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10 Attorneys for Defendant
11 MICHAEL JOSEPH JACKSON

FILED
SUPERIOR COURT of CALIFORNIA
COUNTY of SANTA BARBARA

NOV 05 2004

GARY M. BLAIR, Executive Officer
BY *Carrie L. Wagner*
CARRIE L. WAGNER, Deputy Clerk

** Unsealed pursuant
to 11/16/05 court
Order*

RECEIVED
04 OCT 29 PM 12:53
SANTA BARBARA COUNTY
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12
13 SUPERIOR COURT OF THE STATE OF CALIFORNIA
14 FOR THE COUNTY OF SANTA BARBARA, COOK DIVISION

15
16 THE PEOPLE OF THE STATE OF CALIFORNIA,
17
18 Plaintiffs,
19
20 vs.
21 MICHAEL JOSEPH JACKSON,
22 Defendant.
23
24

) Case No. 1133603
)
) ORDER ENDORSING SUBPOENA DUCES
) TECUM TO VICTIM COMPENSATION AND
) GOVERNMENT CLAIMS BOARD
)
) Honorable Rodney S. Melville
)
) Date: October 29, 2004
) Time: 8:30 am.
) Dept: SM 2

) FILED UNDER SEAL *Wm. Cameron*

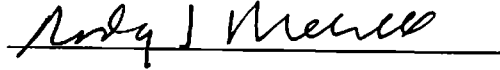
25 The Court having permitted Counsel to submit an Ex Parte Application, Counsel having done
26 so and GOOD CAUSE APPEARING THEREFORE,

27 IT IS HEREBY ORDERED that the evidence of witnesses, the Custodian of Records for the

1 Victim Compensation and Government Claim Board, State of California, is material and relevant,
2 and the Subpoena Duces Tecum for the records of that entity is necessary and relevant to this
3 proceeding, the Court hereby endorses the subpoena attached hereto dated October 28, 2004.

4 **NOTE:** Due to scheduling difficulties, any request for in camera
5 review of records or other objections to production should be set
6 by contacting the Superior Court, department 2, in Santa Maria at

7 **DATED:** NOV 05 2004



8 The Honorable Rodney Melville
9 Judge of the Superior Court of California
10 County of Santa Barbara

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name and Address): Thomas A. Mesereau, Jr. 91182 1875 Century Park East, Suite 700 Los Angeles, CA 90067	Brian Oxman 072172 14126 E. Rosecrans Santa Fe Springs, CA 90670	TELEPHONE NO.: (310) 284-3120 (562) 921-5058	FOR COURT USE ONLY
ATTORNEY FOR (Named): Michael Joe Jackson			
Insert name of court, judicial district or branch court, if any, and post office and street address: Santa Barbara County Superior Court, Santa Maria Division 312 E. Cook Street (Dept. SM-2: Judge Rodney Melville) Santa Maria, CA 93454			
Title of case: The People of the State of California v. Michael Jackson, et al.			CASE NUMBER: 1133603
SUBPENA (CRIMINAL OR JUVENILE) <input checked="" type="checkbox"/> DUCES TECUM			

THE PEOPLE OF THE STATE OF CALIFORNIA, TO (NAME):

Custodian of Records, Victim Compensation and Government Claims Board, State of California

1. YOU ARE ORDERED TO APPEAR AS A WITNESS in this action at the date, time, and place shown in the box below UNLESS you make a special agreement with the person named in Item 3:

a. Date: November 19, 2004	Time: 9:00 a.m.	<input checked="" type="checkbox"/> Dept.: SM-2	<input type="checkbox"/> Div.:	<input type="checkbox"/> Room:
b. Address: 312 E. Cook Street, Dept. SM-2 (Judge Rodney Melville) Santa Maria, CA 93454				

2. AND YOU ARE

- a. ordered to appear in person.
- b. not required to appear in person if you produce the records described in the accompanying affidavit and a completed declaration of custodian of records in compliance with Evidence Code sections 1560, 1561, 1562, and 1271. (1) Place a copy of the records in an envelope (or other wrapper). Enclose your original declaration with the records. Seal them. (2) Attach a copy of this subpoena to the envelope or write on the envelope the case name and number, your name and date, time, and place from item 1 (the box above). (3) Place this first envelope in an outer envelope, seal it, and mail it to the clerk of the court at the address in item 1. (4) Mail a copy of your declaration to the attorney or party shown at the top of this form.
- c. ordered to appear in person and to produce the records described in the accompanying affidavit. The **personal attendance** of the custodian or other qualified witness and the production of the original records is **required** by this subpoena. The procedure authorized by subdivision (b) of section 1560, and sections 1561 and 1562, of the Evidence Code will not be deemed sufficient compliance with this subpoena.
- d. ordered to make the **original business records** described in the accompanying affidavit available for inspection at your business address by the attorney's representative and to permit **copying** at your business address under reasonable normal business hours, conditions during normal business hours.

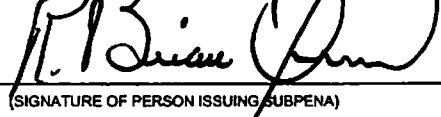
3. IF YOU HAVE ANY QUESTIONS ABOUT THE TIME OR DATE FOR YOU TO APPEAR, OR IF YOU WANT TO BE CERTAIN THAT YOUR PRESENCE IS REQUIRED, CONTACT THE FOLLOWING PERSON BEFORE THE DATE ON WHICH YOU ARE TO APPEAR:

a. Name: Brian Oxman

b. Telephone number: (562) 921-5058

4. **WITNESS FEES:** You may be entitled to witness fees, mileage, or both, in the discretion of the court. Contact the person named in item 3 AFTER your appearance.

DISOBEDIENCE OF THIS SUBPENA MAY BE PUNISHED BY A FINE, IMPRISONMENT, OR BOTH. A WARRANT MAY ISSUE FOR YOUR ARREST IF YOU FAIL TO APPEAR.

FOR COURT USE ONLY	Date: October 28, 2004	 (SIGNATURE OF PERSON ISSUING SUBPENA)
		R. Brian Oxman (TYPE OR PRINT NAME) Attorney for Michael J. Jackson (TITLE)

(See reverse for proof of service)

ATTACHMENT TO ITEM 2(b)
Subpoena to Custodian of Records, Victim Compensation and
Government claims Board, State of California
October 28, 2004

The items described in the following Affidavit to be produced pursuant to this subpoena are as follows:

(1) All DOCUMENTS constituting, evidencing, concerning, discussing, or mentioning any statements regarding injuries, mental, or emotional condition, requests for compensation, assistance, reimbursement of expenses, relocation assistance, medical reimbursements, or other government payments, including but not limited to all applications, periodic renewal requests, financial disclosures, financial statements, employment status, witness statements, victim statements, verifications or communications from doctors, medical records, medical bills, recommendations from government prosecutors, insurance information, communications with government agencies, and records of all kinds since January 1, 1998, relating or concerning COMPLAINANTS, or any of their REPRESENTATIVES, who are:

(a) Janet Arvizo, aka Janet Ventura or Janet Jackson, date of birth [REDACTED] social security number [REDACTED]

(b) Davellin Arvizo, date of birth [REDACTED] social security number [REDACTED]

(c) Gavin Arvizo, date of birth [REDACTED] social security number [REDACTED]

(d) Star Arvizo, date of birth [REDACTED] social security number [REDACTED]

(e) Jay Daniel Jackson, date of birth [REDACTED] social security number [REDACTED]

(2) All DOCUMENTS constituting, evidencing, concerning, discussing or mentioning payment history, monthly statements, periodic statements, deposit reports, accountings to victims, accounts to government agencies, cancelled checks (front and back), electronics funds transfers, financial statements for any public assistance, account deposits, payments of any kind, or other monetary assistance since January 1, 1998, to or on behalf of COMPLAINANTS, or their REPRESENTATIVES, who are:

(a) Janet Arvizo, aka Janet Ventura or Janet Jackson, date of birth [REDACTED] social security number [REDACTED]

(b) Davellin Arvizo, date of birth [REDACTED] social security number [REDACTED]

(c) Gavin Arvizo, date of birth [REDACTED] social security number [REDACTED]

(d) Star Arvizo, date of birth [REDACTED] social security number [REDACTED]

(e) Jay Daniel Jackson, date of birth [REDACTED]
[REDACTED] social security number [REDACTED]

(5) All DOCUMENTS constituting, evidencing, concerning, discussing or mentioning any social worker evaluation, in-home visit, investigation into eligibility, complaints of abuse or violence, determination of living conditions, or evaluation of suitability since January 1, 1998, concerning or relating to COMPLAINANTS, or their REPRESENTATIVES, who are:

(a) Janet Arvizo, aka Janet Ventura or Janet Jackson, date of birth [REDACTED] social security number [REDACTED]

(b) Davellin Arvizo, date of birth [REDACTED] social security number [REDACTED]

(c) Gavin Arvizo, date of birth [REDACTED] social security number [REDACTED]

(d) Star Arvizo, date of birth [REDACTED] social security number [REDACTED]

(e) Jay Daniel Jackson, date of birth [REDACTED] social security number [REDACTED]

(4) All DOCUMENTS constituting, evidencing, concerning, discussing, or mentioning any financial arrangements with an attorney, communications to applications, and all reports and documents produced to the Victim Compensation and Government Claims Board concerning or relating to CLAIMANTS, or their REPRESENTATIVES, who are:

(a) Janet Arvizo, aka Janet Ventura or Janet Jackson, date of birth [REDACTED] social security number [REDACTED]

(b) Davellin Arvizo, date of birth [REDACTED] social security number [REDACTED]

(c) Gavin Arvizo, date of birth [REDACTED] social security number [REDACTED]

(d) Star Arvizo, date of birth [REDACTED] social security number [REDACTED]

(e) Jay Daniel Jackson, date of birth [REDACTED] social security number [REDACTED]

Collins, Mesereau, Reddock & Yu, LLP
1875 Century Park East, 7th Floor
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(310) 284-3120

Brian Oxman 072172
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Santa Fe Springs, CA 90670
(562) 921-5058

Attorneys for defendant,
Mr. Michael Jackson

SUPERIOR COURT OF CALIFORNIA, COUNTY OF SANTA BARBARA

PEOPLE OF THE STATE OF CALIFORNIA,

Plaintiff,

vs

MICHAEL JACKSON,

Defendant.

Case No. 1133603

DECLARATION AND
APPLICATION
FOR SUBPOENA DUCES TECUM

STATE OF CALIFORNIA, COUNTY OF SANTA BARBARA

1. The undersigned states: That he is the attorney of record for defendant, Michael Jackson, in the above-entitled action and that this cause has been duly set for hearing on November 19, 2004, at 8:30 a.m. in Department SM-2 of the Santa Barbara Superior Court, located at 312 East Cook Street, Santa Maria, California 93454.

2. Witness the Custodian of Records for Victim Compensation and Government Claims Board, State of California, has in his possession or control the following documents, objects, or other tangible things:

A. INSTRUCTIONS AND DEFINITIONS:

(1) As used herein, the term "DOCUMENT" or "DOCUMENTS" means any handwritten, recorded, typed, printed, pictorial, or graphic matter whatsoever, however produced or reproduced, and including without limitation, all "WRITINGS" as defined in California Evidence Code § 250. The term "DOCUMENT" or "DOCUMENTS" also includes any data compilation of any sort, whether stored magnetically, electronically, or otherwise, from which information can be obtained, translated, or, if necessary,

through detection devices into reasonably usable form. Any comment or notation appearing on any document, and not a part of the original text, is considered a separate document and any copy, draft, or preliminary form of any document is also considered a separate document.

(2) As used herein, the term "DOCUMENT" is intended to include within its scope each and every "ORIGINAL" (as the term is defined in California Evidence Code Section 255), and each and every "DUPLICATE" (as the term is defined in Evidence Code Section 260), of each and every "WRITING" (as the term is defined in California Evidence Code § 250) described in the requests set forth below. All such documents are meant to referred to those DOCUMENTS which are within your possession and control, or subject to your possession or control.

(3) As used herein, "ACCOUNT" shall include, but not be limited to, any bank account, saving account, certificate of deposit, share draft account, time deposit, money market account, trust accounts, Individual Retirement Account, 401K account, public assistance fund, or other financial instrument or demand deposit. Where DOCUMENTS are requested concerning such ACCOUNTS, you shall produce all records of monthly statements, cancelled checks, deposit checks and drafts, deposit records and receipts, wire transfers, wire deposits, automatic withdrawals or deposits, monthly charges, interest payments, and fees.

(4) As used herein, the "COMPLAINANTS" refers to
(a) Janet Arvizo, aka Janet Ventura or Janet Jackson, date of birth [REDACTED] social security number [REDACTED]
(b) Davellin Arvizo, date of birth [REDACTED] social security number [REDACTED]
(c) Gavin Arvizo, date of birth [REDACTED] social security number [REDACTED]
(d) Star Arvizo, date of birth [REDACTED] social security number [REDACTED]
(e) Jay Daniel Jackson, date of birth [REDACTED] social security number [REDACTED]

or any person who is their representative, agent, or acting on their behalf, including their partners, corporations, or business entities where they have a property or ownership interest. The term "COMPLAINANTS" refers to all the individuals mentioned in this paragraph individually, whether or not the names of the others persons identified in this paragraph appear or are mentioned in the DOCUMENT. The term "COMPLAINANTS" also include present and former attorneys, agents, representatives, and any other persons acting on behalf of COMPLAINANT.

(5) As used herein, the "COMPLAINT" refers to the reports, claims, or allegations made by the COMPLAINANTS regarding Mr. Michael Jackson, which are stated in the Indictment in the case of People v. Michael Jackson, SBSC Case No. 1133603.

(6) "YOU" or "YOURS" refers to the Custodian of Records of the for Victim Compensation and Government Claims Board, State of California, and all of its agents, representatives, employees, attorneys, or any person acting on his behalf.

(7) As used herein, "PERSON" or "PERSONS" means any natural individual in any capacity whatsoever, and all entities of every description, including, but not limited to, associations, organizations (public or private), agencies, companies, partnerships, joint ventures, corporations, and trusts.

(8) As used herein, "REPRESENTATIVE" or "REPRESENTATIVES" means any person (as defined herein) who acts, has at any time acted, or has purported to act, at the request of, for the benefit of, or on behalf of another, including, but not limited to, the parents, guardians, or agents of COMPLAINANT, businesses, partnership, corporation, in which they have an interest or association as reflected in YOUR records.

(9) As used herein, the term "COMMUNICATION" is to be interpreted comprehensively, and means any instance in which information was exchanged between or among two or more persons, including any oral or written utterance, notation, or statement of any nature whatsoever, by and to whomsoever made, and all understanding or exchanges of information between or among two or more persons.

(10) As used herein, the term "CORRESPONDENCE" means any handwritten, printed, typed, or otherwise recorded communication whatsoever between or among two or more persons, and includes, without limitation, memoranda, letters, notes, telegrams, telexes, facsimile transmissions, email records, and marginal notations or comments.

B. DOCUMENTS TO BE PRODUCED:

(1) All DOCUMENTS constituting, evidencing, concerning, discussing, or mentioning any requests for compensation, assistance, reimbursement of expenses, relocation assistance, medical reimbursements, or other government payments, including but not limited to all statements regarding injuries, mental, or emotional condition, applications, periodic renewal requests, financial disclosures, financial statements, employment status, witness statements, victim statements, verifications or communications from doctors, medical records, medical bills, recommendations from government prosecutors, insurance information, communications with government agencies, and records of all kinds since January 1, 1998, relating or concerning COMPLAINANTS, or any of their REPRESENTATIVES, who are:

(a) Janet Arvizo, aka Janet Ventura or Janet Jackson, date of birth [REDACTED] social security number [REDACTED]

(b) Davellin Arvizo, date of birth [REDACTED]

social security number [REDACTED]
(c) Gavin Arvizo, date of birth [REDACTED]
social security number [REDACTED]
(d) Star Arvizo, date of birth [REDACTED]
social security number [REDACTED]
(e) Jay Daniel Jackson, date of birth [REDACTED]
[REDACTED] social security number [REDACTED]

(2) All DOCUMENTS constituting, evidencing, concerning, discussing or mentioning payment history, monthly statements, periodic statements, deposit reports, accountings to victims, accounts to government agencies, cancelled checks (front and back), electronics funds transfers, financial statements for any public assistance, account deposits, payments of any kind, or other monetary assistance since January 1, 1998, to or on behalf of COMPLAINANTS, or their REPRESENTATIVES, who are:

(a) Janet Arvizo, aka Janet Ventura or Janet Jackson, date of birth [REDACTED] social security number [REDACTED]
(b) Davellin Arvizo, date of birth [REDACTED] social security number [REDACTED]
(c) Gavin Arvizo, date of birth [REDACTED] social security number [REDACTED]
(d) Star Arvizo, date of birth [REDACTED] social security number [REDACTED]
(e) Jay Daniel Jackson, date of birth [REDACTED] social security number [REDACTED]

(5) All DOCUMENTS constituting, evidencing, concerning, discussing or mentioning any social worker evaluation, in-home visit, investigation into eligibility, complaints of abuse or violence, determination of living conditions, or evaluation of suitability since January 1, 1998, concerning or relating to COMPLAINANTS, or their REPRESENTATIVES, who are:

(a) Janet Arvizo, aka Janet Ventura or Janet Jackson, date of birth [REDACTED] social security number [REDACTED]
(b) Davellin Arvizo, date of birth [REDACTED] social security number [REDACTED]
(c) Gavin Arvizo, date of birth [REDACTED] social security number [REDACTED]
(d) Star Arvizo, date of birth [REDACTED] social security number [REDACTED]
(e) Jay Daniel Jackson, date of birth [REDACTED] social security number [REDACTED]

(4) All DOCUMENTS constituting, evidencing, concerning, discussing, or mentioning any financial arrangements with an attorney, communications to applications, and all reports and documents produced to the Victim Compensation and Government Claims Board concerning or relating to CLAIMANTS, or their REPRESENTATIVES, who are:

(a) Janet Arvizo, aka Janet Ventura or Janet Jackson, date of birth [REDACTED], social security number [REDACTED]

[REDACTED] (b) Davellin Arvizo, date of birth [REDACTED]
social security number [REDACTED]
(c) Gavin Arvizo, date of birth [REDACTED]
social security number [REDACTED]
(d) Star Arvizo, date of birth [REDACTED]
social security number [REDACTED]
(e) Jay Daniel Jackson, date of birth [REDACTED]
social security number [REDACTED]

3. The above documents are material to the issues involved in the case by reason of the following facts:

A. The information sought will lead to witness, documents, and discoverable evidence that will show the claims made in the Pending Criminal Case in the Santa Barbara Superior Court are unfounded.

B. The information sought by this subpoena will disclose motives, biases, and exaggerations on behalf of and engaged in by the various persons identified in the above requests who are witnesses in this proceeding;

C. The information sought contains information regarding the background, motives, state of mind, character and reputation for veracity, and reports of COMPLAINANTS and the various persons identified in the above-requests who are witnesses in this proceeding;

D. The requested documents and/or information contains the prior inconsistent statements, recollections, observations, and reactions of COMPLAINANTS to the events and circumstances which gave rise to the Pending Criminal Case in the Santa Barbara Superior Court;

E. The requested materials constitute evidence of a financial motive for making false and inaccurate claims in this matter;

4. Good cause exists for the production of the above described matters and things by reason of the following facts:

A. The subpoenaed party is the sole and exclusive source of all such information, and no other person, business, or other entity has possession or control of such information.

B. The information requested by this Subpoena discloses the motive, intent, and conscious state of mind of persons making claims in the Santa Barbara Superior Court, along with persons directing, counseling and controlling the complainants in the Santa Barbara Superior Court action.

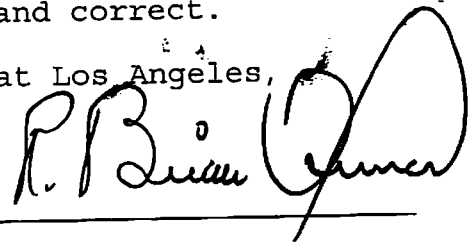
C. No other source exists for such information because such disclosures were made only in the records of the subpoenaed party, and the only person with such information is the

subpoenaed party.

WHEREFORE, request is made that the Subpoena Duces Tecum issue.

I declare under penalty of perjury under the laws of the State of California the foregoing is true and correct.

Executed this 24th day of September, at Los Angeles, California.

A handwritten signature in black ink, appearing to read "R. Brian Oxman", written over a horizontal line. The signature is stylized and cursive.

R. Brian Oxman

FILED
SUPERIOR COURT OF CALIFORNIA
COUNTY OF SANTA BARBARA

JUL 09 2007

GARY M. BLAIR, Executive Officer
Carrie L. Wagner
CARRIE L. WAGNER, Deputy Officer

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SANTA BARBARA

11 THE PEOPLE OF THE STATE OF CALIFORNIA,) Case No.: 1133603
12 Plaintiff,)
13 vs.) Protective Order Regarding Defendant's
14 MICHAEL JACKSON,) Subpoenas Duces Tecum
15 Defendant.)

17 Good cause appearing, it is hereby ordered that the clerk of the court shall permit
18 Defendant Michael Jackson, by and through his counsel, to subpoena materials without
19 disclosing the nature of the subpoena, the person or items sought by the subpoena, or the
20 response to the subpoena and any materials returned therewith.

22 It is further ordered, without limiting the generality of the foregoing, that:

- 23 1. The clerk of the court shall segregate and keep confidential and not disclose to
24 the People any materials pertaining to the subpoena, including returns, documents, and
25 other materials returned in response to said subpoena.

27 ///

28 ///

1 2. The clerk of the court shall permit Counsel for the defendant to subpoena
2 materials to the court on days and times at which the case itself is not on calendar for
3 other purposes.

4 3. Persons or entities subpoenaed by the defendant shall not disclose directly or
5 indirectly to the People the fact that they have been subpoenaed or the nature of the
6 subpoena.

7 4. Any appearance, objection, compliance, or other communication by a party
8 subpoenaed by the defendant shall be filed under seal.

9 5. Any hearings involving the materials pertaining to the subpoena, including
10 returns, documents and other materials returned in response to the subpoena regarding
11 compliance, privacy or other issues shall be held in camera.

12 6. This order does not affect the right of any party whose records are subpoenaed
13 to assert any applicable claims of privilege.

14 7. Subject to the resolution of any issues of privilege that may be asserted, the
15 clerk of the court shall permit counsel for the defendant to inspect and copy the
16 subpoenaed materials.

17 8. A copy of this order shall be served with each subpoena to which it pertains.

18 DATED: JUL 09 2004

19 
20 _____
21 RODNEY S. MELVILLE
22 Judge of the Superior Court
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