

NOV 29 2004

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8 SUPERIOR COURT OF THE STATE OF CALIFORNIA
9 FOR THE COUNTY OF SANTA BARBARA
10 SANTA MARIA DIVISION

**Unsealed
pursuant to
11/16/05 Court
order*

12 THE PEOPLE OF THE STATE OF CALIFORNIA,

13 Plaintiff,

14 v.

15 MICHAEL JOE JACKSON,

16 Defendant.

No. 1133603

PLAINTIFF'S PROPOSED
PROTOCOL FOR EXPERTS'
EXAMINATION OF EnCase
COMPUTER HARDDRIVES

~~FILED UNDER SEAL~~

17
18
19 Plaintiff respectfully submits its Proposed Protocol for Experts' Examination of
20 EnCase Computer Harddrives.

21 DATED: November 29, 2004

22 Respectfully submitted,

23 THOMAS W. SNEDDON, JR.
District Attorney

24 By: *Gerald McC. Franklin*
25 Gerald McC. Franklin, Senior Deputy
26

Bradley Miller computers

Types of files (allocated, or erased and recoverable to be extracted from Bradley Miller computer hard drive evidence and provided to the Special Master for review. ** For reference, example file extensions are included with each file type. The listed file extensions are not meant to be an exhaustive list of the extensions to be searched for. We would like the examiner to include all file extensions recognized by EnCase, which relate to the given type of file.

1. Text files (.txt, .rtf)
 - a. These file types may contain writings, which discuss the victim/ family and the actions of Bradley Miller and his associates with regard to the victim/ family and Michael Jackson.
 - i. One must keep in mind the boundary overstepping on the part of Miller and his associates (stealing of materials from within the victim/ family possessions in storage, surreptitious audio recording, video taping the children, taking part in harassment of the family).
 - b. These file types could be invaluable in so far as showing the planning and execution of the conspiracy between Michael JACKSON and the unindicted co-conspirators.
2. Document files (.doc, .wpd, .ppt, pdf, .xls)
 - a. Same as #1
3. Picture files (.jpg, .bmp, .tiff, .psd)
 - a. May visually document Miller's (and/ or his associates' interaction and handling of the victim/ family and their belongings.
 - b. Picture files may also be used to identify individuals with places and time
 - i. Some picture files contain information as to when the picture was taken.
4. Movie files (.mpeg, .wmv)
 - a. Same as #3
 - b. Of particular note, Miller/ his associates secretly recorded the activities of the victim/ family
5. Sound files (.wav)
 - a. May contain audible documentation of Miller's (and/ or his associates' interaction and handling of the victim/ family and their belongings.
 - b. Of particular note, Miller/ his associates secretly recorded the activities of the victim/ family (Frank Cascio/ mother tape found at Miller's office)
6. Saved emails (.html)
 - a. Same as #1
7. Financial program files [Quicken, Microsoft Money] (.qdf, .qdb, .qdt)
 - a. Same as #1
 - i. These file types contain check register data, which oftentimes associates dates and locations with individuals, through purchase information.

- b. Additionally, this type of file may contain information showing the movement of monies between JACKSON and the unindicted co-conspirators.

The following is a list of Encase examination processes we would like performed on the Miller computer evidence files (in addition to extracting the above file types)

1. .html carver search
 - a. This may extract web page information including partial emails (see emails above)
2. graphic file search
 - a. This will search for deleted graphic files in the unallocated areas
3. file signature analysis
 - a. This will check to insure someone has not renamed the file extensions in order to hide the file.
 - i. Example taking a .jpg picture file and giving it a .exe executable file extension.
4. Key/ stringer word search of the unallocated areas. This will serve to narrow the information to be reviewed, thus minimizing the amount of information the Special Master will need to review Stringer words we feel are pertinent to the investigation are as follows:
 - a. CPS
 - b. Ventura
 - c. Arvizo
 - d. Davellin
 - e. David
 - f. Janet
 - g. Gavin
 - h. Star
 - i. Jackson
 - j. Michael
 - k. Jay
 - l. Asef or Asaf
 - m. Velchick or Vilchick
 - n. Chandler family
 - o. Cascio
 - p. Tyson
 - q. Frank
 - r. Omar
 - s. Aldo
 - t. Angel
 - u. Marie Nicole
 - v. Amen
 - w. Vincent
 - x. Vinnie

y. Bill
z. Dickerman
aa. Larry
bb. Feldman
cc. Brad
dd. Miller
ee. Tucker
ff. Chris
gg. Tucker
hh. Aja
ii. Pryor
jj. Dieter
kk. Wiesner
ll. Alimorad
mm. Farshchian
nn. Evelyn
oo. Tavasci
pp. "Evvy"
qq. Hamid
rr. Moslehi
ss. Jaime
tt. Messada
uu. Jesus
vv. Salas
ww. Ronald
xx. "Ron"
yy. Konitzer
zz. Marc
aaa. Fred
bbb. Schaffel
ccc. marijuana
ddd. Martin
eee. Bashir
fff. MJJ Productions
ggg. Santa Barbara District Attorney
hhh. Sneddon
iii. Santa Barbara Sheriff's Department
jjj. Private eye (Johnny's Private Eye in the Sky)
kkk. Bernstein, Fox, Whitman & Company LLP (accountants for MJ)
lll. February
mmm. March
nnn. "Applehead"
ooo. "Blow hole"
ppp. "Doo Doo Head"
qqq. Jesus Juice
rrr. "Living with Michael Jackson"

sss.	Applehead club
ttt.	cancer
uuu.	contract(s)
vvv.	death threats
www.	Diary
xxx.	Masturbation
yyy.	masturbating
zzz.	ejaculating
aaaa.	ejaculation
bbbb.	erection
cccc.	interview
dddd.	Forgery (signatures)
eeee.	Kaiser Permanente
fff.	kidney(s)
gggg.	money
hhhh.	cash
iii.	Notebook
jjj.	Passports
kkkk.	Phonebook
lll.	Photos
mmmm.	Pictures
nnn.	porn
oooo.	Ranch logs
pppp.	rebuttal
qqqq.	receipts
rrr.	secret
ssss.	Security
ttt.	tapes
uuuu.	recordings
vvvv.	Touching
www.	underwear
xxxx.	urine
yyyy.	vaseline
zzzz.	videos
aaaaa.	Visas
bbbb.	Neverland
cccc.	El Monte
dddd.	Brazil
eeee.	Brazilian consulate
ffff.	Dino's Storage
gggg.	State Department
hhhh.	Federal Building in L.A.
iiii.	Miami
jjjj.	Turnberry Resort
kkkk.	Universal Hilton
llll.	John Burroughs school

mmmmm. wine cellar

Evelyn Tavasci computers

Types of files (allocated, or erased and recoverable to be extracted from Evelyn Tavasci's computer hard drive evidence and provided to the Special Master for review. ** For reference, example file extensions are included with each file type. The listed file extensions are not meant to be an exhaustive list of the extensions to be searched for. We would like the examiner to include all file extensions recognized by EnCase, which relate to the given type of file.

1. Text files (.txt, .rtf)
 - c. These file types may contain writings, which the activities of Michael JACKSON and/ or his close associates during February and March 2003.
2. Document files (.doc, .wpd, .ppt, pdf, .xls)
 - a. Same as #1
3. Picture files (.jpg, .bmp, .tiff, .psd)
 - a. Picture files may be used to identify individuals with places and time
 - i. Some picture files contain information as to when the picture was taken.
4. Movie files (.mpeg, .wmv)
 - a. Same as #3
5. Sound files (.wav)
 - a. May contain audible documentation pertaining to the activities of JACKSON and/ or his close associates during February and March 2003.
 - i. Digital recording of voice messages
 - ii. Dictations
6. Saved emails (.html)
 - a. Same as #1
7. Financial program files [Quicken, Microsoft Money] (.qdf, .qdb, .qdt)
 - a. Same as #1
 - i. These file types contain check register data, which oftentimes associates dates and locations with individuals, through purchase information.

The following is a list of Encase examination processes we would like performed on the Tavasci computer evidence files (in addition to extracting the above file types)

8. .html carver search
 - a. This may extract web page information including partial emails (see emails above)
9. Key/ stringer word search of the unallocated areas. The key word search of the unallocated areas can retrieve deleted and partially overwritten data from the file types documented above. This key word search will serve to narrow the information to be reviewed, thus minimizing the amount of information the Special Master will need to review. Absent the use of key words, a search of the

unallocated space would not be realistically feasible (akin to reading every book in a large library to find pertinent information) Stringer words we feel are pertinent to the investigation are as follows:

- a. CPS
- b. Ventura
- c. Arvizo
- d. Davellin
- e. David
- f. Janet
- g. Gavin
- h. Star
- i. Jackson
- j. Michael
- k. Jay
- l. Asef or Asaf
- m. Velchick or Vilchick
- n. Chandler family
- o. Cascio
- p. Tyson
- q. Frank
- r. Omar
- s. Aldo
- t. Angel
- u. Marie Nicole
- v. Amen
- w. Vincent
- x. Vinnie
- y. Bill
- z. Dickerman
- aa. Larry
- bb. Feldman
- cc. Brad
- dd. Miller
- ee. Tucker
- ff. Chris
- gg. Tucker
- hh. Aja
- ii. Pryor
- jj. Dieter
- kk. Wiesner
- ll. Alimorad
- mm. Farshchian
- nn. Evelyn
- oo. Tavasci
- pp. "Evvy"
- qq. Hamid

rr.	Moslehi
ss.	Jaime
tt.	Messada
uu.	Jesus
vv.	Salas
ww.	Ronald
xx.	"Ron"
yy.	Konitzer
zz.	Marc
aaa.	Fred
bbb.	Schaffel
ccc.	marijuana
ddd.	Martin
eee.	Bashir
fff.	MJJ Productions
ggg.	Santa Barbara District Attorney
hhh.	Sneddon
iii.	Santa Barbara Sheriff's Department
jjj.	Private eye (Johnny's Private Eye in the Sky)
kkk.	Bernstein, Fox, Whitman & Company LLP (accountants for MJ)
lll.	February
mmm.	March
nnn.	"Applehead"
ooo.	"Blow hole"
ppp.	"Doo Doo Head"
qqq.	Jesus Juice
rrr.	"Living with Michael Jackson"
sss.	Applehead club
ttt.	cancer
uuu.	contract(s)
vvv.	death threats
www.	Diary
xxx.	Masturbation
yyy.	masturbating
zzz.	ejaculating
aaaa.	ejaculation
bbbb.	erection
cccc.	interview
dddd.	Forgery (signatures)
eeee.	Kaiser Permanente
fff.	kidney(s)
gggg.	money
hhhh.	cash
iiii.	Notebook
jjjj.	Passports
kkkk.	Phonebook

llll. Photos
mmmm. Pictures
nnnn. porn
oooo. Ranch logs
pppp. rebuttal
qqqq. receipts
rrrr. secret
ssss. Security
tttt. tapes
uuuu. recordings
vvvv. Touching
wwww. underwear
xxxx. urine
yyyy. vaseline
zzzz. videos
aaaa. Visas
bbbb. Neverland
cccc. El Monte
dddd. Brazil
eeee. Brazilian consulate
ffff. Dino's Storage
gggg. State Department
hhhh. Federal Building in L.A.
iiii. Miami
jjjj. Turnberry Resort
kkkk. Universal Hilton
llll. John Burroughs school
mmmm. wine cellar