A You know, it would be if she's like skipped

25 school or you know, something like that.

ROUGH DRAFT

1 Q Stole money?

2 A Yeah.

3 Q I bet they had some blow-ups on that, your  
4 parents and Casey?

5 A Yeah, I tried to stay out of that stuff.

6 Q Just go off.

7 (Off-the-record discussion was had.)

8 Q Now we've talked about her truthfulness in  
9 general. When it Blanchard Park story came out, she  
10 told the police this, and now she's telling us that, did  
11 you and your mom and your daD ever have any  
12 conversatiOns about the lack of truth as related to what  
13 she told the police and what she's telling you all now?

14 A No, we never sat and had that no.

15 Q You never sat down and goes high God shy lied  
16 to the police?

17 A No, it was she lied to the police, this is why  
18 and.

19 Q When you say?

20 A It makes sense.

21 Q Did y'all say -- did you also say at that

22 time?

23 A We didn't agree with.

24 Q Did you also say at that time and she lied to

25 us, too?

ROUGH DRAFT

1 A I've never taken any -- I have never to this  
2 day won't take any of it personally.

3 Q Because she did lie to you all?

4 A She's going to do whatever what she feels she  
5 needs to do to protect her child. And if that means  
6 lying to me I hope she continues to do.

7 Q Isn't it true -- isn't true that she'll do  
8 whatever she needs to do or say to protect herself as  
9 well.

10 A I think that's your secondary always. I think  
11 your child would be first, that's my.

12 Q But isn't it faces -- isn't fair to say that  
13 she would do or say anything to protect herself as well?

14 A After take caring of Caylee's needs absolutely  
15 I know I would. Wouldn't you?

16 Q Would I?

17 MR. MITNIK: Don't answer it.

18 A Within your own --

19 Q I don't --

20 A Wins your own moral compass you know what I

21 mean? It's your.

22 MR. MITNIK: Go on. You're not -- you're hot

23 here to answer question.

24 A That is a pretty straight toward question to

25 anybody.

ROUGH DRAFT

1 MR. MITNIK: And you know I'm happy for him to  
2 answer it after if everybody says we'll stay here  
3 at at all but I'm worried about the time I don't  
4 want date of birth worried about the lawyers asking  
5 questions.

6 Q Eye answer that one later?

7 MR. MITNIK: Yeah when we are done and  
8 everybody got lease sure time you can talk about  
9 did all you want.

10 BY MR. MORGAN:

11 Q Let's circle back and try to get this deal  
12 here cause I want to get this man out of here and it's  
13 Friday I I know he's a happy hour type guy.

14 When you had that first conversation with her,  
15 that conversation in your living room, cause that had to  
16 be a dramatic time, and she told buzz plan charred park,  
17 tell me everything you all talked about, one, two,  
18 three, four, that day in that living room.

19 MR. LUKA: I'm sorry, can we just clarify.

20 A Yeah.

21 MR. LUKA: At Blanchard Park or --

22 Q No everything about what happened, Zenaida

23 Gonzalez, the whole -- everythinhg that you about, one,

24 two , three, four.

25 A Timer 55, say Blanchard Park, everything that

ROUGH DRAFT

1 we've talked about so far. You got to understand, this  
2 was -- my sister and I had a regular conversation prior  
3 to her first release through video visitations and  
4 through cell pony calling from the jail. None of it had  
5 been released at that time so they were going on  
6 regularly because we didn't had I that they were ever  
7 going to be released so you know Jose or whom everybody  
8 never instructed us not to have those conversations or  
9 whatever.

10           So so we had been talking regularly, and I'd  
11 been doing fact finding and get information if her  
12 regularly about anything and everything.

13     Q    But I'm -- but I'll trying to to focus in on  
14 you've been trying to -- you've been fact finding with  
15 cameras on you?

16     A    Exactly.

17     Q    And being recorded?

18     A    You're piecemealing it.

19     Q    I'm talking about for the first time that you  
20 brother and sister are alone in that living rooms you're

21 parents have left you alone and you're talking opinion

22 you a say there's no tapes?

23 A We had about five, sever minutes. My sister

24 and I have never had a, an un -- you know, we've never

25 been in the situation where we've had as much time as we

ROUGH DRAFT

1 need to be able to do the brother and sister we haven't.

2 We still to this day have never done had a.

3 Q Can I ask you a question, and this is

4 something I was told. Isn't it true that you have told

5 law enforcement or someone that if someone would let me

6 get in the room with Casey, by myself with no tapes, no

7 cameras, I could find out what really happened? Luke

8 you be Luke I'm going to object to relevance but

9 everyone?

10 A Something to that extent, I ever asked

11 numerous times to be able to see my sister knowing that

12 she would only you know talk to me under those

13 circumstances.

14 Q But isn't it true that you have told law

15 enforcement or someone that if I, Lee Anthony, could get

16 into room by myself with my sister and everybody leaves

17 us alone I could find out all the truth, the whole truth

18 and nothing but the truth?

19 A I believe I could.

20 Q And you've told people that?

21 A Absolutely.

22 Q Okay?

23 A The ones that I would hope that could

24 facilitate it way back in the day.

25 Q Right. When you were speaking about Zenaida

ROUGH DRAFT

1 Gonzalez -- so that might -- I want to finish up

2 'cause -- you had that five to seven minutes talked

3 about Timer 55?

4 A Yeah.

5 Q You talked about Blanchard Park?

6 A Yes.

7 Q Did you talk about her stay in jail or any of

8 that or no?

9 A No.

10 Q You didn't want to go into that?

11 A Just more information about trying to get

12 specifics on you know, not really Zenaida herself but

13 like the sitser you know like the other circumstances

14 surrounding.

15 Q Did she describe the sister for you?

16 A Blanchard. You know.

17 Q Did you say.

18 A Yeah.

19 Q What did she say she looked like?

20 A Holy cow, I never really focused a lot on that

21 one is there this was a could I spice tore or could he.

22 A You're very right.

23 Q Kid naper?

24 A I have it somewhere.

25 MR. MITNIK: Meaning written.

ROUGH DRAFT

1 A Yeah like written some somewhere.

2 Q Wait a minute, you have something -- had a  
3 written do you think, like her name, like the -- you to  
4 know Zenaida -- all like her family people like her  
5 father.

6 Q Did you take notes?

7 A Her father her mother all that stuff.

8 Q Did you take knows that night?

9 A Not with -- I don't think I took notes with  
10 her then. I had gotten a lot of that information  
11 already, like wasn't new knowledge that she had a sister  
12 and this wasn't new knowledge that her sister had kids  
13 and all that you known what I mean? So able of that we  
14 already had.

15 Q That night did you take notes?

16 A A lot of knows were actually taken for me from  
17 my mom had he my mom and dad, I believe they went  
18 together for that one, went and visited my sister, my  
19 month questioned her on okay, Zenaida's father what's he  
20 looks like has he do, has his name, what's -- you know

21 and down the line and my mom took all those notes I

22 think she knows that I have are my mom's notes.

23 Q Did you ever take any notes yourself?

24 A About that specific.

25 Q About anything?

ROUGH DRAFT

1 A Oh absolutely.

2 Q Where are those notes?

3 A They're either under my attorney you know  
4 they're either with my attorney, they're with law  
5 enforcement.

6 Q So your attorney has the notes?

7 A Like it would either be law enforcement  
8 or -- exactly.

9 MR. MITNIK: Do you have a copy of them Luke I  
10 don't have the notes.

11 Q You don't have the notes?

12 MR. LUKA: They were provided to law  
13 enforcement.

14 MR. MITNIK: You did you keep a copy of.

15 A I'm sorry?

16 MR. MITNIK: Did you keep a copy?

17 A Yeah, the original.

18 MR. MITNIK: Would you save them and preserve  
19 them you once get rid of of them.

20 A Of course.

21 MR. MITNIK: Thank you because we're going to  
22 be subpoenaing those. Do you have a problem giving  
23 them to us.

24 A I don't, I don't see why.

25 Q I don't think so. Hey, the truth is the

ROUGH DRAFT

1 truth?

2 A I mean, it's whatever she said on tapes, you  
3 know, you video visitation recording. It's the same  
4 information so.

5 Q And your mom's been keeping notes too?

6 A Oh yeah I mean we've all been doing it.

7 Q Has she turned those notes over to law  
8 enforcement?

9 A They've been through your house so many times,  
10 they'll take what they want and they were leave stuff  
11 that we're like why the heck didn't you take that that's  
12 just as relevant be a somebody else.

13 Q Let me get to this. You Talked about Timer  
14 55, Blanchard Park you talked about the sister but you  
15 really never asked what she look like or what the  
16 children?

17 A I already have it. I know I already had it.

18 Q How did you ever?

19 A My mom may have.

20 Q How did she have it?

21 A My mom have had an video visitation -- wow ply

22 form and dad prior to her first release had done

23 multiple video visitations with her just like had I and

24 we were getting to think of information.

25 Q And you believe your mom and dad had the

ROUGH DRAFT

1 information about Blanchard Park prior to that night?

2 Cause I don't think so?

3 A I don't know. I can't tell you for sure.

4 I'm -- I can't remember and that is from us thing me is.

5 Q You see why this is so important is because

6 the way we've heard this story today, the first time

7 anyone heard about Blanchard Park, the sitter the would

8 children, the beginning of the arm, the threats to kill

9 you, to kill Casey, to kill Caylee, to kill Lee, to kill

10 Cindy, the way I understand it is the first time we

11 heard it was that night this that living room with you?

12 A No. Yes and no. The first time that the

13 sister, the kids and all that was well prior to that.

14 That was in July during the video visitings. The whole

15 you know, the family's been threatened thing, Casey said

16 in the video visitations to my folks directly. So those

17 facts were not new at all.

18 Q Blanchard Park was?

19 A The Blanchard Park and the whole holding the

20 arm down thing you know, how that circumstance went down

21 is there oh yeah.

22 A That was the newer part to me.

23 Q Right?

24 A And the reason why I kind of am a little -- I

25 wish I could remember but when I would have talked to my

ROUGH DRAFT

1 mom about it, and if she didn't make a big deal about it  
2 it would have to be because she would have already known  
3 or had been told previously or something, otherwise I  
4 can't -- I can't figure had a out for you I really don't  
5 know.

6 Q When you went out to speak to the media and,  
7 and published this information about Zenaida Gonzalez,  
8 you were repeating what your sister had told you?

9 A What my sister had told my parent that is had  
10 told me and then Casey would then have reconfirm to me  
11 as well I mean there were multiple statements some may  
12 have said one description another may have cleared it up  
13 you know what I mean so.

14 Q And I'm probably asking a question I already  
15 know the answer to but had you her blessing to speak to  
16 the immediate Casey's?

17 A I, I never asked her permission.

18 Q Okay.

19 A Never once.

20 Q Did she ever tell you not to speak to the

21 media?

22 A In regards to -- never came from Casey, no.

23 That never came from Casey.

24 Q She never told you not to do it?

25 A No.

ROUGH DRAFT

1 Q What about this?

2 A Jose's instructed us not to.

3 Q We're going to get to Jose in a minute.

4 Was -- now your mother also spoke to the media about

5 Zenaida Gonzalez?

6 A Correct.

7 Q And was she speaking to the media as a

8 spokesperson for Casey?

9 A That is a good question for her. I have no

10 idea.

11 Q But she also repeated these stories about

12 Zenaida Gonzalez to the, to the media a to individuals

13 correct?

14 A Yeah, if recollection serves me me right yeah

15 I meaning.

16 Q And did she have your sister's permission to

17 do that?

18 A I have who idea.

19 Q Let me ask a question I want to maybe help you

20 and help your family here.

21 A Shoot.

22 Q Cause this maybe the first time people are

23 able to do this. Has your -- have you or anybody in

24 your family ever been offered any money from movie, for

25 a movie, television, books, tabloids, anything?

ROUGH DRAFT

1 A I personally have never been approached for  
2 that ever.

3 Q Has -- to your knowledge, has anyone in your  
4 family, let's talk about your mom and dad, been  
5 approached for money for a movie, television show, a  
6 book, magazine article?

7 A People have made wild out land issue offers  
8 for multiple things doesn't means anything's ever  
9 considered or you know what I mean.

10 Q I'm being?

11 A Oh yeah.

12 Q Way to think respectful?

13 A I'm pretty sure that.

14 Q All right who has done that?

15 A I don't -- I don't know the names in  
16 particular.

17 Q You said out land issue that means big money?

18 A No no. Not out land issue as in price because  
19 if you're -- all right. If someone says do you want to  
20 write a book? No. You know well you could write a book

21 about this you I'm talking about the con continues could  
22 be out large issue the idea to me a book a move ease and  
23 all those things is out land issue. The fact that you  
24 know we wanted to -- had a somebody would even want  
25 doing do you know what road to me is ridiculous.

ROUGH DRAFT

1 Q I know, but I.

2 A That's why I use the word outlandish, not a  
3 money related things I've never heard an anything about  
4 anything.

5 Q Has anyone to your knowledge ever offered  
6 anyone in your family including Casey, money for the  
7 story concerning this case, whether it's for a movie, a  
8 television movie, a national inquiry, people magazine?

9 A There have been plenty of rumors nor it, but.

10 Q I know but we're not here about rule ours?

11 A I don't know I've never heard anything myself  
12 like I've never heard it straight from my mom or  
13 straight from my dad or whoever, that someone said I got  
14 such and such a monies.

15 Q How about from Casey?

16 A No.

17 Q Has Jose Baez received money?

18 MR. MITNIK: Or offered.

19 Q Hold on because I notice the answer to this  
20 question.

21 Q Has Jose Baez received money?

22 A I'm not his bookkeeper. I, I don't know.

23 Q What have you heard?

24 I'm going to object at this point becaUse this

25 is work product?

ROUGH DRAFT

1 MR. KASEN: What do you mean Luke can we go  
2 off the record for a second morgue yeah.

3 (Off-the-record discussion was had.) morgue  
4 organization.

5 Q Other than conversations you've had with your  
6 lawyer, which is your layer has pointed out to be work  
7 product, have you heard of Jose Baez receiving any money  
8 from movie offer, television, magazines, anything?

9 A I've not heard that that's -- that any of  
10 that's truthful.

11 Q Have you heard of anyone receiving from A B C  
12 news 2 hung thousand dollars for licenses rights to  
13 pictures from your family?

14 MR. MITNIK: Excluding from your lawyer.

15 Excluding from your lawyer.

16 MR. LUKA: Thank you.

17 Q All this is exclude from your lawyer?

18 A Right, right. I've never -- I've never heard  
19 that to know that it was true.

20 Q So P Jose PWEZ?

21 A I've heard those kind of rumors before but no

22 one ever confirmed.

23 Q To believe them to be true?

24 A I think anything's in the realm of possibility

25 but I don't know.

ROUGH DRAFT

1 Q Do you -- do you know, cause you might have  
2 been told that Jose Baez asked a reporter from people  
3 magazine for 5 hundred THOEUD for an exclusive to that  
4 story? Have you ever heard that?

5 A That's brand flu to me.

6 Q That's brand you this to you?

7 A Had a.

8 A That is the first RAOUPLT tore to me. The  
9 first time heard that one.

10 Q But as we sit here today you TKOFPBS know if  
11 Jose Baez has received any money or not?

12 A I have.

13 Q From any WRAOED I can't think company?

14 MR. LUKA: Again SHRAOUDing.

15 Q SHRAOUDing?

16 A Right I have no knowledge that myself folks,  
17 my sister, Jose, anybody that I know that is related to  
18 had has received any sort of compensation from it. I  
19 have no knowledge of any of that. That would be -- that  
20 would be news to me.

21 Q Had a conversations -- we have keep here about

22 this lawyer Kay song?

23 A Never met him.

24 Q It's HR-PLT like -- you know when I was a

25 little boy I saw the which ARD?

ROUGH DRAFT

1 MR. MITNIK: Be careful.

2 Q But I've never met this fellow. So I want to  
3 ask you about it. Have you ever met the attorney,  
4 Mr. Kay son?

5 A No, sir.

6 Q What is your understanding of his role in this  
7 matter?

8 A And it was something that Tom told me about  
9 the other day. I will no idea I didn't even TPOE that  
10 she had a public attorney versus a, criminal attorney I  
11 didn't know that -- I didn't know.

12 Q So you?

13 A Like that was new THOPBLG to me a couple of  
14 weeks ago.

15 Q So you've 97 spoken to him?

16 A No.

17 Q Did you think he might be here today?

18 A I would have assumed, but -- .

19 Q SH have you ever had conversations with  
20 Mr. Baez?

21 A Oh, you know we used to have regular

22 conversations in regards to just anything or.

23 Q Well this case and Zenaida Gonzalez.

24 A No, because it's always been that's not the

25 Zenaida that Casey's talking about, it's you know it's a

ROUGH DRAFT

1 waste -- it was a waste -- we always referred to it as a  
2 waste of time, sorry.

3 Q But you -- well, that is why we're doing had.

4 But you've spoken to Mr. Baez about Zenaida Gonzalez?

5 A About a Zenaida that.

6 Q Yes.

7 A Like we're talking -- right.

8 Q That took Caylee.

9 A Exactly. Well, that's why I wanted to make  
10 sure because it's separate.

11 Q Oh, yeah.

12 A You know.

13 Q You've never seen this lady before today?

14 A No this is -- no other than a MySpace photo.

15 Q Now,?

16 A And channel six or whoever you know did that.

17 Q Have you ever seen a photograph of the other  
18 Zenaida Gonzalez?

19 A No that would have been on the news

20 immediately, that would have been to police and on news

21 made PWHREUZ.

22 Q All right here's a big question. Have you  
23 ever told Jose Baez about this Blanchard Park story?

24 A Luke you can rust to clarify him personally.

25 Q Him personally.

ROUGH DRAFT

1 MR. LUKA: Okay.

2 A I don't think I sat down and like told him the  
3 story. I'm sure we may have referenced.

4 Q Well this is real important because?

5 A Okay.

6 Q The question is?

7 A Let me -- I want do make sure that I'm right  
8 then so shoot.

9 Q And you've been very?

10 A I don't want to be the wrong things and then  
11 have to redo it or whatever like.

12 Q Well this is -- I think H-S going to be a he's  
13 he one for you?

14 A Okay.

15 Q Because the question is you've had  
16 conversations with Jose Baez, plane conversations?

17 A Oh yeah absolutely.

18 Q In his office?

19 A Everywhere, anywhere ray.

20 Q In your house?

21 A Phone calls.

22 Q Telephone?

23 A Anywhere, yeah.

24 Q What did you tell him, if anything, about the

25 story that your sister told you that August night in the

ROUGH DRAFT

1 confines of your living room about Zenaida Gonzalez, the  
2 abduction of Caylee, the threats on your family's life,  
3 the direction for 30 days, go to target, go here  
4 g-there,?

5 A 55 days.

6 Q 55, did you tell him any of that?

7 A Well, he, he knew a lot of it, too like if it  
8 came up in conversation he would have known it, other  
9 like it seemed like.

10 Q Did he know about Blanchard Park?

11 A Yes, like Casey had told you know -- I don't  
12 think when and all that kind of stuff but, but it.

13 Q What did he say to you about that?

14 A You no he he didn't -- let me just think  
15 before I -- I'm trying to remember if I had a -- nothing  
16 that was like -- no like new information or anything  
17 like THAFRPL like if was discussed, it -LD have been  
18 like me and probably my mom and my dad and him in a room  
19 or something like that. But.

20 Q Did he ever, did he ever tell you all you

21 know, lying to the police and thousand coming up with

22 this knew story creates a problem for our defense?

23 A No I've never heard figure like that. Cause

24 that is not -- that wouldn't be directed -- why would he

25 direct that to me? That's -- if, if your spit PWAULG

ROUGH DRAFT

1 and that's his you know and you want to play you know,  
2 definitely's advocate I mean that would be a  
3 conversation you'd have probably with Casey and not us  
4 you know what I mean?

5 Q What did he -- did you talk do Baez before you  
6 came here for this deposition?

7 A No, I haven't talked to Jose in, since, the  
8 day that Caylee -- that they identified her body.

9 Q Do you get along with low say Baez?

10 A Yeah, absolutely.

11 Q What has he ever told you about talking to the  
12 media? Has he ever told you anything?

13 A You know he prefer that I don't, you know  
14 that's what -- you know we have an attorney for and even  
15 back then, it was just you know, it was I know -- TKAS  
16 more like you know, I can't tell law to do you know, I'm  
17 not your -- I'm not your advisor, you know I can't  
18 dictate what you do, but you know, if -- you know just  
19 kind of -- he was more of just like kind of watch  
20 yourself and that sort of a things because.

21 Q Is your mom and dad?

22 A Just how all things guess gets construed and

23 KRAZ sky.

24 Q Is your mom and dad happy with the

25 representation she's receiving?

ROUGH DRAFT

1 A From Jose.

2 Q Yeah?

3 A If they're not they haven't shared with Twit  
4 me so.

5 Q Now had you a memorial service and I happened  
6 to be home and I got to see it and you know, and got to  
7 watch you. Was the media invite to do that? How did  
8 the media get in there is this how did y'all let the  
9 heed I can't in?

10 A Oh, we just -- we knew that we were going to  
11 have to do something in order to allow Casey to see the  
12 memorial cause she couldn't get out for it. So it was  
13 decided that we'd have to -- if we didn't extreme it  
14 life, we'd have to have it taped you know one way or the  
15 other, if we did it or if you know, we had someone else  
16 do it, or whatever, we wanted Casey to be able to see it  
17 since she couldn't be out there for it. So they worked  
18 to you, I don't know how the details got worked out.  
19 KWHRO even know had a stations it ran on and all that,  
20 I'm sure all of them but.

21 Q But?

22 A I don't know much that was my mom set that up

23 I'm sure with Brad and whomever else at the church but.

24 Q Well I know -- I know that this deposition to

25 stay you all have been sensitive about the media being

ROUGH DRAFT

1 here and, and as you know, to AEU come late you?

2 A I appreciate that.

3 Q To accommodate you and not to have to bring

4 you back, we asked the media to respect your privacy,

5 but I keep thinking about this funeral is why was it

6 okay for the lead I can't to be there for the most

7 private of?

8 A For Casey to be able to to see it.

9 Q Did they knee all those cameras to be there

10 and all that coverage and?

11 A I, I've never seen -- I haven't seen the cover

12 ranch its not involve with the planning of the details.

13 If I had my personal say, we would have had a private

14 memorial like I'm talking a dozen people, real small.

15 Q That's how I -- yeah?

16 A And we will have recorded it for ours if Casey

17 couldn't go out and give -P it to hey highway SARBGS

18 Jose would have showed case and we would have it you mow

19 kept it our files or whatever it wasn't my case.

20 Q But it's you are?

21 A That's not my.

22 Q I'm sorry?

23 A You know lame? So.

24 Q But it's your understanding your mother KAOBD

25 98 that had with the media?

ROUGH DRAFT

1 A Yeah my mom or dad or you know whomever yeah.

2 Q One of the things that was really profound for  
3 me when I was WAFRPLG I and you're the only one I saw.  
4 I saw her key walls 16th I couldn't believe I was seeing  
5 that?

6 A I was saying you missed some good STAUFZ.

7 Q I SUZ her key walls and I think her key needs  
8 to stay with football and not sinking he's a friend of  
9 mine. But you said something there and I remember cause  
10 your mom and dad, you said you know, that you were going  
11 to keep your promise to -- did you say C M A and you  
12 talked about kissing your hand or kissing -- do you  
13 remember that part of the service?

14 A I remember the whole service but.

15 Q What did you HAOEPB by I want to keep my  
16 promise or tell me what you STPHAEUD that -- you know  
17 had a -- the know the part of the funeral I'm talking  
18 about? And I don't mean to be -- I'm going to move  
19 through this very quickly with you?

20 A Right right. Speaking to Caylee, I made a

21 promise to her, I talk I talk to her every day I made a

22 promise to her early, early on in July that no matter

23 what it took, I was going to find out the truth, and I

24 made her that promise. And that's still -- .

25 Q Is you say?

ROUGH DRAFT

1 A STKPWHRAPBGS did you say something about  
2 kissing her hand or did you.

3 A No, I kissed, I kissed both of my bracelets on  
4 my hand.

5 Q What did that -- what was the significance of  
6 that?

7 A I -- rub these bass let's flute the day, one  
8 is for my sister and one is more Caylee so.

9 Q So you were kissing your sister and Caylee?

10 A Um-hum.

11 Q And when you said about C M A what was that  
12 what did you say this was to C M a who were you talking  
13 to?

14 A There are a few women in my life with the  
15 initials C M A. My mother, my sister and Caylee.

16 Q The day that Caylee and Casey went to  
17 Blanchard Park, obviously she didn't have a suitcase or  
18 cause they didn't plan or leaving for the night right  
19 your understanding?

20 A Right.

- 21 Q Do you think -- do you know if either  
22 firsthand or second hand, if, if Casey -- I mean, excuse  
23 me, strike that. If Caylee was carrying her or a within  
24 she the pew blanket?  
25 A I have no idea. Actually the -- I know what

ROUGH DRAFT

1 TAUR you going about, and I actually saw for the -- and  
2 I try not even read half the crap that's out there or  
3 anything like that, but I heard for the first time the  
4 other day that something that I don't even know if it's  
5 true about you know, that blanket or something. So.

6 Q Did you ever everyone like from the media so I  
7 just -- so no I've never.

8 Q Did, did, did did Caylee have a within knee  
9 the PAOUZ blanket everyone she has tons of within knee  
10 the PAOUZ stuff so I'm sure that is probably a blanket  
11 in that mess. I mean, heck, her -- I'm pretty sure the  
12 bed sheets might be PA\* heck her PA\* a within knee the  
13 PHAOUZ stuff oh that could be -- I don't know.

14 Q Did you ever, did you ever see arrange the  
15 house heck, her.

16 Caylee or Casey or anybody playing with like  
17 little heart stickers that they might have used?

18 A No.

19 Q For -- you've never seen that before?

20 A No.

21 Q All right hey want to do at this time is first  
22 of all I want to thank you pore am coulding, Tom I want  
23 to thank you for your courtesies today. I niece Lee  
24 this is very difficult, I can't imagine had a you're  
25 going through. Al today there's been several questions

ROUGH DRAFT

1 that have been certified by Tom and you've been  
2 instructed not to answer, and we respect that and we  
3 understanding that, we're in this business. So there's  
4 going to be a hearing later to, for us to compel you to  
5 come back here. So I'm not going to end the deposition  
6 now. I'm simply going to suspend the deposition, we're  
7 going to go after that hearing, and we may or may not  
8 come back and finish this deposition.

9 A -FPBLGS sure.

10 Q But this is -- and is that okay with you  
11 tomorrow?

12 MR. LUKA: That's fine. That's what I would  
13 suggestion as well is there that's what I would  
14 suggest as well Luke AOUBG yes I would stipulated  
15 to this deposition will be spend around not  
16 terminated PHEULT okay.

17 A KAOLT.

18 Q Thank you and?

19 A And you guys will keep the line ever  
20 communication open as far as had he and you will that.

21 Q Sure?

22 A You'll probably be a little neck I believe for  
23 me if I'm going to be out of town appreciate that.

24 Q We'll be 100 percent?

25 A Thank you. Recessed 12 weigh.

ROUGH DRAFT

1 MR. LUKA: The deponent will waive at this  
2 junction you're for Morgan he agrees to SUS  
3 expense lieu yeah and not terminate at this point  
4 -RG morgue at this point. Recessed 1223.

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ROUGH DRAFT

1 CERTIFICATE OF OATH

2 STATE OF FLORIDA  
3 COUNTY OF ORANGE:

4 I SHARON L. TRAMONTE, R.M.R, certify that  
5 personally appeared before me on the of lmonth of  
6 2009 and was duly sworn.

7 WITNESS my hand and official seal this day of  
8 , 2009.

9

10 \_\_\_\_\_  
11 SHARON L. TRAMONTE, R.M.R.

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**ROUGH DRAFT**

1 CERTIFICATE OF REPORTER

2 STATE OF FLORIDA:  
3 COUNTY OF ORANGE:

4 I, SHARON L. TRAMONTE, R.M.R, do hereby certify  
5 that I was authorized to and did stenographically report  
6 the deposition of ; that the review of the  
7 transcript requested; and that the foregoing  
8 transcript, pages 3 through , inclusive, are a true  
9 and complete record of my stenographic notes.

10 I further certify that I am not a relative,  
11 employee, attorney or counsel of any of the parties nor  
12 am I a relative or employee of any of the parties'  
13 attorneys or counsel connected with the action, nor am I  
14 financially interested in the outcome of the action.

15 DATED this day of , 2009.

16

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SHARON L. TRAMONTE, R.M.R.

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ROUGH DRAFT