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SUPERIOR COURT OF THE STATE OF CALIFORNIA  
COUNTY OF LOS ANGELES

DEPARTMENT 28 HON. YVETTE M. PALAZUELOS, JUDGE

KATHERINE JACKSON, ET AL., ) NO. BC445597  
PLAINTIFFS, )  
VS. )  
AEG LIVE, LLC, ET AL., )  
DEFENDANTS. )  
\_\_\_\_\_ )

REPORTER'S TRANSCRIPT OF PROCEEDINGS  
THURSDAY, AUGUST 29, 2013

APPEARANCES:

FOR THE PLAINTIFFS: PANISH, SHEA & BOYLE LLP  
BY: BRIAN J. PANISH  
KEVIN R. BOYLE  
ATTORNEYS AT LAW  
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SUITE 700  
LOS ANGELES, CALIFORNIA 90025  
KOSKOFF, KOSKOFF & BIEDER  
BY: MICHAEL KOSKOFF  
WILLIAM BLOSS  
ATTORNEYS AT LAW  
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BRIDGEPORT, CONNECTICUT 06604

(CONTINUED ON FOLLOWING PAGE)

RHONDA NORBERG, CSR 9265  
OFFICIAL REPORTER

1 APPEARANCES (CONTINUED) :

2

3 FOR THE DEFENDANTS:

O'MELVENY & MYERS LLP

BY: MARVIN S. PUTNAM

4

JESSICA STEBBINS BINA

KATHRYN CAHAN

5

CAMERON BISCAY

SABRINA STRONG

6

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MASTER INDEX

THURSDAY, AUGUST 29, 2013

CHRONOLOGICAL AND ALPHABETICAL INDEX OF WITNESSES

DEFENSE WITNESS	DIRECT	CROSS	REDIRECT	RECROSS
BY MS. CAHAN	15523		15601	
BY MS. CHANG		15538		

EXHIBITS

(NONE)

1 CASE NUMBER: BC445597  
2 CASE NAME: JACKSON VS. A.E.G.  
3 LOS ANGELES, CALIFORNIA AUGUST 29, 2013  
4 DEPARTMENT NO. 28 HON. YVETTE M. PALAZUELOS,  
5 JUDGE  
6 APPEARANCES: (AS HERETOFORE NOTED.)  
7 REPORTER: RHONDA NORBERG, CSR 9265  
8 TIME: 10:31 A.M.  
9

10 (THE FOLLOWING PROCEEDINGS WERE HELD  
11 IN OPEN COURT, OUTSIDE THE PRESENCE  
12 OF THE JURY:)  
13

14 MS. CHANG: YOUR HONOR, WE DID HAVE A MATTER  
15 BEFORE THE JURORS --

16 MR. PANISH: AND I KNOW IT'S LATE, BUT -- BUT  
17 WE'RE GOING TO BE OFF FOR FIVE DAYS NOW, SO --

18 MS. CHANG: YOUR HONOR, YOU HAD GIVEN ME AN  
19 ASSIGNMENT LAST NIGHT TO WRITE A TRIAL BRIEF. I DID DO  
20 THAT.

21 THE COURT: I READ IT. I'M NOT PREPARED TO  
22 ADDRESS THAT RIGHT NOW.

23 MS. CHANG: CAN I JUST STATE FOR THE RECORD,  
24 THOUGH, IT IS CLEARLY WITHIN YOUR HONOR'S DISCRETION.  
25 I JUST THINK THAT THE MORE TIME THAT PASSES -- IT WAS A  
26 POWERFUL MOMENT YESTERDAY.

27 I BELIEVE THAT THE MORE TIME THAT PASSES,  
28 THE MORE PREJUDICE TO THE PLAINTIFF, SO I DO THINK THAT

1 BEFORE THE WITNESS IS OFF THE STAND THAT IT SHOULD BE  
2 ADDRESSED. BUT I KNOW THAT TODAY'S SCHEDULE IS OFF,  
3 IT'S IMPORTANT TO GET THE WITNESS OFF THE STAND, BUT I  
4 DO BELIEVE THAT --

5 MR. PUTNAM: YOUR HONOR, MS. CHANG SAID WHAT SHE  
6 HAS SAID MANY TIMES HERE BEFORE WHEN SOMETHING HAPPENS,  
7 "I HAVE A CASE ON THAT. I HAVE A CASE DIRECTLY ON  
8 POINT ON THIS."

9 SO WE WENT, "WOW. WHAT IS THAT CASE?" WE  
10 WENT LAST NIGHT AND LOOKED THROUGH ALL OF CALIFORNIA  
11 LAW; AND YOU'LL NOTE THAT THERE'S NOT ONE CASE IN HERE  
12 THAT ADDRESSES THIS ON POINT, YOUR HONOR. NOT ONE THAT  
13 TALKS ABOUT A NEED FOR A CURATIVE INSTRUCTION WHEN  
14 THERE'S A WITNESS ON THE STAND WHO IS BEING EMOTIONAL  
15 AND SOMEONE GOES UP BECAUSE THAT WOULD NOT CONSTITUTE  
16 MISCONDUCT IN THIS CASE. YOUR GUT REACTION --

17 MS. CHANG: YOUR HONOR, IF HE'S GOING TO ARGUE  
18 SUBSTANTIVELY, THEN I WOULDN'T HAVE YIELDED THE FLOOR.  
19 WE'RE EITHER GOING TO ARGUE IT SUBSTANTIVELY OR BYPASS  
20 THE WHOLE THING.

21 THE COURT: THEN LET'S BYPASS THE WHOLE THING.

22 MR. PUTNAM: LET'S BYPASS IT. THANK YOU.

23 MR. PANISH: AT THE END OF THE DAY, CAN I SAY  
24 SOMETHING ABOUT IT? AT THE END OF THE DAY.

25

26 (THE FOLLOWING PROCEEDINGS WERE HELD  
27 IN OPEN COURT, IN THE PRESENCE OF THE  
28 JURORS:)

1 THE COURT: KATHERINE JACKSON VERSUS A.E.G. LIVE,  
2 BC445597. GOOD MORNING, EVERYBODY.

3 COUNSEL, WILL YOU MAKE YOUR APPEARANCES.

4 MR. PANISH: GOOD MORNING, EVERYONE.  
5 BRIAN PANISH FOR THE PLAINTIFFS.

6 MS. CHANG: GOOD MORNING. DEBORAH CHANG FOR THE  
7 PLAINTIFFS.

8 MS. BISCAY: GOOD MORNING. CAMERON BISCAY FOR  
9 THE DEFENDANTS.

10 MS. CAHAN: GOOD MORNING. KATHRYN CAHAN FOR THE  
11 DEFENDANTS.

12 MR. PUTNAM: AND MARVIN PUTNAM, GOOD MORNING, FOR  
13 DEFENDANTS.

14 THE COURT: BEFORE WE START, I WANT TO APOLOGIZE  
15 FOR KEEPING YOU WAITING SO LONG. WHAT HAPPENED WAS  
16 THAT THERE WAS A MOTION IN THIS CASE PENDING BEFORE ME,  
17 AND I HAD WRITTEN A 20-PAGE RULING. I WAS WORKING ON  
18 IT AT NIGHT, AND I LEFT IT ON MY COMPUTER AT HOME.

19 AND THE ATTORNEYS ARE GOING TO WORK ON IT  
20 AND ARGUE IT IN THE AFTERNOON WHILE YOU'RE GONE. IN  
21 OTHER WORDS, YOU'RE GOING TO GO HOME, WE'RE GOING TO  
22 CONTINUE TO WORK ON IT, SO I THOUGHT IT WOULD BE UNFAIR  
23 TO THEM IF I DIDN'T GIVE THEM THE RULING IN ADVANCE SO  
24 THEY COULD PREPARE, SO I HAD TO GO BACK HOME AND GET  
25 IT.

26 I APOLOGIZE. THAT'S WHAT HAPPENED. IT  
27 HAPPENS SOMETIMES. THAT'S WHAT CONSTITUTED THE DELAY.  
28 IT'S ALL ME.

1 OKAY. LET'S CONTINUE, THOUGH.

2 MS. CAHAN: THANK YOU, YOUR HONOR.

3

4 CONTINUED DIRECT EXAMINATION

5 BY MS. CAHAN:

6 Q DR. LEE, ARE YOU OKAY TO CONTINUE TODAY?

7 A YES, I AM. I DO APOLOGIZE FOR WHAT  
8 HAPPENED YESTERDAY, TO THE JUDGE.

9 THE COURT: IT HAPPENS.

10 MS. CAHAN: I'M SORRY FOR YOUR MOTHER. I DIDN'T  
11 MEAN TO BRING UP PAINFUL MEMORIES FOR YOU.

12 THE WITNESS: THAT'S OKAY.

13 MS. CAHAN: I KNOW THIS IS DIFFICULT FOR YOU.

14 Q ARE YOU HERE TO TESTIFY BY CHOICE, DR. LEE?  
15 DID YOU CHOOSE TO COME HERE TO TESTIFY IN THIS CASE?

16 A I WAS SUBPOENAED TO BE HERE.

17 Q AND YOU'RE NOT HERE FOR ONE SIDE OR THE  
18 OTHER?

19 A NO.

20 Q OKAY. SO I DON'T HAVE TOO MANY MORE  
21 QUESTIONS TO ASK YOU. I'LL TRY TO GET THROUGH THE REST  
22 OF IT QUICKLY.

23 WHEN WE BROKE YESTERDAY, WE WERE TALKING  
24 ABOUT THE SECOND TIME YOU WENT TO MR. JACKSON'S HOUSE  
25 ON APRIL 19TH, 2009, WHEN YOU WERE GOING TO OBSERVE HIM  
26 SLEEPING FOR THE EVENING.

27 A YES.

28 Q AND THE -- THE CONVERSATION YOU HAD WITH

1 HIM WHEN YOU FIRST ARRIVED THAT EVENING WHERE YOU WERE  
2 LOOKING AT THE P.D.R.

3 A YES.

4 Q AND YOU WERE UPSET ABOUT -- YOU WERE UPSET  
5 THEN AND YOU WERE UPSET YESTERDAY ABOUT MICHAEL  
6 TRUSTING DOCTORS TO GIVE HIM PROPOFOL WHEN YOU  
7 UNDERSTOOD THAT IT WASN'T SAFE?

8 A YES.

9 Q OKAY. SO PLEASE -- I DON'T THINK WE HAD  
10 FINISHED TALKING ABOUT THAT CONVERSATION, SO PLEASE  
11 JUST TELL US WHAT YOU REMEMBER ABOUT THAT PARTICULAR  
12 CONVERSATION WHERE YOU WERE LOOKING AT THE P.D.R.

13 A WELL, I WAS GOING OVER THE P.D.R. I HAD  
14 ACTUALLY MARKED THE PAGE SO I DIDN'T HAVE TO -- BECAUSE  
15 IT'S A REAL THICK BOOK, TO GO THROUGH AND FIND IT.

16 SO I OPENED IT UP TO EXACTLY WHERE IT SAID  
17 "DIPRIVAN," WHICH WE KNOW THE OTHER NAME FOR IT IS  
18 "PROPOFOL," AND I BEGAN TO GO THROUGH THE SYMPTOMS, I  
19 BEGAN TO GO THROUGH THE -- THE PHYSIOLOGY OF WHAT IT  
20 IS, AND THE PHARMACOLOGY OF WHAT IT IS, BUT BASICALLY  
21 THE SIGNS AND SYMPTOMS AND THE PROBLEMS THAT COULD  
22 HAPPEN FROM PROPOFOL.

23 SO I WAS ON THAT PAGE, AND I ACTUALLY DID  
24 NOTE THAT PAGE IN MY RECORDS. AND I STARTED GOING  
25 THROUGH THE SYMPTOMS; AND I SAID, YOU KNOW, "MICHAEL,  
26 YOU DON'T WANT TO USE THIS. IT'S A SAFE MEDICATION  
27 USED PROPERLY. IT'S A SAFE MEDICATION IN HOSPITALS,  
28 BUT IT ISN'T SAFE TO BE USED AT HOME, AND IT IS NOT



1 USED FOR SLEEP."

2 SO I KEPT TELLING HIM, "YOU DON'T WANT TO  
3 DO THIS. IT'S NOT A SLEEP AID, UNLESS --" SOME OTHER  
4 THINGS. BUT AS I WENT THROUGH THE SYMPTOMS WITH HIM --  
5 BECAUSE I REMEMBER ONE SYMPTOM VERY CLEARLY. I SAID,  
6 "IT CAN CAUSE MEMORY LOSS."

7 YOU KNOW, THE LAST THING ON ANY MEDICATION  
8 ON ANY P.D.R. IS GOING TO BE DEATH. BUT WHEN I GOT TO  
9 THE POINT WHERE IT SAYS CAUSES MEMORY LOSS, I SAID, YOU  
10 KNOW, "WHAT IF YOU FORGET YOUR LYRICS TO YOUR SONG?"  
11 AND HE LOOKED AT ME LIKE WHAT ARE YOU TALKING ABOUT,  
12 FORGET MY LYRICS?

13 SO AT THAT POINT, WE KIND OF CHUCKLED A  
14 LITTLE BIT. BUT HE WAS VERY ADAMANT ABOUT THAT WAS THE  
15 ONLY MEDICATION THAT COULD HELP HIM TO SLEEP. AND I  
16 HAD GONE OVER, LIKE I SAID, ALL THE SYMPTOMS AND THE  
17 NUMBNESS AND THE SIDE EFFECTS.

18 IT WAS FROM GI SYMPTOMS, STOMACH, CENTRAL  
19 NERVOUS SYSTEM SYMPTOMS TO, YOU KNOW, VASCULAR  
20 SYMPTOMS, SIDE EFFECTS THROUGHOUT THE WHOLE BODY. SO  
21 IT AFFECTED THE ENTIRE BODY.

22 YOU KNOW, SO THAT'S WHY I WAS GOING THROUGH  
23 STEP BY STEP ON SOME OF THEM; AND THAT'S WHEN HE KIND  
24 OF STOPPED ME AND HE SAID, YOU KNOW, "I -- I  
25 UNDERSTAND." HE SAW MY WORRY AND MY CONCERN; BUT HE  
26 SAID, "I UNDERSTAND THAT YOU'RE CONCERNED, BUT MY  
27 DOCTORS HAVE TOLD ME THAT I WILL BE SAFE JUST AS LONG  
28 AS I'M BEING MONITORED."

1                   AND I SAID, "WELL, NO --" THAT'S WHEN I  
2                   ASKED HIM WHO -- YOU KNOW, WHO SAID THIS, YOU KNOW. I  
3                   WANTED TO KNOW WHO WOULD ACTUALLY SAY THAT. AND HE  
4                   DIDN'T MENTION TO WHO HAD SAID IT, SO --

5                   Q           AND DID YOU DISCUSS IN GOING THROUGH THE  
6                   POSSIBLE ADVERSE CONSEQUENCES OF USING PROPOFOL FROM  
7                   THE P.D.R. -- YOU MENTIONED, A MOMENT AGO, DEATH. DID  
8                   YOU DISCUSS WITH MR. JACKSON THE POSSIBILITY THAT  
9                   PROPOFOL COULD LEAD -- USING PROPOFOL COULD LEAD TO HIS  
10                  DEATH?

11                  A           YES.

12                  Q           AND WHAT DID YOU SAY, IF YOU CAN REMEMBER?

13                  A           YOU KNOW, WHAT I SAID WAS -- AND IT'S JUST  
14                  VERY CLEAR, BUT -- I SAID, "I UNDERSTAND THAT YOU WANT  
15                  A GOOD NIGHT'S SLEEP. I UNDERSTAND YOU WANT TO BE  
16                  KNOCKED OUT," BUT THAT WAS HIS WAY OF SAYING IT, "I  
17                  JUST WANT TO BE KNOCKED OUT AND GO TO SLEEP; AND OTHER  
18                  THINGS I TAKE, I DON'T GO TO SLEEP RIGHT AWAY."

19                            THAT WAS THE MAJOR PROBLEM. "I HAVE TO  
20                  WAIT FOR, YOU KNOW, 30 MINUTES, AN HOUR TO FALL ASLEEP.  
21                  I WANT TO BE KNOCKED OUT RIGHT AWAY."

22                            AND THAT'S WHEN I SAID, "WELL, YOU KNOW,  
23                  YOU WANT TO BE KNOCKED OUT TO GO TO SLEEP, BUT MY  
24                  CONCERN IS, YOU KNOW, WHAT IF YOU DON'T WAKE UP?" AND  
25                  THAT WAS THE MAIN --

26                  Q           DID YOU TELL HIM THAT THE BOTTOM LINE TO  
27                  USING PROPOFOL IN THIS WAY COULD BE DEATH?

28                  A           YES.

1 Q AND HOW DID HE RESPOND TO THAT? DID HE  
2 JUST CONTINUE TO SAY, "DOCTORS HAVE TOLD ME IT'S SAFE  
3 IF I'M MONITORED"?

4 A YES, HE CONTINUED TO TELL ME, "YOU DON'T  
5 UNDERSTAND." AND HE WAS VERY PERSISTENT WHEN HE SAID  
6 THAT. HE WAS VERY PERSISTENT, "YOU DON'T UNDERSTAND.  
7 I WILL BE SAFE. I WILL BE SAFE AS LONG AS I'M  
8 MONITORED."

9 AND THAT "MONITOR" WORD JUST RANG IN MY  
10 HEAD BECAUSE, YOU KNOW, I'M STILL TRYING TO TELL HIM,  
11 YOU KNOW, YOU DON'T WANT TO -- IT'S NOT A SLEEP AID.  
12 YOU DON'T WANT THIS AT HOME. AND SO I WENT TO GREAT  
13 LENGTH -- I WENT -- TO EXPLAIN IT TO HIM, "YOU DON'T  
14 WANT TO DO THIS AT ALL."

15 Q AND AT SOME POINT, DID THAT CONVERSATION  
16 END AND YOU STAYED AT HIS HOUSE -- YOU CONTINUED TO  
17 STAY AT HIS HOUSE THAT EVENING?

18 LET ME TRY TO ASK A BETTER QUESTION. THAT  
19 WASN'T A VERY GOOD ONE.

20 AFTER YOU FINISHED THIS PARTICULAR  
21 DISCUSSION, DID YOU THEN GIVE MR. JACKSON THE SLEEP --  
22 INTRAVENOUS TREATMENT FOR SLEEP THAT YOU HAD PLANNED TO  
23 GIVE HIM WHEN YOU WENT TO YOUR OFFICE AND GOT THE  
24 EQUIPMENT THAT YOU NEEDED?

25 A YES.

26 Q OKAY.

27 A SO I JUST WANT TO MAKE IT CLEAR, MY SLEEP  
28 AID WAS VITAMINS.

1 Q RIGHT.

2 THAT WAS THE MYERS' COCKTAIL?

3 A YES.

4 Q OKAY. AND SO YOU HAD THIS CONVERSATION  
5 ABOUT PROPOFOL AND THE DANGERS OF PROPOFOL, AND THEN  
6 MR. JACKSON AGREED TO TRY THE MYERS' COCKTAIL AGAIN TO  
7 SEE IF THAT WOULD WORK?

8 A YES.

9 Q AND ABOUT WHAT TIME, IF YOU CAN RECALL, DID  
10 YOU GIVE HIM THE -- THE MYERS' COCKTAIL?

11 A IT WAS -- IT WAS VERY LATE. AS I SAID, WE  
12 STARTED LATE. I DON'T REMEMBER IF IT WAS 12:00, 1:00,  
13 BUT IT WAS LATE.

14 Q AND THEN DID YOU OBSERVE WHETHER  
15 MR. JACKSON FELL ASLEEP AFTER BEING ADMINISTERED THE --  
16 THE MYERS' COCKTAIL?

17 A YES.  
18 HE SEEMED VERY TIRED, A LITTLE -- YOU KNOW,  
19 HE JUST WANTED TO GET A GOOD NIGHT'S SLEEP. LIKE I  
20 SAID, HE SEEMED REALLY AGITATED TO WANT TO GET A GOOD  
21 NIGHT'S SLEEP BECAUSE HE SAID, "I HAVE A BIG REHEARSAL  
22 TOMORROW, AND I HAVE TO BE READY FOR MY REHEARSAL  
23 TOMORROW." THAT WAS HIS MAJOR CONCERN. "I HAVE TO BE  
24 READY."

25 AND I SAID, "I UNDERSTAND." SO IN WATCHING  
26 HIM, YOU KNOW, SLEEP -- I ALSO MADE HIM A CUP OF TEA  
27 BEFORE I STARTED IT; AND I SAID, "LET'S MAKE YOUR -- A  
28 SLEEP AID TEA." AND I CAME BACK AND STARTED HIS I.V.

1 AND I TUCKED HIM IN BED AFTER HE HAD HIS TEA.

2 SO I'M TUCKING HIM IN BED AND SITTING IN A  
3 CHAIR JUST A FEW FEET AWAY FROM HIM, ALMOST WHERE THIS  
4 TABLE IS IN FRONT OF ME, OR THE COMPUTER. I WAS THAT  
5 CLOSE TO HIM, AND I JUST WATCHED HIM. BEFORE I SAID  
6 THAT, I MADE A COMMENT, I SAID, "ARE YOU GOING TO BE  
7 ABLE TO GO TO SLEEP WITH ME SITTING HERE WATCHING YOU?"

8 I KNOW I COULDN'T SLEEP IF SOMEBODY WAS  
9 SITTING THERE STARING AT MY FACE, YOU KNOW. SO I FELT  
10 THAT TO BE, YOU KNOW, KIND OF DIFFERENT, BECAUSE I  
11 CAN'T SLEEP IF SOMEONE IS GOING TO STAND THERE AND  
12 WATCH ME. BUT HE WANTED ME TO SIT THERE AND WATCH HIM  
13 SLEEP. SO -- I'M A NIGHT PERSON, SO IT WASN'T A  
14 PROBLEM FOR ME TO BE AWAKE AT NIGHT.

15 I'M NOT A MORNING PERSON. I MADE IT HERE  
16 ON TIME, BUT -- SO IN WATCHING HIM, SEVERAL HOURS HAD  
17 SORT OF PASSED, AND HE SEEMED TO -- JUST VERY RELAXED,  
18 WAS VERY RELAXED. I DID WATCH HIS EYE MOVEMENT, HIS  
19 EYES CLOSE, AND I COULD SEE RAPID EYE MOVEMENT; BUT IT  
20 WAS LIKE WELL INTO THREE HOURS OR THREE A HALF HOURS  
21 AFTER.

22 SO I DID SEE RAPID EYE MOVEMENT, SO IT  
23 APPEARED THAT HE WAS ASLEEP.

24 Q AND I TAKE IT THAT BEFORE -- BEFORE THIS,  
25 YOU TURNED OFF THE LIGHTS AND THE T.V. AND THE MUSIC  
26 THAT HE WANTED GOING --

27 A NO, HE DIDN'T WANT IT OFF.

28 Q SO ALL THAT WAS GOING?

1 A HE DIDN'T WANT IT OFF.

2 Q SO THERE WAS ENOUGH LIGHT IN THE ROOM THAT  
3 YOU COULD SEE HIS EYES MOVING UNDERNEATH HIS EYELIDS,  
4 IT WASN'T TOTALLY DARK?

5 A NO, IT WASN'T.

6 Q AND THEN AT SOME POINT BEFORE THE MORNING,  
7 DID MR. JACKSON WAKE UP?

8 A YES, HE DID.

9 Q AND ABOUT HOW LONG AFTER YOU THINK HE FELL  
10 ASLEEP DID HE WAKE UP?

11 A IT WAS, I GUESS, ABOUT 4:00 O'CLOCK, 4:30,  
12 OR SOMETHING, IN THE MORNING, SOMEWHERE AROUND THERE.  
13 HOW MANY HOURS LATER, A GOOD THREE -- ABOUT FOUR, FOUR  
14 HOURS OR SO.

15 Q SO YOU GAVE HIM THE I.V. AROUND MIDNIGHT,  
16 AND HE WOKE UP AROUND 4:00 A.M.?

17 A ABOUT 4:00, 4:30, YES.

18 Q AND DID YOU HAVE A DISCUSSION AT THAT  
19 POINT? DID YOU SPEAK TO EACH OTHER?

20 A THAT WAS KIND OF A STRANGE SITUATION WHEN  
21 HE WOKE UP BECAUSE HE WOKE UP, AND I'M SITTING ON THE  
22 BED -- ON THE SOFA -- AND HE STOOD UP ON THE CHAIR --  
23 ON THE BED.

24 Q STOOD UP ON --

25 A ON THE BED.

26 Q OKAY. NOT NEXT TO THE BED, BUT ON THE BED?

27 A ON THE BED.

28 Q OKAY.

1           A           AND HE LOOKED AT ME, AND -- AND, ACTUALLY,  
2           AT 4:30 IN THE MORNING, IT KIND OF SCARED ME. I DIDN'T  
3           KNOW WHAT I SHOULD DO. BECAUSE IT REALLY STARTLED ME  
4           WHEN HE WOKE UP AND JUST STOOD THERE AND STARED AT ME  
5           AND -- YOU KNOW, HIS NICE, BIG, ROUND EYES. SO HE JUST  
6           STARED AT ME.

7                        AND I'M WAITING FOR HIM TO SAY SOMETHING;  
8           AND HE SAID, "I TOLD YOU I CANNOT SLEEP ALL NIGHT."  
9           THEN HE JUMPED OFF THE BED AND RAN TO THE BATHROOM.

10          Q           OKAY. AND WHEN HE CAME BACK FROM THE  
11          BATHROOM, DID YOU HAVE ANY ADDITIONAL CONVERSATION?

12          A           YES.

13                        I SAID, "WELL, MAYBE YOU'RE WAKING UP  
14          BECAUSE YOU NEED TO GO TO THE RESTROOM AT NIGHT." YOU  
15          KNOW, THERE'S CERTAIN CONDITIONS THAT HAPPEN WITH MEN  
16          OVER 40, ENLARGED PROSTATE, PROSTATE HYPOPLASIA, THAT  
17          WILL CAUSE THEM TO GET UP AT NIGHT TO GO TO THE  
18          BATHROOM. SO I SAID, "WHY DON'T WE CHECK THAT OUT AND  
19          SEE IF THAT'S ONE OF THE PROBLEMS."

20                        YOU KNOW, HE SAID, "I KNOW YOU WANT TO  
21          CHECK OUT ALL OF THESE THINGS, I KNOW YOU WANT TO DO  
22          THIS AND I KNOW YOU WANT TO DO THAT, BUT I JUST NEED TO  
23          HAVE SOME SLEEP." HE WAS VERY AGITATED AT THAT POINT.  
24          HE SAID, "I TRIED TO TELL YOU I COULD NOT SLEEP ALL  
25          NIGHT. ALL I NEED IS SOMETHING THAT'S GOING TO HELP ME  
26          TO SLEEP," AND IT WAS DIPRIVAN WHICH HE USED.

27                        "I JUST NEED THE DIPRIVAN TO HELP ME TO  
28          SLEEP SO I CAN SLEEP ALL NIGHT. I HAVE A VERY BIG DAY

1 TODAY. MY DAY IS GOING TO BE DESTROYED." HE WAS  
2 VERY -- HE WAS -- I MEAN, HE WAS SO SHAKEN THAT HE  
3 COULD NOT SLEEP; AND HE SAID, "I NEED TO HAVE SLEEP."  
4 SO AT THAT POINT, YOU KNOW -- I'M A HUGGIE PERSON.

5 I LIKE TO HUG, AND HE KNEW THAT, SO HE GAVE  
6 ME A HUG, HE SAID -- AND HE ESCORTED ME, YOU KNOW, TO  
7 LEAVE. AT THAT PARTICULAR DAY, SECURITY HAD -- I GOT  
8 TO THE POINT SECURITY WOULD PICK ME UP INSTEAD OF ME  
9 DRIVING OUT THERE BECAUSE I WAS LEAVING SO LATE AT  
10 NIGHT AND I WAS KIND OF CONCERNED BEING ON THE ROAD SO  
11 MUCH.

12 SO HE WENT AND -- WE WALKED UP, LEFT THE  
13 HOUSE AND WENT OUTSIDE AND HE TOLD SECURITY THEY COULD  
14 TAKE ME HOME. AND HE SAID, "THANK YOU SO MUCH. I KNOW  
15 YOU'RE TRYING SO HARD, BUT I HAVE TO GET SOME SLEEP."  
16 BUT HE WAS REALLY, REALLY KIND OF AGITATED.

17 Q LET ME JUST -- DURING THAT LAST  
18 CONVERSATION YOU HAD WITH HIM AFTER HE WOKE UP AND  
19 STOOD UP ON THE BED, YOU SAID HE MENTIONED DIPRIVAN  
20 AGAIN BY NAME AND SAID AGAIN THAT HE NEEDED DIPRIVAN TO  
21 SLEEP?

22 A I'M TRYING TO REMEMBER IF HE STOOD UP AND  
23 SAID THAT. WHEN HE STOOD UP ON THE BED AND SAID THAT,  
24 HE SAID, "I TOLD YOU I CANNOT SLEEP ALL NIGHT. I  
25 CANNOT SLEEP ALL NIGHT." AND THAT'S WHEN HE RAN OFF TO  
26 THE BATHROOM.

27 Q DID YOU DISCUSS DIPRIVAN OR PROPOFOL AT ALL  
28 DURING THAT LAST CONVERSATION AROUND 4:00 SOMETHING IN



1 THE MORNING?

2 A I DON'T REMEMBER. I MEAN, IT WAS SO  
3 INTENSE GOING OVER IT BEFORE.

4 Q AND WHEN YOU WENT OVER IT BEFORE, YOU WERE  
5 DOING EVERYTHING YOU COULD TO CONVINCHE HIM THAT THIS  
6 WASN'T SAFE AND HE JUST WASN'T -- YOU ENDED UP JUST  
7 DISAGREEING ABOUT THAT?

8 A YES.

9 BUT MY MAJOR CONCERN WITH ME TELLING HIM  
10 AND SHOWING HIM THE P.D.R., HOW IT WASN'T SAFE, IS THAT  
11 HE WAS TRYING TO ENSURE ME THAT AS LONG AS HE WAS  
12 MONITORED, HE WOULD BE SAFE.

13 BECAUSE HE ACTUALLY TOLD ME WHEN WE WERE IN  
14 THIS CONVERSATION ABOUT THE PROPOFOL IN THE P.D.R. WHEN  
15 I SAID IT'S ONLY USED BY, YOU KNOW, AN  
16 ANESTHESIOLOGIST -- HE SAID, "WELL, WHY DON'T YOU --  
17 WHY DON'T YOU BRING ONE? YOU KNOW, CAN YOU BRING AN  
18 ANESTHESIOLOGIST? AND CAN YOU -- AND YOU CAN COME TOO,  
19 YOU KNOW. YOU CAN COME, TOO."

20 HE SAID, YOU KNOW, "SO I COULD BE  
21 MONITORED." SO HIS --

22 Q IS THIS COME TO HIS HOUSE OR COME TO  
23 LONDON?

24 A COME TO HIS HOUSE.

25 Q OKAY.

26 A SO HE WANTED TO KNOW THAT HE WAS GOING TO  
27 BE SAFE, BECAUSE HE SAID, "I HAVE TO -- I HAVE TO GET  
28 SOME SLEEP. I HAVE TO GET SOME SLEEP." SO HE SAID,

1 YOU KNOW, "I JUST HAVE TO GET SOME SLEEP."

2 BUT HE SEEMED LIKE, YOU KNOW, SLIPPING --  
3 AND I DON'T WANT TO ASSUME THAT, BUT HE WAS JUST SO  
4 AGITATED THAT HE SAID "REHEARSAL, REHEARSAL, REHEARSAL,  
5 I HAVE TO GET SOME SLEEP. I HAVE TO GET SOME SLEEP SO  
6 I CAN PERFORM THE NEXT DAY."

7 Q AT ANY TIME ON THE 19TH OF APRIL DID HE  
8 TELL YOU WHETHER HE HAD PROPOFOL IN THE HOUSE? LIKE  
9 DID HE EVER SAY, "I HAVE SOME PROPOFOL HERE. WILL YOU  
10 PLEASE JUST GIVE IT TO ME?" ANYTHING LIKE THAT?

11 A NO.

12 Q BECAUSE YOU HAD MADE IT VERY CLEAR THAT YOU  
13 DIDN'T THINK THAT WAS SAFE AND YOU WEREN'T GOING TO DO  
14 IT?

15 A NO.

16 YES, I DID MAKE IT VERY CLEAR.

17 Q DID YOU EVER TREAT MR. JACKSON AGAIN WITH  
18 NUTRITIONAL CARE OR OTHERWISE AFTER THAT  
19 APRIL 19TH/APRIL 20TH NIGHT INTO THE MORNING?

20 A AS FAR AS I CAN REMEMBER, NO.

21 Q DID THERE COME A TIME IN JUNE OF 2009 WHEN  
22 YOU GOT A PHONE CALL FROM MR. JACKSON'S SECURITY?

23 A YES.

24 Q AND DO YOU REMEMBER THE DATE OF THAT PHONE  
25 CALL?

26 A I DON'T REMEMBER THE EXACT DATE. I HAVE MY  
27 PAPERWORK YOU GAVE ME. BUT IT WAS FATHER'S DAY.

28 Q OKAY. AND IF I REPRESENT TO YOU THAT

1 FATHER'S DAY IN 2009 WAS SUNDAY, JUNE 21ST, DOES THAT  
2 SOUND RIGHT TO YOU?

3 A IF IT'S IN MY NOTES, YES.

4 Q A FEW DAYS BEFORE MR. JACKSON PASSED AWAY?

5 A YES.

6 Q AND SO YOU GOT A PHONE CALL FROM  
7 MR. JACKSON'S SECURITY.

8 COULD YOU HEAR MR. JACKSON -- WAS  
9 MR. JACKSON ON THE PHONE, AS WELL?

10 A NO, HE WASN'T ON THE PHONE, HE WAS IN THE  
11 BACKGROUND. I COULD HEAR HIM. I WAS --

12 MS. CHANG: YOUR HONOR, I'M JUST GOING TO OBJECT  
13 AND -- I THINK SHE'S ABOUT TO ENCROACH ON HEARSAY.

14 MS. CAHAN: I'M GOING TO ASK WHAT SHE COULD HEAR  
15 MR. JACKSON SAYING.

16 THE COURT: OKAY. JUST AS TO WHAT MR. JACKSON  
17 SAID.

18 MS. CAHAN: I'M SORRY.

19 Q CAN YOU JUST TELL US WHAT YOU COULD HEAR  
20 MR. JACKSON SAYING WHEN YOU WERE ON -- ON THE PHONE  
21 FROM THE BACKGROUND?

22 A WHAT I COULD HEAR MR. JACKSON SAY IS, "TELL  
23 HER. PLEASE TELL HER THAT ONE SIDE OF MY BODY IS HOT  
24 AND ONE SIDE OF MY BODY IS COLD," AND WANTED TO KNOW IF  
25 I COULD --

26 MS. CHANG: I'M SORRY. I'M JUST APPROACHING  
27 CAUTIOUSLY. I DIDN'T WANT HER TO VOLUNTEER ANY FURTHER  
28 HEARSAY, SO --

1 MS. CAHAN: WHATEVER MR. JACKSON SAID IS NOT  
2 HEARSAY.

3 THE COURT: MA'AM, SO LONG AS --

4 MS. CHANG: I THINK THAT CONCLUDES WHAT  
5 MR. JACKSON SAID, BASED ON DISCOVERY THAT WAS  
6 CONDUCTED.

7 THE COURT: OKAY. YOU'RE ONLY TO TELL US WHAT  
8 MR. JACKSON SAID.

9 HAVE YOU TOLD US EVERYTHING THAT  
10 MR. JACKSON SAID?

11 THE WITNESS: I'VE TOLD YOU EVERYTHING HE SAID.

12 THE COURT: OKAY.

13 Q BY MS. CAHAN: AND DID YOU -- AND WITHOUT  
14 TELLING US WHAT THE SECURITY PERSON SAID, WAS THERE  
15 SOME REQUEST MADE OF YOU BY MR. JACKSON'S SECURITY?  
16 JUST YES OR NO.

17 A YES.

18 Q AND WHAT DID YOU SAY IN RESPONSE TO THAT?

19 A I -- I COULD NOT COME TO THE HOUSE.

20 Q AND DID YOU SAY ANYTHING FURTHER?

21 DID YOU MAKE ANY RECOMMENDATIONS ABOUT WHAT  
22 MR. JACKSON SHOULD DO?

23 A YES, I DID.

24 Q AND WHAT DID YOU -- WHAT DID YOU -- SO THAT  
25 WE'RE BEING CAREFUL HERE, JUST TELL ME WHAT YOU SAID IN  
26 TERMS OF WHAT YOU RECOMMENDED TO THE PERSON YOU WERE  
27 SPEAKING WITH ON THE PHONE.

28 A AT THE END OF MY CONVERSATION, BECAUSE OF

1 WHERE I WAS AT THE TIME, I SAID HE SHOULD BE TAKEN TO  
2 THE HOSPITAL.

3 Q SO YOU HEAR MR. JACKSON IN THE BACKGROUND  
4 SAYING, "TELL HER ONE SIDE OF MY BODY IS HOT AND THE  
5 OTHER SIDE OF MY BODY IS COLD," YOU'RE ASKED SOMETHING,  
6 YOU SAY YOU CAN'T COME TO THE HOUSE.

7 WERE YOU IN LOS ANGELES THAT DAY?

8 A NO, I WAS NOT.

9 Q OKAY. AND THEN YOU RECOMMENDED THAT  
10 MR. JACKSON BE TAKEN TO THE HOSPITAL?

11 A YES.

12 Q AND DO YOU KNOW WHETHER MR. JACKSON, IN  
13 FACT, WENT TO THE HOSPITAL THAT DAY ON JUNE 21ST?

14 A NO, I DO NOT.

15 Q AND DID YOU SPEAK WITH MR. JACKSON, JUST  
16 YES OR NO, OR ANYONE ON HIS BEHALF AFTER JUNE 21ST,  
17 2009?

18 A NO.

19 Q SO YOU DON'T KNOW HOW HE MAY HAVE FELT ON  
20 THE FOLLOWING DAYS?

21 A NO.

22 MS. CAHAN: I THINK THAT THAT IS ALL I HAVE FOR  
23 NOW. THANK YOU, DR. LEE.

24 THE WITNESS: THANK YOU.

25 THE COURT: OKAY. CROSS-EXAMINATION?

26 MS. CHANG: THANK YOU, YOUR HONOR.

27 ///

28 ///

CROSS-EXAMINATION

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BY MS. CHANG:

Q GOOD MORNING, DR. LEE.

A GOOD MORNING.

Q I JUST WANT TO GO A LITTLE BIT OVER YOUR BACKGROUND TO START.

EVEN THOUGH WE'RE CALLING YOU DR. LEE, YOU'RE NOT A MEDICAL DOCTOR; IS THAT CORRECT?

A THAT'S CORRECT.

Q YOU HAVE A PH.D. IN HOLISTIC MEDICINE; IS THAT CORRECT?

A THAT'S CORRECT.

Q AND HOLISTIC NUTRITION, FOR SOME OF US THAT MAY NOT KNOW, DEALS WITH NUTRITION AS IT RELATES TO WORKING WITH THE WHOLE BODY; IS THAT CORRECT?

A THAT'S CORRECT.

Q YOU LOOK AT BRINGING BALANCE TO ALL AREAS OF A PERSON'S LIFE WITH A HOLISTIC, NATURAL APPROACH; IS THAT CORRECT?

A CORRECT.

Q AND THAT MEANS YOU LOOK FOR NATURAL WAYS OF BRINGING THE BODY INTO A NATURAL STATE OF BALANCE, CORRECT?

A YES.

Q AND "NATURAL" MEANS PLANT-BASED NUTRIENTS INSTEAD OF CHEMICAL; WOULD THAT BE FAIR TO SAY?

A THAT'S FAIR TO SAY. AND I WANT TO JUST ADD IT'S ALSO NUTRACEUTICAL, SO THESE ARE NUTRITION

1 PRODUCTS AND NOT JUST HERBS. BECAUSE HERBS WOULD BE  
2 UNSTABLE, SO WHAT I WORK WITH IS NUTRACEUTICALS THAT  
3 HAVE BEEN TESTED.

4 Q OKAY. AND YOU ADVOCATE NATURAL,  
5 ALTERNATIVE MEDICINE VERSUS PRESCRIPTION MEDICATION OR  
6 DRUGS, CORRECT?

7 A YES.

8 Q ALL RIGHT. AND YOU HAVE AN INTERESTING  
9 BACKGROUND, TOO, BECAUSE NOT ONLY DO YOU HAVE A PH.D.  
10 IN THAT, BUT YOU ALSO HAVE A DEGREE IN NURSING AS A  
11 REGISTERED NURSE, OR R.N.; IS THAT CORRECT?

12 A YES.

13 Q AND AS A REGISTERED NURSE, YOU'VE WORKED AT  
14 TRADITIONAL H.M.O.'S AND HOSPITALS, CORRECT?

15 A YES.

16 Q AND EVEN FEDERAL PRISON MEDICAL UNITS,  
17 CORRECT?

18 A YES.

19 Q OKAY. AND TO BE AN R.N., YOU MUST HAVE  
20 GRADUATED FROM A NURSING PROGRAM IN A COLLEGE OR  
21 UNIVERSITY AND PASSED A NATIONAL LICENSING EXAM,  
22 CORRECT?

23 A CORRECT.

24 Q AND THEN YOU ALSO FINISHED A PHYSICIAN  
25 ASSISTANT, OR P.A., PROGRAM, CORRECT?

26 A YES.

27 Q AND JUST IN CASE -- FOR THOSE OF US THAT  
28 MAY NOT KNOW, A PHYSICIAN ASSISTANT, OR P.A., IS A

1 HEALTHCARE PROFESSIONAL WHO IS LICENSED TO PRACTICE  
2 MEDICINE IN CONJUNCTION WITH A TEAM OF DOCTORS,  
3 CORRECT?

4 A CORRECT.

5 Q THEY CAN CONDUCT PHYSICIAN EXAMS, DIAGNOSE  
6 AND TREAT ILLNESSES, ORDER AND INTERPRET TESTS AND  
7 PRESCRIBE MEDICATIONS, CORRECT?

8 A YES.

9 Q AND AT THE SAME TIME, YOU BECAME A NURSE  
10 PRACTITIONER WHEN YOU FINISHED THIS PROGRAM, CORRECT?

11 A CORRECT.

12 Q AND A NURSE PRACTITIONER IS KNOWN AS AN  
13 N.P.; IS THAT CORRECT?

14 A CORRECT.

15 Q AND AS YOU STATED, IT NORMALLY HAS  
16 ADDITIONAL TRAINING MORE THAN AN R.N.; IS THAT CORRECT?

17 A MOST DEFINITELY.

18 Q AND AS A NURSE PRACTITIONER, YOU CAN TAKE  
19 HISTORIES, CONDUCT PHYSICAL EXAMS, ORDER TESTS,  
20 INTERPRET TESTS, AND EVEN ACT AS A PATIENT'S PRIMARY  
21 HEALTHCARE PROVIDER; IS THAT TRUE?

22 A THAT'S TRUE.

23 Q AND WOULD YOU AGREE THAT EVEN THOUGH YOU  
24 WORK AS A PRIMARY HEALTHCARE PROVIDER FOR MANY OF YOUR  
25 PATIENTS, YOU OFTEN REFER PATIENTS TO TRADITIONAL  
26 MEDICAL DOCTORS OR SPECIALISTS?

27 CORRECT?

28 A YES.



1 AND COULD I JUST ADD?

2 Q YES.

3 A EVEN WORKING AS AN N.P.R. -- I DON'T WORK  
4 AS A P.A., I DO WORK AS A NURSE PRACTITIONER. MOST  
5 PEOPLE WHO GO TO THE H.M.O.'S AND DOCTORS AND MOST  
6 PLACES WILL END UP SEEING A NURSE PRACTITIONER NOW.  
7 THEY'RE USING THEM NOW IN DIFFERENT -- C.V.S. NOW,  
8 PHYSICALS AND VACCINATIONS.

9 SO THEY'RE BECOMING MORE AND MORE  
10 HEALTHCARE PROVIDERS ALONG WITH THE MEDICAL DOCTOR  
11 BECAUSE AS AN N.P., THE DIFFERENCE IS, UNLESS THEY KIND  
12 OF CHANGED THE LAW A LITTLE BIT, A MEDICAL DOCTOR DOES  
13 NOT HAVE TO BE ON STAFF OR SIGN OFF A CHART FOR A NURSE  
14 PRACTITIONER, SO YOU CAN WORK INDEPENDENTLY OF.

15 Q OKAY. AND YOU WORK IN CONJUNCTION WITH  
16 MEDICAL DOCTORS ALL THE TIME?

17 A I DO, YES.

18 Q AND THEY REFER PATIENTS TO YOU, YOU REFER  
19 PATIENTS TO THEM, CORRECT?

20 A EXACTLY, YES.

21 Q AND A LOT OF YOUR PATIENTS DEAL WITH  
22 SPECIALISTS AND DOCTORS WHILE EVEN TREATING WITH YOU,  
23 CORRECT?

24 A YES, THEY DO.

25 Q OKAY. AND A NURSE PRACTITIONER, OR AN  
26 N.P., CAN PRESCRIBE MEDICATION, CORRECT?

27 A WE CAN, YES.

28 Q NOT CONTROLLED SUBSTANCES, CORRECT?

1 A CORRECT.

2 Q OKAY. YOU'VE ALSO, IN ADDITION TO THAT  
3 TRAINING, TAKEN COURSES IN I.V. NUTRITION THROUGH THE  
4 AMERICAN ACADEMY OF ADVANCEMENT IN MEDICINE, CORRECT?

5 A CORRECT.

6 Q AND I.V. STANDS FOR "INTRAVENOUS," CORRECT?

7 A CORRECT.

8 Q AND THAT MEANS ADMINISTERED INTO A VEIN?

9 A CORRECT.

10 Q AND I.V. NUTRITION, IS THAT A FAST,  
11 EFFECTIVE WAY OF ADMINISTERING VITAMINS AND MINERALS  
12 AND AMINO ACID DIRECTLY INTO THE BLOODSTREAM?

13 A YES, IT IS.

14 Q AND THAT DELIVERS IT TO THE TISSUES  
15 IMMEDIATELY AS OPPOSED TO HAVING TO BE DIGESTED THROUGH  
16 THE GUT; IS THAT CORRECT?

17 A CORRECT.

18 Q OKAY. AND YOU'RE AN ADVOCATE OF I.V.  
19 NUTRITION; IS THAT FAIR TO SAY?

20 A YES.

21 Q OKAY.

22 A CAN I JUST SAY WHY?

23 Q YES.

24 A BECAUSE RIGHT NOW WE ARE LIVING IN SUCH A  
25 POLLUTED ENVIRONMENT THAT PEOPLE ARE COMING DOWN WITH  
26 SOME OF EVERYTHING, AND SOMETIMES PEOPLE JUST WANT TO  
27 FEEL GOOD. I WAS JUST AMAZED THAT JUST THIS WEEK ON  
28 "THE VIEW," THEY ACTUALLY DID I.V.'S ON T.V.

1 Q LIVE ON T.V.?

2 A LIVE ON T.V.

3 Q OKAY.

4 A AND PEOPLE ARE DOING THIS JUST TO FEEL  
5 GOOD. IT'S AMAZING BECAUSE IT COVERS SO MANY THINGS;  
6 CHRONIC FATIGUE SYNDROME, FIBROMYALGIA, PAIN. IT  
7 COVERS SO MANY, A VAST NUMBER OF THINGS.

8 Q NOW, IN ADDITION TO BEING INVOLVED IN I.V.  
9 NUTRITION, YOU'RE ALSO A CERTIFIED NATURAL HEALTHCARE  
10 PROFESSIONAL, OR A C.N.H.P.; IS THAT CORRECT?

11 A YES.

12 Q TO BE CERTIFIED, YOU HAD TO TAKE AND PASS  
13 AN EXAMINATION, CORRECT?

14 A CORRECT.

15 Q HAVE YOU WON AWARDS FROM THIS ORGANIZATION,  
16 DR. LEE?

17 A PRACTITIONER OF THE YEAR FOR THE LAST I  
18 THINK SEVEN YEARS OR SO.

19 Q SO YOU HAVE A LOT OF THEM?

20 A YES.

21 Q OKAY.

22 A IT'S A LOT OF THINGS I DO.

23 Q HAVE YOU WON OTHER AWARDS FOR YOUR WORK AND  
24 SERVICE?

25 A YES.

26 I HAVE AN AWARD FROM PRESIDENT OBAMA AS --  
27 A VOLUNTEER SERVICE AWARD FROM OBAMA BECAUSE DURING THE  
28 MEDICAL MOBILE TEAM THAT CAME TO CALIFORNIA WHO WAS

1 TREATING AT THE FORUM -- THIS IS RIGHT AFTER  
2 MR. JACKSON WAS -- DID HIS PERFORMANCE THERE.

3 I PROVIDED WHAT IS CALLED PAIN MANAGEMENT  
4 WITH MUSCLE STIMULATION. IT'S AN UNBELIEVABLE  
5 TREATMENT. SO I DO A LOT OF THINGS WITHIN THE  
6 COMMUNITIES AND ABROAD FOR FREE, BECAUSE I ALSO HAVE A  
7 NONPROFIT THAT I UTILIZE.

8 WE WERE BLESSED TO OBTAIN THIS WONDERFUL  
9 MACHINE, TOMOGRAPHY; SO I DO SCREENING FOR MEN, WOMEN  
10 AND CHILDREN, EARLY SCREENING FOR BREAST CANCER.  
11 BECAUSE OF WHAT'S HAPPENING, PEOPLE ARE NOT AWARE. I  
12 HAVE A MALE SPOKESPERSON WHO HAD A MASTECTOMY WHEN HE  
13 WAS 21 YEARS OLD.

14 I'VE DONE WALK-A-THONS FOR MEN, THE FIRST  
15 ONE EVER IN WEST L.A.

16 Q AND DO YOU SPEAK AT CONFERENCES ALL OVER  
17 THE WORLD?

18 A WELL, I HAVEN'T LEFT THE UNITED STATES YET.

19 Q OKAY.

20 A JUST -- BUT I DO SPEAK AT CONFERENCES, YES.

21 MS. CHANG: ALL RIGHT. I'D LIKE TO SHOW, I GUESS  
22 TO COUNSEL AND THE JUDGE ONLY FIRST, EXHIBIT 1121.

23 THE WITNESS: WHILE YOU'RE DOING THAT, CAN I JUST  
24 ALSO SAY THAT I'M AN AMBASSADOR FOR WORLD HEALTH -- OR  
25 WORLD PEACE. BUT THAT'S ONE OF MY REALLY BIG BELIEFS,  
26 IS WORLD PEACE; SO I AM AN AMBASSADOR FOR WORLD PEACE,  
27 TOO.

28 Q BY MS. CHANG: HOW LONG HAVE YOU DONE THAT?

1 A PROBABLY THE LAST SIX YEARS; SIX, SEVEN  
2 YEARS.

3 MS. CHANG: OKAY. ANY OBJECTIONS TO --

4 MS. CAHAN: NO.

5 MS. CHANG: I'D LIKE TO SHOW EXHIBIT 1121,  
6 PLEASE. LET'S SHOW THAT TO EVERYBODY.

7 Q IS THIS FROM YOUR WEBSITE, DR. LEE?

8 A THAT'S FROM ONE OF THE WEBSITES, YES.

9 Q OKAY. AND UP AT THE TOP, IT SAYS PH.D.,  
10 N.P., R.N., C.N.H.P.

11 YOU HAVE COVERED ALL OF THESE INITIALS?

12 A YES, I HAVE.

13 Q OKAY. AND THIS WEBSITE DESCRIBES YOU AS A  
14 HEALTHCARE PRACTITIONER AT NUTRI-MED INTEGRATED  
15 HEALTHCARE CENTER, CORRECT?

16 A CORRECT.

17 Q THAT'S THE NAME OF YOUR COMPANY; IS THAT  
18 CORRECT?

19 A I WORK FOR NUTRI-MED.

20 Q OKAY. AND DO YOU SPECIALIZE IN VITAMIN  
21 I.V. THERAPY?

22 A YES, I DO.

23 Q AND IT ALSO LISTS SOME OF THE CONDITIONS  
24 THAT YOU TREAT; IS THAT CORRECT?

25 A YES, IT DOES.

26 Q AND THAT INCLUDES DRUG ADDICTION, CORRECT?

27 A YES.

28 Q THAT INCLUDES LUPUS?

1 A YES.

2 Q THAT INCLUDES VITILIGO?

3 A YES.

4 Q AND YOU PROVIDE NUTRITIONAL SUPPORT; IS  
5 THAT CORRECT?

6 A YES.

7 Q NOW, I DIDN'T SEE TREATED IN THERE --  
8 INCLUDED IN THE CONDITIONS INSOMNIA OR SLEEP DISORDERS.  
9 DO YOU ALSO HAVE PATIENTS, HOWEVER, THAT  
10 YOU TREAT THAT HAVE COMPLAINED OF INSOMNIA OR SLEEP  
11 DISORDERS?

12 A YES.

13 Q OKAY. IN THE PERCENTAGE OF YOUR PATIENTS  
14 THAT YOU TREAT IN YOUR -- HOW MANY YEARS OF EXPERIENCE?  
15 28? 30?

16 A OVER 30 YEARS.

17 Q OVER 30 YEARS.

18 -- WHAT PERCENTAGE OF YOUR PATIENTS HAVE  
19 COMPLAINED TO YOU OF HAVING A SLEEP DISORDER SUCH AS  
20 INSOMNIA?

21 A AT LEAST 80 PERCENT.

22 Q OKAY. SO IT'S A COMMON COMPLAINT THAT  
23 YOU --

24 A VERY COMMON.

25 Q NOW, IT ALSO SAYS ON THIS THAT YOU HAVE --  
26 IF WE HAD -- IF WE GO TO THE BOTTOM, THAT THERE IS --  
27 IF WE CAN GET RID OF -- YEAH -- "THE CHERILYN LEE  
28 HEALTH RADIO SHOW"; IS THAT CORRECT?

1 A YES.

2 Q DO YOU HAVE YOUR OWN RADIO PROGRAM?

3 A YES, I DO.

4 Q AND DO YOU DISCUSS ISSUES RELATING TO  
5 NATURAL, HOLISTIC HEALTH?

6 A YES.

7 ACTUALLY, I BRING ON THE TOP DOCTORS FROM  
8 ALL OVER THE WORLD AS GUESTS, SO -- TO HELP TO EDUCATE  
9 AND LET PEOPLE KNOW WHAT'S GOING ON. SO  
10 DR. THOMAS LEVY IS AN M.D., J.D., WHO WROTE THE BOOK ON  
11 VITAMIN THERAPY AND CURES. HE HAS MANY BOOKS OUT WHERE  
12 PEOPLE WHO HAVE HAD PNEUMONIA, WHO WAS IN I.C.U. --  
13 IT'S JUST AMAZING. SO HE'S A FREQUENT GUEST, ALONG  
14 WITH MANY OTHERS.

15 Q AND WHAT RADIO STATION IS THAT?

16 A IT'S INTERNET, SO YOU WOULD GO TO  
17 THECHERILYNLEEHEALTHSHOW.FM. AND WE ARCHIVE THEM,  
18 SO -- SO MANY THINGS.

19 Q DR. LEE, AS PART OF DOING YOUR RADIO SHOW  
20 AND SPEAKING AT SEMINARS AND ATTENDING SEMINARS, DO YOU  
21 MAKE IT A POINT TO EDUCATE YOURSELF ON CURRENT ISSUES?

22 A MOST DEFINITELY.

23 AS A MATTER OF FACT, MY LABOR DAY WEEKEND  
24 WILL BE SPENT AT THE SHERATON ON ALL THE LATEST  
25 ADVANCEMENTS FOR CANCER. AND THAT'S -- EVERY YEAR MY  
26 WEEKENDS ARE AT A CANCER CONTROL CONVENTION. I SPOKE  
27 THERE A COUPLE OF YEARS AGO.

28 Q ALL RIGHT. NOW, CONTINUING ON WITH YOUR

1 BACKGROUND, IN ADDITION TO YOUR EDUCATION, DOCTOR, YOU  
2 ALSO HAVE TRAINING AS A MINISTER; IS THAT CORRECT?

3 A A MINISTER OF HEALTH.

4 Q OKAY. THAT'S FOR THE METHODIST CHURCH; IS  
5 THAT CORRECT?

6 A YES.

7 Q OKAY. AND IS YOUR FAITH IMPORTANT TO YOU  
8 IN YOUR HOLISTIC NUTRITION PRACTICE?

9 A MY FAITH IS IMPORTANT TO ME MAINLY BECAUSE  
10 OF MY OWN HEALTH BACKGROUND. I'VE BEEN IN TWO COMAS  
11 MYSELF. I WAS SCHEDULED TO HAVE MY LEGS AMPUTATED WHEN  
12 I WAS SEVEN YEARS OLD, AND BECAUSE OF -- I'M PASSIONATE  
13 IN WHAT I DO.

14 THIS IS WHY I PROBABLY SEEM SO EMOTIONAL;  
15 BECAUSE HAD IT NOT BEEN FOR ONE DOCTOR WHO -- WHEN MY  
16 MOTHER WAS TOLD I HAD TO HAVE MY LEGS AMPUTATED, AND  
17 THIS ONE DOCTOR OUT OF A TEAM SAID -- CAME BACK A DAY  
18 LATER AND TOLD MY MOTHER, "WE'RE NOT GOING TO HAVE TO  
19 AMPUTATE. I'M GOING TO WORK WITH HER PERSONALLY SO WE  
20 CAN SAVE HER LEGS." SO, YOU KNOW -- YES.

21 Q SO, DOCTOR, ARE YOU SAYING THAT YOU'VE GONE  
22 INTO THIS FIELD OF ALTERNATIVE, HOLISTIC MEDICINE AS A  
23 RESULT OF YOUR OWN PERSONAL EXPERIENCE?

24 A YES.

25 AND -- I'M SORRY. CAN I JUST GO BACK A  
26 LITTLE BIT --

27 Q YES.

28 A -- BECAUSE OF A QUESTION YOU ASKED.



1 FAITH AND -- I WORK WITH PEOPLE FROM ALL  
2 DIFFERENT WALKS OF LIFE. IT DOESN'T MATTER TO ME  
3 BECAUSE BEFORE I DO ANYTHING WITH PEOPLE -- AND I TOLD  
4 THIS TO MR. JACKSON WHEN I MET HIM, IS I BELIEVE IN  
5 PRAYER FIRST BECAUSE THE NUMBER ONE TRUE HEALER FOR ME  
6 IS A HIGHER POWER, AND IT ISN'T ME.

7 I GO TO SCHOOL, I LEARN EVERYTHING, I GO TO  
8 SEMINARS, BUT I ASK GOD TO DIRECT ME AND EVERYONE'S  
9 TREATMENT BECAUSE EVERYBODY IS AN INDIVIDUAL AND THEIR  
10 PROTOCOL HAS TO BE SET ACCORDINGLY TO THEM AS AN  
11 INDIVIDUAL PERSON.

12 SO MY FAITH IS VERY IMPORTANT TO ME BECAUSE  
13 A PERSON CAN WALK IN THE DOOR AND SAY, "WELL, I HAVE  
14 CHEST DISCOMFORT," BUT AT THE HEART OF THE MATTER, WHEN  
15 WE LOOK AT THE WHOLE PERSON, WHAT'S REALLY EATING AWAY  
16 AT YOU IN YOUR HEART? WHAT'S BOTHERING YOU IN YOUR  
17 LIFE ITSELF?

18 SO IT'S IMPORTANT FOR US TO -- PEOPLE JUST  
19 LET GO AND PRAY. SOME PEOPLE DON'T WANT TO PRAY, SO I  
20 TELL THEM PRAY SILENTLY, THEN, AND THEN I'LL PRAY  
21 SILENTLY FOR YOU, BECAUSE NOT EVERYBODY WANTS TO DO  
22 THAT. BUT MOST PEOPLE WHO COME TO ME, THEY COME  
23 BECAUSE THEY WANT TO BE HEALED.

24 THEY COME BECAUSE THEY KNOW SOME OF MY  
25 JOURNEY, AND I'M STILL HERE FROM TWO COMAS. SO IF GOD  
26 BLESSED ME TO STILL BE HERE, HE CAN DO THE SAME FOR  
27 YOU. HE'S NO -- RESPECT THE PERSON.

28 Q SO YOU USE YOUR FAITH AND HELP MOTIVATE

1 PEOPLE WITH RESPECT TO THEIR HEALTH ISSUES?

2 A I DO.

3 Q AND YOU'VE ALSO SERVED AS THE HEALTH  
4 CHAIRPERSON FOR THE ADVISORY BOARD OF THE N.A.A.C.P.,  
5 CORRECT?

6 A YES.

7 Q AND IN YOUR SPARE TIME, YOU HAD THREE  
8 DAUGHTERS AND NOW YOU ARE A GRANDMOTHER TO NINE  
9 GRANDCHILDREN, CORRECT?

10 A YES.

11 Q OKAY. AND THAT KEEPS YOU BUSY, AS WELL?

12 A AND I WAS THERE FOR THEIR BIRTH.

13 Q OKAY. THAT KEEPS YOU BUSY.

14 IN YOUR PRACTICE, DOCTOR, DO YOU TREAT A  
15 LOT OF CELEBRITIES?

16 A YES.

17 Q AND DOES THAT INCLUDE MUSICAL ARTISTS?

18 A YES.

19 Q DOES THAT INCLUDE MOVIE STARS?

20 A I HAVE, YES.

21 Q DOES THAT INCLUDE SPORTS ATHLETES?

22 A YES.

23 Q AND DO THEY ALL TYPICALLY USE ALIAS NAMES  
24 INSTEAD OF THEIR REAL NAMES?

25 A YES.

26 Q OKAY. AND I NOTICED IN YOUR MEDICAL  
27 RECORDS THAT MR. JACKSON USED -- WHAT WAS THE NAME THAT  
28 HE USED?

1 A DAVID.

2 Q I HAVE IT.

3 A MICH.

4 Q THE DATE OF HIS BIRTHDAY THAT HE GAVE WAS  
5 AUGUST 1ST.

6 WAS THAT MR. JACKSON'S TRUE BIRTHDAY?

7 A NO.

8 Q WHAT IS HIS TRUE BIRTHDAY?

9 A HIS TRUE BIRTHDAY IS TODAY.

10 Q AUGUST --

11 A 28TH.

12 29TH.

13 Q SO TODAY IS MR. JACKSON'S BIRTHDAY?

14 A YES; AND MY GRANDDAUGHTER'S, ALSO.

15 Q OKAY. SO EASY FOR YOU TO REMEMBER?

16 A YES.

17 Q YOU FIRST MET MR. JACKSON ON JANUARY 28,  
18 2009, ACCORDING TO YOUR RECORDS, CORRECT?

19 A YES.

20 Q AND THE REASON FOR THIS CALL WAS BECAUSE  
21 HIS CHILDREN HAD A COLD; IS THAT CORRECT?

22 A CORRECT.

23 Q AND YOU WENT TO THE CAROLWOOD HOUSE; IS  
24 THAT CORRECT?

25 A YES.

26 Q AND WERE YOU ABLE AT THAT TIME TO OBSERVE  
27 THE CHILDREN INTERACT WITH THEIR FATHER,  
28 MICHAEL JACKSON?

1 A YES.

2 Q THIS WAS THE FIRST TIME YOU EVER MET  
3 MR. JACKSON; IS THAT FAIR TO SAY?

4 A YES, IT IS.

5 Q FROM THAT FIRST MEETING, WHAT DID YOU  
6 OBSERVE BETWEEN THE CHILDREN AND THEIR FATHER?

7 MS. CAHAN: OBJECTION; SCOPE.

8 THE COURT: OVERRULED.

9 THE WITNESS: WHAT I OBSERVED WAS A VERY  
10 CARING -- CARING, CONCERNED FATHER. I WAS SURPRISED HE  
11 WAS THERE WHEN I WAS CALLED TO GO SEE THE CHILDREN, AND  
12 HE WAS THERE TO FINISH GIVING ME THEIR HISTORY OF WHAT  
13 WAS GOING ON WITH THEIR COLD, THE SYMPTOMS.

14 AND THE LOVE -- IF I COULD JUST SAY IT  
15 EXACTLY, YOU CAN WALK INTO A HOUSE, AND IF A PERSON HAS  
16 BEEN ARGUING IN A HOUSE, OR WHATEVER, YOU CAN FEEL THE  
17 COLDNESS AND FEEL THE TENSION THERE. WHEN YOU WALK  
18 INTO HIS HOUSE, YOU JUST FEEL LOVE. YOU FEEL A WARMTH,  
19 YOU FEEL A LOVE.

20 AND BEING IN HIS PRESENCE, THAT'S WHAT YOU  
21 WOULD SEE AND THAT'S WHAT YOU WOULD FEEL BECAUSE HE WAS  
22 VERY CLOSE TO THE CHILDREN AND VERY LOVING TOWARD HIS  
23 CHILDREN EQUALLY.

24 Q BY MS. CHANG: IT WAS A LOVING ENVIRONMENT?

25 A VERY LOVING, YES.

26 Q AND THE CHILDREN WERE SMALL THEN; IS THAT  
27 TRUE?

28 A THEY WERE YOUNGER, YES.

1 Q YOU DID NOT INFUSE VITAMINS INTO THEM,  
2 CORRECT?

3 A OH, NO.

4 Q HOW WOULD YOU GIVE THEM VITAMINS?

5 A WHAT I DID WAS -- BECAUSE I KNEW OF  
6 SYMPTOMS PRIOR TO GOING, SO I HAD SET UP SOME THINGS  
7 THAT WERE HOMEOPATHIC AND ALSO SOME TEAS. I MADE A  
8 LITTLE VITAMIN C TEA PARTY FOR THEM.

9 Q IS THAT WHEN BEING A GRANDMOTHER OF EIGHT  
10 AT THAT TIME HELPS?

11 A OH, YES, YES.

12 Q AND MR. JACKSON WAS ABLE TO SEE YOU  
13 INTERACT WITH HIS CHILDREN?

14 A YES.

15 Q AND HE ASKED YOU QUESTIONS ABOUT YOUR  
16 APPROACH TO MEDICINE, CORRECT?

17 A YES, HE DID.

18 Q THE HOLISTIC, NATURAL APPROACH, CORRECT?

19 A YES.

20 Q NOW, FOLLOWING THAT DATE, HE WANTED TO USE  
21 YOU, AS WELL; WOULD THAT BE FAIR TO SAY?

22 A YES.

23 Q AND FROM THAT DATE ON, WOULD YOU AGREE THAT  
24 YOU SAW MR. JACKSON FOR A TOTAL OF AROUND 20 VISITS  
25 SPREAD OUT FROM THAT DAY AT THE END OF JANUARY 2009 ALL  
26 THE WAY UNTIL APRIL 19TH, 2009?

27 CORRECT?

28 A 20 PLUS.

1 Q 20 PLUS.

2 SOME OF THOSE VISITS ENTAILED YOU SPENDING  
3 THE NIGHT, CORRECT?

4 A YES.

5 Q SOME REQUIRED YOU TO SPEND ALMOST A FULL  
6 DAY WITH HIM, CORRECT?

7 A CORRECT.

8 Q MANY HOURS, CORRECT?

9 A YES.

10 Q YOU WOULD EAT MEALS WITH HIM, YOU STATED,  
11 CORRECT?

12 A YES.

13 Q WHEN HE WAS BEING INFUSED WITH NUTRIENTS,  
14 WOULD YOU TALK TO HIM?

15 A WE WOULD TALK -- JUST HAVE A GOOD TIME. HE  
16 WAS THE MOST DOWN-TO-EARTH PERSON THAT I HAVE EVER MET,  
17 AND WE ENJOYED WATCHING -- JUST BASICALLY ONE MOVIE  
18 OVER AND OVER.

19 Q WHAT MOVIE WAS THAT?

20 A AND IT WAS A MOVIE -- "THE MUMMIES." AND I  
21 DON'T THINK IT WAS SO MUCH THE MOVIE, HE LIKED ALL THE  
22 DETAIL WORK IN THE MOVIE, HOW IT WAS PRODUCED.

23 Q SPECIAL EFFECTS?

24 A SPECIAL EFFECTS. THANK YOU.

25 Q COULD YOU TELL FROM TALKING WITH HIM AND  
26 BEING WITH HIM THAT HE LIKED MOVIES?

27 A I COULD TELL IN WATCHING HIM WATCH THE  
28 MOVIE HE WAS ONLY INTERESTED IN THE THINGS THAT -- TO

1 STIMULATE HIM, YOU KNOW, TO STIMULATE HIS MIND.  
2 SOMETIMES PEOPLE WATCH MOVIES TO DISTRACT THEM FROM  
3 OTHER STUFF THAT'S GOING ON, YOU KNOW; BUT HE --  
4 DEFINITELY HE LIKED MOVIES AND WALT DISNEY. HE TALKED  
5 ABOUT WALT DISNEY MOVIES AND WALT DISNEY HIMSELF.

6 Q THE CLASSICS?

7 A YES.

8 Q WOULD YOU SPEND TIME WITH HIM AND HIS  
9 CHILDREN TOGETHER?

10 A YES.

11 Q AND IN ADDITION TO SEEING HIM AT CAROLWOOD,  
12 DID THE TWO OF YOU TALK ON THE PHONE IN ADDITION TO  
13 THESE MEETINGS?

14 A YES, BECAUSE HE WOULD CALL ME AT TIMES.

15 Q AND DID HE CALL YOU HIMSELF?

16 A YES.

17 Q OKAY. DID THE TWO OF YOU, AS YOU WORKED  
18 TOGETHER AND SPENT THIS TIME TOGETHER, HAVE A LOT IN  
19 COMMON?

20 A YES.

21 Q AND WHAT WAS THAT?

22 A THE ONE THING WE HAD IN COMMON THAT WE WERE  
23 TALKING ABOUT -- BECAUSE, YOU KNOW, I -- ONE NIGHT I  
24 WAS REALLY KIND OF CONCERNED ABOUT THE HYPERBARIC  
25 OXYGEN THERAPY. AS YOU KNOW, I HAVE ONE IN MY OFFICE.

26 SO WE STARTED TALKING ABOUT THAT, AND I  
27 TOLD HIM, I SAID, YOU KNOW, "I GREW UP WITH YOUR  
28 MUSIC -- WITH YOUR MUSIC, AND PEOPLE JUST LOVE YOU SO

1 MUCH, AND THE MUSIC --" WE STARTED TALKING ABOUT THAT,  
2 THINGS I HAD SHARED WITH HIM ABOUT WHAT I DO AND WHAT I  
3 DID IN THE CLINIC.

4 AND I'M SURE HE DID LOOK -- SOMEONE LOOKED  
5 UP MY WEBSITE, HE LOOKED IT UP, SO HE KNEW A LOT OF  
6 THINGS I DID, ALSO. AND THE ONE THING HE HAD SAID THAT  
7 WAS VERY PAINFUL IN THE END, BUT -- IS THAT HE SAID, "I  
8 WANT TO USE MY -- MY MUSIC TO HEAL PEOPLE AND TO HEAL  
9 THE WORLD, JUST LIKE YOU USE YOUR CLINIC TO HELP HEAL  
10 PEOPLE."

11 Q JUST LIKE YOU HELP PEOPLE, HE WANTED TO  
12 HEAL THE WORLD WITH MUSIC?

13 A HE SAID, "YOU HELP PEOPLE IN YOUR CLINIC, I  
14 WANT TO HELP PEOPLE THROUGH MY MUSIC."

15 Q AND DID HE EXPRESS AN INTEREST IN YOUR WORK  
16 AND THE PATIENTS YOU WERE WORKING WITH?

17 A OH, MOST DEFINITELY.

18 THE THING -- HE WOULD ALWAYS ASK ME --  
19 BECAUSE WHEN HE WOULD CALL ME SOMETIMES TO COME TO SEE  
20 HIM BECAUSE HE WOULD WANT AN I.V., THERE WAS A LOT OF  
21 TIMES I COULD NOT COME BECAUSE I WAS -- BECAUSE I -- I  
22 ACTUALLY TAKE CARE OF PEOPLE WHO ARE HOMEBOUND, ALSO.

23 AND I JUST WANT TO ADD -- BECAUSE IT KIND  
24 OF WENT OUT INTO THE MEDIA THAT I ONLY TAKE CARE OF  
25 WEALTHY PEOPLE. THAT IS NOT TRUE. I TAKE CARE OF  
26 PEOPLE, AND I LOVE PEOPLE. IT DOESN'T MATTER WHAT  
27 TITLES THEY HAVE ON THEM, AND THAT'S THE ONE THING I  
28 SAID.



1                   EVERYBODY THAT WALKS IN MY DOOR, MY STAFF  
2                   KNOW THAT IT'S V.I.P., VERY IMPORTANT, SO IT DOESN'T  
3                   MATTER WHO YOU ARE. I JUST WANT TO MAKE THAT CLEAR.  
4                   AND HE SORT OF KNEW THAT, TOO. WE HAD SPOKE ABOUT  
5                   THAT, TOO; NOT JUDGING PEOPLE FOR WHO THEY ARE.

6                   AS A MATTER OF FACT, SOME CELEBRITIES, IN  
7                   ALL HONESTY, I KIND OF PRAYED THEM AWAY BECAUSE I  
8                   JUST -- I JUST LIKE TO BE AROUND PEOPLE WHO ARE NOT  
9                   SHALLOW PEOPLE AND PEOPLE WHO -- AND NOT BEING  
10                  JUDGMENTAL; BUT IF I'VE GOT TO SIT THERE FOR THREE AND  
11                  A HALF HOURS, I REALLY DON'T WANT TO LISTEN TO THE  
12                  SHOES THEY'RE WEARING, YOU KNOW, RESTAURANTS THEY'RE  
13                  GOING TO.

14                  I JUST DON'T WANT TO UTILIZE MY ENERGY THAT  
15                  WAY.

16                  Q           THERE ARE SOME PEOPLE, YOU'RE SAYING,  
17                  CELEBRITIES, WHO TALK ABOUT THEMSELVES OR ARE  
18                  EGOTISTICAL?

19                  WOULD THAT BE FAIR TO SAY?

20                  A           AND THEY REALLY TALK ABOUT OTHER PEOPLE.  
21                  THE ONE THING I ADMIRER WITH MR. JACKSON IS HE DID NOT  
22                  GOSSIP, AND THAT WAS SO REFRESHING, TO BE WITH SOMEONE  
23                  WHO DID NOT GOSSIP ABOUT OTHER PEOPLE.

24                  AND WHAT -- SOMETHING VERY POWERFUL THAT I  
25                  HAD LEARNED FROM HIM, TOO, BECAUSE -- ESPECIALLY AFTER  
26                  HIS -- HIS PASSING MORE SO, WAS THAT HE HAD SUCH A  
27                  HEART OF FORGIVENESS, SUCH A HEART OF FORGIVENESS, AND  
28                  I -- AND I TELL MY PATIENTS AND PEOPLE IN ORDER TO HEAL

1 AND GO THROUGH THESE PATHS OF HEALING, YOU HAVE TO  
2 FORGIVE.

3 THAT'S A JOURNEY YOU HAVE TO GO THROUGH IF  
4 YOU WANT TO HEAL FROM ANYTHING. AND IT WAS JUST  
5 AMAZING HOW -- BECAUSE IT'S PART OF THE QUESTIONNAIRE,  
6 AND WE HAD A DISCUSSION ON FORGIVENESS, AND HE WASN'T  
7 HOLDING ONTO ANY ANIMOSITY OR ANYTHING.

8 HE SAID, "I DON'T HOLD ON TO ANYTHING FROM  
9 ANYTHING THAT HAPPENED TO ME IN THE PAST. I'VE LET IT  
10 GO. I WANT PEOPLE TO SEE THAT YOU CAN LET GO AND," HE  
11 SAID, "JUST BE THE BEST FATHER I CAN BE."

12 AND I HAD TO LEARN FROM THAT IN '09,  
13 BECAUSE SO MUCH HAPPENED TO ME IN '09 THAT WAS NOT  
14 TRUE, THAT CAME OUT IN THE MEDIA, THAT I HAD TO GO BACK  
15 AND I COULD JUST HEAR MICHAEL'S VOICE ON HOW HE WAS  
16 ABLE TO FORGIVE.

17 Q OKAY.

18 A EVEN THOUGH I DO FORGIVE, BUT --

19 Q DR. LEE, WOULD YOU SAY THAT MR. JACKSON AND  
20 YOU SHARED COMMON MOTIVATION AND INSPIRATIONAL BELIEFS?

21 A YES, WE DID.

22 WHEN I FIRST -- PROBABLY I THINK ON MY  
23 SECOND OR THIRD VISIT -- I USED TO HAVE THIS LITTLE  
24 CARD, AND IT HAD AN APPLE ON IT. AND ON THIS CARD, IT  
25 HAD A WONDERFUL SAYING THAT -- THAT I LIKE TO USE.

26 Q IS THAT CARD SAYING ALSO ON YOUR BUTTON  
27 THAT YOU'RE WEARING RIGHT NOW?

28 A YES.

1 Q AND WHAT DOES -- SOME OF US MAY NOT BE ABLE  
2 TO SEE IT.

3 WHAT DOES YOUR BUTTON SAY?

4 A MOST PEOPLE WHO KNOW ME KNOW THAT I HAVE IT  
5 ON OR WEAR IT ALL THE TIME, BECAUSE IT'S SO POWERFUL.

6 Q IS IT YOUR -- IS IT YOUR PERSONAL MANTRA?

7 A YES, IT IS.

8 Q AND WHAT IS IT?

9 A IT'S SOMETHING I START OFF MY DAY -- I  
10 CERTAINLY DID TODAY. AND IT STATES "I AM --" AND I WAS  
11 TELLING MICHAEL AND THE KIDS THAT DAY TO TAKE IN THE "I  
12 AM" BECAUSE THE "I AM" IS SO IMPORTANT. I AM SO  
13 GRATEFUL AT HOW GRATEFULNESS BRINGS MORE TO YOU TO BE  
14 GRATEFUL FOR WHAT YOU HAVE. "I AM SO GRATEFUL THAT I  
15 AM A MAGNET FOR MIRACLES."

16 Q AND DID YOU SHARE THAT WITH MR. JACKSON AND  
17 HIS CHILDREN?

18 A I SHARED THAT WITH MR. JACKSON. HE SAID,  
19 "I'M GOING TO WRITE THIS DOWN AND PUT IT ON MY MIRROR."

20 Q I'M GOING TO SHOW YOU EXHIBIT 500, DASH,  
21 147 THAT'S ALREADY IN EVIDENCE. AND I'LL JUST TELL  
22 YOU, DR. LEE, THIS WAS IN MR. JACKSON'S HANDWRITING,  
23 IT'S BEEN IDENTIFIED, AND WAS ON HIS MIRROR.

24 IS THAT YOUR MANTRA, "I AM SO GRATEFUL THAT  
25 I AM A MAGNET FOR MIRACLES"?

26 A YES, IT IS.

27 Q AND DOES THAT MAKE YOU FEEL GOOD THAT HE  
28 WROTE IT DOWN AND HAD IT?

1 A YES, IT DOES.

2 Q OKAY.

3 A YOU KNOW, HE SAID HE WAS GOING TO DO IT. I  
4 DIDN'T KNOW HE ACTUALLY DID IT.

5 Q DR. LEE, DO YOU CONSIDER THE TIME PERIOD  
6 THAT YOU SPENT WITH MICHAEL JACKSON TO BE SPECIAL TO  
7 YOU?

8 A YES, YES, IT WAS.

9 Q DID IT CHANGE YOUR LIFE?

10 A YES, IT DID.

11 Q IN WHAT WAYS?

12 A THE ONE IS ON THE FORGIVENESS SIDE. THE  
13 SECOND ONE IS TO SEE A SINGLE FATHER -- BECAUSE I HAVE  
14 A COUSIN WHO WORKS WITH SINGLE FATHERS, AND -- AND TO  
15 SEE A -- A MAN TO TAKE THAT MUCH TIME AND ENERGY -- IT  
16 WASN'T EVEN ENERGY, IT WAS JUST THE LOVING PASSION HE  
17 HAD WITH HIS OWN FAMILY AND HOW HE LOVED HIS CHILDREN.

18 THERE WAS SUCH A SCHEDULE IN THAT HOUSE.  
19 YOU KNOW, YOU WOULD THINK -- YOU KNOW, SOME PEOPLE WHO  
20 HAVE MONEY AND WHATEVER, KIDS IS GOING TO DO WHAT THEY  
21 WANT AND RUN FREE AND IT KIND OF RUINS THEM. BUT IN  
22 THIS CASE, THAT DID NOT HAPPEN.

23 AND IT WAS JUST WONDERFUL TO SEE THAT THEY  
24 HAD A SPECIAL TIME TO GO TO BED, A SPECIAL TIME FOR  
25 DINNER, AND THEY ALL SAT AT THE TABLE. THAT'S WHAT  
26 AMAZED ME, AS A FAMILY, YOU KNOW, AND HAD DINNER  
27 TOGETHER, BECAUSE SO MANY PEOPLE DON'T DO THAT.

28 AND A LOT OF ENTERTAINERS I KNOW ARE SO

1 BUSY, AND PEOPLE -- THEY DON'T EVEN HAVE TIME TO BE  
2 THERE BECAUSE THEY ARE WORKING, THEY ARE BUSY. BUT TO  
3 SEE HIM PUT HIS FAMILY FIRST -- IT WAS ALWAYS HIS  
4 CHILDREN FIRST; AND TO SEE THAT, IT WAS JUST WONDERFUL,  
5 AND HOW KIND HE WAS.

6 HE CALLED ME ON FEBRUARY 21ST TO COME UP TO  
7 THE HOUSE, AND I TOLD HIM I COULDN'T COME BECAUSE IT  
8 WAS MY BIRTHDAY. AND I COULD HEAR THE KIDS IN THE  
9 BACKGROUND. AND HE SAID, "OH, IT'S ALSO BLANKET'S  
10 BIRTHDAY, TOO." SO JUST -- I HAVEN'T REALLY MET ANYONE  
11 THAT WAS SO CARING AND SO GIVING.

12 AND COULD I JUST SAY ONE OTHER THING?

13 Q SURE.

14 A AND AFTER HIS PASSING, I WAS AT AN EVENT  
15 AND A YOUNG LADY WALKED UP TO ME AND SHE JUST STARTED  
16 CRYING, AND SHE SAID, "I WOULDN'T BE HERE TODAY IF  
17 MICHAEL HADN'T CAME TO THE HOSPITAL TO PAY FOR MY BRAIN  
18 SURGERIES." SO HE DIDN'T WANT ANYBODY TO KNOW. AND  
19 SHE WANTED ME TO FEEL HER SCALP, REALLY TO SEE WHERE  
20 SHE HAD HAD THE INCISIONS.

21 AND SHE WAS SO HAPPY BECAUSE THROUGH THAT  
22 WHOLE PROCESS, NOW SHE HAS A CHILD THAT SHE'S RAISING,  
23 AND IT'S -- JUST TO HEAR AND -- YOU KNOW, ALL THE  
24 THINGS EVEN AFTER, BUT TO ACTUALLY -- TO HAVE BEEN IN  
25 THE COMPANY OF A PERSON WHO WAS GENUINELY FROM THE  
26 HEART -- A PERSON CAN GIVE YOU A GIFT, A PERSON CAN SAY  
27 SOMETHING, YOU CAN TELL WHEN IT COMES FROM THE HEART  
28 AND NOT.

1           YOU CAN TELL IF IT'S LOVE. YOU CAN  
2 ACTUALLY TELL. WITH HIM, YOU KNEW IT. YOU KNEW IT WAS  
3 LOVE. AND WHAT'S STRIKING FOR ME IS HE WAS A PERSON  
4 WHO ONLY WANTED TO BE HEALTHY, WHO ONLY WANTED THE BEST  
5 NUTRITION, WHO ONLY WANTED THE BEST DOCTOR, WHO NOT WAS  
6 LOOKING -- AND THAT'S WHAT TEARS ME APART.

7           DOCTOR SHOPPING? IF I'M LOOKING FOR A GOOD  
8 DENTIST, I'M GOING TO KEEP SHOPPING -- I'M NOT GOING TO  
9 SHOP, IF YOU WANT TO CALL IT THAT, BUT I'M GOING TO  
10 KEEP LOOKING FOR A DENTIST. BUT WITH HIM, THEY STICK  
11 LABELS ALL OVER HIM.

12           AND FOR A MAN TO BE SO LOVING FOR OTHER  
13 PEOPLE, AND CARING -- AND NOBODY WALKED IN HIS SHOES,  
14 NOBODY SAW THE PAIN HE WENT THROUGH, NOBODY SAW WHAT HE  
15 WENT THROUGH. I HAD ECZEMA AS A CHILD. I KNEW WHAT  
16 THAT WAS LIKE, I KNEW HOW IT WAS TO BE BULLIED. I WAS  
17 BULLIED AT SCHOOL, I HAD DIRT THROWN ON ME AT SCHOOL.  
18 I KNEW WHAT THAT FELT LIKE.

19           NOBODY WALKED THROUGH HIS SHOES TO SEE WHAT  
20 HE WENT THROUGH AND WHAT KIND OF CHILD LIFE HE HAD OR  
21 DIDN'T HAVE. NOBODY KNEW THAT. HE DIDN'T EVEN WANT TO  
22 TALK ABOUT THAT. BUT FOR ALL THAT TO CONSTANTLY BE  
23 THROWN AT A PERSON WHEN ALL HE WAS DOING WAS LOOKING  
24 FOR THE BEST DOCTOR TO HELP HIM WITH HIS INSOMNIA --  
25 UNFORTUNATELY, PEOPLE TOLD HIM THAT IT WAS SAFE TO USE  
26 AT HOME.

27           AND I'D JUST LIKE TO SAY THAT SINCE THIS  
28 HAS HAPPENED, I HAVE BEEN PLACES -- EVEN AT THE FORUM,

1 WHEN I WENT THERE TO DO -- WITH THE MEDICAL MOBILE  
2 AFTER MICHAEL'S PASSING, THE DOCTOR IN THE ROOM NEXT TO  
3 ME WAS AN ANESTHESIOLOGIST.

4 HE CAME UP AND SAID, "I SAW YOU ON T.V.  
5 YOU KNOW HOW MANY PEOPLE ASK FOR SOMETHING TO SLEEP  
6 WHEN THEY WAKE UP, THEY WANT THIS AT HOME? IT'S VERY  
7 COMMON. IT'S VERY COMMON." SEVERAL ANESTHESIOLOGISTS  
8 HAVE APPROACHED ME AND SAID, YOU KNOW, "PEOPLE WAKE UP  
9 FROM SURGERY, AND THEY'LL ASK, 'OH, GREAT.'"

10 A VERY DEAR FRIEND OF MINE RIGHT NOW WHO  
11 HAS UNDERGONE FIVE BREAST SURGERIES -- SHE SAID, YOU  
12 KNOW, "I LIKE WHEN THEY USE IT BECAUSE, YOU KNOW, I  
13 FEEL BETTER WHEN IT'S OVER, AND I SLEEP WELL." I MEAN,  
14 I DON'T -- I'VE HAD SURGERY, BUT I DON'T FEEL THAT WAY.

15 MY OWN GRANDDAUGHTER HAS HAD TO HAVE  
16 PROPOFOL, THE ONE WHOSE BIRTHDAY WAS WEEK BEFORE LAST,  
17 WHO JUST TURNED EIGHT YEARS OLD, FROM A DISLOCATED  
18 JOINT.

19 SO I TELL PEOPLE IT IS A SAFE MEDICATION  
20 USED IN THE PROPER PLACE, BUT FOR THEM -- IT JUST -- IT  
21 JUST BREAKS MY HEART FOR PEOPLE TO LABEL SOMEONE AS  
22 DOCTOR SHOPPING WHEN THEY'RE ONLY TRYING TO FIND THE  
23 BEST PERSON TO GIVE THEM THE BEST CARE.

24 Q DR. LEE, IT SEEMS LIKE YOU'VE KEPT A LOT OF  
25 FRUSTRATED THOUGHTS INSIDE YOU.

26 IS THAT CORRECT?

27 A MOST DEFINITELY, AND I -- I SAID MY LITTLE  
28 MANTRA TODAY. I SAID I WAS NOT GOING TO BREAK DOWN,

1 I'M NOT GOING TO DISRUPT THE COURT TODAY.

2 Q OKAY. BUT HAS IT BEEN FRUSTRATING FOR YOU  
3 TO HEAR IN THE PRESS WHAT PEOPLE SAY ABOUT  
4 MICHAEL JACKSON?

5 MS. CAHAN: JUST OBJECTION TO THE EXTENT THIS  
6 WOULD CALL FOR THINGS THE JURY HASN'T HEARD, IT'S  
7 HEARSAY.

8 MS. CHANG: SHE MAKES A GOOD POINT. I WILL  
9 RETRACT THAT AND MAKE ANOTHER POINT.

10 THE COURT: OKAY.

11 Q BY MS. CHANG: IT'S IMPORTANT TO YOU,  
12 DR. LEE, THAT PEOPLE KNOW THE REAL MICHAEL JACKSON; IS  
13 THAT CORRECT?

14 A YES.

15 Q AND TO BREAK DOWN SOME OF THE THINGS THAT  
16 YOU WERE SAYING, YOU BELIEVE IN YOUR HEART, BASED ON  
17 YOUR TIME WITH HIM, THAT HE WANTED TO BE HEALTHY; IS  
18 THAT CORRECT?

19 A YES.

20 Q AND HE TRUSTED DOCTORS; WOULD THAT BE FAIR  
21 TO SAY?

22 A YES, HE DID.

23 Q WOULD YOU ALSO SAY THAT YOU HAVE SINCE  
24 LEARNED THAT HIS REQUESTS THAT HE HAD FOR AN ANESTHETIC  
25 SUCH AS DIPRIVAN WAS NOT UNUSUAL?

26 A NO, AFTER MEETING -- AFTER HAVING  
27 ANESTHESIOLOGISTS ACTUALLY APPROACH ME TO TELL ME THIS,  
28 AND AFTER SEEING, YOU KNOW, SOME OF THE LATEST RESEARCH



1 THAT IT ACTUALLY HAS BEEN USED FOR -- FOR SLEEP.

2 MS. CAHAN: OBJECTION; HEARSAY ON THAT.

3 THE COURT: SUSTAINED.

4 MS. BINA: MOVE TO STRIKE, YOUR HONOR.

5 THE COURT: MOTION GRANTED. THE ANSWER IS  
6 STRICKEN.

7 MS. CHANG: ALL RIGHT.

8 Q DR. LEE, YOU WOULD SAY THAT IN YOUR MIND,  
9 MICHAEL JACKSON WAS NOT STRANGE OR WEIRD, CORRECT?

10 A HE WASN'T STRANGE OR WEIRD AT ALL.

11 Q IN FACT, DID HE INSPIRE AND HELP YOU AS  
12 MUCH AS YOU INSPIRED AND HELPED HIM?

13 A HE WAS A VERY INSPIRING PERSON TO SEE --  
14 LIKE I SAID, I WOULD HAVE NEVER THOUGHT WHO HE IS THAT  
15 HE WOULD HAVE BEEN THAT HUMBLE. SEEING HIM PERFORM AND  
16 SEEING HIM IN PERSON, IT WAS LIKE TALKING TO -- YOU  
17 JUST KNEW A PERSON WHO REALLY CARED FOR PEOPLE,  
18 PEOPLE -- CARED ABOUT OTHERS.

19 HE EVEN ASKED ME HOW IS MY PATIENTS FOR  
20 TODAY, "IS THERE ANYTHING I CAN DO?" I DIDN'T HAVE ONE  
21 PATIENT WHO WAS CONCERNED ABOUT THE OTHER PEOPLE THAT I  
22 WAS SEEING. AND HE KNEW AT THE TIME, TOO, I WAS A  
23 CAREGIVER OF MY MOTHER, BECAUSE I WOULD LEAVE HIM  
24 SOMETIMES AND GO SEE HER.

25 AND HE NEVER -- AND HE WOULD ALWAYS ASK ME,  
26 "HOW IS YOUR MOTHER DOING?" YOU KNOW, VERY INSPIRING.

27 Q IN ALL YOUR YEARS OF PRACTICE DEALING WITH  
28 THE VERY RICH, THE VERY FAMOUS, THE VERY POOR, THE

1 HOMELESS, AS YOU SAID, IS THERE ANY OTHER PATIENT WHO  
2 YOU'VE HAD OR WORKED WITH THAT MADE SUCH A POSITIVE  
3 IMPRESSION OR LASTING IMPRESSION ON YOU?

4 A NO.

5 Q ALL RIGHT.

6 A MICHAEL GAVE ME THE IMPRESSION THAT HE KNEW  
7 WHERE HE CAME FROM, AND ALL HE WAS INSPIRED TO HAVE,  
8 THAT DID NOT CHANGE HIM. AND A LOT OF PEOPLE, IT DOES  
9 CHANGE THEM.

10 Q ALL RIGHT. NOW I JUST WANT TO QUICKLY GO  
11 OVER SOME OF THE ITEMS IN THE MEDICAL RECORDS THAT WE  
12 WENT OVER YESTERDAY. DEFENSE COUNSEL INTRODUCED TRIAL  
13 EXHIBITS 12009 TO 99.

14 IN THOSE RECORDS, DOCTOR, THERE'S VARIOUS  
15 WEIGHTS LISTED; IS THAT CORRECT?

16 A YES.

17 Q ALL RIGHT. WOULD YOU AGREE THAT WHEN YOU  
18 SAW MR. JACKSON FROM JANUARY TO APRIL OF 2009, YOU  
19 YOURSELF NEVER WEIGHED HIM?

20 IS THAT CORRECT?

21 A NO, I DID NOT.

22 Q ALL WEIGHTS THAT ARE LISTED IN YOUR RECORDS  
23 ARE WHAT HE REPORTED TO YOU AS HIS BEST ESTIMATE,  
24 CORRECT?

25 A YES.

26 HE DID HAVE A SCALE IN HIS BATHROOM, I  
27 FOUND OUT LATER; BUT I DIDN'T KNOW THAT UNTIL APRIL.

28 Q OKAY.

1 A BUT YES, TO THE BEST OF HIS -- YES.

2 Q AND YOU NEVER SAW HIM ON THAT SCALE OR  
3 WEIGHED HIM ON THAT SCALE, CORRECT?

4 A CORRECT.

5 Q BUT WHILE YOU TREATED HIM, DOCTOR, WOULD  
6 YOU AGREE HE WAS THIN BUT HE WAS HEALTHY?

7 FAIR TO SAY?

8 A CERTAINLY, YES.

9 Q CERTAINLY NOT GAUNT, CORRECT?

10 A NO.

11 MS. CHANG: ALL RIGHT. AND I JUST WANT TO LOOK  
12 REAL QUICK AT PART OF THAT PACKET, AND I'M JUST GOING  
13 TO PULL IT UP. I BELIEVE IT WOULD BE 12009, DASH, 20;  
14 BUT FOR US, IT WOULD BE 1119, DASH, 20. WHY DON'T WE  
15 JUST SHOW IT TO COUNSEL AND --

16 MS. CAHAN: I HAVE IT.

17 MS. CHANG: AND WE'LL JUST SHOW IT TO YOU  
18 FIRST.

19 MS. CAHAN: IT'S FINE.

20 MS. CHANG: OKAY. LET'S JUST SHOW IT REAL QUICK.  
21 OKAY.

22 Q DOWN IN THE CORNER, RIGHT-HAND CORNER  
23 THERE, THE MOST IMPORTANT PHYSICAL COMPLAINTS THAT HE  
24 HAD THE FIRST DAY WOULD BE FATIGUE, AND HE GAVE YOU A  
25 HISTORY OF LUPUS AND A HISTORY OF VITILIGO; FAIR TO  
26 SAY?

27 A YES.

28 Q OKAY. AND YESTERDAY WE WENT OVER A LONG

1 QUESTIONNAIRE THAT YOU GIVE TO YOUR PATIENTS AND YOU  
2 ASK THEM ABOUT A SUBSTANCE SURVEY FORM AND A MEDICATION  
3 HISTORY; IS THAT CORRECT?

4 A YES.

5 Q ALL RIGHT. ONE OF THEM STATED -- THE  
6 SUBSTANCE SURVEY FORM STATED "PRESCRIPTION MEDICATION  
7 YOU ARE CURRENTLY TAKING OR HAVE TAKEN IN THE LAST  
8 YEAR."

9 DOES THAT SOUND RIGHT?

10 A YES.

11 Q OKAY. THE MEDICATION HISTORY SAYS "PLEASE  
12 CHECK ANY OF THE FOLLOWING MEDICATION YOU HAVE BEEN OR  
13 ARE CURRENTLY TAKING."

14 DOES THAT SOUND ALSO CORRECT?

15 A YES.

16 Q WOULD IT BE FAIR TO SAY THAT YOU WERE  
17 ACTUALLY ASKING HIM THE QUESTIONS AND FILLING IT OUT  
18 FOR HIM?

19 A YES.

20 Q ALL RIGHT. WOULD YOU AGREE THAT THE TYPE  
21 OF DRUGS THAT YOU EXPECT PATIENTS TO DISCLOSE TO YOU TO  
22 THOSE QUESTIONS ARE THOSE THAT THEY TAKE ON A REGULAR  
23 BASIS, SUCH AS BLOOD PRESSURE MEDICATION, SYNTHROID,  
24 THINGS OF THAT NATURE?

25 A YES.

26 Q OKAY. YOU DID NOT EXPECT THEM TO INCLUDE  
27 DRUGS THAT ARE ADMINISTERED TO THEM BY DOCTORS DURING  
28 MEDICAL PROCEDURES, SUCH AS DEMEROL BY INJECTION OR

1 PROPOFOL DURING A PROCEDURE OR BOTOX, CORRECT?

2 A CORRECT.

3 Q OKAY. AND MR. JACKSON, WHEN YOU WERE GOING  
4 THROUGH THE QUESTIONNAIRE, TOLD YOU HE HAD TAKEN XANAX,  
5 CORRECT?

6 A YES.

7 Q HE TOLD YOU HE HAD TAKEN AMBIEN, CORRECT?

8 A YES.

9 Q HE TOLD YOU HE HAD TAKEN ATIVAN; IS THAT  
10 CORRECT?

11 A YES.

12 Q AND ATIVAN -- ANOTHER WORD FOR THAT IS  
13 LORAZEPAM; IS THAT CORRECT?

14 A YES.

15 Q ALL RIGHT. AND WE SAW A NOTATION YESTERDAY  
16 WHERE IT SAID 12-YEAR HISTORY -- OR 12 YEAR, HISTORY  
17 GREATER THAN 12 YEARS.

18 DO YOU KNOW AS YOU SIT HERE TODAY WHETHER  
19 HE SAID HE ONLY TOOK THESE DRUGS 12 YEARS AGO, OR COULD  
20 IT HAVE BEEN WITHIN THE 12 YEARS?

21 A FROM WHAT I REMEMBER IN WRITING IT, IT WAS  
22 12 YEARS AGO.

23 Q OKAY. DO YOU KNOW WHETHER HE HAD TAKEN IT  
24 AT ALL WITHIN THOSE 12 YEARS?

25 A NO.

26 WE WERE GOING OVER THE MEDICATION HISTORY,  
27 AND --

28 Q BASED ON YOUR ASSESSMENT OF PATIENTS, DID

1 YOU BELIEVE THAT HE WAS BEING TRUTHFUL TO YOU TO THE  
2 BEST OF HIS ABILITY?

3 MS. CAHAN: OBJECTION; CALLS FOR SPECULATION.

4 THE COURT: SUSTAINED.

5 MS. CHANG: WELL, I THINK DOCTORS CAN ASSESS  
6 WHETHER A PATIENT IS BEING EVASIVE OR SECRETIVE OR  
7 HIDING.

8 THE COURT: OKAY.

9 MS. CAHAN: THIS IS THE FIRST MEETING?

10 THE COURT: LAY OPINION AS TO WHAT SOMEONE --  
11 OVERRULED.

12 Q BY MS. CHANG: DID YOU BELIEVE THAT  
13 MR. JACKSON WAS BEING HONEST WITH YOU WHEN HE WAS  
14 ANSWERING YOUR QUESTIONS TO THE BEST OF HIS  
15 RECOLLECTION AND ABILITY?

16 A I BELIEVE HE WAS BEING HONEST MAINLY  
17 BECAUSE WHEN WE FIRST STARTED OUT -- WHEN I START OUT  
18 WITH ANYONE, IF ANYONE IN THIS ROOM WERE TO COME TO SEE  
19 ME, THE FIRST THING I WANT TO KNOW IS EVERYTHING THAT'S  
20 GOING ON WITH YOU BECAUSE I'M THERE TO HELP YOU. WE'RE  
21 WORKING TOGETHER AS A TEAM.

22 SO IF YOU DON'T TELL ME EVERYTHING THAT'S  
23 GOING ON WITH YOU RIGHT NOW, THEN I CAN'T HELP YOU  
24 NUTRITIONALLY, YOU KNOW. THAT'S WHAT I NEED TO KNOW.  
25 SO WE HAVE TO BE OPEN AND HONEST AND WORK TOGETHER AS A  
26 TEAM. SO --

27 Q OKAY.

28 A -- WHY WOULD I NOT BELIEVE SOMEONE?

1 Q AND TO BE CLEAR, THAT'S YOUR HANDWRITING ON  
2 THOSE SHEETS, NOT HIS HANDWRITING, CORRECT?

3 A IT IS MY HANDWRITING, YES.

4 Q OKAY. NOW LET'S LOOK AT PAGE 30 OF THE  
5 EXHIBIT THAT MS. CAHAN SHOWED YESTERDAY, WHICH FOR US  
6 WOULD BE 1119, DASH, 30.

7 THIS MEDICATION HISTORY THAT YOU TOLD US  
8 ABOUT, THIS FORM, YOU SAID YESTERDAY, ASKED PATIENTS  
9 FOR CATEGORIES OF DRUGS THAT A NATURAL REMEDY CAN  
10 REPLACE; IS THAT CORRECT?

11 A YES.

12 THIS IS A COMPANY THAT I BROUGHT UP  
13 YESTERDAY THAT OFFERS THE SAME -- THAT'S WHY IT'S SET  
14 UP THE WAY IT IS, SO THEY HAVE THE SAME EQUIVALENT  
15 THAT'S IN A NATURAL FORM.

16 Q OKAY. AND IN THIS FORM -- THIS IS A  
17 PRE-MADE FORM BY THAT COMPANY THAT YOU USE; IS THAT  
18 CORRECT?

19 A YES, IT IS.

20 Q AND DEMEROL IS NOT IN THIS FORM; IS THAT  
21 CORRECT?

22 A NO, IT ISN'T.

23 Q OKAY. AND MR. JACKSON INDICATED HE DIDN'T  
24 WANT TO TALK ABOUT THE SURGERIES THAT HE HAD, CORRECT?

25 A CORRECT.

26 Q AND IN YOUR PRACTICE, THAT'S NOT UNUSUAL  
27 WHEN DEALING WITH SOME PATIENTS WHO'VE HAD SURGERIES IN  
28 THE PAST, OR CELEBRITIES, FOR THAT MATTER; IS THAT

1 CORRECT?

2 A SOMETHING THAT WAS PAINFUL, CORRECT.

3 Q OKAY. NOW, DURING THIS TIME PERIOD, BASED  
4 ON YOUR CONVERSATION WITH MR. JACKSON, HE KNEW THAT YOU  
5 WERE A NATURAL, HOLISTIC HEALTHCARE PROVIDER, CORRECT?

6 A CORRECT.

7 Q YOU DISCUSSED THAT AND YOUR APPROACH,  
8 CORRECT?

9 A CORRECT.

10 Q AND THAT MEANT HE KNEW YOU WERE NOT GOING  
11 TO PRESCRIBE NARCOTICS OR PRESCRIPTION DRUGS TO HIM,  
12 CORRECT?

13 A CORRECT.

14 Q AND WOULD YOU AGREE THAT WHEN YOU STARTED  
15 TREATING HIM, HE WANTED TO TRY ONLY NATURAL REMEDIES  
16 FOR SLEEP?

17 CORRECT?

18 A CORRECT.

19 Q HE DID NOT WANT TO USE ANY TYPE OF SLEEP  
20 PRESCRIPTION DRUGS, CORRECT?

21 A CORRECT, WHEN WE STARTED, YES.

22 Q AND THE TWO OF YOU, IN FACT, HAD A PLAN,  
23 CORRECT?

24 A YES.

25 MS. CHANG: ALL RIGHT. AND LET'S LOOK AT  
26 PAGE 52. LET'S SHOW COUNSEL AND THE COURT FIRST,  
27 BUT --

28 ANY OBJECTION?



1 MS. CAHAN: NO.

2 MS. CHANG: OKAY. AT THE TOP THERE, LET'S SHOW  
3 THAT.

4 Q IT INDICATES -- I'M TRYING TO SEE WHERE IT  
5 IS. IT SAYS "NEEDS PRODUCTS FOR SLEEP, WILLING TO TRY  
6 NATURAL PRODUCTS"?

7 A YES.

8 Q ARE WE ON THE WRONG PAGE?

9 A I DON'T SEE --

10 Q IN ANY EVENT -- I'M TRYING TO FINISH THIS  
11 IN TIME.

12 DOCTOR, DO YOU RECALL THAT HE SAID "NEEDS  
13 PRODUCTS FOR SLEEP, WILLING TO TRY NATURAL PRODUCTS?"

14 A YES.

15 Q IT'S 53. SORRY. LET'S JUST HIGHLIGHT  
16 THAT, FIRSTLY.

17 "NEEDS PRODUCTS FOR SLEEP, WILLING TO TRY  
18 NATURAL PRODUCTS." OKAY. AND THAT WAS THE PLAN THAT  
19 THE TWO OF YOU DEvised TOGETHER; IS THAT CORRECT?

20 A YES.

21 Q HE LIKED THE IDEA, JUST LIKE FOR HIS  
22 CHILDREN, OF NOT HAVING CHEMICALS, HE WANTED TO GO  
23 NATURAL; FAIR TO SAY?

24 A FAIR TO SAY.

25 Q OKAY. AND HIS PRIMARY CONCERN WHILE HE SAW  
26 YOU WAS FATIGUE, BEING TIRED, NOT GETTING ENOUGH SLEEP,  
27 AND DIFFICULTY FALLING ASLEEP; WOULD THAT BE A FAIR  
28 ASSESSMENT?

1           A           WHEN WE FIRST STARTED, HIS INITIAL  
2 COMPLAINT WAS FATIGUE.

3           Q           OKAY. WOULD IT BE FAIR TO CHARACTERIZE  
4 YOUR TIME WITH HIM AS HAVING THOSE COMPLAINTS IN  
5 GENERAL?

6           A           YES.

7           Q           OKAY. AND THE FIRST TIME YOU SAW HIM --  
8 YOU CAN TAKE THAT DOWN.

9                   -- YOU NOTICED HE WAS GUZZLING DOWN THOSE  
10 RED BULL DRINKS; IS THAT CORRECT?

11          A           YES.

12          Q           AND YOU TOLD HIM TO STOP; FAIR TO SAY?

13          A           FAIR TO SAY.

14          Q           AND DURING YOUR TREATMENT OF HIM, DID YOU  
15 FIND HIM TO BE PRETTY COMPLIANT WITH WHAT YOU HAD  
16 SUGGESTED?

17          A           HE TOLD ME THAT, "WHATEVER YOU TELL ME, I  
18 NEED TO DO TO BE HEALTHY." THIS IS AROUND FEBRUARY OR  
19 SO.

20          Q           OKAY. AND HE --

21          A           "I WILL DO IT. I WILL STOP IT IF IT'S  
22 SOMETHING THAT'S NOT -- IS NOT GOING TO BE GOOD FOR  
23 ME."

24          Q           AND YOU WERE THERE THROUGHOUT THE HOUSE IN  
25 THE KITCHEN, LOOKING IN THE REFRIGERATOR DURING THAT  
26 TIME PERIOD THAT YOU WERE WITH HIM, CORRECT?

27          A           YES; BECAUSE I MADE HIS TEA AND DIFFERENT  
28 THINGS FOR HIM TO --

1 Q YOU HAD A BLENDER IN THE KITCHEN; FAIR TO  
2 SAY?

3 A THERE WAS ONE THERE.

4 Q OKAY. AND YOU SAW, AFTER YOU TALKED TO  
5 HIM, NO MORE RED BULL CANS IN THE REFRIGERATOR; FAIR TO  
6 SAY?

7 A I SAW NO MORE CASES OF RED BULLS.

8 Q OKAY. NO MORE RED BULL.  
9 AND INSTEAD, YOU SAW FRESH JUICES IN THE  
10 REFRIGERATOR?

11 A AS TIME WENT ON -- BECAUSE THERE WERE A  
12 COUPLE OF CHEFS THERE; AND AS TIME WENT ON -- BECAUSE I  
13 WAS GOING IN TO MAKE THE SMOOTHIE. WHEN I SAY  
14 "SMOOTHIE," AGAIN, IT SOUNDS LIKE SOMETHING SIMPLE, BUT  
15 IT WASN'T SIMPLE. AND, ACTUALLY, THE INGREDIENTS OF  
16 ALL THE PRODUCTS THAT I USED WERE IN HIS CHART. BUT AS  
17 TIME WENT ON, YES.

18 Q YOU SAW FRESH JUICES?

19 A I SAW FRESH. I SAID, "MAKE SURE IT'S ONLY  
20 ORGANIC, MAKE SURE THIS -- CERTIFIED ORGANIC, NOT JUST  
21 ORGANIC."

22 HE SAID, "OKAY. I'LL SEND UP TO THE STORE  
23 AND DO THIS." BUT I KNOW HE WAS CHANGING CHEFS; AND  
24 ONE NIGHT I CAME IN AND SAW ALL THESE GLASSES OF JUICE,  
25 EXACTLY WHAT I DISCUSSED WITH HIM, LABELED IN THE  
26 REFRIGERATOR.

27 AND I SAID, "HE'S LISTENING."

28 Q GOOD. THAT'S GOOD.

1 A YEAH.

2 Q AND HE STARTED ADDING PROTEIN TO HIS DIET;  
3 IS THAT CORRECT?

4 A OH, YES, YES.

5 Q AND HE STARTED EATING BETTER, CORRECT?

6 A OH, YES.

7 Q AND YOU OBSERVED, BECAUSE YOU ATE WITH HIM,  
8 CORRECT?

9 A I ATE WITH HIM, YES.

10 Q AND UNDER YOUR WATCH, YOU RESOLVED HIS  
11 PROBLEMS WITH HYPOGLYCEMIA, CORRECT?

12 A CORRECT.

13 Q AND THE VITAMIN D DEFICIENCY WAS RESOLVED,  
14 AS WELL, CORRECT?

15 A HE WAS ON THE D -- I USUALLY FOLLOW IT UP  
16 AFTER FOUR OR FIVE MONTHS TO SEE HOW -- THROUGH THE LAB  
17 WORK IF IT'S ACTUALLY IMPROVING, YES.

18 Q AND BASED ON YOUR INTERACTION WITH HIM, HE  
19 WAS LOVING THE WAY HE FELT UNDER YOUR PROGRAM, CORRECT?

20 A OH, YES, YES.

21 Q HE FELT ENERGETIC AND HE FELT GOOD,  
22 CORRECT?

23 A YES, HE DID.

24 Q AND HE LOVED THE FACT THAT IT WAS ALL  
25 NATURAL AND NO CHEMICALS, CORRECT?

26 A YES, CORRECT.

27 Q AND THERE WAS NO DOUBT IN YOUR MIND THAT  
28 MR. JACKSON WANTED TO BE HEALTHY, CORRECT?

1 A NO DOUBT AT ALL.

2 Q OKAY. HE LIKED GOING OVER THE LAB RESULTS  
3 WITH YOU AND SEEING IMPROVEMENT; WOULD THAT BE FAIR TO  
4 SAY?

5 A OH, YES, YES.

6 Q OKAY. AND BY FEBRUARY, IN FACT, HE ASKED  
7 YOU TO GO ON TOUR WITH HIM; WOULD THAT BE FAIR TO SAY?  
8 BECAUSE HE LOVED THE WAY HE WAS FEELING?

9 A YES, HE DID.

10 Q AND TO BE CLEAR, YOUR TREATMENTS CONSISTED  
11 OF MULTIPLE INFUSIONS THROUGH I.V. OF VITAMIN THERAPY  
12 AND WHAT'S KNOWN AS THE MYERS' COCKTAIL; IS THAT  
13 CORRECT?

14 A THAT'S CORRECT.

15 Q ALL RIGHT. LET'S JUST SHOW COUNSEL AND THE  
16 COURT EXHIBIT 1122.

17 MS. CAHAN: NO OBJECTION.

18 MS. CHANG: ALL RIGHT. LET'S SHOW THIS REAL  
19 QUICK.

20 ALL RIGHT. AND I DON'T KNOW IF EVERYONE  
21 CAN SEE THAT, BUT MAYBE WE CAN BLOW IT UP A LITTLE BIT.

22 Q THIS IS THE MYERS' COCKTAIL -- THIS IS SOME  
23 PICTURES THAT YOU USE ON YOUR WEBSITE; IS THAT FAIR TO  
24 SAY?

25 A THAT'S A COMBINATION OF TWO WEBSITES.

26 Q OKAY. AND THIS IS -- THE MYERS' COCKTAIL  
27 CONSISTS OF MAGNESIUM, CALCIUM, VITAMIN B-12, VITAMIN  
28 B-6, PANTHENOL, B COMPLEX AND VITAMIN C; IS THAT --

1 A THAT'S CORRECT.

2 Q OKAY.

3 A AND I JUST WANT TO SAY THAT I MADE IT VERY  
4 CLEAR TO HIM WHEN I SAW HIM -- BECAUSE NOW THAT VITAMIN  
5 C'S ARE BIG IN THE MEDIA NOW, THAT I TOLD HIM I USE A  
6 NON-CORN VITAMIN C BECAUSE CORN IS A G.M.O. I WENT  
7 THROUGH THE WHOLE THING WITH HIM.

8 Q WHAT'S A G.M.O.?

9 A GENETICALLY MODIFIED ORGANISMS.

10 Q ARE THOSE THE BIG FAT TOMATOES, THOSE  
11 HUGE --

12 A THOSE, STRAWBERRIES, AND A LOT OF OTHER  
13 THINGS.

14 Q THOSE TASTELESS STRAWBERRIES?

15 A AND YOUR SQUASH, THE YELLOW HOOK NECK  
16 SQUASH.

17 Q WE'LL STAY AWAY FROM THOSE.

18 SO THESE ARE THE VITAMINS. NOW, TO USE IT  
19 FOR SLEEP, WHAT ONE OF THOSE ITEMS DO YOU INCREASE?

20 A THE MAGNESIUM.

21 Q OKAY. SO IF YOU -- YOU CONTROL THE DOSAGE  
22 OF THESE NATURAL INGREDIENTS AND ON -- IN SOME  
23 PROPORTION, THEY GIVE YOU MORE ENERGY, AND IN SOME  
24 PROPORTION, THEY HELP YOU SLEEP? IS THAT --

25 A EXACTLY.

26 Q OKAY. WE CAN TAKE THAT DOWN.

27 AND, DOCTOR, DO YOU HAVE A SPECIAL  
28 TECHNIQUE OR WAY ABOUT INSERTING NEEDLES TO TAKE BLOOD

1 FOR LAB WORK OR INFUSING I.V.'S THAT ALLOW PATIENTS WHO  
2 ARE SCARED OF NEEDLES TO BE LESS AFRAID?

3 A YES.

4 Q AND WHAT IS THAT?

5 A WELL, WHAT I DO, I WANT TO REASSURE MY  
6 PATIENT ABOUT, YOU KNOW, THE NEEDLE. BECAUSE MOST  
7 PEOPLE THINK A NEEDLE, THEY THINK OF SOMETHING VERY  
8 LARGE. AND I ACTUALLY USE VERY SMALL BUTTERFLY  
9 NEEDLES, ALMOST LIKE PEDIATRIC.

10 THE ONE THING I DO, AND I DID WITH  
11 MR. JACKSON -- BECAUSE, UNFORTUNATELY, HE HAD VERY,  
12 VERY SMALL VEINS. BASICALLY THE ONES THAT YOU CAN SEE  
13 WELL WERE THE ONES THAT WERE IN HIS HAND. SO WHAT I DO  
14 IS, NUMBER 1, SHOW THEM I'M GOING TO USE A SMALL  
15 VEIN -- A SMALL NEEDLE, AND I PRAY OVER MY VEINS FIRST.

16 YOU KNOW, I JUST TAKE MY HAND LIGHTLY, AND  
17 I SAY, "WE'RE JUST GOING TO MEDITATE OVER THIS VEIN SO  
18 I DON'T MISS, AND SO THAT YOU CAN HAVE LESS PAIN." SO  
19 I TRY TO HOLD THEIR HANDS AND REASSURE THEM THAT I'M  
20 GOING TO -- YOU'RE GOING TO HAVE AS LESS DISCOMFORT AS  
21 POSSIBLE.

22 I'VE BEEN A PATIENT MOST OF MY LIFE. NO  
23 ONE DID THAT WITH ME. IT WOULD HAVE BEEN VERY NICE IF  
24 I WAS TREATED THE SAME WAY I TREAT OTHER PEOPLE. SO I  
25 TRY TO MAKE THEM AS COMFORTABLE AS POSSIBLE.

26 BUT THE ONE THING THAT I JUST WANT TO SAY  
27 THAT I FEEL IS SO POWERFUL, AND THE REASON WHY PEOPLE  
28 FEEL SO GOOD, JUST LIKE MOST PEOPLE BLESS THEIR FOOD

1 AND PRAY OVER THEIR FOOD, I HOLD THE I.V. AND BLESS AND  
2 PRAY OVER THE I.V.'S.

3 I THINK IT'S VERY IMPORTANT. IT'S  
4 SOMETHING GOING IN YOUR BODY; SO JUST LIKE YOU'RE  
5 EATING YOUR FOOD GOING IN YOUR BODY, IT SHOULD BE  
6 BLESSED OVER.

7 Q AND MR. JACKSON APPRECIATED THAT?

8 A OH, YES.

9 Q WAS HE SECRETIVE AT ALL ABOUT THIS  
10 TREATMENT?

11 A ABOUT HIS I.V.'S?

12 Q YES.

13 A NO.

14 THERE'S TWO PEOPLE -- ONE IN PARTICULAR  
15 THAT HE WANTED TO GO TALK TO HER SO SHE COULD RECEIVE  
16 THE I.V.'S, ALSO.

17 Q OKAY. WERE HIS CHILDREN AROUND ALL THE  
18 TIME WHEN --

19 A THEY WERE SITTING THERE -- WE WOULD ALL SIT  
20 IN THE LIVING ROOM TOGETHER.

21 Q OKAY. AND WHO WAS THAT OTHER PERSON?

22 A ELIZABETH TAYLOR.

23 Q OKAY. AND DID HE WANT ANYONE ELSE IN HIS  
24 HOUSEHOLD STAFF TO RECEIVE THESE TREATMENTS?

25 A ACTUALLY, HE TOLD ME HE WANTED ME TO TAKE  
26 CARE OF GRACE.

27 Q GRACE HAD SOME PHYSICAL ISSUES?

28 A I GUESS I AM UNDER --



1 Q WE DON'T HAVE TO --

2 A YES.

3 Q SO THROUGHOUT THE TIME PERIOD FROM JUNE TO  
4 APRIL, WERE YOU EVER TOLD NEVER TO GO UPSTAIRS?

5 A NO.

6 Q DID YOU HAVE FREE ACCESS TO GO THROUGHOUT  
7 THE HOUSE?

8 A I HAD FREE -- YES.

9 Q OKAY. AND THE ROOMS AND THE HOUSE WERE  
10 ALWAYS VERY CLEAN AND ORDERLY AND NEAT?

11 A OH, YES.

12 Q OKAY.

13 A YES.

14 Q THERE WERE NO LOCKED DOORS THAT YOU SAW?

15 A NO.

16 Q OKAY. AND DURING THIS TIME PERIOD, WERE  
17 YOU THERE SOMETIMES IN THE EARLY MORNING?

18 A OH, YES.

19 Q AND SOMETIMES IN THE MID AFTERNOON?

20 A YES.

21 Q SOMETIMES ALL DAY?

22 A YES.

23 Q SOMETIMES LATE AT NIGHT?

24 A YES.

25 Q SOMETIMES THROUGHOUT THE NIGHT?

26 A EXACTLY.

27 Q AND SOMETIMES A COMBINATION?

28 A YES.

1 Q OKAY. AND SOMETIMES YOU CAME ONCE A WEEK?

2 A YES.

3 Q AND OTHER TIMES YOU CAME SEVERAL TIMES  
4 DURING THE WEEK?

5 A YES.

6 Q ALL RIGHT.

7 A SOMETIMES TWICE IN ONE DAY.

8 Q AND DURING THIS ENTIRE TIME PERIOD FROM  
9 JANUARY TO APRIL OF 2009, YOU NEVER SAW  
10 DR. CONRAD MURRAY; IS THAT FAIR TO SAY?

11 A THAT'S FAIR TO SAY.

12 Q YOU NEVER MET HIM AT THE CAROLWOOD HOUSE,  
13 CORRECT?

14 A NO.

15 Q YOU NEVER HEARD HIS NAME?

16 A NO.

17 Q YOU NEVER SAW ANY MEDICAL SUPPLIES FROM  
18 ANYONE ELSE THERE, CORRECT?

19 A CORRECT.

20 Q YOU HAVE AN I.V. POLE THAT YOU LEFT IN THE  
21 ROOM THAT YOU WERE TREATING HIM, CORRECT?

22 A CORRECT.

23 Q BUT OTHER THAN THAT, YOU TOOK EVERYTHING  
24 HOME WITH YOU?

25 A THERE WAS A NEBULIZER THERE.

26 Q OKAY.

27 A BECAUSE I BELIEVE WHEN YOU HAVE A COLD OR  
28 PROBLEMS WITH THE THROAT, I USE GLUTATHIONE, WHICH IS

1 AN AMINO ACID FOR INHALATION TREATMENT. SO THAT WAS  
2 THERE.

3 Q SO FOR SOME OF US WHO ARE NOT IN THE  
4 MEDICAL FIELD, WHAT IS A NEBULIZER?

5 A A NEBULIZER IS A MACHINE THAT GIVES  
6 MEDICATION THROUGH -- LIKE AN ASTHMATIC. AND THE  
7 REASON WHY I USE GLUTATHIONES AND BECAME A BIG PART OF  
8 THAT IS BECAUSE MY COMAS WERE DUE TO ASTHMA, SO I --  
9 THE GLUTATHIONE HELPS WITH THAT, BUT IT ALSO  
10 STRENGTHENS YOUR VOCAL CORDS, TOO. AND COLDS. SO IT'S  
11 A MASK YOU PUT OVER THE MOUTH AND MEDICATION IS PUT  
12 INTO IT WITH A --

13 Q AND THAT'S GOOD FOR HIS VOCAL CORDS,  
14 CORRECT?

15 A VOCAL CORDS AND JUST OVERALL.

16 Q OKAY. AND, DOCTOR, YOU SAW NO OTHER I.V.  
17 POLES OTHER THAN THE ONE THAT YOU LEFT, CORRECT?

18 A CORRECT.

19 Q YOU NEVER SAW ANY DIPRIVAN IN BOXES AT HIS  
20 HOUSE, CORRECT?

21 A NEVER SAW ANY MEDICATION IN VIALS AT ALL.

22 Q YOU NEVER SAW ANY LARGE OXYGEN TANKS  
23 ANYWHERE IN THE HOUSE, CORRECT?

24 A CORRECT.

25 Q AND THAT'S UP TO THE APRIL 19TH, 2009,  
26 CORRECT?

27 A YES.

28 Q AND I JUST WANT TO BE CLEAR. LET'S BRING

1 UP EXHIBIT 941, WHICH IS ALREADY IN EVIDENCE. THIS IS  
2 THE MAP OF THE SECOND FLOOR OF THE CAROLWOOD HOUSE.  
3 CAN WE BLOW UP THE PART WITH BEDROOM TWO.

4 ALL RIGHT. DOCTOR, THE SECOND BEDROOM,  
5 BEDROOM TWO, THAT IS WHERE YOU GAVE SOME OF YOUR  
6 TREATMENTS; IS THAT CORRECT?

7 A CORRECT.

8 Q AND WHILE YOU WERE IN THAT ROOM, YOU NEVER  
9 SAW ANY SIGNS THAT THERE WAS ANOTHER DOCTOR WHO WAS  
10 TREATING MR. JACKSON IN THAT ROOM; WOULD THAT BE FAIR  
11 TO SAY?

12 A THAT WOULD BE FAIR TO SAY.

13 Q OKAY. AND THAT WAS TRUE AS OF APRIL 2009,  
14 CORRECT?

15 A I'M SORRY?

16 Q THAT WAS TRUE AS OF APRIL 2009, CORRECT?

17 A CORRECT.

18 Q APRIL 19TH, 2009?

19 A YES.

20 I HAVEN'T SEEN THAT SINCE.

21 Q OKAY. NOW, IN JANUARY --

22 WE CAN TAKE THAT DOWN.

23 -- WHEN YOU FIRST MET MR. JACKSON, WOULD  
24 YOU SAY THAT HE WAS EXCITED AND HAPPY TO BE GOING ON  
25 THE "THIS IS IT" TOUR?

26 A HE WAS VERY HAPPY, HE WAS VERY EXCITED.

27 THERE WERE TIMES I WOULD BE THERE AT NIGHT AND HE WOULD  
28 BE GOING OVER PAGE AFTER PAGE OF MUSIC THAT -- SONGS

1 THAT HE KNEW THEY WANTED TO HEAR. HE AND THE KIDS.  
2 AND WE WERE JUST ALL --

3 Q DID HE MAKE IT A FAMILY PROJECT?

4 A HE MADE IT A FAMILY PROJECT. HE MADE IT  
5 FUN FOR THEM, TOO; AND THEY WERE ALL EXCITED.

6 Q AND WOULD YOU SAY IN FEBRUARY HE WAS STILL  
7 EXCITED?

8 A OH, YES.

9 Q DID THERE COME A TIME WHEN YOU WERE AWARE  
10 THAT HE WAS GOING TO BE LEAVING FOR LONDON FOR A PRESS  
11 CONFERENCE IN MARCH OF 2009?

12 A YES, HE WENT TO --

13 Q DID YOU NOTICE ANY CHANGE IN HIM AFTER HE  
14 RETURNED FROM THAT PRESS CONFERENCE?

15 A WHEN HE RETURNED, HE WASN'T AS JOVIAL, HE  
16 WASN'T --

17 Q WAS HE MORE QUIET AND SUBDUED?

18 A HE WAS A LITTLE BIT -- A LITTLE BIT MORE  
19 QUIETER, HE WASN'T -- WE WERE WATCHING THE MOVIES  
20 DURING HIS I.V.'S, BUT NOT AS TALKATIVE.

21 MS. CHANG: OKAY. I WANT TO SHOW PAGE 49 OF THE  
22 MEDICAL RECORDS, WHICH IN OUR RECORDS WOULD BE 1119,  
23 DASH, 49.

24 MS. CAHAN: NO OBJECTION.

25 Q BY MS. CHANG: AND JUST TO GIVE YOU A  
26 REMINDER, DOCTOR -- AND WE'LL BLOW UP THAT FIRST  
27 SECTION. IT INDICATES "VERY STRESSFUL DAY TODAY, VERY  
28 LONG DAY."

1 CAN WE HIGHLIGHT THAT?

2 AND THAT IS 3/24/09?

3 A YES.

4 Q OKAY. AND DO YOU RECALL HIM -- DID YOU  
5 NOTICE ANY INCREASE IN STRESS AND ANXIETY IN  
6 MR. JACKSON AS TIME PROGRESSED FROM MARCH TO APRIL?

7 A YES, I DID.

8 Q DID YOU NOTICE WHEN YOU'D COME TO THE HOUSE  
9 THAT THERE WERE SOMETIMES CARS AT THE HOUSE FOR  
10 MEETINGS?

11 A WELL, IF -- IF HIS STAFF OR HE HAD CALLED  
12 FOR ME TO BE THERE AT A CERTAIN TIME, AND I ARRIVED, A  
13 COUPLE OF TIMES I ARRIVED AND THE YARD WAS ALL FULL OF  
14 CARS, SECURITY MET ME OUT FRONT, SO -- AND ASKED ME  
15 WOULD I JUST PARK AROUND TO THE SIDE BECAUSE THEY WERE  
16 ENDING A MEETING. SO I DIDN'T SEE ANYONE, I JUST  
17 SAW --

18 Q CARS?

19 A EXPENSIVE CARS.

20 Q OKAY. NICE CARS?

21 A YEAH.

22 Q OKAY. DID YOU NOTICE THAT HE WAS GETTING  
23 INCREASINGLY MORE ANXIOUS AS TIME WENT BY?

24 A YEAH, BECAUSE HE WAS -- EVEN THAT NIGHT  
25 WHEN I WENT IN AFTER EVERYONE LEFT, HE -- HE WAS VERY  
26 QUIET. I DIDN'T -- HE WASN'T --

27 Q OKAY. DID HE SAY THAT REHEARSALS WERE  
28 STRENUOUS?

1 MS. CAHAN: OBJECTION; HEARSAY.

2 THE COURT: SUSTAINED.

3 MS. CHANG: WELL, I THINK -- YOUR HONOR, IT WOULD  
4 BE RELATED TO HIS STATEMENTS OF HIS PHYSICAL CONDITION  
5 OR STATE OF MIND AS SHE'S GIVING HIM TREATMENT OR  
6 DIAGNOSIS.

7 MS. CAHAN: THERE'S NO FOUNDATION RIGHT NOW  
8 THAT --

9 MS. CHANG: OKAY. I CAN LAY THE FOUNDATION.

10 Q DOCTOR, DURING YOUR TREATMENT OF  
11 MR. JACKSON, DID YOU ALWAYS TRY TO ASSESS, AS WE'VE  
12 SEEN IN YOUR NOTES, HIS MOOD, HIS MENTAL CONDITION AND  
13 HIS EMOTIONAL CONDITION AS PART OF THE HOLISTIC  
14 APPROACH TO HIS NUTRITIONAL CARE?

15 A YES.

16 Q ALL RIGHT. AND DID YOU MAKE IT A POINT IN  
17 EACH -- FROM JANUARY TO APRIL TO ASSESS HOW HE WAS  
18 EVERY DAY; HAPPY, EXCITED, ANGRY, AGITATED, STRESSFUL,  
19 OR ANXIOUS?

20 A YES.

21 Q THAT'S PART OF WHAT YOU DO?

22 A THAT'S PART OF WHAT I DO.

23 IF HE SAID, "IT'S GOING TO BE A STRESSFUL  
24 DAY," THAT'S WHY I WENT THAT MORNING, TOO. IF IT'S  
25 A.M. AND HE SAYS IT'S GOING TO BE A LONG, STRESSFUL  
26 DAY, THAT'S WHY I WOULD GIVE THE B-12 SHOTS.

27 Q AND DID YOU TRY TO ASSESS WHAT WAS GOING ON  
28 IN HIS LIFE THAT WOULD MAKE HIM STRESSFUL BY ASKING

1 HIM, "WHAT DO YOU HAVE?" LIKE ARE REHEARSALS  
2 STRESSFUL, ARE PEOPLE --

3 A HE WOULD JUST VOLUNTEER AND SAY, "IT'S THE  
4 REHEARSAL, THE REHEARSAL, THIS IS GOING TO BE A VERY  
5 STRESSFUL DAY AND, YOU KNOW, BECAUSE, YOU KNOW, I'M  
6 REHEARSING, I'M GOING TO BE LEAVING SOON."

7 Q OKAY. BY THE TIME MR. JACKSON ASKED FOR  
8 DIPRIVAN ON APRIL 19TH, WOULD YOU SAY HE WAS DESPERATE?

9 MS. CAHAN: OBJECTION; CALLS FOR SPECULATION.

10 THE COURT: OVERRULED.

11 THE WITNESS: WELL, IT WAS PUT OUT THAT I SAID HE  
12 BEGGED. HE DIDN'T BEG. HE WAS JUST VERY PERSISTENT.  
13 HE WAS EXTREMELY PERSISTENT WHEN HE ASKED ME FOR IT,  
14 BECAUSE HE SAID, "I NEED TO GET SOME SLEEP."

15 Q BY MS. CHANG: DID HE SEEM ANXIOUS?

16 A YES.

17 Q AND WAS PART OF YOUR CONCERN OVER HIS  
18 REQUEST WAS THAT ALL OF A SUDDEN -- IT WAS A SUDDEN  
19 DEPARTURE FROM HIS DESIRE NOT TO RELY ON PRESCRIPTION  
20 MEDICATION FOR SLEEP, AND NOW TO ASK FOR DIPRIVAN?

21 A IT WAS A CONCERN BECAUSE HE WAS GETTING --  
22 IT WAS CONCERNED -- I WAS CONCERNED; BUT, ALSO, HE  
23 SAID, "I ONLY HAVE A FEW -- A LITTLE TIME LEFT FOR  
24 REHEARSAL, AND I NEED TO SLEEP ALL NIGHT. I HAVE TO  
25 SLEEP ALL NIGHT."

26 Q BUT YOU HAD INDICATED HE TOLD YOU HE WANTED  
27 TO PERFORM WELL SO HE WANTED TO BE REALLY ORGANIC AND  
28 HEALTHY, CORRECT?



1 A YES.

2 Q AND HE WOULD DO ANYTHING YOU TOLD HIM TO  
3 DO?

4 A YES.

5 Q OKAY. AND HE WAS LOVING THE WAY HE FELT?

6 A YES.

7 Q ALL RIGHT. AND AS A HOLISTIC NUTRITIONIST,  
8 WOULD IT BE FAIR TO SAY THAT YOU, DR. LEE, HAD NEVER  
9 HEARD OF DIPRIVAN BEFORE?

10 A NO, I HAD NOT HEARD OF IT.

11 Q AND YOU CERTAINLY NEVER PRESCRIBED IT  
12 BEFORE?

13 A NO.

14 Q YOU CERTAINLY NEVER ADMINISTERED IT BEFORE,  
15 CORRECT?

16 A NO.

17 Q YOU WANTED HIM TO STAY ON THE NATURAL,  
18 HOLISTIC COURSE; FAIR TO SAY?

19 A FAIR TO SAY.

20 Q ALL RIGHT. AND THE P.D.R. THAT YOU HAD  
21 USED, I THINK YOU HAD SAID IN YOUR NOTES, WAS A 2005  
22 P.D.R.; IS THAT CORRECT?

23 A I BELIEVE SO. I DON'T --

24 Q OKAY. AND IT WAS -- THE P.D.R. STANDS FOR  
25 PHYSICIAN'S DESK REFERENCE; IS THAT FAIR TO SAY?

26 A YES.

27 Q IS THIS AN EXAMPLE OF A PHYSICIAN'S DESK  
28 REFERENCE, 2005?

1 A YES.

2 Q IS THIS SIMILAR TO THE ONE THAT YOU HAD IN  
3 YOUR --

4 A THEY'RE ALL THE SAME COLOR.

5 Q OKAY. BLUE?

6 A YEAH.

7 Q OKAY. AND THIS IS WHAT YOU LUGGED OVER TO  
8 HIS HOUSE?

9 A YES, SURE DID, PUT IT ON HIS LAP.

10 Q ALL RIGHT. AND -- AND YOU HAVE -- YOU'RE  
11 FAMILIAR WITH IT FROM YOUR YEARS OF NURSING; IS THAT  
12 CORRECT?

13 A YES.

14 Q WOULD YOU AGREE, DR. LEE, THAT PART OF THE  
15 REASON WHY YOU PULLED IT FROM YOUR OFFICE AND BROUGHT  
16 IT TO HIS HOUSE IS BECAUSE YOU KNEW THAT THE P.D.R. HAS  
17 ALL THE SYMPTOMS AND WARNINGS GIVEN BY MANUFACTURERS  
18 LISTED IN IT?

19 A YES.

20 Q OKAY. AND MANUFACTURERS USUALLY LIST  
21 EVERYTHING, WOULD YOU AGREE?

22 A YES, THEY DO.

23 Q AND IF WE LOOK THROUGH THAT BOOK, ALMOST  
24 ALL OF THE DRUGS WOULD INDICATE THAT THE BOTTOM LINE IS  
25 DEATH; FAIR TO SAY?

26 A YES.

27 Q OKAY. I THINK YOU INDICATED LIPITOR  
28 YESTERDAY.

1 A YES.

2 Q AND AMBIEN.

3 IF WE LOOKED UP AMBIEN, A SLEEP DRUG THAT  
4 MR. JACKSON HAD USED, THAT WOULD HAVE SOME OF THE SAME  
5 SYMPTOMS THAT YOU ASCRIBED TO DIPRIVAN?

6 A ACTUALLY --

7 MS. CAHAN: OBJECTION; HEARSAY, YOUR HONOR, AS TO  
8 WHAT THE P.D.R. SAYS ABOUT ANOTHER DRUG.

9 THE COURT: SUSTAINED.

10 MS. CHANG: I DIDN'T HEAR THE OBJECTION.

11 THE COURT: IT WAS HEARSAY AS TO WHAT THE P.D.R.  
12 SAYS ABOUT AMBIEN.

13 THE WITNESS: ON AMBIEN --

14 MS. CHANG: THERE'S AN OBJECTION.

15 THE WITNESS: WE DID DISCUSS AMBIEN.

16 THE COURT: THAT'S OKAY.

17 MR. PANISH: JUST A SECOND.

18 MS. CHANG: OKAY. LET ME JUST -- DOCTOR, IT'S  
19 REALLY MY INTENT, BECAUSE YOU'VE BEEN SO GOOD, TO GET  
20 YOU OUT OF HERE; SO I'M JUST GOING TO GO REAL FAST  
21 HERE.

22 Q DOCTOR, WHEN YOU TALKED TO -- YOU KNOW THAT  
23 MOST OF THE DRUGS THAT ARE LISTED IN THE P.D.R. HAVE  
24 SIMILAR SYMPTOMS AND END RESULTS AS DIPRIVAN, CORRECT?

25 A SAY THAT AGAIN?

26 Q DEATH IS LISTED IN MOST DRUGS, CORRECT?

27 A BOTTOM LINE?

28 Q YES.

1 A YES.

2 Q OKAY. AND YOU HAVE NO IDEA, DR. LEE, IF  
3 OTHER ANESTHESIOLOGISTS OR DOCTORS HAVE PREVIOUSLY GONE  
4 OVER DIPRIVAN USING A P.D.R. JUST LIKE THIS, CORRECT?

5 A NO.

6 Q OKAY. YOU TOLD MR. JACKSON THAT ANY DOCTOR  
7 THAT WOULD GIVE HIM PROPOFOL AT HIS HOUSE WOULDN'T CARE  
8 ABOUT HIM, BUT THEY WOULD BE DOING IT JUST FOR MONEY;  
9 IS THAT FAIR TO SAY?

10 A THAT'S FAIR TO SAY.

11 Q OKAY. WHEN HE TALKED TO YOU ABOUT USING  
12 DIPRIVAN, HE HAD TOLD YOU THAT HE HAD USED IT A LONG  
13 TIME AGO, CORRECT?

14 A YES.

15 Q DO YOU KNOW IF HE COULD REMEMBER THE NAME  
16 OF THE DOCTOR WHO GAVE IT TO HIM A LONG TIME AGO?

17 MS. CAHAN: OBJECTION; CALLS FOR SPECULATION.

18 MS. CHANG: I'M JUST ASKING IF SHE KNOWS.

19 THE COURT: OKAY. YES OR NO?

20 THE WITNESS: NO, HE DIDN'T KNOW -- HE DIDN'T  
21 TELL ME.

22 Q BY MS. CHANG: BUT HE DID TELL YOU, DOCTOR,  
23 THAT HE WAS TOLD BY A DOCTOR THAT IT WAS SAFE AS LONG  
24 AS SOMEONE WAS MONITORING HIM, CORRECT?

25 A YES.

26 Q AND IN APRIL OF 2009, HE WAS ASKING YOU IF  
27 YOU COULD HELP HIM FIND SOMEONE; WOULD THAT BE FAIR TO  
28 SAY?

1 A YES.

2 AND HE DIDN'T MEAN "SOMEONE," HE MEANT AN  
3 ANESTHESIOLOGIST.

4 Q OKAY. HE ASKED YOU IF YOU KNEW OF AN  
5 ANESTHESIOLOGIST?

6 A ANESTHESIOLOGIST.

7 Q AND TO BE CLEAR, HE NEVER ASKED YOU TO  
8 ADMINISTER DIPRIVAN TO HIM, CORRECT?

9 A NO.

10 Q HE ASKED YOU TO FIND SOMEONE, CORRECT?

11 A YES; AND THAT I COULD ACCOMPANY -- I COULD  
12 COME WITH THEM, ALSO.

13 Q DR. LEE, UP TO THAT POINT IN TIME, YOU HAD  
14 GIVEN HIM MANY I.V. NUTRIENT TREATMENTS AND YOU SAW HIS  
15 ARMS, CORRECT?

16 A YES.

17 Q YOU HAD GIVEN HIM B-12 INJECTIONS IN THE  
18 BUTTOCK; WOULD THAT BE FAIR TO SAY?

19 A CORRECT.

20 Q YOU SAW HIS BODY?

21 A YES.

22 Q OKAY. DID YOU EVER SEE SIGNS OF NEEDLE  
23 MARKS OR ANY DISCOLORATION INDICATIVE OF I.V. USE THAT  
24 MADE YOU SUSPECT HE WAS GETTING I.V. TREATMENTS FROM  
25 ANOTHER DOCTOR?

26 A NO.

27 Q BASED ON YOUR ASSESSMENT OF HIS SITUATION  
28 AND HIS TREATMENTS AND BEING AT HIS HOUSE, AND TALKING

1 TO HIM AND ASSESSING HIM, YOUR WORKING KNOWLEDGE WAS  
2 THAT HE HAD NOT YET STARTED TAKING ANY TYPE OF DIPRIVAN  
3 OR MEDICATION FOR SLEEP AS OF APRIL 19TH, 2009?

4 MS. CAHAN: OBJECTION; CALLS FOR SPECULATION.

5 THE COURT: SUSTAINED.

6 MS. CHANG: OKAY.

7 Q BASED ON THE HOUSE AND WHAT YOU SAW AND  
8 OBSERVED, YOU NEVER SAW ANY SIGNS OF DIPRIVAN INFUSION  
9 AS OF APRIL 19TH, 2009, CORRECT?

10 A FROM THE TIME I SAW HIM UNTIL APRIL 9TH --

11 Q 19TH.

12 A -- 19TH, I SAW NO SIGNS ON HIS BODY OF ANY  
13 INJECTIONS, AND I CERTAINLY DIDN'T SEE ANY VIALS OF  
14 ANYTHING IN HIS HOUSE.

15 Q OKAY. ALL RIGHT. AND DID HE SOUND  
16 DESPERATE AS OF APRIL 19TH FOR YOU TO FIND HIM SOMEONE?

17 A YES.

18 Q AND, IN FACT, HE SAID, "I'M NOT GOING TO BE  
19 ABLE TO REHEARSE, I CAN'T DO THIS WITHOUT IT"; IS THAT  
20 FAIR TO SAY?

21 A WELL, THE MORNING THAT HE WOKE UP AND STOOD  
22 ON THE BED AND RAN OFF TO THE BATHROOM, WHEN HE CAME  
23 BACK, HE SAID THAT THE DAY WAS NOT GOING TO BE A GOOD  
24 DAY FOR HIM AT ALL, AND IT WAS NOT GOING TO BE A GOOD  
25 REHEARSAL DAY BECAUSE HE DID NOT GET A GOOD NIGHT'S  
26 SLEEP.

27 AND HE JUST SEEMED VERY FRANTIC. SO HE  
28 JUST HELPED ME GATHER UP MY BAGS QUICKLY AND -- SO I

1 COULD LEAVE. AND LIKE I SAY, HE GAVE ME A HUG BEFORE I  
2 LEFT AND SAID THANK YOU. AND FROM APRIL 19TH, I DID  
3 NOT SEE HIM --

4 Q OKAY.

5 A -- ANYMORE.

6 Q NOW, WHEN YOU TALKED TO HIM, YOU SAID HE  
7 LEANED IN TO YOU.

8 DID YOU HAVE A CHANCE TO LOOK INTO HIS  
9 EYES?

10 A WHEN HE ASKED ME ON THE 19TH?

11 Q YES.

12 A ABOUT THE DIPRIVAN?

13 Q YES.

14 A YOU KNOW, AS -- AS A PRACTITIONER, WHEN  
15 YOU'RE DISCUSSING THINGS WITH PEOPLE IN CLASSES THAT  
16 YOU TAKE, ESPECIALLY THE PSYCHOLOGY COMPONENTS, WHEN A  
17 PERSON IS LEANING IN TALKING TO YOU, AND YOU -- YOU CAN  
18 SEE THE SINCERENESS IN HIS EYES -- HE SAW THAT I WAS  
19 CONCERNED ABOUT HIM NOT LETTING ANYONE GIVE HIM  
20 DIPRIVAN.

21 I EVEN WENT AS FAR AS TO SAY THAT, "YOU  
22 FEEL LIKE FAMILY, I'VE BEEN KNOWING YOU FOR ALL MY  
23 LIFE, YOUR MUSIC, AND I WOULDN'T GIVE THAT TO MY FAMILY  
24 MEMBER IN THE HOME. IT HAS ITS OWN SETTING, BUT THIS  
25 ISN'T IT, NOT IN THE HOUSE. YOU DON'T DO THAT." SO --

26 Q DID HE --

27 A REALLY --

28 Q DID HE --

1 A REALLY --

2 Q I'M SORRY. GO AHEAD, DOCTOR.

3 A SO WHEN HE LEANED IN TO ME, HE WAS VERY  
4 SINCERE. HE SAID, "YOU DON'T UNDERSTAND." AND HE KEPT  
5 HITTING HIS WRIST. HE SAID, "YOU DON'T UNDERSTAND. I  
6 NEED SLEEP. I NEED SOMETHING THAT'S GOING TO KNOCK ME  
7 OUT AS SOON AS IT DRIPS IN MY VEINS SO I CAN GO TO  
8 SLEEP."

9 Q DID HE APPEAR TO YOU AS EARNEST IN HIS  
10 BELIEF THAT A DOCTOR TOLD HIM THAT IT WAS SAFE?

11 A THAT WAS MY MAJOR PROBLEM.

12 Q AND YOU TOLD US ABOUT YOUR EXPERIENCE WITH  
13 YOUR MOTHER YESTERDAY.

14 WOULD YOU AGREE THAT A PATIENT BELIEVING A  
15 DOCTOR IS NOT UNUSUAL, IN YOUR EXPERIENCE?

16 A IF I COULD TELL YOU THE PERCENTAGE OF  
17 PEOPLE WHO COME TO ME AND TELL ME, "MY DOCTOR TOLD ME I  
18 NEED TO DO ALL THESE THINGS WITHOUT EVEN GETTING A  
19 SECOND OPINION" --

20 Q IT'S NOT UNUSUAL, CORRECT?

21 A IT IS -- IT IS -- NO, IT'S NOT UNUSUAL.

22 Q OKAY. AND YOU DON'T KNOW WHAT DOCTOR WAS  
23 TELLING HIM IT WAS SAFE, CORRECT?

24 A NO.

25 Q AND YOU HAVE NO IDEA AS YOU SIT HERE TODAY  
26 WHAT CAUSED MR. JACKSON TO DEVIATE FROM YOUR JOINT PLAN  
27 TO USE ONLY NATURAL, HOLISTIC REMEDIES TO TREAT HIS  
28 SLEEP DISORDER OR INSOMNIA, CORRECT?



1 A I'M SORRY. COULD YOU SAY THAT AGAIN?

2 Q SURE.

3 YOU HAVE NO IDEA WHAT CAUSED MR. JACKSON TO  
4 DEVIATE FROM THE JOINT PLAN OF THE NATURAL HOLISTIC  
5 PLAN YOU GUYS DEvised AND -- AND GO WITH ANOTHER  
6 ALTERNATIVE, CORRECT?

7 YOU HAVE NO IDEA WHY, CORRECT?

8 A I DON'T KNOW WHY HE WAS PERSISTENT IN DOING  
9 THAT AND NOT EVEN WANTING TO DO THE OTHER TREATMENTS OR  
10 TESTING TO FIND OUT WHY HE HAD INSOMNIA. BECAUSE I  
11 SAID, "LET'S JUST FIND OUT WHY," AND HE SAID, "I DON'T  
12 HAVE TIME TO FIND OUT WHY. I'M LEAVING TO GO AND START  
13 THIS -- THE TOUR --"

14 Q OKAY.

15 A "-- AND I HAVE TO GET SOME SLEEP." SO HE  
16 WAS VERY ANXIOUS ABOUT, "I HAVE TO GET SLEEP BECAUSE I  
17 HAVE TO REHEARSE."

18 Q DID HE ACT LIKE HE WAS BEING PRESSURED?

19 MS. CAHAN: OBJECTION; CALLS FOR SPECULATION.

20 THE COURT: SUSTAINED.

21 THE WITNESS: I CAN'T SAY HE --

22 THE COURT: SUSTAINED.

23 Q BY MS. CHANG: DOCTOR, IS THE REASON WHY  
24 YOU CAME FORWARD AFTER MR. JACKSON'S DEATH TO THE PRESS  
25 IS BECAUSE YOU WANTED TO DISPEL RUMORS THAT HE WAS A  
26 DRUG ADDICT?

27 A YES.

28 I WORKED WITH MR. JACKSON FROM THE FIRST

1 OF -- MET HIM IN JANUARY, LATTER PART, INTO FEBRUARY.  
2 AND TO MEET SOMEONE WHO WAS SO KIND AND SO GIVING AND  
3 SO LOVING AND TO HEAR ON THE NEWS THAT HE HAD ALL THESE  
4 TRACK MARKS ALL OVER HIS BODY -- I KNEW HE WAS NOT ON  
5 DRUGS.

6 Q DOCTOR, I'M GOING TO GO REAL FAST BECAUSE I  
7 WANT TO GET YOU OUT, BUT I WANT TO COVER THE FATHER'S  
8 DAY CALL. OKAY?

9 THAT WAS FOUR DAYS BEFORE MR. JACKSON DIED;  
10 IS THAT FAIR TO SAY?

11 THE COURT: MR. PANISH, WHY ARE YOU --

12 MR. PANISH: BECAUSE MS. CAHAN IS SLAMMING HER  
13 HANDS ON THE TABLE. I JUST --

14 MS. CAHAN: I'M NOT SLAMMING MY HANDS.

15 MS. CHANG: YOUR HONOR, CAN I JUST FINISH?

16 THE COURT: YES. PLEASE STOP. LET'S TRY TO  
17 FINISH.

18 MS. CHANG: OKAY. DR. LEE, I'M JUST FOCUSING ON  
19 YOU RIGHT NOW.

20 Q YOU RECEIVED A CALL FROM MR. JACKSON'S, I  
21 THINK, SECURITY GUARD FOUR DAYS BEFORE MR. JACKSON  
22 DIED; IS THAT FAIR TO SAY?

23 A YES.

24 Q BASED ON WHAT YOU HEARD FROM MR. JACKSON'S  
25 PORTION OF THE CALL ONLY, DID HE SEEM SCARED AND  
26 FRIGHTENED?

27 A YES.

28 MS. CAHAN: OBJECTION; CALLS FOR SPECULATION.

1 THE COURT: OVERRULED.

2 Q BY MS. CHANG: YOU YOURSELF WERE IN  
3 ST. PETERSBURG, FLORIDA, CORRECT?

4 A YES.

5 Q YOU WERE ATTENDING A SEMINAR?

6 A YES.

7 Q HOWEVER, YOU HAD YOUR OWN HEALTH ISSUES AT  
8 THAT TIME, CORRECT?

9 A YEAH. I WAS A LITTLE BIT OVER- -- WAY  
10 OVERWORKED.

11 Q AND YOU WERE, IN FACT, IN THE EMERGENCY  
12 ROOM WHEN YOU GOT THIS PHONE CALL, CORRECT?

13 A YES.

14 Q YOU WERE, IN FACT, BEING GIVEN MEDICATION  
15 AT THE TIME THAT YOU WERE TALKING TO HIM ON THE PHONE,  
16 CORRECT?

17 A YES.

18 I HAD MY LEFT ARM OUT AND THEY WERE  
19 STARTING AN I.V. WHEN I SAW MY PHONE RINGING, I  
20 GRABBED IT, AND WHILE THIS WONDERFUL NURSE WAS TRYING  
21 TO FLIRT WITH THE DOCTOR, SHE PUSHED IN TOO MUCH OF THE  
22 BLOOD PRESSURE MEDICINE AND BOTTOMED ME OUT.

23 Q AND YOU WENT OUT, UNCONSCIOUS, CORRECT?

24 A I DIDN'T GO OUT UNCONSCIOUS. I WAS FADING  
25 AWAY, AND ALMOST.

26 Q OKAY.

27 A BUT I WAS -- I JUST WAS ENDING THE  
28 CONVERSATION WITH THEM.

1 Q OKAY. AND YOU DON'T KNOW IF ANYONE TOOK  
2 HIM TO THE HOSPITAL, CORRECT?

3 A I DON'T KNOW.

4 Q AND HAD YOU PLANNED TO FOLLOW UP AND GO SEE  
5 HIM AFTER YOU RETURNED TO CALIFORNIA?

6 A I WAS HOSPITALIZED FOR ABOUT TWO DAYS OR  
7 SO. WHEN I CAME BACK, I WENT STRAIGHT TO WORK; AND THE  
8 DAY OF HIS PASSING WAS THE DAY THAT I WAS GOING TO GO  
9 UP AND --

10 Q THAT WAS THE DAY YOU WERE GOING TO CHECK ON  
11 HIM?

12 A I WAS GOING TO CHECK ON HIM.

13 Q OKAY. YOU INDICATED PREVIOUSLY THAT  
14 MR. JACKSON SAID HE DIDN'T WANT TO GAIN WEIGHT -- DO  
15 YOU RECALL THAT? -- FOR HIS PERFORMANCES?

16 A YES.

17 Q WOULD YOU AGREE THAT HE ALSO SAID HE DIDN'T  
18 WANT TO LOSE WEIGHT BEFORE THE SHOWS?

19 A OH, NO, HE DIDN'T WANT TO LOSE ANY WEIGHT.

20 Q OKAY. IT TOOK A LOT OF ENERGY TO DO THESE  
21 SHOWS, CORRECT?

22 A OH, YES.

23 Q I WANT TO SHOW YOU EXHIBIT 8, DASH, 54  
24 THAT'S ALREADY IN EVIDENCE.

25 WHY DON'T WE BLOW UP A LITTLE BIT --

26 WOULD YOU AGREE, DR. LEE, THAT WHEN YOU  
27 LAST SAW MR. JACKSON IN APRIL, HE DID NOT LOOK THIS  
28 THIN?

1 A YOU SURE THAT'S HIM?

2 Q THAT'S HIM.

3 A OH, MY GOODNESS. HE DID NOT LOOK LIKE  
4 THAT. WHEN I SAW HIM IN APRIL, HE DID NOT LOOK LIKE  
5 THAT.

6 Q AS SOMEONE WHO PRACTICES HOLISTIC --

7 A OH, MY GOODNESS.

8 Q AS SOMEONE WHO PRACTICES HOLISTIC NUTRITION  
9 AND VITAMIN I.V. THERAPY, WOULD YOU HAVE BEEN CONCERNED  
10 IF YOUR PATIENT LOOKED LIKE THAT?

11 A I WOULD HAVE BEEN BEYOND CONCERNED. BEYOND  
12 CONCERNED. OH, MY GOODNESS. THAT'S HORRIBLE.

13 MS. CHANG: I HAVE NO FURTHER QUESTIONS, YOUR  
14 HONOR.

15 THE COURT: ANY REDIRECT? LET'S TRY TO --

16 MS. CAHAN: I HAVE ABOUT THREE MINUTES, YOUR  
17 HONOR.

18 THE COURT: YES. OKAY.

19 MS. CAHAN: VERY QUICK.

20

21 REDIRECT EXAMINATION

22 BY MS. CAHAN:

23 Q DR. LEE, WHEN MR. JACKSON TOLD YOU HIS --  
24 SELF-REPORTED HIS WEIGHT TO YOU DURING THAT FEBRUARY TO  
25 APRIL TIME PERIOD, DO YOU REMEMBER ABOUT WHAT HE SAID  
26 HE WEIGHED?

27 A IT'S WRITTEN DOWN. I DON'T REMEMBER IT  
28 OFFHAND.

1 MS. CAHAN: PAM, IF YOU COULD JUST QUICKLY PULL  
2 UP 12009.18.

3 MR. PANISH: IS THAT PAGE 18? IF IT'S IN THERE,  
4 JUST PUT IT UP SO YOU CAN GET THROUGH THIS.

5 MS. CAHAN: TOP LEFT.

6 IT SAYS THERE -- THIS IS FEBRUARY 1ST,  
7 2009. IT HAS A WEIGHT OF 128 POUNDS.

8 Q IS THAT WHAT MR. JACKSON TOLD YOU HE  
9 WEIGHED ON THAT DATE?

10 A THAT'S WHAT HE SAID, BECAUSE THAT'S WHAT I  
11 HAVE WRITTEN.

12 Q AND THAT SEEMED ABOUT RIGHT TO YOU AT THE  
13 TIME HE TOLD YOU THAT, IT DIDN'T SEEM FAR OFF BASED ON  
14 YOUR EXPERIENCE WITH PATIENTS?

15 A IN LOOKING AT HIS BODY FRAME, I DON'T -- I  
16 DIDN'T KNOW AT THAT POINT WHAT PERCENTAGE OF THAT WAS  
17 LEAN BODY MASS VERSUS FLUID MASS; SO, YOU KNOW, I JUST  
18 TOOK HIM AT HIS WORD.

19 Q BUT IT SEEMED REASONABLE TO YOU THAT WAS IN  
20 THE BALLPARK OF WHAT IT LOOKED TO YOU HE MIGHT WEIGH,  
21 128 POUNDS?

22 A YES.

23 Q AND, PAM, YOU CAN TAKE THAT DOWN.

24 SO WE TALKED A LITTLE BIT TODAY ABOUT  
25 INSOMNIA. AND YOU SAID THAT 80 PERCENT OF YOUR  
26 PATIENTS COMPLAIN OF SLEEP PROBLEMS.

27 A THEY DON'T WALK IN MY DOOR AND COMPLAIN OF  
28 SLEEP PROBLEMS, BUT IT'S JUST PART OF THEIR OVERALL

1 HISTORY.

2 Q AND YOU MENTIONED YESTERDAY A NUMBER OF  
3 FACTORS THAT YOU BELIEVE MAY HAVE CONTRIBUTED TO  
4 MR. JACKSON'S INSOMNIA IN THE SPRING OF 2009, RIGHT?

5 A YES.

6 Q YOU MENTIONED HYPOGLYCEMIA MIGHT HAVE BEEN  
7 A CAUSE?

8 A YES.

9 Q AND CONSUMPTION OF RED BULL OR OTHER  
10 CAFFEINE MIGHT HAVE BEEN A CAUSE?

11 A YES.

12 Q POOR SLEEP HYGIENE, LIKE -- MIGHT HAVE BEEN  
13 A CAUSE?

14 A YES.

15 Q AND INCLUDED IN THAT POOR SLEEP HYGIENE,  
16 YOU SAW HIM LEAVING MOVIES, TELEVISIONS ON OVERNIGHT?

17 A YES.

18 Q AND MUSIC PLAYING?

19 A YES.

20 Q AND LIGHTS ON?

21 A YES.

22 Q AND THOSE WOULD BE ON THROUGHOUT THE NIGHT,  
23 NOT JUST WHEN HE WAS TRYING TO FALL ASLEEP BUT ALL  
24 NIGHT?

25 A THROUGHOUT THE NIGHT, YES.

26 Q AND YOU ALSO MENTIONED YESTERDAY THAT THE  
27 ELECTROMAGNETIC FIELD GENERATED BY DEVICES SUCH AS CELL  
28 PHONES AND ALARM CLOCKS MIGHT HAVE CONTRIBUTED TO HIS

1 INSOMNIA IN THIS TIME FRAME IN YOUR ASSESSMENT?

2 A YES.

3 Q AND YOU ALSO MENTIONED THAT MR. JACKSON MAY  
4 HAVE FELT SOME STRESS FROM REHEARSALS?

5 A YES.

6 Q AND THAT MAY HAVE ALSO CONTRIBUTED TO HIS  
7 INSOMNIA?

8 A YES.

9 Q BUT THAT WOULDN'T HAVE BEEN THE ONLY CAUSE,  
10 IN YOUR VIEW, OF THE SLEEP PROBLEMS THAT HE WAS  
11 EXPERIENCING?

12 A NO.

13 THAT'S WHY I WANTED TO DO THE NEUROLOGIC  
14 TESTING WITH THE AMINO ACID, WHICH IS JUST A URINE  
15 TEST, ALONG WITH SLEEP STUDIES TO FIND OUT -- GET MORE  
16 TO THE ROOT CAUSE OF WHY HE WAS HAVING A PROBLEM.

17 Q AND I THINK YOU SAID THAT MR. JACKSON  
18 EXHIBITED SOME STRESS ABOUT SOME REHEARSALS, BUT HE  
19 ALSO TOLD YOU HE WAS EXCITED ABOUT DOING THE TOUR,  
20 RIGHT?

21 A HE TOLD ME AT THE FIRST PART OF THE YEAR HE  
22 WAS EXCITED ABOUT THE TOURS; AND THEN AS IT GOT CLOSER,  
23 IN APRIL, HE WAS, YOU KNOW, A LITTLE BIT MORE STRESSED.

24 Q AND IN YOUR EXPERIENCE --

25 A WITH REHEARSALS. NOT THE TOUR. HE WAS  
26 NOT -- HE WAS NOT SADDENED ABOUT THE TOUR, HE WAS JUST  
27 SADDENED --

28 Q AND IN YOUR EXPERIENCE TAKING CARE OF



1 PATIENTS, IS IT COMMON FOR PEOPLE TO EXPERIENCE STRESS  
2 ABOUT AN EVENT THAT THEY'RE REALLY EXCITED ABOUT,  
3 SOMETHING WHERE THEY WANT TO PERFORM WELL?

4 MS. CHANG: OBJECTION; LACKS FOUNDATION, CALLS  
5 FOR SPECULATION.

6 THE COURT: OVERRULED.

7 THESE ARE MUSICIANS, ATHLETES AND  
8 CELEBRITIES? OVERRULED. YOU MAY ANSWER.

9 THE WITNESS: YES.

10 MS. CAHAN: NOTHING FURTHER. THANK YOU,  
11 DR. LEE.

12 MS. CHANG: I HAVE NOTHING FURTHER.

13 THE COURT: OKAY. THANK YOU, MA'AM. YOU MAY  
14 STEP DOWN. THANK YOU.

15 MS. CHANG: THANK YOU, DR. LEE.

16 THE COURT: OKAY. LADIES AND GENTLEMEN, I GUESS  
17 THE NEXT TIME WE SEE EACH OTHER IS TUESDAY; AND THAT  
18 WILL BE AT 9:45. REMEMBER MY ADMONITION NOT TO DISCUSS  
19 THE CASE, DON'T GO ON THE INTERNET AND LOOK AT  
20 ANYTHING, DON'T READ ANYTHING ABOUT THE CASE, DON'T  
21 EVEN THINK ABOUT THE CASE.

22 JUST COME FRESH ON TUESDAY, AND WE'LL SEE  
23 YOU AT THE 9:45. OKAY? THANK YOU. HAVE A GOOD LONG  
24 WEEKEND.

25

26 (THE FOLLOWING PROCEEDINGS WERE HELD  
27 IN OPEN COURT, OUTSIDE THE PRESENCE  
28 OF THE JURY:)