

Rough Draft - 1

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

3 ZENaida GONZALEZ,

4 Plaintiff/Counter-Defendant,

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

6 CASEY ANTHONY,

7 Defendant/Counter-Plaintiff.

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9 ROUGH DRAFT ** ROUGH DRAFT ** ROUGH DRAFT

10 The videotaped deposition of CINDY ANTHONY taken
11 pursuant to Notice on behalf of the
12 Plaintiff/Counter-Defendant on Thursday, April 9, 2009,
13 beginning at 1:25 p.m., at the law firm of Morgan &
14 Morgan, 20 North Orange Avenue, 16th Floor, Orlando,
15 Florida, before Laura J. Landerman, R.M.R., C.R.R.,
16 F.P.R., and Notary Public, State of Florida at Large.

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

2 KEITH R. MITNIK, ESQUIRE
JOHN B. MORGAN, ESQUIRE
3 JOHN W. DILL, ESQUIRE
Morgan & Morgan, P.A.

CAAnthony-rough.txt
20 North Orange Avenue -- 16th Floor
Orlando, Florida 32801

For the Plaintiff/Counter-Defendant,

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

BRADLEY A. CONWAY, ESQUIRE
390 North Orange Avenue -- Suite 1630
Orlando, Florida 32801

For the Deponent, George Anthony.

THE VIDEOGRAPHER: Lee Fouraker of Ron Fleming
Video Productions

ALSO PRESENT: Zenaida Fernandez-Gonzalez
George Anthony

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1 I N D E X

3 Direct Examination by Mr. Dill
Examination by Mr. Morgan
4 Examination by Mr. Mitnik

6 CERTIFICATE OF REPORTER

8 E X H I B I T S

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

It is hereby stipulated and agreed between counsel
for the respective parties and the witness that the
reading and signing of the deposition be reserved.

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1 THE VIDEOGRAPHER: Good afternoon. The date
2 is April 9, 2009. This is the deposition of Cindy
3 Anthony, being taken in the matter of Zenaida
4 Gonzalez versus Casey Anthony. The time is 1:26
5 p.m. We're on record.
6 Counsel, please introduce yourselves.
7 MR. DILL: John Dill, along with John Morgan
8 and Keith Mitnik representing the plaintiff.
9 MR. CONWAY: I'm Brad Conway for Cindy
10 Anthony.
11 THE VIDEOGRAPHER: Court reporter please wear
12 in the witness.
13 CINDY ANTHONY

14 having been first duly sworn testified as follows:

15 DIRECT EXAMINATION

16 BY MR. DILL:

17 Q Please state your name, ma'am.

18 A Cynthia Marie Anthony.

19 Q You have a daughter named Casey Marie Anthony;
20 is that correct?

21 A Yes.

22 Q And had a granddaughter Caylee as well?

23 A Correct.

24 Q I'm going to ask you some questions about the
25 time period before and leading up to your granddaughter's

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1 disappearance and then we're going to go through some
2 other questions. Okay?

3 So right now I'm going to ask some questions
4 particularly about the household and the setup of the
5 household, who lived there during the time period, let's
6 say, about March or April of last year. Okay?

7 A Explain to me the relevance of the question
8 regarding the civil lawsuit with Zenaida
9 Fernandez-Gonzalez, please.

10 Q Ma'am, the attorney may have told you we're
11 going to ask questions in this case. He's the one who
12 objects. I need you to answer the questions because
13 we've noticed this case. We've subpoenaed you. So if
14 you can do your best to answer me, but I will say if I
15 don't understand --

16 A I'm not understanding what you're asking for,
17 the relevance. Okay?

18 Q Ma'am. I am --

19 A I'm just asking a question.

20 MR. CONWAY: Let him do the questioning.

21 Q We'll try to make this quick if you can answer
22 what I do ask you. If you don't understand what I ask
23 you, not why I ask you something, but if you don't
24 understand what I've asked you, let me know I'll be sure
25 to repeat it.

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1 A Okay. Please repeat the question.

2 Q I'll get to that and ask you in a second. Let
3 me tell you a couple other things. I might talk
4 confusing a little bit, maybe too fast. If you don't
5 understand me, let me know and I'll reask it. If you do
6 answer one of my questions, I'm going to assume you that
7 did understand it; is that fair?

8 A That's fair.

9 Q Let's go on back to about March of last year.
10 What house did you live at?

11 A 4937 Hopespring Drive.

12 Q And who lived there with you?

13 A Casey, George and myself, and Caylee Marie.

14 Q Tell me a little bit. How many bedrooms was
15 the house?

16 A We have four bedrooms.

17 Q And did Caylee Marie have her own bedroom?

18 A Yes, she did.

19 Q During that time period, was it your
20 understanding -- and this is in the beginning of last
21 year -- was it your understanding that your daughter
22 Casey had a job?

23 A Yes, it was.

24 Q where was she working, to your knowledge, at
25 that point in time?

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1 A To my knowledge, Universal Studios and Hard
2 Rock Café.

3 Q And that was something that she told you
4 during that time period?

5 A Yes.

6 Q Did you ever learn from any other source
7 during that time period that she was working there; in
8 other words, somebody from the Hard Rock Café ever call
9 her for work? Did somebody from Universal ever contact
10 the house?

11 A Not that I'm aware of.

12 Q So the only source of information would have
13 been from your daughter; is that fair to say, from Casey?

14 A Yes.

15 Q And you also knew some of your daughter's
16 friends is my understanding?

17 A Some of them, yes.

18 Q Amy -- well. Amy Huizenga were friends?

19 A I never met Amy Huizenga in March. I didn't
20 know Amy Huizenga until July the 15th of 2008.

21 Q Thanks for clarifying that. So of Casey's
22 friends during, let's say, the early time period of last
23 year, of Casey's friends, did you ever hear from them
24 anybody mention where, in fact, she worked?

25 A I didn't talk to Casey's friends.

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1 Q So it's -- I apologize. So my understanding
2 is what you're telling me is Casey's the one who told you

3 she had a job back during that time period; is that
4 correct?

5 A That is correct. I actually was with her when
6 she met her first boss back in June of 2004.

7 Q All right. Now, but I'm talking about in
8 2005.

9 A I have never -- I had never had a reason to
10 believe she did not still have her job which I did have
11 knowledge of that she did have a job.

12 Q And that first boss was who?

13 A You know, I can't remember his name right now.
14 It's not on the tip of my tongue. I'll probably remember
15 it before this is over, though.

16 Q I'm sorry. What year was that?

17 A 2004, I believe, I when she started. It was
18 the year before Caylee was born.

19 Q Now, do you or your husband claim Casey, your
20 daughter, as a dependent on your taxes?

21 A No. I haven't claimed Casey since she was 18
22 years old.

23 Q So it's fair to say she paid her own taxes or
24 should have paid her own taxes?

25 A Yes.

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1 Q Did you ever see any documents coming in like
2 a W-2 to the house?

3 A Yes, I have seen a W-2 form.

4 Q Another thing I should have told you earlier
5 and I apologize. I'm going to ask a question. You
6 probably know what I'm asking you, but because we want to
7 make this clear, let me finish -- I appreciate what

8 you're doing, but let me finish my question and then
9 we'll go from there.

10 So back during the 2004 time period, are you
11 saying you saw a W-2 come in?

12 A Yes, I did.

13 Q How about in 2005?

14 A I don't recall.

15 Q Don't recall seeing it. And how about going
16 forward from there 2006, 2007?

17 A No.

18 Q And then 2008?

19 A The only reason is because that was her first
20 W-2 and I actually helped her with her taxes. I did not
21 need to help her do that after that year, so that's why I
22 would not have had a reason to look at her.

23 Q But on that point, after 2005, did you ever
24 see her doing her taxes?

25 A No.

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1 Q Do you know if she ever received a tax refund?

2 A All I've seen was an H&R Block card from her.

3 Q All right. So as far as -- let's go back now
4 to the period when -- she was taking care of Caylee and
5 there were issues about baby-sitters. I just want to
6 focus in on it. Your understanding was she had a job
7 that was the same job of the boss that you had met back
8 in 2004?

9 A Yes, similar.

10 Q Similar. Was it at the same company?

11 A Not really because she never worked for
12 Universal Studios. She work at Universal Studios. These

13 were companies that were contracted by Universal Studios.

14 Q Have you subsequently come to learn about when
15 the last time was she actually did, in fact, have a job?

16 A I can't remember the exact date.

17 Q Is it fair to say, though, that you've come
18 now at this point in time to find out that she did not
19 actually hold a job at Universal Studios back in about a
20 year ago or so back in March of April of last year?

21 A She never worked for Universal Studios.

22 Q Did she have any job you're aware of now in
23 March or April of last year where she received a
24 paycheck?

25 A Yes.

□Rough Draft - 11

1 Q where was that?

2 A Through my -- where my son works.

3 Q And what's that?

4 A Click and Park.

5 Q I'm sorry?

6 A Game Day, Click and Park. I'm not sure of the
7 exact name, but I know that she did receive a paycheck
8 because she did help him.

9 Q How much did she receive; do you know?

10 A I have no idea.

11 Q And what was her position?

12 A She just helped him with some of his work on
13 the Super Bowl last year, a year ago.

14 Q So Super Bowl a year ago would have been in,
15 obviously, end of January, early February. Other than
16 helping your son, Lee Anthony, are you aware of any other
17 payments or source of income that she would have been

18 receiving last year?

19 A Not -- no, not to my knowledge.

20 Q So is it fair to say your understanding is
21 that she did not have a source of income certainly from
22 Universal or any of those other entities associated
23 within Universal back in 2008?

24 A That's correct.

25 Q Okay. Now, your husband has testified and
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1 we've heard from him about who watched your
2 granddaughter, and it's my understanding that she lived
3 in your house, of course. And did you help contribute
4 for feeding her and clothing her, all that type of stuff?

5 A Yes, I did.

6 Q Paid medical bills, I assume?

7 A No, I never paid -- I think I only paid one
8 medical bill for Caylee, and that was right after Caylee
9 was born.

10 Q Is it fair to say that you were involved
11 actively in raising her?

12 A Yes.

13 Q And of -- my understanding is you work full
14 time?

15 A Yes.

16 Q And where was it you were working back in
17 2008?

18 A Genteva Home Care.

19 Q What was your position?

20 A I'm a nurse manager.

21 Q And do you have a certain shift that you work?

22 A I work day term.

23 Q Is that 7:00 to 7:00 or --

24 A My -- you know, I could go in at 7:30. I

25 could go in at 8:00. I could be there at 7:00. It just
Rough Draft - 13

1 depends on what time I wanted to be there. But usually
2 there at least by 8:30, and then till 5:00, 5:30, 6:00 or
3 whatever.

4 Q Is that a Monday through Friday?

5 A Monday through Friday.

6 Q Home health nurse is what you are?

7 A Nurse manager in a home healthcare company.

8 Q There's night shifts and then there's day?

9 A Not in my company.

10 Q So just day shift?

11 A Not for what I do.

12 Q And your husband was also working back in
13 2008; is that correct?

14 A Yes.

15 Q And what was his job, let's say, starting with
16 January through December 2008?

17 A You know, I can't remember. George has had a
18 couple jobs in 2008. I can't remember what he had.

19 Q There were periods of time, though, that both
20 of you were working; is that correct?

21 A Yes.

22 Q Now, at the times that George wasn't working,
23 would George be actively involved in the watching of your
24 granddaughter?

25 A George was actively involved with Caylee when
Rough Draft - 14

1 he was working or when he wasn't. We both were.

2 Q I want to be clear on my question so let me
3 clarify it again, and I apologize.

4 A I thought you were finished. I apologize.

5 Q That's okay. What I'm saying is when he
6 wasn't at the office or wherever he was working and he
7 was at home, would he be the one that was in charge of
8 watching her and babysitting for her, taking care of her?

9 A If Casey wasn't there, yes.

10 Q Now, if Casey wasn't working during this time
11 period and your husband was taking care of your
12 granddaughter, do you know where Casey would have been
13 going if she wasn't working or do you have any
14 information on that?

15 A I -- I have no idea.

16 Q Aside from you watching your granddaughter and
17 George watching your granddaughter and then, of course,
18 Casey, of the three of you watching her, what would you
19 say the percentage was? Do you think that you and your
20 husband watched her more than Casey back in, let's say,
21 before 2008, the 2007 time period?

22 A No. I think Casey watched Caylee more than
23 any of us did.

24 Q Okay. So a statement that 99 percent of the
25 time was you or your husband, you're saying that Casey

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1 watched her more often?

2 A Casey watched her more often. I was --
3 Casey -- when I would come home from work, I would be
4 there.

5 Q Right.

6 A And I would not necessarily watch Casey, I
7 mean, Caylee, but Caylee was in the same house.

8 Q I understand.

9 A So unless Caylee, you know, unless Casey was
10 gone from the house, then I didn't have to, quote,
11 unquote, baby-sit her --

12 Q I understand that.

13 A -- and on the weekends. So if I'm working
14 Monday through Friday 40 to 50 hours a week --

15 Q Now, and if your understanding is that Casey
16 doesn't have a full-time job during this time period, if
17 she wasn't watching her and your husband wasn't watching
18 her and you weren't watching her, did you all have any
19 other baby-sitter during this time period?

20 A There was different people that baby-sat
21 Caylee.

22 Q Let's kind of go back on that. Would one of
23 those people be Lauren Gibbs?

24 A Yes.

25 Q And what --

□ Rough Draft - 16

1 A But not in 2008.

2 Q I appreciate you clarifying. Let's go back.
3 Lauren Gibbs would --

4 A Lauren Gibbs.

5 Q Lauren Gibbs would have babysit her when?

6 A Right after Casey went back to work, which was
7 three months after Caylee was born.

8 Q So do you know how long a time period it was
9 that Lauren Gibbs watched her?

10 A Lauren Gibbs watched her probably until about

11 January, roughly. I can't say for sure on the dates.

12 Q January what year would that be?

13 A 2006.

14 Q And do you know if she was ever compensated or
15 paid for watching her?

16 A I don't believe so. Lauren did that as a
17 favor because she was Casey's best friend.

18 Q And as far as other people in that same
19 category, people who did it because they were friends
20 with either you or your husband or the family, who else
21 would be in the category of let's call them baby-sitters?
22 who else would there be?

23 A I know her fiance at that time, Jesse Grund,
24 watched Caylee. He watched her either at his parents'
25 home or at my home. I know his father, Richard Grund,

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1 and his father or his mother, Deborah Grund, watched
2 Caylee for Casey while Casey would work. I know that
3 Christina Chester watched Caylee. Holly Gognon watched
4 Caylee.

5 Q Let me just stop you there. So we have Lauren
6 Gibbs, Jesse Grund -- and Jesse Grund, obviously, knew
7 the family and knew you; is that right?

8 A Uh-huh.

9 Q You have to answer out loud because she's
10 taking it down.

11 A Yes.

12 Q And Richard and Deborah Grund, you knew them
13 and they also knew the family?

14 A Yes.

15 Q Holly >Gagne?

16 A >Gogne.
17 Q Holly >Gogne, you know her as well?
18 A Yes.
19 Q And the family knows her?
20 A Yes.
21 Q And Christina what was her name?
22 A Chester.
23 Q Gesture?
24 A Chester, C.
25 Q You know her and the family knows her as well?

□ Rough Draft - 18

1 A I did not meet Christina Chester till -- you
2 know, I met Christina Chester briefly when Casey was
3 pregnant. I met her at a like Babies r Us, and that was
4 the only really time that I had met her before. I didn't
5 really know her that well. She was a schoolmate of
6 Casey's.
7 Q Fair. Somebody who knew Casey and you
8 actually had laid eyes on and talked to; is that right?
9 A Uh-huh, actually because I ran into her one
10 day when Casey and I were shopping for Caylee's things.
11 Q It's your understanding, correct me if I'm
12 wrong, that Holly >Gogne, Grund family and also Christina
13 Chester, they did it, again, because they were friends
14 with the family and they weren't compensated; is that
15 right?
16 A As far as I know.
17 Q Well, you certainly never paid them?
18 A No, I didn't.
19 Q And you don't believe your husband paid them
20 either?

21 A No, I didn't. Wouldn't have been our
22 responsibility to do that.

23 Q On that point, though, did Casey ever say to
24 you that she paid any of these people to watch your
25 child?

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1 A We never discussed that.

2 Q So no knowledge if she did or not?

3 A Never discussed it with her. It wasn't an
4 issue.

5 Q Now, all these people -- again, we're talking
6 about the time period when your granddaughter was from an
7 infant through being a toddler, of all these people,
8 though, they were all people that you could reach out to
9 and get ahold of if necessary; is that fair to say? If
10 something happened and something happened to either you
11 or your husband --

12 A No, that's not true. I never had Jesse
13 Grund's cell phone number. I never had Richard Grund's
14 cell phone number. I do not know where they lived. I
15 never went to their house. So, no, that's not correct.
16 I never had Christina's phone number. Lauren was the
17 only one that I had a phone number for and I knew where
18 she lived.

19 Q Let me go back, though. But you knew that
20 Richard's first name and last name, Richard Grund and
21 Deborah Grund, Jesse's first name and last name, and you
22 had actually met them?

23 A Yes, I'm sorry.

24 Q You actually met them and they were people
25 that if they walked in the room, you would recognize

□Rough Draft - 20

1 them; is that right?

2 A Yes, correct.

3 Q Now, have we covered all the people?

4 A No. There was other friends of Casey's that
5 watched Caylee.

6 Q Now, the people that you know and that you've
7 met and all the people you listed for me are people that
8 you know and you've met.

9 A I wouldn't so I know them.

10 Q I understand. When I say know, I mean it like
11 I met you.

12 A I could identify them.

13 Q I met you and you could identify me and I
14 could identify you.

15 A I probably wouldn't be able to pick out
16 Christina again except we got close after Caylee went
17 missing. I would know her now, but prior to that, I
18 wouldn't be able to pick her out of a line up.

19 Q All right. Now, did you -- at some point in
20 time -- these were baby-sitters. Was anybody in this
21 group, were they ever referred to as a nanny?

22 A No.

23 Q And your understanding is a nanny is somebody
24 that's compensated or paid for their services?

25 A You're assuming that's my understanding of a
Rough Draft - 21

1 nanny. I really have never thought of what a nanny is.

2 A nanny is someone that helps watch a child.

3 Q All right. Well, in your experience, a nanny
4 generally, correct me if I'm wrong --

5 A Jesse is the one, excuse me, that started
6 calling Zanny the nanny. Okay? Casey called her the
7 baby-sitter. So the nanny came from the Grunds.

8 Q Fair enough. And we're going to get -- I
9 haven't gotten there yet. I know you're fast-forwarding
10 to that.

11 A I just don't see the relevance.

12 Q I understand, ma'am, and we're going to get
13 there in a moment.

14 So of all these people, though, it's fair to
15 say that baby-sitters that you've listed for me are
16 baby-sitters that you knew and if push came to shove, you
17 could get ahold of them somehow. Something happened to
18 you, your husband or Casey, you could get ahold of these
19 people?

20 A I'm not sure at the time if I could have
21 gotten ahold of the Grunds without contacting Casey. You
22 know, there was other people. I saw pictures of Jeffrey
23 Hopkins. The other gentleman that Zenaida watched, Zanny
24 watched, her son Zachary, I saw a picture of Zachary and
25 Jeff. I could pick them out because I saw pictures of

□ Rough Draft - 22

1 them.

2 Q Have you ever seen a picture of Zanny?

3 A No, I haven't.

4 Q Now, I wanted to clarify --

5 A But I have a picture in my head from
6 descriptions from the last two and a half years.

7 Q But unlike the people that you listed to me
8 because you've never met Zanny, I assume, you can't --
9 you can't tell me what she looks like from your own

10 personal observations; is that right?

11 A That's correct.

12 Q So this isn't somebody that if something had
13 happened to either yourself or your husband that you had
14 a method of reaching out and get ahold of this --

15 A Actually, I had phone numbers for Zanny at
16 different times and I had addresses at different times.

17 Q Why don't you tell me the phone number.

18 A I don't have it now.

19 Q Where is it?

20 A I -- I don't have it now.

21 Q Where would it have been?

22 A Would have been in an address book, something
23 that Casey had or I had.

24 Q So when you say you had -- let me get this
25 straight. You had addresses and phone numbers of Zanny,

□ Rough Draft - 23

1 and Zanny is -- your understanding -- when you're saying
2 Zanny, I want to make sure, Zanny is the person that you
3 were saying was watching --

4 A Casey always gave me a phone number, yes.

5 Q And these phone numbers, you're saying they
6 are in existence and you've written them down somewhere
7 in an address book and they're out there somewhere to be
8 found; is that right?

9 A I gave all that to the sheriff's department.

10 Q So then the sheriff's department will have all
11 that?

12 A I gave it all to the sheriff's department.

13 Q That will include the address of Zanny, of
14 this person?

15 A Anything I had I gave to the sheriff's
16 department.

17 Q The phone numbers, do you remember the area
18 code of them?

19 A No.

20 Q How about the address, for instance, of the
21 part of the town where the address was?

22 A From my knowledge, Casey told me there was
23 like four different addresses over the course of three
24 years, that she moved quite frequently.

25 Q And these four -- the addresses, then, and the
Rough Draft - 24

1 phone numbers, they all came from Casey?

2 A Yes.

3 Q Did Zenaida or Zanny, the person that you
4 believed was watching Caylee, did she in any way provide
5 to you a phone number or an address?

6 A No, never needed to talk to her.

7 Q Did she --

8 A I never needed to talk to her.

9 Q If the need arose that you needed to talk to
10 her, get ahold of her, would you have had to go to these
11 addresses and phone numbers that Casey gave you; is that
12 right?

13 A Yes, correct.

14 Q Did you ever dial or call or talk to this
15 person?

16 A No, I have not.

17 Q And let me -- I just want to clarify some
18 things. We have some things that I need to ask about
19 this, and I just want to clarify so we're clear on a

20 couple of different things.

21 (Whereupon, a video is being played for the

22 witness not reported by the court reporter.)

23 Q Let me ask that question. The statement that

24 you made there about this is a person who's been in

25 normal conversations with for three years prior to

□Rough Draft - 25

1 Caylee's birth; is that accurate?

2 A No, that was a misstatement. And that was a

3 week after my granddaughter went missing.

4 Q I understand. The reason I made --

5 A That was like three days after Caylee went

6 missing and, do you know what? That was -- that was just

7 a misstatement.

8 Q And that's fine. We're clarifying. That

9 statement there that this is somebody whose name you had

10 heard.

11 A And probably no sleep for, you know.

12 Q That statement, just to be clear on the record

13 that this is somebody whose name has been in normal

14 conversation around your house for three years prior to

15 Caylee's birth, that's inaccurate?

16 A That's inaccurate.

17 Q Right.

18 A From about 2006, to clarify that.

19 Q So you're sitting here as we sit here today,

20 again, this is at a different circumstance than that --

21 are you saying that her Zanny's identity was conversed

22 around your house from when until when?

23 A Zanny's name came up back around when Jesse

24 and Casey were engaged, and that was in 2006.

25 Q So in 2006, you first heard the name Zanny.
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1 Did you ever hear Jesse talk about Zanny?

2 A Yes.

3 Q Did jesse Grund talk about Zanny?

4 A Yes.

5 Q What did Jesse Grund say as far as who --

6 A I can't remember. I just know the name came
7 up while he was --

8 Q When I say talk about Zanny, I want to be a
9 little bit more clear about that. Did Jesse Grund ever
10 tell you that he had met or seen Zanny?

11 A No.

12 Q So where the name came up, it may have been in
13 conversation as you said, but it wasn't like I just came
14 from Zanny, and --

15 A No.

16 Q -- Zanny was watching Caylee; is that right?

17 A No, correct.

18 Q Let me expand that question out a little bit.
19 Is there any other person besides your daughter that has
20 told you that they have met or seen Zanny?

21 A No, but Caylee talked about Zanny's dog.

22 Q We'll get to that in a second.

23 A She's another person.

24 Q I appreciate that. I just want to be clear?

25 A If there's a dog that belongs to Zanny, then
Rough Draft - 27

1 there must be a Zanny.

2 Q Fair enough. Besides your daughter and Caylee

3 saying that about the dog, okay, is there any other adult
4 that has said to you I have met Zanny or I know who she
5 is?

6 A Not that I'm aware of.

7 Q I'm just going to hit this briefly on this
8 pointed. You said Caylee talked about the dog. Describe
9 for me what time period we're talking about that was.

10 A Probably sometime between March and May of
11 2008.

12 Q March and May --

13 A May have been even before that.

14 Q Anything else besides the statement about the
15 dog?

16 A She talked about her dog.

17 Q Okay.

18 A Caylee loved dogs.

19 Q So I assume there is a statement about the dog
20 and that would be the extent of it?

21 A Uh-huh.

22 Q So sort of backing up then, as far as whether
23 Zanny was somebody that any adult saw, you don't have any
24 knowledge that this Zanny person who was watching Caylee
25 was seen by any adult; is that right?

□ Rough Draft - 28

1 A I wouldn't know if anybody saw her, you know.

2 Q That's kind of what I'm getting at. You
3 wouldn't know --

4 A How would I know if you saw somebody. I
5 wouldn't know if she saw me. I'm not in someone else's
6 head, so I have no idea if anybody saw it. That's kind
7 of a question I couldn't answer.

8 Q Okay. Did anybody say to you, hey, I met
9 Zanny. She's a nice girl?

10 A No, I never -- Zanny never came up in
11 conversation with anybody other than Casey typically.

12 Q So where you're saying here on Greta
13 Vansustren, and we got the dates wrong but you're saying
14 in normal conversation around your house, that normal
15 conversation you're talking about is from Casey and you;
16 is that right?

17 A Right, or my husband George.

18 Q And it's your understanding that he had never
19 seen Zanny either; is that right?

20 A That's correct.

21 Q And once again, as far as the phone number and
22 how to get ahold of her or address, that would have been
23 all information that had been given to you by Casey and
24 you say you've turned all that over?

25 A Right. Casey would give me a new phone number
Rough Draft - 29

1 for Zanny probably every three months because she said
2 the girl changed her phone number almost like she changed
3 her address.

4 Q Did Casey tell you that she was paying Zanny?

5 A I never asked her.

6 Q Okay. What was your understanding of whether
7 Zanny was doing it for free or whether she was getting
8 compensated?

9 A My understanding was Jeffrey Hopkins was
10 paying Zanny, who was his ex-girlfriend, to watch his
11 little boy Zachary when Casey first met Zanny, and
12 Jeffrey was compensating for both children.

13 Q Okay.

14 A And then later on --

15 Q Let me stop you there, and we'll get to that
16 in just a second.

17 A I'm answering your question.

18 Q You are, ma'am, and I appreciate that. Your
19 understanding is that Jeffrey Hopkins was the
20 ex-boyfriend of Zanny?

21 A Yes.

22 Q And how did you gain that understanding or
23 that knowledge?

24 A Because that's what Casey told me. When she
25 first met Jeff, she was working for -- I believe she was

□ Rough Draft - 30

1 still working for Colorvision or Kodak, one of them, I
2 don't know when they changed hands, and Jeffrey was a IT
3 tech at Universal.

4 Q Okay.

5 A And that's when I saw his picture and
6 Zachary's picture.

7 Q Now, where is Jeffrey Hopkins today?

8 A I have no idea.

9 Q Now, the information that Zanny was the
10 ex-girlfriend or girlfriend of Jeffrey Hopkins came you
11 to by Jeffrey Hopkins?

12 A No, I never met him.

13 Q How did you get that information --

14 A From Casey.

15 Q I'll finish the question and we'll get it.
16 You know what I'm asking and I appreciate it.

17 The information about Jeffrey Hopkins being

18 the boyfriend of Zanny --

19 MR. CONWAY: It's all right.

20 THE WITNESS: He just asked me a question how

21 I got it and I answered it.

22 Q I'll reask it. I appreciate that.

23 A Raise your hand when you're finished and I'll

24 know that you're done.

25 Q I think you'll know when I'm finished, ma'am.
Rough Draft - 31

1 A I thought I did. Obviously, I was wrong.

2 Q Jeffrey Hopkins and this relationship between
3 him and Zanny and this being the boyfriend and also the
4 part about him compensating Zanny, that information came
5 from Casey?

6 A Yes, it did.

7 Q You've never spoken to Jeffrey Hopkins about
8 this relationship between Zanny and him?

9 A No.

10 Q Have you ever spoken to Jeffrey Hopkins?

11 A No, I haven't.

12 Q So the only information that you have, and if
13 there's more, tell me. The only information you have
14 about Jeffrey Hopkins having a girlfriend named Zanny who
15 was watching the kids came from your daughter Casey?

16 A Correct.

17 Q And there's no other source out there?

18 A Correct.

19 Q All right. So it's your understanding based
20 upon what Casey told you that Jeffrey Hopkins was paying
21 for Zanny to watch both children. How long a time period
22 was that and how did you learn that? Is that from Casey?

23 A From Casey. I think that was until December
24 of 2007.

25 Q How about after December 2007? Obviously, you
Rough Draft - 32

1 had an understanding that she was being paid by Jeffrey
2 Hopkins. Did you come to an understanding as to who now
3 was paying Zanny after Jeffrey Hopkins was no longer
4 paying her?

5 A I didn't ask. Wasn't an issue.

6 Q Did you have an assumption in your head that
7 Zanny is something who charges for her services?

8 A Again, the -- it never came up.

9 Q Little different question, though. Did you
10 have an assumption in your head that Zanny was somebody
11 who charges for childcare?

12 A By that time Casey and Zanny had been friends,
13 so a lot of Casey's friends volunteered to watch Caylee.
14 Caylee was a delightful young child --

15 Q Yes, ma'am.

16 A -- that everybody liked to watch, so you asked
17 me a question, let me finish it. What I'm telling you is
18 it never came up and I didn't think about it. And I'm
19 answering your question.

20 Q Just so I'm clear. You had an understanding
21 in your mind that at one point in time Zanny was being
22 compensated by Jeffrey Hopkins; is that correct?

23 A That's correct.

24 Q And as you said that ended around the end of
25 2007; is that correct?

Rough Draft - 33

1 A From my understanding.
Page 27

2 Q And after that, do you have an understanding
3 in your mind as to who, if anybody, was compensating
4 Zanny for her childcare services?

5 A No, because I was never -- I never spoke to
6 Casey about that. So, again, Casey told me that she was
7 being compensated by Jeffrey. When Jeffrey moved, I
8 didn't ask who was compensating Zanny, so I have no
9 understanding. I do not know. Again, Zanny was a friend
10 of Casey's, so she could very well have volunteered.
11 That did not come up.

12 Q Did Casey say to you that Zanny, my friend, is
13 volunteering to watch my daughter?

14 A The subject did not come up.

15 Q So when you're saying it could have happened,
16 that's not something you know either --

17 A I can't speculate.

18 Q Ma'am, I appreciate that. Let me finish my
19 question, if you don't mind. When you're saying it could
20 have happened, that isn't something you know by a
21 affected that you've learned from anybody; is that right?

22 A No.

23 Q So as far as whether she was volunteering,
24 this Zanny person, or whether she was being compensated
25 from 2007 on, you really don't know?

□ Rough Draft - 34

1 A No, and I don't know if Casey ever paid Lauren
2 or anybody else either because I never asked them.

3 Q I appreciate that.

4 A Again, that didn't come up. So I never -- I
5 never interviewed any of her baby-sitters to find out if
6 they were getting paid or not. It wasn't my position to

7 do that.

8 Q I understand that, ma'am. That wasn't really
9 my question, ma'am.

10 A I'm trying to clarify the question when you
11 ask me specifically about Zanny, so I'm clarifying it
12 wasn't just Zanny that I didn't have that knowledge of.
13 I didn't have the knowledge for any of them. She asked
14 several people to watch. I don't know if they paid or
15 not. I assume they didn't get paid. But, again, Casey
16 was working then, so it's irrelevant to C. Zenaida
17 Gonzalez. I'm sorry.

18 Q You said two things, but let me just go on
19 back. During this time period, you have no specific
20 knowledge if Zanny was doing it for free or whether she
21 was being paid; is that correct?

22 MR. CONWAY: Mr. Dill, she's answered the
23 question over and over again.

24 MR. DILL: Sir, you can make your objection.
25 You know you can make your objection.

□Rough Draft - 35

1 BY MR. DILL:

2 Q I just want to clarify. You have no specific
3 knowledge that Zanny was doing it for free or being paid
4 from 2007 on; is that correct?

5 A As I stated, I have no particular knowledge.

6 Q Now, when you said Casey was working after
7 2007, is this based on the information you told me before
8 about her working at Universal or is it based on some
9 other fact that we haven't talked about?

10 A Casey never worked at Universal Studios, for
11 Universal Studios.

12 Q I misunderstood when you said that before.
13 Anybody affiliated with Universal Studios or Hard Rock
14 Café, which you told me about earlier. Do you have any
15 understanding or information that Casey was working for
16 any entity after 2007 when Jeff Hopkins was out of the
17 picture going forward?

18 A At this -- at that point, I was under the
19 impression that she was working. I do not have any proof
20 that she was working.

21 Q And you've come to learn that she was not
22 working; is that correct?

23 A That's correct.

24 Q So when you said before that Casey was working
25 then, it's your understanding now that Casey was not

□ Rough Draft - 36

1 working then; is that right?

2 A My understanding now is that she wasn't
3 working at those particular places.

4 Q Or anywhere else?

5 A I don't know that.

6 Q So you don't have any information that she was
7 working anywhere else?

8 A I don't know that. I can't answer that.

9 Q All right. So you told me before you never
10 talked to Zanny on the phone. Did you ever talk to Casey
11 when she was with Zanny or said she was with Zanny?

12 A Possibly.

13 Q Don't have a recollection specifically?

14 A I don't have a specific date. That's
15 possible.

16 Q All right. Now --

17 A I know she called me from Zanny's apartments.

18 Q Because she told you she was at Zanny's

19 apartment?

20 A Because she told me she was at the hospital.

21 Q Which apartment was that?

22 A Again, I can't tell you. I'd have to have a

23 specific date to tell you what end of town she lived on

24 that particular time.

25 Q Let's go general to make it easier. At what
Rough Draft - 37

1 point in time was it that you were called from Zanny's
2 apartment knowing anywhere in town or any of the counties
3 around here, including Osceola and Sanford, that she was
4 calling from somewhere?

5 A Zanny only lived in Orange County.

6 Q She only lived in Orange County, and how do
7 you know that?

8 A Because Casey told me.

9 Q All right. And when did Casey tell you that?

10 A Over the years that we talked about Zanny,
11 that she lived -- the places that she described, the
12 areas of town that she described, was only in Orange
13 County.

14 Q So when she called from the apartment, did
15 Zanny ever have a house or was it always an apartment?

16 A It was always an apartment, to my knowledge,
17 except her mom had a house, I believe, was a house. It
18 could have been an apartment.

19 Q You're getting that information about her mom
20 from Casey?

21 A Casey, of course.

22 Q And so all the information you have about
23 Zanny -- ma'am, if I may. All the information you have
24 about Zanny comes from Casey?

25 A Of course, because Caylee's too little to tell
Rough Draft - 38

1 me about it.

2 Q So when you're saying that she called from an
3 apartment, that would have been Casey telling you I'm
4 calling from Zanny's and it's wherever it is?

5 A Right. She'd say I'm going to stay at Zanny's
6 tonight.

7 Q How many times did Casey stay out of the house
8 with Zanny and with Caylee? I mean, we're talking about
9 before --

10 A What time frame?

11 Q Let me narrow it down. How many times was it
12 before June 15th that Casey stayed out of the house with
13 Zanny and with Caylee?

14 A Maybe on an average once or twice a month.

15 Q And during this time period, you're saying
16 that Caylee was able to speak and talk about where she
17 had been or where she had gone?

18 A Well, Caylee's been speaking since she was 18
19 months in phrases, but she's two. Unless I specifically
20 asked her questions, her point of reference is what's
21 right in front of her.

22 Q So she would never volunteer about other than
23 the dog as you told me, never volunteer about, let's say,
24 where she was or anything like that?

25 A Right.
Rough Draft - 39

1 Q Now, so during this time period -- and we're
2 going to go on forward a little bit here in the March
3 time period because we're already into 2008, March
4 through May of 2008, it's your understanding that Zanny
5 is a baby-sitter for Caylee; is that correct, or a nanny,
6 baby-sitter, whatever you want to use?

7 A Yes.

8 Q And that's all, again, based upon what Casey
9 has told you, essentially, that she's the one watching
10 her; is that right?

11 A Right.

12 Q All right.

13 A And that wouldn't be very often.

14 Q How often would it be?

15 A You know, just -- most of the time Casey was
16 gone in the evenings so I would watch Caylee.

17 Q So when you said that there were times where
18 she would stay over at Zanny's house, that would be how
19 many times would you estimate?

20 A I said once or twice a month.

21 Q Once or twice a month, so we're starting at
22 what time period of once or twice a month she stayed over
23 there?

24 A It would have had to have been when -- she had
25 to have gone when I was at work because if I had been

□ Rough Draft - 40

1 home, she wouldn't have needed to take her.

2 Q How about with the staying over part because
3 you would be home every night, wouldn't you?

4 A Right, but if she was already gone and I was

5 at work --

6 Q So once or two times a month?

7 A Yes.

8 Q Okay. And it's your understanding that the

9 Zanny --

10 A Most of the time, Caylee -- Casey brought
11 Caylee up to my office and dropped her off and then I
12 took her home.

13 Q Couple other questions here on the dog issue.
14 What kind of dog was it? Was it ever described?

15 A You know, it was a little white dog. I don't
16 remember if it was a Pomeranian mix or what it was.

17 Q And when she's saying she liked playing with
18 the dog, how did she describe the dog?

19 A She just called it her -- the new puppy.

20 Q So --

21 A I can't remember the name. It was several
22 months ago.

23 Q She talked about the new puppy, then how did
24 you get in your mind about Zanny and the new puppy?

25 A Because I asked her if it was Zanny's puppy.

□ Rough Draft - 41

1 Q And she responded yes?

2 A Yes.

3 Q So there is no other description besides the
4 new puppy in all that?

5 A Correct.

6 Q What time period was this that that was said?

7 A I believe I told you somewhere between March
8 and May, and it could have been earlier than that.

9 Q So when she stayed out of the house, let's say

10 during the March and May time period, if it's a couple
11 times or once or twice a month, that would have been in
12 March or May. From March going forward to May?

13 A It was all the time.

14 Q All the time?

15 A Uh-huh, once or twice a month.

16 Q Going back to when?

17 A Probably December.

18 Q December 2 --

19 A January or December.

20 Q January, December 2007, so you're saying once
21 or twice a month from January to December --

22 A Yeah, January 2008, December 2007.

23 Q Till May. Again, you never picked up either
24 your daughter or Caylee at this apartment or location
25 where this was?

□ Rough Draft - 42

1 A Never had to.

2 Q And it never actually physically --

3 A The need never arose.

4 Q I understand. You never physically went there
5 to this apartment?

6 A Correct.

7 Q And you never physically saw a dog or anything
8 that your granddaughter had been talking about?

9 A No.

10 Q Was there ever a time that you told law
11 enforcement about Caylee talking about Zanny's dog?

12 A I believe so.

13 Q Do you know if you were asked that by law
14 enforcement?

15 A I don't know if law enforcement knew to ask me
16 about a dog.

17 Q well --

18 A Oh, actually, I do remember speaking to law
19 enforcement about it because there was a tip that came in
20 from Texas in July, and the person fit Zenaida's
21 description, and she had the same type of dog. And the
22 little girl at the pool said her name was Caylee, and she
23 fit the description of my granddaughter, so I did speak
24 to them about it.

25 Q And this -- that was in response to the tip
Rough Draft - 43

1 later on?

2 A Yes, and that was probably in July.

3 Q Okay.

4 A Or August.

5 Q But when you told me -- you told me a few
6 minutes ago that Caylee would talk about Zanny's dog, did
7 you ever volunteer that to law enforcement?

8 A You know, I don't know. I don't know.

9 Q No recollection if you did or not?

10 A No, no. I volunteered a lot of stuff to law
11 enforcement. I gave them Zanny's curling iron. I gave
12 them some movies that came from Zanny's apartment that
13 Casey had brought home, you know, different items.

14 Q We're going to get to the curling iron and
15 movies in a second. Was it at law enforcement that you
16 talked to about the dog; do you recall?

17 A It had to be someone from missing persons and
18 probably either John Allen or Gary Mellich because they
19 were on the case or could have been Nick Savage from FBI

20 because I spoke to them with tips.

21 Q And every one of those -- you had interviews
22 with them that were recorded; is that right?

23 A I know that now.

24 Q Okay.

25 A No one told me that when we were having them.

□ Rough Draft - 44

1 Q So is it fair to say when you were -- when you
2 were talking and you're being open and honest with them,
3 clearly?

4 A Right. It wasn't during those taped
5 interviews, though, that you guys have seen on TV.

6 Q It's another interview you're saying --

7 A It's when I used go down to the sheriff's
8 department three times a week and go over tips with them.

9 Q And it still --

10 A They didn't pull me into a room where they had
11 video, so I'm sure that was not part of the video.

12 Q So you don't know right now as you're sitting
13 here who it was from law enforcement that you spoke with?

14 A No. I'm sure it was someone from missing
15 persons because that's who I would, you know, go over
16 tips with. It was either Cary Roddick or Awilda and, I'm
17 sorry, I can't remember her last name right now.

18 Q And there was -- was that one occasion or more
19 than one occasion or just in response to that tip?

20 A I talked to them about these tips on several
21 occasions. Sometimes the same tip on several occasions
22 so I can't tell you how many times.

23 Q Now, when Casey would stay over at the
24 baby-sitter's over at Zanny's, would they pack a bag for

25 Caylee?
Rough Draft - 45

1 A Casey always packed a bag for Caylee.

2 Q So she had a understanding or knowledge when
3 she was going to be staying over and she would take
4 clothes from the house?

5 A Casey always had a bag for Caylee no matter
6 where she went. Caylee and I went to the store, we
7 always had a bag for Caylee with extra clothes and
8 diapers and things in it.

9 Q How many days worth of clothes would have been
10 in the bag?

11 A Probably two, as a normal thing. I used to do
12 that for my kids. Even if I just went to my mom for the
13 day, I'd pack two outfits because you never know what
14 kids are going to get into.

15 Q Was there ever an extended period of time,
16 more than, say, two days, that Casey was outside of the
17 house with Caylee -- I'm sorry -- that Casey and Caylee
18 were outside of the house with Zanny prior to the
19 disappearance?

20 A Casey was never. It was never consecutive two
21 days. It was only one day at a time before June.

22 Q So it was never a period of two, three, four,
23 five --

24 A Nope. I'm saying one to two times a month.

25 Q So there was never an extended period of
Rough Draft - 46

1 time --

2 A No.

3 Q -- as we go along that she's out of the house

4 for a week of time?

5 A No, not prior to June 16.

6 Q Zanny's curling iron and movies, where did
7 those come from and who gave them to you?

8 A I remember about a year ago Casey -- actually,
9 it wasn't a curling iron. It was a hair straightener
10 that Casey had at the house. I saw it. I asked her
11 where did you get that. She said Zanny gave it to me.
12 And same thing about a year or so ago Casey had some
13 videos and she said that Zanny didn't want the videos
14 anymore so we had some videos at the house so I gave them
15 to John Allen and Cary rod Rick from missing persons
16 because I thought that there might be fingerprints on
17 them.

18 I also gave them Caylee's airbag at that time
19 that Casey bought specifically for Zanny's apartment if
20 she ever had to stay overnight there.

21 Q She would bring the airbag with her?

22 A Casey had the airbag in her car so if she ever
23 needed it.

24 Q And where was -- where was the airbag?

25 A The airbag's with the sheriff's department.

□ Rough Draft - 47

1 Q So how about the time period when she was gone
2 and supposedly he had given Zanny the child, where was
3 the airbag then?

4 A What do you mean supposedly? Clarify that
5 question.

6 Q Okay. Well, we're going to get to in a second
7 but there came a point 234 time where your daughter was
8 supposedly, according to her, gave Caylee to the

9 baby-sitter. The baby-sitter had the child?
10 A What specific date are you talking about?
11 Q June 15th moving forward.
12 A All right.
13 Q So at that point in time, the airbag that
14 you're telling me about --
15 A Casey, from my understanding, never gave
16 Caylee to Zanny.
17 Q Okay. I think you understand what I'm asking.
18 A (Shakes head.) .
19 Q When she went missing on June 15 --
20 A She didn't go missing on June 15. It was June
21 16.
22 Q I'm sorry, ma'am. June 6th, moving forward,
23 was this airbag, this air mattress that you're telling me
24 about, was that in Casey's possession or your possession?
25 A That was at the house at that time.

□ Rough Draft - 48

1 Q The house meaning your house?
2 A Yes.
3 Q Okay. So this wasn't a trip where, as you
4 said before, that there would be times where she slept
5 over and that the air mattress would have gone with her.
6 This wasn't one of them; is that right?
7 A No. From my understanding, on June 16th,
8 Casey was going to pick Caylee back up at 4:00 in the
9 afternoon or whatever time it was.
10 Q Okay. Well, you were aware of the presence of
11 the air mattress in your house; was that right?
12 A I didn't know it was in the house until I
13 started going through things.

14 Q When was that?

15 A Actually, I didn't even think about the air
16 mattress until -- till the day they gave it to John
17 Allen, and I can't remember the specific date, but it was
18 the day after they did their first search of the house.

19 Q So the date they first searched your house
20 would have been after the 911 calls; is that right?

21 A Yes.

22 Q When was the date of the first search of the
23 house?

24 A That's what I'm just saying. I can't remember
25 the date of the first search of the house, but it was the

□ Rough Draft - 49

1 very next day because of what they were looking for in
2 the house is when I started thinking that next morning
3 and I was cleaning, and when I saw the hair straightener,
4 I said, oh, my gosh, because they were looking for
5 evidence at that time. It was the first time they were
6 actually looking in my house for evidence, so I thought
7 something that may have fingerprints or hairs on it, so I
8 went through closets. I went through things to see if
9 anything would trigger in my head something that they
10 could use.

11 So I also gave them her favorite movies like
12 bam by and different things so that they could take
13 fingerprints off.

14 Q We're getting far --

15 A You asked me a question and I'm explaining to
16 you.

17 Q This air mattresses you're telling she about,
18 this is something that Casey used to take with her to

19 Zanny so her child could sleep on; is that right?

20 A If she thought that she might be staying late.

21 Q So it wasn't until after there was a search
22 through the house that you actually thought about whether
23 the air mattress had been taken to Zanny's house or not?

24 A Like I said, I happened to stumble across the
25 air mattress and I had more gotten about the air

□ Rough Draft - 50

1 mattress. I didn't realize that it was here. For all I
2 know it could have been in someone's apartment. You
3 know, Casey -- she could have left it at Zanny's house.
4 I hadn't seen it until I started looking for it. It was
5 in a spare closet.

6 Q Did you ever tell investigators that she used
7 take this air mattress over to have her daughter Caylee
8 sleep at Zanny's?

9 A Yes, I did. When I gave it to John Allen that
10 was the reason I handed it to John Allen.

11 Q Prior to the time you handed it to John Allen,
12 there were other times you talked to investigators?

13 A Again, I forgot about the air mattress until I
14 ran across it when I was looking specifically after they
15 searched the house on the first time so I wouldn't have
16 had a reason to think about it.

17 Q So during the 31 day time period when Caylee
18 in your mind was missing, that you --

19 A 31 day period Caylee was not missing in my
20 mind.

21 Q There came a point by July 3rd at least you
22 that thought she was missing?

23 A No, I did not believe that Caylee Marie was

24 missing until July 15th. If I would have thought that
25 Caylee Marie was missing before July 15th, I would have
Rough Draft - 51

1 called 911 before July 15th.

2 Q Okay. Let me -- we'll get back to the air
3 mattress in just a bit. You had a Myspace account, did
4 you not?

5 A Yes, I opened a Myspace account.

6 Q And you actually would post on Myspace, right?

7 A I posted it for my daughter -- for Casey's
8 benefit only because I didn't have any friends on
9 Myspace, and I did it --

10 Q Let me hand you -- we'll go ahead and mark
11 this as an exhibit. And that's -- you recognize that,
12 don't you.

13 (Exhibit No. was marked.)

14 A Yeah, I know it. I wrote it.

15 Q You wrote it and this is something you put on
16 Myspace, correct?

17 A Right, for Casey. And I tried to get her to
18 be my friend so she could read that.

19 Q All right. So what is the date of that
20 posting?

21 A July the 3rd.

22 Q All right. And you say, what? What is the
23 title of the posting?

24 A My Caylee is missing.

25 Q All right. So is it fair to say that when you
Rough Draft - 52

1 wrote this, your mind was that Caylee, in fact, was

2 missing?

3 A No.

4 Q So that doesn't mean -- my Caylee's missing
5 doesn't mean what it says?

6 A No.

7 Q Okay. So on July 3rd did you ever think to go
8 look for this air mattress or find out if, in fact, the
9 air mattress had been taken over to Zanny's house?

10 A No.

11 Q So this wasn't until sometime later that you
12 thought of it and you didn't --

13 A I didn't think of it until I ran across it
14 when I was looking for things in the house that could
15 potentially help the sheriff's department.

16 Q Okay. Now, you told me a few moments ago that
17 there was a time period I guess where she would stay over
18 at Zanny's house. Did you ever have any notation
19 anywhere of when those times could have been? In other
20 words, some people keep a diary, calendar while it's
21 going on. Can you direct me specifically from this May
22 or March time period on through to June what days would
23 it have been?

24 A I have no idea.

25 Q You have no idea and there's no way --

□ Rough Draft - 53

1 A I have no idea.

2 Q There is nothing we can look at to tell us?

3 A Absolutely not.

4 Q Let me clarify a couple other things here. CK
5 if any, maybe one and the only time Casey --

6 Video being played. Was they were crashing at

7 Zanny's.

8 Q So the crashing at Zanny's, I want to talk
9 about that is that what you're describing to me that she
10 would say to you she was crashing over at Zanny's?

11 A Uh-huh.

12 Q And those times she was crashing over at
13 Zanny's it's your recollection that she would bring the
14 air mattress with her?

15 A No. When Casey knew that she may work late or
16 what she had told she when she would work late, she would
17 take the air mattress and have it in her car. Okay? And
18 if she felt that it was too late to come home and to
19 disrupt Caylee, she would stay at Zanny's and stay
20 overnight and then she'd be home the next morning.

21 Q And say she was crashing?

22 A She was crashing at Zanny's. That way she
23 could sleep on the couch or wherever next to Caylee in
24 the air mattress and then pick her up -- and then bring
25 her home the next day.

□ Rough Draft - 54

1 Q So there would be times -- you physically saw
2 her taking the air mat trers with her when she left with
3 her daughter?

4 A No, not really.

5 Q Did you ever see your daughter case --

6 A Because I was thrnt when she would leave to
7 take Caylee.

8 Q So all this with whether she had the air
9 mattress or not, again, that's coming from Casey; is that
10 correct?

11 A From shy understanding I believe I saw the air

12 mattress in Casey's car quite a bit.

13 Q Okay.

14 A But it wasn't in Casey's car when we got the
15 car on July 15.

16 Q I understand that and we're going to get to
17 that but I want to focus back on this time period where
18 she's staying over at Zanny's house, you're saying that
19 when she would work late, she would take the air mattress
20 with her; is that right?

21 A No. What I'm saying is if she thought there
22 was a possibility -- if Zanny would watch her in the
23 evenings, she may have the air mattress with her. If she
24 watched her during the day, she may not have the air
25 mattress with her.

□ Rough Draft - 55

1 Q This was, again, from March to May of 2 # 008?

2 A No, actually I stated before it was probably
3 from January.

4 Q January do May 2008, bow I think, maybe I'm
5 wrong, we've already established as of now know that she
6 did not have a job CK and so she would not have been
7 working late between January and May of 2008 #?

8 A That's my understanding.

9 Q All right. Now, how do you reconcile your
10 understanding that she didn't have a job so she wouldn't
11 be working late and then she would be crashing at Zanny's
12 as you said -- ma'am, if I may -- crashing at Zanny's as
13 you told the investigators, how do you reconcile in your
14 mind those two things?

15 A You mean now?

16 Q Yes, ma'am.

17 A I don't. I don't reconcile with it.

18 Q And one --

19 A Reconciling with it means that you've come to
20 terms with it. I haven't come to terms with it.

21 Q Well, let me use a different word as opposed
22 to reconcile. There are two different things because if
23 she doesn't have a job, she's not working late, correct
24 (Witness shrugs).

25 Q Is that right?

□ Rough Draft - 56

1 A I don't know. I have -- you know, I don't
2 know if she worked or not. I don't know. I mean, you're
3 asking me. I don't know. No one has found pay stubs.
4 No one has found anything. I don't know.

5 Q And you obviously have been extremely involved
6 in this case, more than anybody as far as a lot of the
7 facts and what happened because you were looking for her.
8 Do you have any information --

9 A Because this is my granddaughter.

10 Q I understand, ma'am?

11 A I yes, I'm extremely involved in this case.
12 This is tearing me up every single day because I don't
13 have my granddaughter.

14 Q Let me direct you so we can go ahead and talk
15 about what --

16 A Can we actually get to the reason we're here
17 today is to clear Mr. More gab's client's name, that
18 she's not Zanny.

19 Q We're get thrgh in just a moment, okay.

20 A Okay, please.

21 Q Let me go back here because I want to focus.

22 There are two different opposite things. One is that
23 she's working and she's staying out and she has to crash
24 over at Zanny see as you told the police officers. And
25 the other thing is that she wasn't working.

□ Rough Draft - 57

1 A I don't know if she was staying out. You're
2 speculating and I'm not going to speculate. She could
3 have just been staying with a friend and her and Caylee
4 and the frind could have had just a nice night. I have
5 no idea and I'm not going to speculate on where my
6 daughter was. I'm not going to speculate. And you
7 shouldn't either. You don't have a Chris tap ball.

8 Q I thought you told the police officers, again,
9 we just looked at the clip, that she would have been
10 crashing at Zanny's so that swrob your understanding
11 based --

12 A That's on -- that's my understand at that
13 time. And searches then I found out that Casey wasn't
14 working and I found out a lot of stuff since then.

15 Q All right.

16 A But unfortunately, you know, you're asking me
17 something I don't know. I don't know where Casey was at,
18 and I don't know the circumstances.

19 Q Is it fair to say, then, if you don't know
20 where Casey was at, it's very possible that your
21 granddaughter was never with Zanny?

22 A I can't speculate. She could very well have
23 been with Zanny.

24 Q But you really don't have any information and
25 you also know now that she wasn't working during this

□ Rough Draft - 58

1 time period that she said she was?

2 A Do you know what?

3 MR. CONWAY: Are you cross examining her.

4 Q Can you answer her?

5 A I'm not on trial here. Bottom line is --

6 MR. CONWAY: If you ask a question.

7 MR. DILL: Hold on. If you have an objection,
8 the rules of civil procedure are objection to the
9 form. If there is some sort of privilege that I'm
10 impinging on between attorney-client, then you can
11 get involved in this but I don't want to have you
12 interrupting and coaching this witness because I'm
13 doing an examination.

14 MR. CONWAY: I'm not coaching, Mr. Dill dilz
15 Dill. If you have an objection, go ahead and make
16 the objection but I'm entitled to do my examination.
17 I intend to go forward with my examination and
18 that's what we're going to do.

19 MR. CONWAY: My objection is you're cross
20 examining. Ask a question and let her answer it.
21 That's what she's trying to do for you, listen,
22 bottom line is I shouldn't be answering any
23 questions that is not relevant to Zenaida
24 Fernandez-Gonzalez that is a civil lawsuit against
25 Casey Marie Anthony. And I am graciously answering

□ Rough Draft - 59

1 these ridiculous questions that have nothing to do
2 with Mr. Morgan's client that is the Zenaida
3 Gonzalez. Okay.

4 Q I understand you want -- if I may, Ms.

5 Anthony, I appreciate it and I have a job to do here and

6 I understand that you want to short circuit the process.

7 A I'm not trying to short circuit anything con
8 Congress I object to that back character saition.

9 A You're acausing 6 me -- I'm giving Mr. More
10 gang what he wants. He wants a tricking TV show. We're
11 getting it, you know, this is all he wants. This is why
12 we're here today.

13 Q Ma'am, if you can answer my questions -- if
14 you can answer my questions, if you do the best to answer
15 them.

16 A I think I've tried up to this pointed to
17 answer your questions.

18 Q I don't want to argue with you and I don't
19 want to argue with you.

20 MR. CONWAY: Let's take the next question.

21 Q Let's go forward. So between -- during this
22 time period up to May when shy said she was crashing at
23 Zanny's, you've come to learn now that it wouldn't be
24 because she was working late because she did not have a
25 job; is that right?

□Rough Draft - 60

1 A That's what I'm understanding.

2 Q Okay. So but your daughter told you she was
3 working late and working, right?

4 A Yes.

5 Q And is it fair to say then that your daughter
6 was not being truthful with you?

7 A That's correct.

8 Q And that wouldn't have been the only time she
9 was untruthful with you; is that right?

10 A Kids are untruthful all the time.

11 Q This -- her being untruthful about this,
12 though, is particularly important because it has to do
13 with your granddaughter, though. She was untruthful with
14 you about the location of your granddaughter certainly
15 from this time period when she said when she was working
16 late she was crashing at Zanny's; is that correct?

17 A I don't know that because she could have been
18 crashing at Zanny's. You're having me speculate that
19 Casey was not at Zanny's. You're telling me that I know
20 for a fact that there is no Zanny.

21 Q Okay. Let's go forward here. I want to ask
22 you another question on that point. CK video. Safn any
23 came Caylee's main primary baby-sitter from what Casey
24 said probably from October -- probably around right after
25 Caylee's first birthday until present time, you know what

□ Rough Draft - 61

1 I'm saying? So this person wasn't made up just a month
2 ago or whatever, but when I'm thinking I think that Zanny
3 at this point was a real person in the beginning, but I
4 think Zanny is now whoever is watching Caylee. In my
5 mind man man transferred the responsibility?

6 A The name, yes. So I think she refers to -- I
7 believe -- man man do you think we're spinning our wheels
8 looking for a Zanny.

9 THE WITNESS: I'm not sure but my -- I have
10 two theories and I'll share that with you. I think
11 Zanny could either be Amy or Jesse at this point CK
12 CK Dill.

13 Q All right. So, again, we're talking here, and
14 this is today and this interview with the police was
15 taken some time ago, obviously, I think it was in August

16 of last year?

17 A I think it was like August 1st.

18 Q We've been talking about Zanny and her
19 watching the child and you just told me that you don't
20 know that she wasn't over at Zanny's, yet you told the
21 police that you're not even sure if Zanny was a person --
22 a real person moving forward from the beginning?

23 A Again --

24 MR. CONWAY: Object to the form of the
25 question because that's not what she said.

□ Rough Draft - 62

1 Q Let me go back. I'll rephrase it. Okay?
2 You've told me for the last I guess hour and a half we're
3 talking about Zanny -- we're talking about Zanny, but
4 you've told police that it was in your mind there's a
5 thought that Zanny while she may have been a real person
6 at one point in time had evolved into anybody that was
7 watching Caylee?

8 A That was my feeling on August 1st.

9 Q Now, here we are, whatever today is, April
10 9th, you're saying what you told the police officers on
11 August 1st was not accurate?

12 A No, I'm not saying that. And on August 1st I
13 believe that Zanny could have been -- because Casey at
14 one point told me that one of the pictures that Caylee
15 was taken at was Zanny's apartment when it was Ricardo
16 Morales' apartment.

17 Q I understand the one with the drums. But
18 let's go back to thnchts there are several. There are
19 several. There is one with Caylee with her blanket.
20 There are several pictures of Caylee --

21 Q Let me do this because we've got to change
22 tape and we'll table a second. When you say in this clip
23 and you're talking to investigators you that think Zanny
24 may have been a real person at first but then later it
25 was somebody who was watching -- ma'am, if I may --
Rough Draft - 63

1 whoever was watching her, that is what you said back
2 there in August and again --

3 A That's why said could be a possibility.

4 Q -- you were telling the police officers?

5 A Yes. At that point we were looking at all
6 possibilities, sir.

7 MR. DILL: Let's go ahead and switch tapes.

8 THE VIDEOGRAPHER: Time is 2:24. We'll go off
9 the record.

10 (A minute recess was had.)

11 THE VIDEOGRAPHER: Time is 2:29 p.m. We're
12 back on record.

13 BY MR. DILL:

14 Q You were saying some things before concerning
15 Zenaida Gonzalez. And, again, you've said volunteered a
16 few times that you don't believe that this person,
17 Zenaida Gonzalez, was the one who was watching at any
18 time Caylee?

19 A Absolutely not.

20 Q And as you sit here today, you don't have any
21 information that she had anything to do with watching
22 Caylee or the disappearance or anything else; is that
23 correct?

24 A Correct. I mean, on the same assumption that,
25 you know, Casey gave me information regarding Zenaida

1 Gonzalez. She told me her name was Zenaida
2 Fernandez-Gonzalez. She told me she was 25 years old.
3 She also told the sheriff's department. It's in the
4 discovery, page 29, her description of Zenaida Gonzalez.
5 That was her handwritten statement taken on July 16th at
6 10500 a.m.

7 Q Let me focus in on that and this is an
8 important point. That description you're talking about,
9 you know that your daughter gave information to the
10 police; is that right?

11 A Yes, I was there when she wrote the statement.
12 I was there when she told Jerry Melich. I was there when
13 she told the other detectives.

14 Q It's also your understanding that squint to
15 when she was incarcerated, when she first was put in
16 jail, that she actually had been interviewed by the
17 police about this person, about this Zenaida Gonzalez; is
18 that right?

19 A Yes. My understanding is also what I've read
20 and I've seen on the discovery page 4 of the narrative
21 from John Allen that he pulled your Zenaida out of the
22 David file. He went down and spoke to her, and then he
23 showed Casey a picture of her, and Casey did not
24 recognize her. John Allen also told me that there was
25 only two Zenaida Gonzalezs in Orlando.

1 Q Let me go to that first point because that
2 obviously is an point important because you understand
3 that there was a photo line up and that your daughter

4 identified -- if I may -- your daughter identified her --
5 didn't identify her. Said I've never have seen her.
6 That's your understanding; is that right and that's what
7 police told you?

8 A That's what they told me and that's what I
9 read in the discovery, the narrative.

10 MR. CONWAY: Can we stop it for a minute.
11 You're making it awfully hard on the court reporter.
12 You're stepping on her. Could we go to a question
13 and let her answer it for you.

14 Q I appreciate that on this pointed that we're
15 talking about, though, you have an understanding that
16 there was -- your daughter had been shown the photograph.
17 I'm focusing on that now. You visited with your daughter
18 in jail right around July 25th. Do you remember that?

19 A That's correct.

20 Q Let's take a look at that visitation. Video
21 play. Did anybody ask you to describe her and they did a
22 composite drawing of her. Not once and when they went
23 and interviewed that girl down in Kissimmee they never
24 showed me a picture of her. They never search -- they
25 told us that you couldn't pull her out of a line up.

□ Rough Draft - 66

1 They're full of shit. I had told them multiple times
2 find a sketch artist. Show me pictures, show me
3 something. I could point her out to you.

4 A That's correct.

5 Q So -- just so I'm understanding that you were
6 asking her about whether they ever shoid her a photo and
7 she's saying no. Didn't you just tell me --

8 A That's correct whavment I'm telling you is

9 based on what John Allen told me and what I read in
10 discovery is my understanding of what happened that they
11 showed her a picture.

12 Q So based on what -- based on what John Allen,
13 you read, it was your understanding --

14 A That's what John Allen personally told me.

15 Q You don't believe John Allen's lying to you,
16 do you?

17 A No, I don't believe John 58 hen's lying.

18 Q If John Allen's being truthful then in fact he
19 showed your daughter a picture of this Zenaida Gonzalez
20 and she said she didn't recognize her; is that right,
21 based on your understanding?

22 A That's my understanding.

23 Q But we just saw your daughter say that they
24 never showed her anything and that girl that they
25 interviewed down in Kissimmee, this girl here that was

□ Rough Draft - 67

1 interviewed down in Kissimmee, they never showed her
2 picture of that?

3 A That's what she states, yes.

4 Q Do you believe that to be true or not?

5 A I have no idea. I was not in the vehicle when
6 Casey when John Allen showed her.

7 Q You just told me a moment ago you that believe
8 John Allen when he said that he showed a picture of
9 Zenaida Gonzalez --

10 A You asked me if John Allen would have a reason
11 to lie and I said, no, I don't know that John Allen would
12 have a reason to lie.

13 Q So assume for he hypothetically John Allen's

14 being truthful and the questions you were asking her were
15 in fact truthful that you had been told or it was your
16 understanding there had been a photo line up. well, your
17 daughter's saying something quite different there, isn't
18 she's?

19 A Yes.

20 Q And what she's saying based on your knowledge
21 what happened in the investigation, what she's saying
22 is, again, inaccurate?

23 A well, again, you know what? I don't know
24 that. I wasn't in the car with Casey. She could be
25 telling the truth. John Allen could be lying. I have no

□ Rough Draft - 68

1 idea. I don't know why he would.

2 Q At that point in time, then, who did you think
3 was telling the truth, John Allen or your daughter?

4 A At that point in time, I really didn't know
5 what to believe because at that point in time I wasn't
6 trusting the sheriff's department.

7 Q But you had an understanding, though, because
8 you talked about it, that this person down in Kissimmee
9 had in fact been interviewed? You knew that, right?

10 A Correct.

11 Q Okay. As you sit here this person down in
12 Kissimmee we're talking about you know that we're talking
13 about Zenaida Gonzalez that is sitting here; is that
14 right?

15 A I only know that because she interviewed with
16 channel 6.

17 Q I didn't ask why. I just need to know. When
18 your see talking about --

19 A You asked me a question.

20 MR. CONWAY: Let her answer a question. If
21 you ask her too broad of a question, she's going to
22 give the answer --

23 A Ask me a yes or no question and I'll answer
24 yes or no, but if you ask me an open ended question I'm
25 going to answer the question.

□ Rough Draft - 69

1 Q Fair enough. Let's go back to this statement
2 by your daughter. At that point in time when your
3 daughter said -- you didn't know fit was true or you
4 didn't know it was false, right, correct.

5 Q And you -- when you went in there you were
6 going on information from John Al rent that you think to
7 be -- thought to be true at the time?

8 A At the time John Allen told me that. At the
9 time I did not read the discovery.

10 Q As we sit here now, though, you've read the
11 discovery?

12 A Yes.

13 Q And you believe the discovery to be true?

14 A Actually, I don't believe half of the
15 discovery because -- I don't --

16 Q I understand?

17 A Because there is a lot of typographical errors
18 in the discovery. In fact, if you look at page 145 and
19 49, there is typographical errors on the card that she
20 filled out at Sawgrass Apartments.

21 Q I'm sure there is and we're going to get to
22 that from a moment, am?

23 A It's not a because somebody added a name to

24 her Z after it was picked up from the sheriff's
25 department.

□Rough Draft - 70

1 Q I'm not talking about typographicalers. I
2 didn't say anything about hype?

3 A Gone sally and Gonzalez is two different
4 names, so -- you're asking me a question if I believe
5 everything that I read in the discovery, I'm answering
6 that question because I'm telling you exactly why I don't
7 believe it.

8 Q I'm sorry. I didn't ask the question and if I
9 did ask it that way --

10 A Yeah, did you.

11 Q If I asked it this way, I apologize. The
12 statement made by the police officer John Allen that he
13 in fact showed her a picture of Zenaida Gonzalez and she
14 said she didn't know who it was, you believe that
15 statement to be true?

16 A He told me he pulled up on the David.

17 Q I don't know what a David it. I don't know if
18 it's a computer or a picture?

19 MR. MORGAN: It's a yes or no question.

20 A A picture is this. You're questioning/j me E
21 a question yes or no, clarify for me. A picture I don't
22 know.

23 Q Sure, I'll declare fight it?

24 A I don't know.

25 Q You at this point in time as we sit here

□Rough Draft - 71

1 today -- ma'am, if I may, please. I'm trying to ask
2 these questions. Don't beacon at the sending.

3 Q I'm trying not to do that?

4 A Yeah, you are.

5 Q As you sit here today you've read the
6 discovery and you read the part of the discovery and this
7 is what I'm focusing on whether that he, John Allen, or
8 somebody from the police department showed your daughter
9 a picture of this Zenaida Gonzalez. You thawndz. Is
10 that yes or no. Do you have that understanding?

11 A He told me -- yes. He said that he showed
12 something with her picture on it.

13 Q And you believe that statement that he told
14 you, you believe that to be true?

15 A At the time I believed it to be true.

16 Q Okay. At the time when he told you that you
17 believed it to be true?

18 A Correct.

19 Q Was that before you spoke to her?

20 A Yes.

21 Q So you knew something that you believed to be
22 true at that point in time was that this police officer
23 had shown her photograph of our client, Mr. Morgan's
24 client, and that she had exonerated said, no, that's not
25 the right person?

□ Rough Draft - 72

1 A Correct.

2 Q That was in your mind that that was true?

3 A That's correct.

4 Q When you asked your daughter these questions,
5 it was also in your mind that that was true; is that
6 correct?

7 A Correct.

8 Q So when your daughter tells you she was never
9 shown a photo line up on this exact point, do you believe
10 your daughter at that point or do you believe Mr --
11 detective Allen?

12 A At that point I can't remember what I believe.
13 At this point, I still don't know what I believe.

14 Q Well, what is the truth and what isn't true,
15 then, as far as that statement, that's all I'm talking
16 about, this statement here that your daughter was shown a
17 photograph of Zenaida Gonzalez, my client, what do you
18 believe to be true? Do you think that happened or not?

19 A My belief has nothing to do with it because I
20 wasn't there.

21 Q I understand you weren't there. Do you
22 believe that happened or not?

23 A I have no idea. I really don't know what I
24 believe and that's the honest to God's truth.

25 Q During this time period here in July, though,
Rough Draft - 73

1 when you were speaking with your daughter, she was -- you
2 were asking her to relay messages to you so you could
3 relay messages through the media because you were talking
4 to the media at this pointed; is that right?

5 A Yes. I was talking to the media quite a bit
6 to get Caylee's picture out there gli understand that and
7 obviously we saw one picture already from get ta van and
8 there were other news organizations too but it's fair to
9 say like we had today there were cameras around you; is
10 that right.

11 A On which particular day.

12 Q Any time. If you wanted to talk to media --
Page 61

13 A I couldn't sneeze without a camera iewnd
14 around me, sir.

15 Q That's what I'm getting at. So when you were
16 talking to Caylee in jail there earlier in the day I
17 think you asked her if she had any messages for Zanny.
18 Do you remember that, and --

19 A I remember at some point. Whether or not that
20 was that particular one, I don't know.

21 Q So it's fair to say that she was giving you
22 the authority to speak for her bypassing along messages
23 and stuff?

24 A Correct.

25 Q So when you were talking to the media, you
Rough Draft - 74

1 were talking on your daughter's behalf for the idea to
2 try to find Caylee?

3 A Correct.

4 Q You're speaking for her?

5 A Correct.

6 Q So you're saying that on this particular day,
7 that statement you don't know if it was true or not. You
8 don't know what to believe. Let's go forward here. Did
9 you also talk to the immediate I don't know the 28th?

10 A They're calling my CK CK.

11 A Are they lying to us when they told us there's
12 only one in Central Florida and she's in Kissimmee and
13 because, you know, my doubt I said that she didn't
14 recognize her. My daughter said they never showed her
15 picture.

16 A That's what they told me.

17 A She said she didn't look at any line ups.

18 A That's true.

19 Q I don't have a question pending so we'll go
20 ahead and focus it. You've gone and you've had this
21 conversation from your daughter. She's now empowered you
22 to go ahead and basically broadcast or publish what her
23 thoughts are, her statements.

24 A (Nods head.)

25 Q And as we see here you've gone and you've Brad
Rough Draft - 75

1 cast her statement about this particular Zenaida Gonzalez
2 really to the world; is that right?

3 A I broadcast her?

4 Q No, no, the statement, I just heard it, about
5 that -- whether she was shown a photo line up, that type
6 of thing, that was now published to anybody who wants to
7 watch; is that right?

8 A Okay.

9 Q And obviously this case as we all the know has
10 a great deal of public interest, right?

11 A (Witness shrugs).

12 Q Is that --

13 A Of course.

14 Q So the statement that the police officers have
15 made that your daughter has denied that this Zenaida
16 Gonzalez is the actual Zenaida Gonzalez, that now has
17 been undone by this statement you've made because your
18 daughter has told you and you've broadcast to the world
19 that she never was shown a photograph?

20 A No, it's not undone because Casey's
21 handwritten statement does not describe her. Her
22 birthday is not September 1 the. She not 25 years old.

23 She's not five foot seven. She's not 140 pounds. She
24 doesn't have black hair. She doesn't have perfect teeth.

25 She's not a ten. I'm sorry, ma'am. You're cute but
Rough Draft - 76

1 you're not a ten.

2 Q Did you say all those things to the press
3 here?

4 A I didn't need to.

5 Q Did you say it when the cam was was there?
6 Did you say anything about how you just described Ms.
7 Gonzalez for me on --

8 A Not on that day. Ask me a question if I ever
9 talked to the press about that young lady.

10 Q I'm going's oh we're going to go one question
11 at a time?

12 A Then I'll answer it.

13 MR. MORGAN: Right now the question and then
14 follow up. Brad has the right -- later Ms. Anthony
15 to ask his own questions for you to clarify.

16 THE WITNESS: He just asked me if I ever
17 talked to the media about it, yeah, I did.

18 MR. MORGAN: Hold on. We're entitled to ask
19 our questions and I know there's questions you may
20 want us to ask and then later Brad will have that
21 opportunity for you to be -- for you to clarify.

22 BY MR. DILL:

23 Q So on this date when this statement was
24 made -- I'm talking about this statement here, if I may.

25 The statement to the media that your daughter has
Rough Draft - 77

1 authorized you to make, again, that is something that
2 you're talking about the photo lineup and whether a
3 photograph has been shown to the police about my client.
4 That's what you were talking about on this date, correct?

5 A I believe so.

6 Q All right.

7 A But that's only part of the interview. You
8 never see the whole interview on TV, so I can't tell you
9 if I didn't say more on that day.

10 MR. CONWAY: She's entitled to answer. You're
11 asking me a question.

12 MR. MORGAN: Listen, Brad. Your -- she's
13 entitled to answer and then you're entitled later to
14 come back as you well know and ask her your own set
15 of questions to clarify.

16 MR. CONWAY: All I'm asking is that she fully
17 answer the question. That's I'm asking.

18 MR. MORGAN: She will because you'll ask
19 anything you want.

20 THE WITNESS: He's shaking his head when I'm
21 answering a question. That's exactly what Shir I
22 have's department did to my daughter. They never
23 let her speak. You guys are doing the same thing to
24 me.

25 Q When you said that to the media and when I say
Rough Draft - 78

1 that to the media, I'm focusing now just about this
2 statement that you said in front of the cameras on July
3 28th referring to what your daughter had told you in the
4 jail. When you said that to the media, when you were out
5 there, you had questions in your mind as to whether the

6 statement you were making was truthful or not; is that
7 fair to say?

8 A I don't get what you're asking. You're asking
9 me if I thought that sheriff's office statement was not
10 true or Casey's statement was not true?

11 Q Either or both. You had questions in -- if I
12 may. I'll rephrase it since you don't understand.

13 You had a question in your mind when you said
14 that about your daughter told you and your daughter
15 wasn't shown a photograph, you had a question in your
16 mind as to whether your daughter was telling you the
17 truth or not; is that right?

18 A No, I didn't have a question.

19 MR. CONWAY: Yes or no.

20 A No.

21 Q No question in your mind. You believe when
22 they said to you they didn't show me a photo line up, you
23 believe that to be the truth?

24 A I didn't have a question whether or not she
25 was telling me the truth.

□ Rough Draft - 79

1 Q What did you have a question about?

2 A I didn't. You're asking me if I had a
3 question. I didn't have a question about any of it.

4 Q So now about she said to you and you told me
5 before you didn't know what truth was. When she said to
6 you they didn't show me a photo, you believe that to be
7 true and the police to be inaccurate; is that what you're
8 saying?

9 A No. What I'm saying is the sheriff's office
10 told me certain things. At the time when they told me, I

11 believed them. As time goes on, I'm not sure what I
12 believe. Same thing with Casey.

13 Q So when you talked to the media on this date,
14 just this clip. Thinks the only clip I'm talking about
15 now, you weren't resolved in your mind as to what the
16 truth was and what was not the truth about this statement
17 about the photo lineup of Zenaida Gonzalez; is that fair
18 to say?

19 MR. CONWAY: Yes or no.

20 A Whether or not Casey was shown a picture, I'm
21 not sure if Casey was shown a picture at that date.

22 Q And whether -- how about whether Casey was
23 being truthful with you or not 1234 were you sure or not
24 sure or you don't know?

25 A I don't know CK. She had no reason to lie at
Rough Draft - 80

1 that point about her.

2 Q Casey your daughter had no listen to lie at
3 that pointed?

4 A She had no reason to lie about the picture
5 that they would have shown her. It would have made no --
6 it would have made no sense for her to say it's not her
7 or she didn't see the picture -- why would she lie about
8 that.

9 Q Your daughter -- is it fair to say your
10 daughter's lied to you about many things?

11 A It's fair to say that the sheriff's department
12 lied to me about many things.

13 Q We'll get to the sheriff department lying to
14 you in a minute but I want to ask you about your
15 daughter. Is it fair prior to this time you that made

16 this statement to the media that your daughter has lied
17 to you about many things?

18 A Correct.

19 Q And so when you're saying you don't know if
20 she had a reason to lie or not, other than the fact that
21 there was some suspicion of your daughter involvement in
22 her daughter's disappearance CK, do you think that she
23 was more truthful because she told you or do you think
24 she's more -- let me reask it. I apologize.

25 At this pointed in time you're saying you're
Rough Draft - 81

1 not sure if your daughter's telling the truth or not
2 about the picture or do you know?

3 A I believe Casey may not have been shown a
4 picture of this particular Zenaida.

5 Q And you say you believe that. You believe
6 that now?

7 A I believe that now.

8 Q Okay.

9 A That there's a possibility that she may not
10 have been shown that picture.

11 Q All right. Now, if the flip -- now we've
12 heard through -- you were saying it before about the
13 description and the police showing her. Are you saying
14 that the police are being untruthful about that they
15 showed your daughter a picture of my client?

16 A What I'm saying is that the sheriff's
17 department has stated many things that have been not
18 truthful.

19 Q Okay. But I want to go specifically to this
20 issue because it's an important issue, ma'am, obviously.

21 Do you believe the share I have's department was lying to
22 you and not only lying to you lying in official documents
23 about whether they showed your daughter a photograph of
24 my client Zenaida Gonzalez?

25 A Well, the reason I believe it's a possibility
Rough Draft - 82

1 that they were telling me not the truth CK about it is
2 because they also told me in the same breath that there
3 was only two Zenaidas that they were able to pull up, and
4 I was able to pull up on the same day eleven myself. So
5 that's when the doubt came to my mind before I went to
6 see my daughter there.

7 So, yes.

8 Q So but as --

9 A The doubt is there.

10 Q But as we sit here today, we're not talking
11 about whether there's a doubt or not, do you believe that
12 the police department, the sheriff's office that was
13 charged with finding your granddaughter, do you believe
14 that they misled the public and misled you and misled
15 everybody else about that they showed Casey a photograph
16 of my client. Is that what you believe?

17 A I don't know. There's a possibility that they
18 could have.

19 Q And that's based upon the fact about the
20 Zenaida Gonzalezs you're talking about?

21 A It's because of the fact that they told me on
22 the same breath that he told me he showed her a picture
23 that there was only two, and that's why he singled her
24 out. It was John Allen that picked her, not Casey.

25 Q The John Allen picked her and not Casey?
Rough Draft - 83

1 A John Allen told me he's the one that went to
2 her. Casey never told him to go to Kissimmee. Casey
3 never said the person lived in Kissimmee. John Allen
4 went to Kissimmee. Read his reported CK. He said she
5 went to Kissimmee and interviewed her. Read the
6 discovery unless the discovery's wrong.

7 Q I guess that's where we're getting at.
8 Besides the fact about the number of Zenaida Gonzalezs
9 that you just said to me, I just want to make sure are
10 you saying here now today under oath that it's your
11 belief that the police are lying?

12 A No.

13 Q That the police are lying about that statement
14 in the discovery CK?

15 A No. I'm not saying that I believe they're
16 lying.

17 Q Where did you pull up the Zenaida -- the
18 multiple Zenaida Gonzalezs? What computer would that
19 have been?

20 A What do you mean what computer?

21 Q Said you pulled it up. I assuming you pulled
22 it up on a computer?

23 A You're asking me what computer or what site I
24 pulled it up on?

25 Q Both.

□ Rough Draft - 84

1 A No, you didn't. Now you're asking both.
2 That's what I was trying to clarify. But now because I
3 went there -- gli appreciate that.

4 A But see your questions aren't specific and
Page 70

5 that's why --

6 Q That's my fault. I'll make them more
7 specific.

8 A Okay, please.

9 Q You said you pulled up and to me that means
10 pulled up means ran a search on the Internet.

11 A Correct.

12 Q Was that on a computer?

13 A Yes.

14 Q What computer was that?

15 A It was my desktop.

16 Q The desktop that the -- the Hugh lit pack card
17 desk top from your house?

18 A Yes.

19 Q St one that's been squeezed?

20 A Actually, it was after because they only took
21 it for four days CK. They took it July 17 and I got it
22 back on July twoafn.

23 Q So the searches you're talking about when you
24 got it back, are you saying that they wouldn't be there
25 because you ran the search on July tweafnth?

□ Rough Draft - 85

1 A It was actually August the 16th when I ran
2 some searches on her because I have some print outs. I
3 probably ran it before then but I have print outs that
4 are printed out with the date --

5 Q This statement here was made on July 28th that
6 you made, right? So at that point in time, you didn't
7 have any information about --

8 A What I just said, if you listen to my
9 statement, I said I have some that I printed out on

10 July -- I mean, on August the 6th, but I know I ran some
11 searches prior to that.

12 Q Okay. When you say you ran searches --

13 A But my computer was back in my home on July 22
14 acknowledged and you're saying I made that statement on
15 July the 28th. So, yes, I could have ran searches after
16 they had my computer, and that's where you're getting at.

17 Q Okay. I'm going to so oh?

18 A Correct? Isn't that what you're getting at?
19 You wanted to see the time frame?

20 Q My question was a little bit more specific and
21 simple than that CK. You're talking about a search that
22 you ran about the multiple Zenaida Gonzalezs. Are you
23 saying here -- again, we're under oath -- are you saying
24 here that prior to the time you made this statement to
25 the media, you made multiple searches for Zenaida

□Rough Draft - 86

1 Gonzalezs?

2 A Correct.

3 Q So that's what you're saying. That is your
4 recollection?

5 A I started -- I started on the 16th of July
6 looking up Zenaida Gonzalez on Myspace and searches.

7 Q Okay. And there was 21 something that came
8 up?

9 A There was eleven just in Orange County.

10 Q well, the searches that you ran, then, would
11 have been on July sixth as you said, those would have
12 been showing up on the history for the desktop, right?

13 A Possibly CK.

14 Q And we could get the sites there fr that. Do
Page 72

15 you recall what the sites were?

16 A No.

17 Q No recollection?

18 A Probably Myspace. I think I went on Myspace
19 first.

20 Q When you're searching on Myspace, that's not a
21 search 17 gin. You're searching Myspace?

22 A I'm searching Myspace. It's a search engine.

23 Q Well, maybe I'm confusing --

24 A And then I did a people search later on and a
25 did a My Orange Clerk -- My Orange County Clerk. I've

□ Rough Draft - 87

1 done several.

2 Q All that's later on after the fact?

3 A Yeah, because I different have a computer on
4 joolt 17th.

5 Q And let me ask this.

6 Q Going back -- we're going to move forward from
7 this statement here. Going back, then, as you sit here
8 today, and this isn't what you were thinking then, this
9 is what you're thinking now, are you saying that you
10 think the police are being untruthful about whether they
11 showed your daughter a photo of my client?

12 A What oil --

13 MR. CONWAY: The question has been asked and
14 answer bd four different times.

15 Q I just want to know today?

16 MR. CONWAY: She said she doesn't know.

17 A I stated I'm not sure if they did or not.

18 That's even today. I am not sure.

19 Q You're not sure. Okay.

20 Q You were telling me before about addresses,
21 that Casey had given you about the addresses about Zanny.
22 I'm sorry.

23 The computer search, the computer search that
24 you did that you pulled off the computer about all the 21
25 odd or different people.

□ Rough Draft - 88

1 A I never said 21. You've said 21.

2 Q whatever number it was that you said to me
3 before that cast doubt as to whether the police were
4 being honest with you, whatever number of searches and
5 all the searches and the print ups and things you talked
6 about, did you give those to Dominic Casey, the
7 investigator?

8 A No, I did not.

9 Q why not?

10 A Because he wasn't working for me at that time.

11 Q was there ever a time that he was working for
12 you?

13 A Not early on.

14 Q was there ever a time he was working for you?

15 A Yes. He still is.

16 Q And when -- during the time he was working
17 with you before the December time frame, during that time
18 period when your granddaughter's missing, did you ever
19 give those addresses to Dominic Casey, the Zenaida
20 Gonzalez information?

21 A No, I didn't.

22 Q why not?

23 A Because I gave them to José Baez when I had
24 them.

25 Q And is it your understanding that José Baez --
Rough Draft - 89

1 do you know what he did with them?

2 A I have no idea. And I know Dominic was
3 working for him when I gave them to him.

4 Q I'm going to go through some of the time line
5 a little bit about -- around the June period, so we're
6 going to focus on that right now. It's my understanding
7 that around the first week of June of last year, you took
8 a vacation. You had Caylee most of that week?

9 A That's correct.

10 Q Was there -- there's some talk in some of the
11 interviews about -- when I say interviews, I mean police
12 interviews -- that Casey had been telling Amy Huizenga
13 that you and Mr. Anthony were splitting up and moving
14 out, moving to Mt. Dora, moving out of the house, and
15 that Casey would be moving into the house with a me.

16 A I do not know what Casey told Amy Huizenga.

17 Q Well, is there any truth to that, though, that
18 you and George were going to be moving up to Mt. Dora or
19 leaving the house somehow to Casey? Is there any
20 accuracy or truth to that?

21 A No.

22 Q So there came a point in time, though, later
23 on where you did talk to Amy later on?

24 A The only time I ever talked to Amy was July
25 the 15th.

Rough Draft - 90

1 Q Okay. July 15th, and that's the day you
2 actually found your daughter over at was it Tony

3 Lazzaro's apartment?

4 A That's correct. Amy took me there.

5 Q Now, during this -- I'm going to focus you in.
6 During the time after your birthday -- your birthday was
7 June 5th?

8 A Correct.

9 Q During that time period, was Casey saying --
10 during that time period there, what the source of her
11 income was there? Did she ever mention it specifically
12 at that point?

13 A We didn't talk about her source of income
14 during that time frame.

15 Q And did you ever come to know that both Casey
16 and Casey were in fact staying over at Ricardo Morales'
17 house?

18 A Casey and Caylee did not stay at Ricardo.

19 MR. MORGAN: 's house on June 5th CK.

20 Q I'm not talking about June 1st?

21 A Then what are you asking? You just the
22 defendant me about that time frame, so go back.

23 Q No problem. Let's say June 7th, around there,
24 around that time period. Did you ever learn that Casey
25 and Caylee were in fact staying over at Ricardo's house?

□ Rough Draft - 91

1 A I learned it, yes.

2 Q And you learned that later?

3 A After the fact, yes.

4 Q That was something that was inconsistent, from
5 what your daughter was telling you she was doing with her
6 daughter; is that right?

7 A On June 7th, I wasn't home. I had no idea.

8 Q well --

9 A If that was -- she didn't tell me where she
10 was at because I wasn't home.

11 Q Did she ever tell you, mom, Caylee and I
12 stayed over at Ricardo's house?

13 A No.

14 Q And it's fair to say that would have been
15 probably something you would have disapproved of because
16 Caylee really should have been home in her own bed?

17 A I would have to know the circumstances.

18 Q Can you think of a circumstance around the
19 June time period where it would have been something you
20 approved of having Caylee and Casey sleep over at
21 Ricardo's house without you knowing about it?

22 A I don't know what circumstance would be.

23 Q So if, in fact, Caylee and Casey were staying
24 at Ricardo's house on June 7th --

25 A It's not my decision where Casey stays. She's

□ Rough Draft - 92

1 an adult and Caylee's her daughter. It's not up to me to
2 stay where Caylee stays to clarify that question.

3 Q And June 7 r, that would be something you'd
4 want to know about, though?

5 A No. It's none of my business.

6 Q But did you ever hear from Casey or Caylee
7 during that time period that they had stayed over at
8 Ricardo's house?

9 A No. I -- on the 7th of June I was staying at
10 my mom's house that night because my dad was very ill.

11 Q And your dad up in the nursing home?

12 A Yes.

13 Q And that's in Lake County is my understanding;
14 is that right?

15 A It's not relevant to this.

16 Q Well, it's in all the documents that it's up
17 in late county so I just -- hold on. I just want to
18 understand --

19 A My dad is irrelevant to this.

20 Q I'm not asking about your dad's condition or
21 anything else.

22 A No. Do you know what? My parents don't need
23 people going up there with cameras so my point is leave
24 them out of it. I'm not going to answer any questions
25 about my father or my mother.

□ Rough Draft - 93

1 Q Well, your mother did in fact speak with
2 investigators, did she not?

3 A To my knowledge --

4 Q Right.

5 A -- you know, only that I've heard or seen,
6 yes, but I wasn't there.

7 Q I understand that.

8 A Okay?

9 Q You heard it --

10 A I wasn't physically there.

11 Q You've read --

12 A I haven't seen video things and I haven't seen
13 the depositions. I haven't read all the discovery. It's
14 very hard for me.

15 Q I understand, ma'am?

16 A To read such. I just -- we just had Caylee's
17 memorial two months ago.

18 Q Let me cut through this because I'm not asking
19 about all that.

20 A Well, you're asking me if I know for a fact.
21 All I know is what I hear.

22 Q Okay. You have heard and you have an
23 understanding that your mom was interviewed --

24 A Yes.

25 Q -- by the investigator?

□ Rough Draft - 94

1 A Several times glue also know and have an
2 understanding that your daughter had taken money from
3 your mother; is that right.

4 A Correct.

5 Q And when was that and how much was that?

6 A I believe there was a 27 dollar or 47
7 something one time and 200 and some dollars one time.

8 Q And that she actually took money from your
9 grandmother -- I'm sorry -- from your mother, her
10 grandmother, by writing a bad check. Is that your
11 understanding?

12 A Correct.

13 Q And it had something to do with the Publix and
14 also Casey's birthday party, second birthday party; is
15 that right?

16 A That was the same one, the Publix was Caylee's
17 second birthday party.

18 Q When did you become aware of that affected
19 that your mother had been -- had money taken from her by
20 your daughter?

21 A My mother told me.

22 Q When did she tell you?

23 A Shortly thereafter she found out about it --
24 same day she found out about it.

25 Q Now, did you ever confront Casey and ask why
Rough Draft - 95

1 would it be that Casey, who you thought had I job, would
2 be stealing money from your mother?

3 A Yes, I did.

4 Q And what did Casey tell you?

5 A That's irrelevant to the case.

6 Q what did Casey tell you?

7 A It's irrelevant to this case.

8 Q Ma'am, I believe it's relevant. It isn't --

9 A No, it isn't relevant.

10 Q Respectfully it's not for you to decide what's
11 relevant and what isn't. What did Casey tell you
12 about --

13 A I can't remember the exact words. It's
14 irrelevant to this case.

15 MR. CONWAY: Just let him ask the question.

16 Q Generally -- well --

17 MR. CONWAY: I want to hear the question.

18 Q My question is what did Casey say to you about
19 this allegation that she had taken money from your
20 mother?

21 A That's not the question you asked me.

22 Q well, answer the question that I did ask you.

23 A Okay. What you just asked me is what did
24 Casey say to me. She told me she was sorry. You asked
25 me a question earlier about why she took it, so ask the

Rough Draft - 96

1 same question because she wasn't working.

2 Q I don't believe I said that, ma'am, and if I
3 did a apologize?

4 A You asked me why she would take it if she was
5 working and you wanted me to figure that out.

6 Q Let me ask you that question now.

7 A Wasn't that correct?

8 Q Is it your understanding or did you ask Casey
9 why was it -- let me reask it.

10 Did you ask Casey why was it that she had
11 taken money from your mother if in fact she was working?

12 A I can't remember if I asked her that. What I
13 made her do is talk to my mom and I had her and my mom
14 work it out. It was not between me and Casey. It was
15 between my mother and Casey.

16 Q Did it cause you some concern, though, knowing
17 that this had taken place and that Casey may have been
18 hiring a baby-sitter from money that she had coming in
19 from a job? Did that cause you any concern in your mind?

20 A I did not put the two and two together at that
21 time.

22 Q Was that only time she'd stolen something from
23 your family members?

24 A Casey is only ever taken something from her
25 grandmother.

□ Rough Draft - 97

1 Q How about from you? Did she ever use your
2 credit cards without your permission?

3 A It's not relevant to this case.

4 Q Not my question. Did she ever take and use
5 your credit cards without your permission?

6 A It's not relevant to the cases.

7 MR. CONWAY: It's an ongoing investigation.

8 Can we get --

9 Q Time out. It's an ongoing investigation of
10 you? Are you being investigated in that?

11 MR. CONWAY: We don't know. We don't know the
12 answer to that, Mr. Dill.

13 Q I'm going to ask the question then. The
14 question is pretty specific. Okay? As far as your
15 interactions with your daughter, did Casey ever take
16 money from you by using your credit cards without your
17 permission?

18 A It's not relevant to this case.

19 Q That's not -- that isn't really for you to
20 decide?

21 A I'm answering the question.

22 Q I want to make sure and you can discuss this
23 with your attorney as far as your refusal -- again,
24 ma'am, I'm going to tell what you Mr. Morgan told your
25 attorney earlier that this isn't a situation where, you

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1 know, this is treated lightly by the rules. If somebody
2 refuses to answer a valid question, we might have to come
3 back --

4 A It's not valid to this young lady that's
5 sitting here. Mr. Morgan went on TV and said that the
6 reason he's doing this is because he wants his client
7 cleared, so the reason I'm here is to clear his client.
8 It has nothing to do with my daughter's and my
9 relationship.

10 Q I appreciate that.

11 A So let's move on to Ms. Gonzalez so that Mr.

12 Morgan can go home and I can go home because I'm very
13 tired. It's been a long day.

14 Q I understand you're tired but let's go back to
15 my question.

16 A I'm not answering it.

17 Q I want to make sure maybe your attorney can
18 advise you. In Florida we have certain rules about not
19 answering questions. If there is a privilege that
20 applies, in other words, in you're under investigation
21 for something, then it's knock to the answer but here's
22 what's going to happen. We're going to go to the judge
23 and we're going to explain it to the judge and the judge
24 gets to say we come back and answer this question and
25 this whole thing is going over one more time. I know you

□ Rough Draft - 99

1 don't want that. I know Mr. Conway doesn't want that and
2 none of us want that. Before you don't want to answer
3 the question, maybe you want to confer --

4 A You might want to go to the judge and explain
5 why Zenaida has Fernandez-Gonzalez on the complaint when
6 per per is not her name.

7 MR. DILL: Do you want to advise your client
8 or not.

9 THE WITNESS: It's the same thing so if you
10 guys want to per -- do perjury, then go for it.
11 I'll take my chances with the judge.

12 MR. DILL: Mr. Conway, is that your position
13 too as her attorney that she's not answering this
14 question that I'm asking?

15 MR. CONWAY: We don't know whether there is an
16 investigation or not so let's move on.

17 MR. MORGAN: Are you taking the Fifth.

18 MR. CONWAY: Let's move on.

19 MR. MORGAN: You have to state.

20 MR. DILL: I need to know the basis.

21 MR. MORGAN: Are you taking the fifth amend
22 the here.

23 MR. CONWAY: I want to take a break and talk
24 to my client. That's what I want to do.

25 MR. CONWAY: She's over here typing away. I
Rough Draft - 100

1 can't get an objection in. You can't get a question
2 in and my client can't answer the question fully.
3 If we could just let each other -- and you're going
4 fast, John, so if you could just --

5 MR. DILL: That's fair.

6 MR. CONWAY: Slow it down because you're
7 getting three questions into one and it's
8 impossible.

9 THE WITNESS: And you keep changing the
10 question.

11 MR. DILL: Being cognizant of the court
12 reporter, I will endeavor to do that.

13 MR. CONWAY: I don't care if you watch 20
14 questions, if you could just do it one at a time, it
15 makes it easier for me, her and you and we could get
16 through this a lot quicker. You guys ready to go
17 back on?

18 THE VIDEOGRAPHER: Time is 3:11. We're back
19 on the record.

20 BY MR. DILL:

21 Q My question was was there a point in time when

22 your daughter had used your credit cards without your
23 permission?

24 MR. CONWAY: My client's position on that is
25 that she doesn't want to answer that question right

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1 now, that the purpose of this deposition has gone
2 way far afield. That the question giving the
3 current pending criminal charges prevent her
4 daughter from getting a fair trial, and so she
5 doesn't want to answer that question.

6 MR. DILL: I understand, but you understand
7 the rules, Brad. You're an experienced attorney.
8 She may not want to answer the question right now
9 but I want to know from a legal stand point is what
10 basis legally are you asserting for her not to
11 answer the question?

12 MR. CONWAY: That the question is entirely I
13 relevant; that it will not lead to evidence that
14 would be admissible in any way, shape or form in the
15 civil trial.

16 MR. DILL: Just for your edification because I
17 don't want to come back here and I will tell you
18 this, the relevance of it is if in fact there's a
19 financial issue concerning her daughter, that tends
20 to that her daughter was not hiring a baby-sitter or
21 in fact a Nancy and also if your daughter wasn't
22 working and having to steal money from family
23 members and other people, for instance, Amy Huizenga
24 and the other people who were stolen from by Casey,
25 that would also tend to she wasn't hiring or paying

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1 for a nanny, Zanny the nanny person. That's the
2 relevance and that's why I'm asking.

3 I'm not asking to impede any criminal case.
4 I'm not interested and we're not interested in
5 depriving of of her right to fair trial but I am
6 interested in getting answers to my trial. As we
7 say we want to clear this person, Zenaida Gonzalez,
8 in this lawsuit, and that's what I'm here to do.
9 That's what we've been doing this morning. That is
10 the reason for the question.

11 MR. CONWAY: We're here to help you do that,
12 Mr. Dill, and in terms of payment, she's already
13 established that she doesn't know whether Zanny the
14 nanny was paid or not so --

15 MR. DILL: I'm not going to argue with you
16 about the case. We're trying to get everybody out
17 of here as you know so I just want to understand.
18 The legal basis you were asserting before we go back
19 in front of judge Rodriguez is that she doesn't want
20 to answer it. Is there another reason.

21 MR. CONWAY: My client does not want to answer
22 that because it's going to affect her daughter's
23 ability to get a fair trial on pending criminal
24 charges.

25 MR. DILL: Okay. I assume you've advised her

□ Rough Draft - 103

1 of the implications of that.

2 MR. CONWAY: We have discussed it.

3 BY MR. DILL:

4 Q Ma'am, just so I'll clear and I want -- if you

5 can just -- I understand. These questions I'm asking you
6 about your daughter and the credit card, you're refusing
7 to answer those questions?

8 A It's not relevant.

9 Q Are you refuzzing to answer the questions?

10 MR. CONWAY: Just answer --

11 A Yes.

12 Q Now, were there ever any conversations between
13 you and your daughter Casey, concerning taking money from
14 family members, including yourself or anybody else,
15 around the June time period?

16 A Around June?

17 Q Yes, ma'am.

18 A Be specific on the area around June.

19 Q Right.

20 MR. CONWAY: Just yes or no.

21 THE WITNESS: I want to know what he means by
22 around. Are we talking two month?

23 MR. CONWAY: Yes or no and let them clarify
24 their question.

25 Q Did you ever have a discussion --

□Rough Draft - 104

1 A Nothing in June, no in June.

2 Q On June 15 was there ever a discussion between
3 you and your daughter over stealing 400 dollars from your
4 account?

5 A No.

6 Q Did that ever take place?

7 A I'm not even sure we're talking 400 dollars.

8 Q Was there ever discussion with you and your
9 daughter about your daughter taking money from your

10 account?

11 MR. CONWAY: Yes or no.

12 A Yes.

13 Q When was that?

14 A I don't know. You're asking me dates. I
15 don't know.

16 Q Give me a ballpark. Was it in the year 2008?

17 MR. CONWAY: Yes or no.

18 A Yes.

19 Q Was it around the time period leading up to
20 the last time you saw your granddaughter prior to June
21 15th?

22 A What time frame leading up to?

23 Q Prior to June 15th, in the year 2008, let's
24 say in the time period --

25 A I already answered that question.

□ Rough Draft - 105

1 Q Let me get more specific. In May was there a
2 discussion about or an argument or any type of discussion
3 about your daughter taking money from your account and
4 you not being happy about that?

5 A Possibly in May.

6 Q Okay. And so it's fair to say that that was
7 a -- a sore subject or a point of conflict between you
8 and your daughter right around this time period?

9 A No.

10 Q So it was -- there wasn't conflict over that?

11 A No.

12 Q And --

13 A There was no argument.

14 Q Was it something you gave her permission to do

15 was to take money from your account?

16 A Again, I'm not answering those questions.

17 Q I just want to be clear. You said there was
18 no argument, so you're answering that. Was it something
19 you gave her permission to do to take money from your
20 account?

21 A I all right stated that -- I already answered
22 that question.

23 Q I don't think you did, ma'am?

24 A Yes, I did CK.

25 Q Did you -- let me ask it again.

□ Rough Draft - 106

1 THE WITNESS: Go back.

2 Q It's okay. We don't need to have it reread.
3 Did you give your daughter permission to take money from
4 your account during this time period?

5 MR. CONWAY: Same --

6 A I already answered that question.

7 Q We're talking about credit cards before. I'm
8 talking about the account now, something different. Did
9 you give your daughter permission --

10 A I never answered a question about credit
11 cards.

12 Q I'll ask that again too in a second.

13 A That's the one I said I wasn't going to
14 answer.

15 Q Gotcha. On credit cards or accounted? Just
16 so I'm clear. I don't want to confuse you --

17 A You're confusing me because you keep changing
18 your question.

19 Q Okay. That's my fault.

20 A It is your fault and you expect me -- I know
21 I've already answered these questions.

22 Q And if I ask it, I apologize, but let me ask
23 it a little bit differently.

24 Did your daughter have permission to take
25 money from your account, not talking credit cards, I'm

□ Rough Draft - 107

1 talking an account?

2 A I answered the question already.

3 Q Okay. Tell me the answer. Did she have her
4 permission or not?

5 A No.

6 Q Was that a point of conflict between the two
7 of you?

8 A No.

9 Q So did she, you and her have a conversation,
10 and everything was fine about her taking money --

11 A Yes.

12 Q -- from your account?

13 A Yes.

14 Q She had taken money from your account,
15 though, right?

16 A Yes.

17 Q How much was it?

18 A I don't know the exact amount.

19 Q Was it more than 200?

20 A Somewhere around there, two, 300.

21 Q Two, 300. And it's fair to say from my
22 understanding of reading through this that that was not
23 probably money that you could afford to give to her at
24 that point?

25
 Rough Draft - 108

A I gave Casey money all the time.

1 Q I'm talking about this specific one.

2 A I can't tell you if that specific one, you

3 know, mattered any different than any other sometime.

4 Q Did she ever talk about moving out around this
 5 time period?

6 A No.

7 Q Never discuss Thad with you?

8 A No.

9 Q Now, before CK the disappearance, before June
 10 15th, what friends did Casey have at Sawgrass Apartments?

11 A That I knew then or that I know now?

12 Q Either one, ma'am, but let's break it down.

13 That you knew then, what friends did she have at the
 14 Sawgrass Apartments?

15 A I had no idea at that time.

16 Q Currently, what friends that you've learned
 17 that Casey had at the Sawgrass Apartments who were her
 18 friends there?

19 A I know at some point Annie lived there. I
 20 know at some point Ricardo, JP lived there and I think --

21 Q Annie being Annie who?

22 A Dowling.

23 Q Because there's another Annie is my
 24 understanding or Amy. I apologize. Amy Dowling lived
 25 there. Would that be Ricardo morale list?

Rough Draft - 109

1 A Morales.

2 Q Moo was her boyfriend at one point in time?

3 A Which I know now.

4 Q Do you know when it was that more her
5 boyfriend lived at the Sawgrass Apartments?

6 A No CK.

7 Q Who else was it, Annie and Ricardo and who
8 else?

9 A JP's his roommate.

10 Q Do you know his last name?

11 A Chat.

12 Q And you've learned all this information from
13 where?

14 A From her friends.

15 Q Being who?

16 A From those people.

17 Q They told you or --

18 A They told me.

19 Q Okay. Do you know if she, your daughter, knew
20 anybody who work at Sawgrass?

21 A No.

22 Q You don't know?

23 A I don't know.

24 Q So these people, Ricardo Morales and Andy

25 Dowling, you've come to learn that there was a time that

□ Rough Draft - 110

1 in fact they lived at Sawgrass?

2 A Correct.

3 Q And they lived there prior to the
4 disappearance is your understanding?

5 A Correct.

6 Q No, let's go ahead to the June 15th. It's my
7 understanding -- thinks Father's Day weekend; is that
8 right?

9 A Yes.
10 Q You had gone to -- you had gone up to visit
11 your father?
12 A Correct.
13 Q All right. And in fact there's a photograph
14 and that's we know was June 15 because it was Father's
15 Day weekend; is that right?
16 A Correct.
17 Q Your husband was working at that time period,
18 wasn't he?
19 A Yes.
20 Q And on June 15th, when you got home, was your
21 husband at home that night when you got home?
22 A When I got home in the evening, no one was
23 home.
24 Q Did there come a point -- and where had Casey
25 been during the day?

□ Rough Draft - 111

1 A I don't know if she was with friends or where
2 she was at. I just had taken Caylee for the day to see
3 my dad.
4 Q I see. There came a point in time, though,
5 that Casey came home and you were at home and Casey's at
6 home and Caylee's at home?
7 A Correct.
8 Q Was there ever any type of -- strike that what
9 time was it you that got home?
10 A I want to say somewhere around 4:00 whatever
11 because -- just because I remember I fed Caylee dinner
12 when I got home and then we went swimming.
13 Q Swimming and obviously --

14 A In the pool. We were in the pool about.

15 MR. KASEN: Came home.

16 Q Did?

17 MR. KASEN: Get in the pool.

18 A She started to and realized -- I told her it
19 would be too told for her because the sun was starting to
20 go down. We were getting a little bit chilled and I told
21 her I was about ready to take Caylee out.

22 Q Was there any type of disagreement or
23 discussion between you and your daughter Casey that
24 night?

25 A Absolutely not, no CK.

□ Rough Draft - 112

1 Q So statements about somebody overhearing a
2 loud argument at the house -- if I may, the statements in
3 the police reports about people overhearing a loud
4 argument at the house, you're saying that there was no
5 loud argument at the house?

6 A Correct.

7 Q There was no -- we've seen in some reports no
8 altercation between you two?

9 A Correct CK.

10 Q Do you know why it would be, then, that the
11 next morning Casey would have left with her daughter and
12 not returned?

13 A I have no idea why Casey and Caylee did not
14 come back. I mean, I know why Casey didn't come back
15 now, but I don't know why Caylee didn't come back.

16 Q And during -- I'm just going to go through
17 this quickly.

18 During the time period when they leave on June

19 15th, this would be something out of the ordinary --

20 A They left on June 16th.

21 Q I'm sorry, morning of June 16 and actually

22 George was the one that fed Caylee breakfast that

23 morning, if you know.

24 A I don't know. I have no idea who fed Caylee

25 Beck fast that morning. I was at work.

□ Rough Draft - 113

1 Q You had already gone to work?

2 A Yes.

3 Q But we do know that none of the clothes that
4 were Casey's or rather Caylee's clothes, none of those
5 clothes to your knowledge were taken for a five, ten, 15
6 day trip?

7 A No.

8 Q And once again, we know that the air mattress
9 that you told me about, we know that was in your house
10 because later on we found it at the house?

11 A I don't know when the air mattress was -- you
12 know, I don't know when the air mattress came back to the
13 house or whatever. I just know the day that I found it,
14 I gave it to the sheriff's department.

15 Q That's fair, but it certainly was in your
16 house and at the time --

17 A I have -- I don't have knowledge to that
18 whether it was in the house on the 16th or not.

19 Q Okay. well --

20 A I wasn't looking for it then.

21 Q Certainly --

22 A Casey was in and out of the house in June. I
23 have no idea.

24 Q Did you see Casey -- you say Casey was in and
25 out of the house, but to your knowledge, I know your
Rough Draft - 114

1 husband saw her at one point in time, after June 15, you
2 didn't see her until when?

3 A Casey?

4 Q Yes, ma'am.

5 A July the 15th.

6 Q Okay. And so to your knowledge during that
7 time period, did she ever say to you, hey, I took the air
8 mattress?

9 A No.

10 Q Never said that?

11 A No.

12 Q Now, again, this would be out of the ordinary
13 for her to be out of the house for more than two days in
14 a row with Caylee.

15 A Correct.

16 Q Is that correct? All right. And you were
17 calling Casey from your home phone?

18 A I called Casey from my home phone and my cell
19 phone.

20 Q And from -- and the records actually have you
21 calling herself different times during this time period;
22 is that right?

23 A Correct.

24 Q Now, did you ever talk to your granddaughter,
25 Caylee, after June 16th -- I'm talking on the telephone,
Rough Draft - 115

1 did you ever speak to her or talk to her?

2 A No.

3 Q Did you ever hear her in the background?

4 A No.

5 Q And during this time speerd -- during this
6 time period, what was your understanding of what Casey
7 was doing?

8 A Casey was with friends and she was working.

9 Q And I'm asking you now, though, as you know
10 that she was not working because she did not have a job,
11 what was your understanding as we sit here today now of
12 what Casey was doing?

13 A She was with her friends.

14 Q And what friends were those?

15 A From what my understanding is she was with
16 Tony Lazzaro. She spent time with Jesse Grund. She
17 spent time with Amy. She spent time with Ricardo.

18 Q Right.

19 A And there's several people that she saw during
20 that time.

21 Q And I've seen that from the records. None of
22 those people saw your granddaughter during that time
23 period, though; is that right?

24 A I don't know if they did or not. I have no --

25 Q To your knowledge?

□Rough Draft - 116

1 A I have no idea. You'd have to ask those
2 people.

3 Q well, you have read certain parts of the
4 police report. That would be important piece of
5 information for not only the police to know but for you
6 to know as to when somebody last saw your granddaughter;

7 is that right?

8 A Correct.

9 Q So as far as --

10 A If they're telling the truth.

11 Q You, however, were talking to your daughter, I
12 think you said every day.

13 A Correct, just about every day.

14 Q And she would tell you that the child was with
15 her or the child was with the nanny?

16 A Not necessarily.

17 Q What would she tell you?

18 A She would tell me that she was sleeping or
19 something.

20 Q Sleeping or something meaning --

21 A Yeah.

22 Q Meaning that the child was sleeping where?

23 A I didn't ask her. Taking a nap, you know, or
24 whatever.

25 Q Did it cause you concern, though, as the time
Rough Draft - 117

1 went on?

2 A Yeah, I missed my granddaughter. I had never
3 gone more than 24 hours without seeing Caylee.

4 Q Let me ask you, though, what in your mind was
5 the reason why now on June 15th now we've got an extended
6 period of time where you're not seeing Caylee? What in
7 your mind was the reason for that?

8 A In my mind at that time was everything that
9 Casey told me that she was doing.

10 Q Meaning that she said she was working?

11 A She said she was working. She said she was

12 spending time with friends. She said she was spending
13 time with Caylee.

14 Q And that was totally out of the ordinary,
15 though, from anything that had happened prior?

16 A It was out of the ordinary but long overdue
17 because Casey had never taken a vacation since Caylee was
18 born. Casey barely would see her friends. She'd go
19 months without seeing friends.

20 Q Well -- okay. If she wanted to take a
21 vacation, though, couldn't you and your husband have
22 watched Caylee?

23 A But she wanted to take a vacation with Caylee
24 is what she told me.

25 Q She said that. She said she wants to take a
Rough Draft - 118

1 vacation with Caylee?

2 A Yes.

3 Q And she told you that on the phone?

4 A At some point they said they were spending
5 some time together.

6 Q Did she say assuming taking a vacation with
7 Caylee or she's spending time together?

8 A She said she's spending sometime with her.

9 Q So she said the purpose of her taking the
10 vacations was in fact to spend time with Caylee? That's
11 what she told you?

12 A In essence, yes.

13 Q Okay. Now --

14 A But --

15 Q Why then would she need a nanny if she wanted
16 to take a vacation with her daughter?

17 MR. CONWAY: You know, you're asking for
18 speculative answer.

19 Q I just want to know --

20 MR. CONWAY: Ask her a specific question.

21 MR. DILL: Make an objection. Maybe an
22 objection.

23 A I'll answer his question. Bottom line is what
24 you -- what you asked me is why would she need a Nancy
25 during that time she's taking a vacation. She wouldn't

□ Rough Draft - 119

1 need a nanny during that time she took a vacation, but
2 some of the people that she was with were supposed to
3 have been Zanny during that time.

4 Q When you say some of the people she was with
5 were supposed to have been Zanny? What do you mean by
6 that? Are you tacking what you're talking about here
7 with Amy?

8 A Several weeks -- several weeks she told me she
9 was with Zanny.

10 Q That she was with Zanny herself?

11 A Yes.

12 Q Casey was?

13 A Casey and Caylee were with Zanny.

14 Q So as part of her vacation she was going on
15 vacation with Caylee and Zanny but Casey with her?

16 A Yes.

17 Q So she told you there were times that Casey
18 and Caylee and Zanny were all together. That would have
19 been after June 15th, right?

20 A Correct.

21 Q Okay. So was there a time later on that you

22 heard that a first version of events that she had dropped
23 off her daughter, Caylee, at the Sawgrass Apartments?
24 Did you hear that?

25 A Yes.
Rough Draft - 120

1 Q And that was -- you heard that actually around
2 June 15th, right?

3 A No. I heard that on July 15th.

4 Q I'm sorry, you're right. July 15th. So when
5 she was saying that she was talking to you on the phone
6 and saying that she was with Zanny and her daughter,
7 during that time did you ever talk to your daughter -- I
8 mean, your granddaughter?

9 A I already -- I already said that.

10 Q So you did not?

11 A Correct.

12 Q So during that time when she had been telling
13 you that she was with -- that Casey was with Zanny and
14 your grandchild, based on what you learned on July 15th,
15 that was not accurate?

16 A Correct.

17 Q Why would she lie to you about that, ma'am?

18 A I don't know.

19 Q And how do you reconcile your belief that
20 there was a Zanny person watching this child with the
21 fact you can't answer that question as to why she would
22 lie to you about that?

23 A I don't know that Casey --

24 MR. CONWAY: Just answer the question.

25 A What she told me and what I found out was two
Rough Draft - 121

1 different things. I don't know Casey's reasons for
2 telling me except that what she told me. She told me she
3 was protecting Caylee because she's protecting the
4 family. And until this day, I still believe that she's
5 protecting Caylee and the family.

6 Q Okay. But during the time period when you
7 were making many calls and I think you said you spoke to
8 her every day, your daughter was not telling you the
9 truth about where shoo was in relation to her daughter
10 Caylee; is that fair to say?

11 A Correct.

12 Q Because she was telling you that Zanny was
13 together but that wasn't accurate or true?

14 A Correct.

15 Q So --

16 A But I don't know when that stopped. I don't
17 know what day.

18 Q There same a point in time that you and your
19 husband, I'm sure, got more concerned about it and in
20 fact there was a time that your husband basically saw
21 Casey and kind of chased after her -- saw her in the car
22 kind of chased after her. Did you understand that?

23 A Yeah, and he was wrong on the dates of that.

24 That was actually in April or May because Caylee was with
25 me when George went after Casey that day so George was --

□Rough Draft - 122

1 George was wrong on his dates.

2 Q Was it your understanding that he saw her
3 during this time period or not?

4 A He saw Casey during the time period.

5 Q Right.

6 A But he never followed Casey. The statement
7 that he made that he followed Casey on the expressway and
8 when we went through E-PASS it wasn't there. I told him
9 if you recall the night you that followed Casey, Caylee
10 was with me in the living room because we were sitting
11 coloring when he took off.

12 Q How about the statement that she tried to
13 prevent him from getting into the trunk? Was that an
14 accurate statement, to your knowledge?

15 A I have no idea. I wasn't there, sir.

16 Q So in April -- let me follow up on that. In
17 April when he saw her and was following her, what was
18 that all about?

19 A You'd have to ask my husband.

20 Q I mean, you've said to me that that was in
21 April so you became aware that it was in April. What
22 were the circumstances, to your understanding, as to why
23 he was doing that?

24 MR. CONWAY: I'm going to object to that. It
25 calls for information that's privilege, marital

□ Rough Draft - 123

1 privilege.

2 Q Was anybody else present when the statement
3 was made?

4 A What statement? What statement?

5 MR. CONWAY: I don't know. He's going to have
6 to ask the question.

7 Q Let me ask it this way. Was there any
8 conflict going on that would have caused your husband to
9 chase around Casey back in April?

10 A You'd have to ask George.

11 Q Are you aware of any?
12 A Not that I'm aware of.
13 Q So does that strike you as odd that George was
14 chasing Casey in April as opposed to this time period
15 when you were out kind of looking for her?
16 A I found out about that after the fact. Okay?
17 So --
18 Q Found out --
19 A I found out about him going after Casey.
20 Q What was your understanding why he was going
21 after her?
22 MR. CONWAY: Same objection.
23 A Again, I have no idea.
24 MR. CONWAY: Same objection.
25 Q You have no idea. But does it strike you as

□ Rough Draft - 124

1 odd, then, that he would have been chasing after her if
2 you're not aware of any conflicted?
3 A You'd have to ask my husband.
4 Q All right. Now, as far as the -- Casey trying
5 to keep him from getting in the trunk of the car, I think
6 you told me that you don't have any information as to
7 whether that happened or not?
8 A I -- I was not present. I never heard that
9 she kept him --
10 MR. CONWAY: Just yes or no.
11 A No. I have no knowledge of that.
12 Q You've seen your husband in the statement,
13 though, haven't you?
14 A No, I haven't read his statement.
15 Q You haven't read over his statement?

16 A No, I haven't.

17 Q So when he told the police officers about that
18 and he told the FBI about that, you're not reviewed that
19 or aware of that?

20 A No, there is a lot of stuff that I haven't
21 reviewed.

22 Q So there comes a point in time -- is it fair
23 to say because we've got the phone records here that
24 there were many, many calls where there were attempts
25 from the Anthony home, from your house, to call Casey

□ Rough Draft - 125

1 during this time period?

2 A Correct.

3 Q And it's also fair to say you're getting more
4 concerned about Caylee because you haven't seen her in a
5 long period of time?

6 A Correct.

7 Q Now, do you think, in fact, that it's possible
8 that Casey was fabricating the story about Zanny because
9 she was wanting to stay over at some boy's house or a
10 guy's house?

11 MR. CONWAY: I'm going to object to the form
12 of the question. Calls for speculation.

13 Q Do you believe that she was fabricating the
14 story during that time speed because her motivation was
15 not to let you know that she was staying with a guy -- at
16 some guy's house?

17 A No, I think she fabricated the stories because
18 she didn't have Caylee with her and she knew if she came
19 home without Caylee, there would be a red flag.

20 Q And that red flag would mean that something

21 was probably wrong?

22 A Something happened, right.

23 Q You think that's what her reasoning was for

24 fabricating the story; is that right CK?

25 A Correct.

□ Rough Draft - 126

1 Q CK CK video is played. So that she would

2 justify to me why I couldn't talk to Caylee because she

3 knew that if it wasn't a reasonable thing, then I would

4 say where the hell are you? I'm coming to pick Caylee up

5 because something's wrong?

6 A That's what I just said. You didn't need to

7 make me live through that again. Thank you very much.

8 That was a painful time in my life.

9 Q Am, what I want --

10 A No, what you're trying to toys add insult to

11 injury. You know, I don't need to sit again when I find

12 out that I've been videotaped. That was a cruel thing in

13 my life that they did to me. Okay, to tape me on a day

14 that I go in there and, you know, and I'm distraught over

15 my granddaughter and everything and it's cruel for you to

16 sit there and make me watch it again.

17 Q Let me ask some questions about it and we

18 won't talk about the video. Was it your belief when you

19 made this statement that she was fabricating where she

20 was for some reason?

21 A I already answered this question.

22 Q And you believe she was fabricating?

23 A I already answered the question. I'm not

24 answering it again.

25 Q At the time you made that statement though to

1 the police, you had already heard or already had an
2 understanding that Casey told you that Zenaida other
3 Zanny was threatening your family; is that right?

4 MR. CONWAY: Can you repeat that question?
5 I'm not even sure what you asked.

6 Q It's not very clear. Do you need a moment?
7 As far as -- let me ask this. When you made that
8 statement there about fabrication, you already knew from
9 Casey that Casey told you she was protecting the family
10 because of Zenaida or Zanny, do you remember that?

11 MR. CONWAY: That's not what she said on
12 there, Mr. Dill. That's not what she said.

13 MR. DILL: Make your objection, Brad. Make
14 your objection and we'll move on.

15 MR. CONWAY: My objection is you're not asking
16 a question that's relevant to what you just showed
17 her so ask a relevant question.

18 MR. DILL: I can ask a question to something I
19 didn't show her.

20 MR. CONWAY: Ask her a question then.

21 MR. DILL: Let me just move on.

22 Q When you made the statement that you thought
23 she was fab indicating because of the motivation that CK
24 the red flag and all the stuff you just told me about,
25 you knew at that point in time from your daughter that

1 your daughter was protecting the family and that's why
2 she'd been lying to you; is that right?

3 MR. CONWAY: Yes or no.

4 A Yes.

5 Q So did you believe what your daughter was
6 telling when you she said that she was lying to you to
7 protect the family or did you believe what you said to
8 the police officers about the fab indication and the
9 reason for that?

10 A It's both. It's true. Both things is true.

11 Q So she was lying to protect you and also lying
12 so you wouldn't be upset or find out?

13 A Exactly because she knew that I would look for
14 her. That's exactly what I said. It doesn't change.
15 It's the same thing.

16 Q And you went looking for her, though, didn't
17 you?

18 A I never went looking for Casey until the 15th
19 of July is the first time I went looking for Casey.

20 Q Okay. Well, how about on July 3rd, did you
21 ever go to universal to attempt to pick up Caylee?

22 A I went to Universal.

23 Q Why --

24 A Not.

25 MR. CONWAY: Yes or no.

□ Rough Draft - 129

1 A Yes.

2 Q Why did you go to Universal?

3 A To go pick up Caylee.

4 Q Okay. And what was it that motivated you to
5 go pick up Caylee at Universal?

6 A Because Casey told me Caylee was there.

7 Q And did you come to find out that, obviously,
8 Casey and Caylee weren't at Universal?

9 A Yes.
10 Q Did that cause you concern?
11 A Yes.
12 Q Did you call the police at that point?
13 A No.
14 Q why not?
15 A Because I still believe my daughter.
16 Q But did you will find out while you were at
17 Universal she didn't work there?
18 A No, I did not.
19 Q How did you go about trying to find her 1234
20 did you go --
21 A when I got there I called her and she told she
22 she was not there so I went home.
23 Q Did she also tell you that she was in
24 Jacksonville around July 4th?
25 A Yes.

□ Rough Draft - 130

1 Q And that turned out to not be true?
2 A Correct.
3 Q So and the reason why in your mind is that --
4 A It would have been a red flag.
5 Q A red flag you to and others if she had told
6 you that?
7 A Yes. If I thought that Caylee was in caner at
8 any point, I would have gone --
9 Q And I understand.
10 A Goa goa called 911 Oregon to the sheriff's
11 department. I already stated that so you just asked me a
12 question why I didn't go to the police that day.
13 Q well, okay. So you didn't think that there

14 was anything wrong about -- I just want to ask about it?

15 A I didn't think there was anything wrong with
16 Caylee.

17 Q That's because Casey was telling you
18 everything was fine?

19 A Yes.

20 Q Now, let's go to July 15th.

21 A Because Casey didn't want me to worry.

22 Q Let me fast forward, ma'am, probably in a
23 different subject to get away from this subject matter
24 right here.

25 There came a point in time -- and we're into

□ Rough Draft - 131

1 the December time period now that police executed a
2 search warrant on your house. They came looking for
3 certain materials. Do you remember that in December?

4 A There's two search warrants in December, so
5 which one we talking about?

6 Q One or both. I just want to direct you to the
7 December time period to get your mind and memory there.
8 The police came and they executed -- they were looking
9 for certain materials and I don't know what but they came
10 and they executed the search warrant.

11 Did you ever tell one of the police officers
12 who executed the search warrant that you had sent someone
13 to look in the woods around sub sub Drive --

14 A No, I did not.

15 Q -- back in -- let me get the question out
16 because I know you want to answer this.

17 Did you ever tell one of the investigators
18 that you had sent someone to look in the woods around

19 Suburban Drive back in November?

20 A No, I did not.

21 Q That did not happen CK?

22 A That did not happen.

23 Q So if that's somewhere in one of the police
24 report, would you have issue with that?

25 A I would have huge issue with that.

□ Rough Draft - 132

1 Q And you would say that would be a falsity?

2 A That would be a bold faced lie.

3 Q Now, just so I understand, Dominic Casey
4 during this time period, to your knowledge, was he
5 working for you around November -- working --

6 A Dominic Casey's been working for us.

7 Q Who paid Dominic -- do you know who paid
8 Dominic Casey?

9 A (Shakes head.) Paid Dominic Casey for what?

10 Q To work for you?

11 A Dominic Casey and I have a contract.

12 Q Okay. And who has that contract?

13 A I have a copy of it. Dominic Casey has a copy
14 of it.

15 Q Are you the only two parties to the contract?

16 A George is on there too.

17 Q You and George and Dominic. And when was that
18 signed?

19 A It was signed probably in October but we had a
20 verbal contract prior to that.

21 Q I understand. Anybody else -- did anybody
22 else sign the contract?

23 A Yes.

24 Q who?

25 A We have Sherry million stead and did Dennis
Rough Draft - 133

1 sign it too? I don't know. I can't ask him.

2 Q who is Sherry million stead and Dennis?

3 A From kid finders. It was notarized CK.

4 Q This notarized contract, who has possession of
5 it?

6 A I already stated dom anything has a copy and I
7 have a copy.

8 Q He was being retained in your mind to do what?

9 A Dominic did whatever we asked him to do.

10 Q Okay. And what were you asking him to do?

11 A Look for Caylee.

12 Q Do you know if he was ever given any
13 information about Zanny or Zenaida Gonzalez?

14 A Yes.

15 Q When was that?

16 A Him and I talked about Zenaida Gonzalez all
17 the time.

18 Q You talked about all the time, but did he ever
19 report to you what his efforts to find Zenaida Gonzalez
20 or Zanny were?

21 A There were several, yes, on several occasions.

22 Q And when were those and did he give them to
23 you in writing?

24 A I don't have anything in writing.

25 Q What did he tell you?
Rough Draft - 134

1 A He told me several things. We have a Zenaida
2 Fernandez-Gonzalez Rivera in Puerto Rico that he had been

3 watching, still watching.

4 Q I see. Okay. So of all of that during that
5 time -- during this time period when you're talking about
6 Zenaida Gonzalez, did he ever report to you what the
7 leads were he was following up or anything like that?

8 MR. CONWAY: Yes or no.

9 A Yes.

10 Q He did report. What did he --

11 A Yes.

12 Q -- report to you?

13 MR. CONWAY: I'm going to object to work
14 product, privilege.

15 MR. DILL: Clarify so we're here we have a
16 contract between a private entity, private
17 individual and kid finders and these --

18 A Kid finders, they were just witnesses to the
19 contract.

20 Q I appreciate --

21 A You asked me who else signed the contract.
22 They're witnesses.

23 Q Thanks for clarifying. That makes it easy.
24 This is directly between --

25 THE WITNESS: I answered his question but he

□ Rough Draft - 135

1 got it wrong.

2 Q Ms. Anthony, I got it fine.

3 MR. DILL: I want to make sure for your
4 objection, these private citizens have retained a
5 private attorney to work for them and you're --

6 MR. MITNIK: Private investigator dial Dill
7 private investigator and you're taking the position

8 that there is a privilege that applies that makes it
9 not discoverable in a civil lawsuit about the
10 substance of any conversations or anything else?

11 MR. CONWAY: The conversations between them,
12 correct.

13 MR. DILL: What is the basis for that.

14 MR. CONWAY: Product, work product.

15 MR. DILL: You understand -- I'm not trying
16 to -- hold on. I'm not trying to argue here but I
17 want to be clear. Work product means that there is
18 something in pending litigation that's made in
19 anticipation of -- in existing or pending
20 litigation. Is there existing or pending litigation
21 against these individuals, the answers that I'm not
22 aware of CK.

23 MR. CONWAY: There may be.

24 MR. DILL: I want to know or not.

25 MR. CONWAY: You guys are on a fishing

□ Rough Draft - 136

1 Expedition and a lot of your questions go to what
2 she said and whether she republished defamation so,
3 yes, sir, there is. Not only that. This is an
4 ongoing investigation and it affects the criminal
5 trial as well as the civil trial.

6 MR. DILL: I understand. You're claiming work
7 product on these conversations.

8 MR. CONWAY: Yes, yes.

9 MR. DILL: Between the Anthonys.

10 MR. CONWAY: On behalf of my client, yes, I
11 am.

12 MR. DILL: We'll deal with that later.

13 MR. CONWAY: And to clarify one more thing,
14 Shirley million stead is a witness not a party to
15 the contract.

16 MR. DILL: I understand that.

17 Q When you said they signed the contract, they
18 signed it as witnesses. It was just between George and
19 Cindy and Mr. Casey?

20 A They are not parties to the contract.

21 Q Let me clarify that. There's -- our lawsuit
22 was filed sometime later. Was the contract and these
23 conversations about Zenaida Gonzalez, was that prior to
24 our lawsuit being filed; do you know?

25 A We had a verbal contract.

□ Rough Draft - 137

1 MR. CONWAY: Yes or no.

2 A Yes.

3 Q That was prior to the lawsuit?

4 A Yes.

5 Q How about the written contract. That's before
6 the lawsuit. The conversations before the lawsuit's
7 filed?

8 A We had two written contracts and I can't tell
9 you the first conversation.

10 Q The conversation, though, when were those?
11 Those were before the lawsuit was filed?

12 A Yes.

13 MR. DILL: Are you still asserting the
14 privilege?

15 MR. CONWAY: When was the lawsuit filed? I
16 don't know the answer to that.

17 MR. DILL: Let's look back to that.

18 MR. CONWAY: If we can just do time frames, it
19 will make it a lot easier.

20 MR. DILL: We'll come back to it.

21 BY MR. DILL:

22 Q I'm not going to go through the nine win win
23 call with you, I have it here but I don't want to ask
24 specifically. There were three calls to the police on
25 the 15th; is that correct?

□ Rough Draft - 138

1 A Correct.

2 Q You had found your daughter Casey at Tony
3 Lazzaro's apartment?

4 A Correct.

5 Q You had talked to Amy Huizenga and she had
6 given you the location?

7 A Amy took me to the location.

8 Q She took you to the location. You went in and
9 there was Casey; is that right?

10 A I did not go into the apartment.

11 Q Did Casey come out at some point?

12 A Yes.

13 Q And did you ask her where Caylee was?

14 A Yes.

15 Q And what did she tell you?

16 A With Zanny.

17 Q And did you say where's Zanny?

18 A Yes.

19 Q And what did she tell you?

20 A She said she was at her apartment, and I said
21 okay. We're going to go get her.

22 Q And so -- well, did you go to the apartment to
Page 116

23 go get her?

24 A No.

25 Q Where'd you go?

□ Rough Draft - 139

1 A I took her to the police station.

2 Q Okay. So you took her -- you took her to the
3 police station. Why was it you took her to the police
4 station?

5 A Because she didn't take me to the apartment
6 and I didn't know where she lived.

7 Q And that gave you a concern. Were you driving
8 the car or was she?

9 A I was.

10 Q And she wouldn't tell you where the department
11 was?

12 A Correct.

13 Q And that caused you concern?

14 A Correct.

15 Q And because of that you took her to the police
16 station?

17 A Correct.

18 Q And you told the police officer and called, I
19 guess, per shins first --

20 A I was sitting at per shins and they were
21 closed.

22 Q And you called in and you said I have someone
23 that needs to be arrested CK?

24 A Correct.

25 Q And --

□ Rough Draft - 140

1 A Because I wanted to scare her to having me
2 take her.

3 Q And then you made another call the second 911
4 call which --

5 A Was from the house.

6 Q -- from the house, and you said that at that
7 point that your daughter had been missing. You just
8 found her. You need to get a grand threat. What was the
9 grand threat?

10 A The car is still registered in my name even
11 though essentially the car was her's, just like when we
12 bought the car, you know, for Lee back in 2000 or
13 whatever when we bought the car.

14 Q So you thought it was grabbed threat because
15 you had taken the car?

16 A I wanted them to come out and help me so I
17 said whatever I said to have them come out and help me
18 talk to Casey. I was hoping I could go in and talk to a
19 police officer without calling 911, so you wanted my
20 reasoning, I'm telling you. That's not a yes or no
21 question.

22 Q Okay. That's fair?

23 MR. MITNIK: It was served September 26, 08.

24 MR. DILL: September 26, 08. Let me finish
25 this and we'll go back to that.

□Rough Draft - 141

1 BY MR. DILL:

2 Q There's a third call, though, okay, and this
3 is about after the officers are already on their way, and
4 you say in the call -- I'm sure you remember it. I could
5 play it but I don't have 0 --

6 A You don't have to tell me what's in the call.

7 Q We're not going to do that but I am going to
8 ask you. You said my daughter finally admitted to me
9 that somebody took her or Zanny took her.

10 A Correct.

11 Q Tell me the circumstance between that first
12 call and the second call because there's a time period in
13 between it. What happened? What did she tell you?
14 Where were you? How did the conversation -- because I'm
15 sure you remember that. Tell me what happened.

16 A I can't get into that conversation.

17 Q Why not?

18 A I can't.

19 Q And the reason why is what?

20 A Number one is I can't remember exactly the
21 conversation verbatim what it was. Essentially, I asked
22 her -- my son was there when we got home. He asked her.
23 She told me she'd take me there the next day, and that
24 wasn't good enough for me.

25 Q Right. What --

□ Rough Draft - 142

1 A So finally I I left Lee alone and he talked to
2 Casey. And when I was coming back in because the
3 sheriff's office on the second phone call made it sound
4 like they could be --

5 Q Right. And it took a while?

6 A Any time. It could be two hours. It was a
7 nonemergency phone call per them. That's why every phone
8 call got more urgent.

9 Q So when -- but there's three.

10 A When I walked back in --

11 Q I want to ask about that. In between the time
12 of the first call when you think they're coming over
13 shortly and the second call, are you saying that Lee
14 talked to her?

15 A Yes.

16 Q And were you present in that room for that
17 conversation?

18 A Not during the whole conversation because I
19 kept walking outside. I kept hearing a door. I had the
20 garage door open. I kept hearing a car door and every
21 time I went out there I'd think it was the sheriff's
22 office.

23 Q So Lee came in and she told you what?

24 A Lee didn't tell me anything.

25 Q Did Casey tell you something?

□ Rough Draft - 143

1 A No. I walked in and overheard Casey telling
2 Lee.

3 Q What did she say?

4 A I can't remember exactly the words, but I
5 heard her saying that it had been 31 days or something
6 that she had seen Caylee.

7 Q And that caused you again to call back at that
8 point?

9 A Yes, that was -- that was the reason for the
10 third phone call.

11 Q Right. But when you say she finally admitted,
12 does that mean after all this time she's admitting now in
13 your mind --

14 A That Caylee was missing.

15 Q That Zanny had taken her?

16 A That Zanny had taken her.

17 Q Now, as you sit here today and everything
18 you've learned and everything you see, do you believe
19 that to be true?

20 A I have no -- I don't -- I have no idea who
21 had -- who took Caylee.

22 Q But there's one thing we are sure of and that
23 is that this person, Zenaida Gonzalez, despite what your
24 daughter had said, you don't believe at all that this
25 person had anything to do with it?

□ Rough Draft - 144

1 A Casey never said that this person right here
2 (indicating).

3 Q I'm asking you, though, at this point?

4 A I never said that that person had anything to
5 do with Caylee.

6 Q So you don't believe this person has
7 anything --

8 A I never did, no. The first time I saw her
9 even when her face was blotted out I called channel 6
10 news and spoke to Henry pool da know said I sd what the
11 hell are you doing putting this poor woman on the stand
12 because she's been through enough. You know, the police
13 department's the one that finger her not Casey and they
14 said she came willing down there to talk to her. You
15 know, it would have just -- it would have just all blown
16 away for her if she wouldn't have gone and had her little
17 channel 6 # and then Mr. Morgan parading her all around.

18 Q I appreciate you want to say all that ma'am --

19 A I'm telling you the truth.

20 Q I'm not asking you those questions, I'm really

21 not?

22 A I know you're not. That's okay. That's okay.

23 I'm giving you the answer. You asked me if I thought it

24 was her to the point that --

25 Q I didn't say that I didn't say that?

□Rough Draft - 145

1 A You asked me if I thought it was her and if

2 Casey thought it was her.

3 Q No, I didn't, but --

4 A Yes, you did.

5 Q Let me just clarify. Do you know what? The

6 good news -- the good news?

7 A You asked me T I thought it was her and Casey

8 thought it was her and I said no to the point they called

9 the news station and said what are you doing putting her

10 on so I'm going you -- or answering your question.

11 Q Good. Let me ask another question then

12 because you're answering a question I'm not asking you.

13 A But you did ask the question.

14 Q I don't want to an. I really don't want to

15 argue.

16 A Read back the transcript. Watch it laitzer.

17 That's why you've got it on video.

18 MR. MORGAN: Brad, Brad, could you get

19 control. Brad, please.

20 THE WITNESS: Get control of him, Mr. Morgan.

21 Q Thinks my question and I'm going to try to

22 make it simple N. your mind as you sit here -- as you

23 said before you wanted to clear her name. In your mind,

24 this Zenaida Gonzalez has absolutely nothing to do with

25 what happened to your granddaughter?

□Rough Draft - 146

1 A Correct.

2 Q Okay. And we've already gone through what you
3 said to the press and what was said earlier back in --
4 back during that time period about your daughter. We
5 already went through all that started, but something you
6 said shear so oh?

7 A I never thought she was from today back to
8 when you filed the frivolous lawsuit to when she went in
9 front of the news to whatever.

10 Q The good news is Ms. Anthony we're almost done
11 and I promise you that so if you want to talk to the
12 press again and say all these things that's fine but I'm
13 going to ask my questions and we're going to wrap this
14 thing up. Okay?

15 So there came a pointed in time that when
16 Casey came home that she changed the version of event
17 that you understood about Sawgrass Apartments --

18 THE WITNESS: I'm done. I've already answered
19 the question. She's not the one. I'm done.

20 MR. MORGAN: Let me just say this for the
21 record, hold on, Brad. Let me -- let me say this.

22 THE WITNESS: I'm tired of getting beat up.
23 He asked me a question and he won't let me finish
24 it. He's just like everybody else. They want to
25 cut you off when they don't want to hear the answer.

□ Rough Draft - 147

1 MR. CONWAY: All right.

2 MR. MORGAN: Brad, if she's going to walk out,
3 we're going to move to find her in contempt of
4 court. We've going to be seeking sanctions,

5 attorneys fees.

6 THE WITNESS: Ask me the last question.

7 MR. MORGAN: Ma'am --

8 MR. CONWAY: We're not walking out, Mr.

9 Morgan.

10 MR. MORGAN: We need to mic up.

11 A I don't need to mic anything. I never agreed

12 to have a mic on.

13 MR. MORGAN: Ma'am.

14 THE WITNESS: I'm not micking up. Someone

15 touching me I'm going to file may asment charges

16 that someone's touching me. I'm not Miking up.

17 I'll talk loud enough that your tricking cameras --

18 MR. CONWAY: Could we take a break, please.

19 THE VIDEOGRAPHER: Time is 3:53. We'll go off

20 the record.

21 (A minute recess was had.)

22 THE VIDEOGRAPHER: Stand by one moment,

23 please.

24 THE VIDEOGRAPHER: Time is 3:59. We're back

25 on record.

□Rough Draft - 148

1 - - - - -

2 CROSS-EXAMINATION

3 BY ATTORNEY :

4 Q Cindy, there came a time where your private
5 investigator, Dominic Casey, summoned one of your
6 security people, Mr. Hoover, to his office at 8:00 on a
7 Saturday morning before -- about a month before the body
8 was found. When did you become aware of that meeting?

9 A In Mr. Conway's office. It was -- what day

10 did we go into your office? Was it the 17th? No, the
11 13th or something.

12 Q Of what month?

13 A December.

14 MR. CONWAY: Approximately, roughly.

15 A It was after we got -- it was the day we got
16 fingerprinted at Brad's office.

17 Q And Mr. Casey was with you, then?

18 A Yes, and Mr. Hoover.

19 Q That's the first time they told you that they
20 had gone in to the woods?

21 A Yeah, Mr. Hoover's the one that told me.

22 Q And they told you that they'd gone into the
23 woods based on a tip --

24 A Yes.

25 Q -- that had been received by Mr. Casey?
Rough Draft - 149

1 A Correct.

2 Q Did Mr. Casey tell you who gave him that tip?

3 A Yes.

4 Q And who did he say gave him that tip?

5 A I'm not sure Jeanette's last name. I think
6 it's Lucas.

7 Q And who is Jeanette Luke cas?

8 A She's psychic or medium, whatever she is. She
9 had some kind of ability that she sees things and like,
10 you know, visions or whatever. I'm not sure how it
11 works.

12 Q And he told you that that day in Brad's
13 office?

14 A They -- he told me -- he told me about the
Page 125

15 time that they went out there, yes, in Brad's office.

16 Q And did they actually tell you they'd been out
17 there three times?

18 A I --

19 MR. CONWAY: If you could clarify. You keep
20 saying they --

21 Q Dominic Casey and Mr. Hoover, sorry.

22 MR. CONWAY: Thank you.

23 A I really didn't realize he was out there three
24 times until I heard it all on the news.

25 Q But the home time he'd worked for you up until
Rough Draft - 150

1 the day at Brad's office, they had never told you about
2 this tip or about going out on any day?

3 A Correct.

4 Q And when you finally learned about it that day
5 in Brad's office, what did he tell you?

6 A Mr. Hoover is the one, I believe --

7 Q Mr. Hoover.

8 A Is the one I believe brought it up and said
9 something. I can't recall. That day, you know, I can't
10 recall exactly what was said. That was very emotional
11 day.

12 Q Of course.

13 A Because it was two days after we found out
14 that it could possibly be Caylee, and it was the first
15 day it was actually able to go back into my home after
16 we'd been away and found the house ran sacked just before
17 we got there. So it was very emotional. I can't
18 remember exactly what the words were, but I know they
19 talked -- James told me about a snake that he had seen

20 and --

21 Q James being?

22 A Hoover, Mr. Hoover.

23 Q Did Mr. Hoover tell you that day --

24 A And Mr. Hoover was never employed by us.

25 Q He was like a volunteer security?

□ Rough Draft - 151

1 A He volunteered. He -- I thought he was a
2 stalker at first.

3 Q Did Mr. Hoover tell you where the tip came
4 from?

5 A No. Mr. Hoover never did.

6 Q But Mr. Casey told you?

7 A Correct.

8 Q Did Mr. Hoover hear Mr. Casey tell you that?

9 A You know, I can't remember.

10 Q whoever is telling you about the medium, did
11 they tell you what the medium had said to Mr. Casey?

12 A No.

13 Q Did you ever hear or understand that the
14 medium or psychic in conversation with Mr. Casey told Mr.
15 Casey the approximate area where she believed the body
16 was located?

17 A I found that out, you know, watching the news.

18 Q Okay. And did you also find out watching the
19 news that the medium had said when you walk into the
20 woods here, there will be pavers that --

21 A I remember pavers.

22 Q Now, you all have pavers at your home,
23 correct?

24 A Correct.

25 Q Where do you -- who worked with the pavers at
Rough Draft - 152

1 your home?

2 A Our pavers are not the same pavers that they
3 found there that were shown in the photographs. We have
4 peach colored pavers. Those pavers were white. Those
5 were 12 by 12. Ours are 16 by 16 and 14 by whatever.
6 Our pavers are like a peach color.

7 Q So it's your understanding --

8 A We've never had white pavers at all.

9 Q So it's your understanding that the location
10 that Mr. Casey went to on multiple times did, in fact,
11 turn out to be the area where Caylee was ultimately
12 found?

13 A My understanding, I don't know exactly where
14 Mr. Okay see went in relation because you can't tell by
15 his pictures with the way it looks now --

16 Q But there on that -- what road did you say?

17 A Suburban.

18 Q But he went to suburban road on his visits
19 into the woods, correct?

20 A That's what he says CK.

21 Q And he did that solely based on his
22 conversation with this psychic?

23 A Correct.

24 Q Okay. Now, if the psychic didn't tell him
25 this, someone else would have, true? If the tip didn't
Rough Draft - 153

1 come from the psych I will, the tip --

2 A I think the sheriff's department already

3 established it was the psych ig through her phone records
4 and his phone records and she's also come to the
5 sheriff's department and told hem or smoke en with them.
6 So my understanding it is Jeanette because she's already
7 given her records and dom anything's given his records
8 voluntarily to Sergeant Allen and Nick Savage to verify
9 that indeed it matches the time on the time stamp of the
10 video that Mr. Hoover took.

11 Q where does Jeanette live?

12 A I think Virginia.

13 Q Okay. And is it fair to say if it was not the
14 psychic, that the only other person it could have been
15 would have been someone who had firsthand knowledge of
16 how --

17 A You know, I don't know what to say to that
18 because from my understanding is they've already
19 confirmed that it was her who he spoke, and he was
20 speaking to her while he was there so that's already been
21 established. So I could not speculate on anything else.

22 Q But if that is not in fact the case --

23 A I have no idea. I would not want to speculate
24 on that, sir.

25 Q Okay.

□ Rough Draft - 154

1 A That would be an ongoing investigation.

2 Q But just a hypothetical then --

3 A I don't do hypotheticals, sir. You can ask me
4 a question that I can actually answer and I'll answer.

5 Q The question is if it wasn't the psychic --

6 A He didn't find Caylee that day so obviously,
7 you though --

8 Q He never found Caylee?

9 A No, he didn't, and neither the psychic had a
10 premonition prior to her being found. Now, we did work
11 with the psychic before that up until November believed
12 that Caylee was indeed alive.

13 Q Wasn't there a time -- was it the same psychic
14 or different psychic?

15 A It was the same psychic.

16 Q Okay. So the psychic and you were having
17 conversations --

18 A I never spoke to the psychic. In fact, I
19 never knew her last name or anything until after the
20 video came out.

21 Q So Dominic was having conversations with the
22 psychic?

23 A Dominic was having conversation gls and
24 Dominic was telling the psychic what was going on in the
25 investigation.

□Rough Draft - 155

1 A No, Dominic -- from my understanding, she
2 would seek him out when she had a vision.

3 Q Okay. And the questions then is if it was not
4 the psychic --

5 A There is no question in my mind that it isn't
6 the psychic because of Dominic's phone records, who he
7 was speaking with at the time, and his statements to the
8 sheriff's department and his phone records and her phone
9 records coincide with the video. So there is no
10 speculation. There is nothing in my mind that is not
11 her.

12 Q Okay. I understand that, but there is --

13 Dominic was speaking to a lot of people?

14 A I'm not aware of that. His phone records
15 don't show that. His phone records show that he spoke to
16 his daughter and to her.

17 Q You're aware that Mr. Hoover believes that the
18 tip didn't come from the psychic because he didn't
19 believe --

20 A Mr. Hoover -- Mr. Hoover can believe what he
21 wants but if you check Lee's phone records and Dominic,
22 they didn't even speak that day so Mr. Hoover, it's like
23 Mr. Hoover. Mr. Hoover wants to make money off of this
24 like a lot of people. I don't believe anything Mr.

25 Hoover says. Mr. Hoover was video taping us getting

□ Rough Draft - 156

1 fingerprinted and we had no idea in Brad's office and
2 John Allen found out about it because it was on Mr.
3 whoever's camera when Sergeant Allen confiscated his
4 camera. So I don't believe a dang gone thing that Mr.
5 Hoover states.

6 Q There was a time where Casey was saying from
7 jail or at home I feel like she's close. I feel like
8 Caylee is close to home. Do you remember that?

9 A I remember what she said.

10 Q It turned out she was right, wasn't she?

11 A Well, people heard that.

12 Q That's a yes or no?

13 MR. CONWAY: Yes or no.

14 Q It turns out that Casey was right when she
15 said I feel like --

16 A Yes.

17 Q -- Caylee is close?

18 A Yes, and someone probably heard that and put
19 Caylee's body there after the fact.

20 Q What does that mean? Say that again?

21 A What does that mean? She wasn 't there when
22 Dominic was there in November so someone had to put her
23 there.

24 Q How would Casey know that she was close?

25 A She felt -- what she meant by that is what she
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1 explained to me is that she felt that Zanny was still in
2 the area because Zanny told her she'd bring her back to
3 her in 50 days, which was Caylee's birthday. So don't
4 take stuff out of context and think just because it's
5 said that, you know, that it means anything.

6 Q Well, I think that's part of the problem here
7 that what is said is --

8 A Part of the problem is number one, again, this
9 person, this case and why I'm here today and why this
10 lawsuit is here and why I'm here is to state that this
11 person had nothing to do with Caylee's disappearance.

12 Q Let me focus --

13 A You said on TV if I said and if Casey said
14 that she had nothing to do with it, that's all you
15 wanted. You said that on -- you said that on November
16 17th with your channel 9 interview that you had here.

17 Q I do want to come mend you. You know your
18 dates and page numbers better than anybody?

19 A I did my homework before I came here today,
20 sir. I got prepared for this.

21 Q You're the most prepared witness I've ever
22 had.

23 A You know what, sir? This is -- this is
24 important to me because this affects --

25 Q Of course?
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1 A -- my grand daughter. This affects me. Okay?

2 Q What all did you do to prepare for this today?

3 A Why did to prepare for this was I watched your
4 interview and I pulled three things. I pulled the -- you
5 asked for it. I pulled the Sawgrass Apartments where
6 someone signed C Zenaida gone solly.

7 Q Where did you get that from?

8 A From the discovery. It's page 45. Do you
9 want a copy of it.

10 Q Are you aware of the day that she filled out
11 that form at Sawgrass?

12 A June the 17th.

13 Q Isn't that right after the Casey had a fight
14 with her family?

15 A Yeah, glts and left the home.

16 A She didn't have a fight with me. Go there.
17 Go there, Mr. Morgan. She didn't fight with me, sir.

18 A No, no, let it go. Let him look like an as on
19 the thing. Go ahead.

20 Q Isn't that the time that Zenaida Gonzalez --
21 you are aware that this Zenaida Gonzalez was at Sawgrass
22 Apartments, are you not?

23 A Whether or not she was or not, what I'm aware
24 of is that her signature glue just said --

25 A Is that her significant sure? Did she sign it
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1 C -- answer the question.

2 Q whoa. Hold on.

3 A Answers the question. You're asking me did
4 she sign that. All right. You're asking me a question
5 and I want to verify it. Did she sign that Sawgrass
6 thing C Zenaida Gonzalez. She just shook her head yes.

7 Q Let me ask you a question.

8 A So was your client there.

9 MR. CONWAY: Let him ask the question.

10 A And she in fact signed that ask the question.

11 Q You said you have spreed to get ready today
12 because this is important day for you?

13 A Yes.

14 Q And you said that one of the things that you
15 did in the preparation was you examined the signature
16 from C Zenaida Gonzalez at Sawgrass Apartments?

17 A Right, from the discovery.

18 Q From the discovery. And you said you're here
19 to clear this Zenaida Gonzalez's name.

20 A Correct.

21 Q Isn't it true, ma'am, that the date that you
22 examined that signature was on June 17th?

23 A No.

24 MR. CONWAY: Yes or no.

25 A The date that I examined that signature --
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1 Q The date that she was there?

2 A Was two days ago. You just asked me the other
3 question.

4 Q When you examined -- about you examined that
5 document --

6 A Yes.

7 Q -- didn't you find that Zenaida Gonzalez was,
8 in fact, at that Sawgrass apartment on June 17th, 2008?
9 Yes or no and I know that's the way you look it?

10 A I would not know --

11 Q I know that's the way you --

12 A If that's her signature. If that's her
13 signature, then the answer is yes. If it's not her
14 signature, then the answer is I don't know. Is that fair
15 to say that?

16 Q It's more than fair.

17 A Okay. Is that her signature?

18 Q And finally, isn't it true that two days
19 before Zenaida Gonzalez signed that at Sawgrass, that
20 Casey Anthony, your daughter, had had a fight with the
21 family and left the family and didn't return for 30 days
22 and was hanging out at Sawgrass Apartments and would have
23 had a time to see this person at Sawgrass Apartments and
24 would have had a time to talk to people about her visit
25 to Sawgrass Apartments?

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1 A No, because we did not have an argument.

2 MR. CONWAY: Yes or no.

3 A No, we did not have an argument on June --

4 Q Take the argument out. Isn't it a fact that
5 even if there's no argument, as you say, and Casey left
6 the home, that during those last -- those two days, that
7 she had the opportunity to go where her friends lived at
8 Sawgrass to hang out at Sawgrass, to sleep at Sawgrass
9 and to see this person pull in and to get information
10 about Zenaida Gonzalez being at the Sawgrass Apartments?

11 A Then she -- then she would have --

12 Q Yes or no?

13 A -- told the sheriff department it was C.

14 Zenaida Gonzale.

15 Q Yes or no?

16 A And not Fernandez.

17 Q Yes or no? You like it this way.

18 A No, no. It's not fair to say.

19 Q Okay.

20 A It's not fair to say.

21 Q And why is that?

22 A Because you're asking me why is that? Because

23 if you're saying that Casey's accusing her, then on her

24 statement on July 16th, she would have said the nanny was

25 C. Zenaida Gonzalez without a Z. on it. Where's the

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1 Fernandez come in? Casey gave that.

2 Q Let me say this to you.

3 A So there you go, Mr. Morgan. Where did she

4 get the Fernandez? Where did you get the Fernandez? Why

5 don't you tell the camera and all the viewers out there

6 where Fernandez came from? It's not on her DMV record.

7 That's part of our homework too.

8 Q Casey, your daughter --

9 THE WITNESS: What's your date of birth,

10 10/1/1968?

11 MR. MORGAN: Brad, for God's sake. This is

12 outrageous.

13 A It's not outrageous.

14 MR. DILL: This is a court proceeding.

15 Q This is a court proceeding. This is going to

16 be played at a trial at some date. For your own good,

17 please stop.

18 THE WITNESS: I got it out. Yeah, my chest is
19 pounding. It hurts. I let it out because he's got
20 to prove it now. He opened the door. Thank you.
21 Thank you, Mr. Morgan. Thank you. Go ahead. I'm
22 done.

23 Q You're going to be thanking me for something
24 else here in a minute?

25 A Thanking because you opened the door. You
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1 said she signed it that day so now you've got to prove.

2 Q Casey, your daughter, was at Sawgrass
3 Apartments?

4 A I don't know.

5 Q She had friends at Sawgrass Apartments who
6 lived there, didn't she?

7 A I don't know if they lived there on the 16th
8 or not or the 17th.

9 Q Okay. Or the 15th?

10 A I don't know.

11 Q And you don't know if she was visiting friends
12 there on the 17th, do you?

13 A No.

14 Q And so if she was, you wouldn't know one way
15 or the other?

16 A That's correct.

17 Q So you've come here to clear this woman.

18 A Correct.

19 Q We go all the way back to the beginning.
20 You've been told that -- by the police officers that your
21 daughter had identified in a lineup or had cleared this

22 woman in a lineup and that she did not -- that this was
23 not the Zenaida Gonzalez. The police told you, correct?

24 A The police told me that, correct.

25 Q And then you went and met with Casey and she
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1 told you that she had never seen a lineup and she'd never
2 said that wasn't the person, correct?

3 A Correct.

4 Q And then, ma'am, and this is what you're going
5 to thank me for, and then despite that fact and despite
6 that lie that you knew, you went on TV and you said that
7 this is the person --

8 A No, I did not.

9 Q Ma'am.

10 A I did not say that this is the person.

11 Q We have played -- you went on television
12 instead of clearing this person's name about you had the
13 opportunity on television to clear this person's name,
14 even though that the police had told you that Casey had
15 told you that this Zenaida Gonzalez was not the person
16 she picked out, you went on TV and did not clear her name
17 that night, did you?

18 A No, because I didn't --

19 Q Yo or no the way you like it. Yes or no the
20 way you like it?

21 A No, because I didn't know her name was C.
22 Zenaida Gonzale or I would have cleared her name.

23 Q Let's don't play games.

24 A I said Zanny. I didn't say C. Zenaida.

25 What's C. stand for? Zenaida is probably her middle
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1 name.

2 Q You knew when you went on TV that night that
3 this woman was not the Zenaida Gonzalez and you did not
4 clear her name, did you? Yes or no? If you dare?

5 A No.

6 Q Thank you.

7 A No.

8 Q And then, ma'am, in fact, you published the
9 defamation and you slandered this woman yourself in that
10 publication; isn't that true. Yes or no?

11 A No.

12 MR. MORGAN: That's all I have.

13 THE WITNESS: Nope. You slandered me on TV.

14 MR. CONWAY: Stop.

15 THE WITNESS: You've purgerred yourself with
16 this because she's not Fernandez.

17 MR. DILL: Let's go off the video record.

18 THE WITNESS: There you go. You want to fight
19 it, go for it. To us that she's Zenaida
20 Fernandez-Gonzalez.

21 THE VIDEOGRAPHER: Time is 4:17. We'll go off
22 the record.

23 THE WITNESS: Prove.

24 MR. MORGAN: I have. I have.

25 MR. CONWAY: Do you know something? This is

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1 completely out of hand.

2 THE WITNESS: Because if we were in a
3 courtroom, the judge wouldn't have let you talk to
4 me that way either.

5 MR. MORGAN: Well, you've told the truth at
6 least.

7 THE WITNESS: I always told the truth, Mr.
8 Morgan. I went on TV a while ago and said that it
9 wasn't her.

10 MR. DILL: Off the record.

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