

1 IN THE CIRCUIT COURT OF THE
2 NINTH JUDICIAL CIRCUIT IN AND
FOR ORANGE COUNTY, FLORIDA
3 ZENAIDA FERNANDEZ-GONZALEZ,
4 Plaintiff/Counter-Defendant,
5 vs. CASE NO.: 08-CA-24573
6 CASEY ANTHONY,
7 Defendant/Counter-Plaintiff.

8 -----

9 ROUGH DRAFT ** ROUGH DRAFT ** ROUGH DRAFT
10 The videotaped deposition of GEORGE ANTHONY taken
11 pursuant to Notice on behalf of the
12 Plaintiff/Counter-Defendant on Thursday, April 9, 2009,
13 beginning at 10:35 a.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.

4 GAnthony-rough.txt
20 North Orange Avenue -- 16th Floor
Orlando, Florida 32801
5
6 For the Plaintiff/Counter-Defendant,
7
8 No appearance on behalf of the
Defendant/Counter-Plaintiff,
9
10 BRADLEY A. CONWAY, ESQUIRE
390 North Orange Avenue -- Suite 1630
Orlando, Florida 32801
11 For the Deponent, George Anthony.

12 THE VIDEOGRAPHER: Lee Fouraker of Ron Fleming
Video Productions
13

14 ALSO PRESENT: Zenaida Fernandez-Gonzalez
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Rough Draft - 3

1	I N D E X	
2	TESTIMONY OF GEORGE ANTHONY	
3	Direct Examination by Mr. Mitnik	4
4	Examination by Mr. Morgan	
4	Examination by Mr. Mitnik	
5	CERTIFICATE OF OATH	
6	CERTIFICATE OF REPORTER	
7	WORD INDEX	

8 E X H I B I T S

9 (None marked.)

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

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It is hereby stipulated and agreed between counsel

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for the respective parties and the witness that the

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reading and signing of the deposition be reserved.

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□ Rough Draft - 4

1

MR. CONWAY: Before we get started, I just

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want to make it clear for the record that we came

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here to answer any and all questions that are

4

relevant to the defamation case. The ones that

5

aren't we'll object -- I'll put my objection on the

6

record and certify it.

7

MR. MITNIK: Well. Okay. That's not the

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proper procedure. The proper procedure is relevance

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has nothing -- is not a proper objection. You can

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object, if you want, but you don't certify it.

11

Answer all questions unless it's privileged.

12

THE VIDEOGRAPHER: Stand by, rolling tape.

13

The date is April 9, 2009. This is the deposition

14 of George Anthony being taken in the matter of
15 Zenaida Fernandez-Gonzalez versus Casey Anthony.
16 Our time is 10:23 a.m. and we're on record.
17 Counsel, please introduce yourselves.
18 MR. MITNIK: Keith Mitnik for Zenaida
19 Gonzalez. I have with me John Morgan and John Dill.
20 MR. CONWAY: Brad Conway on behalf of George
21 Anthony.
22 THE VIDEOGRAPHER: The court reporter please
23 swear in our witness.
24 - - - - -

25
□ Rough Draft - 5

1 GEORGE ANTHONY
2 having been first duly sworn testified as follows:
3 THE WITNESS: I will.
4 DIRECT EXAMINATION
5 BY MR. MITNIK:
6 Q would you state your name, please?
7 A George Anthony.
8 Q And Mr. Anthony, what is your current address?
9 A 4937 Hope Spring Drive, Orlando, Florida.
10 Q And did your daughter, Casey, live with you up
11 to the time that Caylee disappeared?
12 A Yes.
13 Q How long had she lived with you?
14 A Ever since she's been born.
15 Q And in the -- I want to focus on year, maybe
16 two years before the disappearance to start with as the
17 time frame.
18 During that time frame, was -- to your

19 knowledge, was Casey working?

20 A To my knowledge, yes.

21 Q Where do you believe she was working in the
22 year or two leading up to the disappearance?

23 A I was told she was working at Universal
24 studios.

25 Q And who were you told that by?
Rough Draft - 6

1 A My daughter.

2 Q And was she working part time, full time?
3 what was your understanding?

4 A Full time.

5 Q And let's -- I'm going to focus on the year
6 leading up to this, to the disappearance, so we'll be
7 talking about from, say, June of the preceding year up
8 till June of '08.

9 what hours was she working, to your knowledge?

10 A That could vary. It could be -- could be a
11 day shift. Could be an afternoon shift.

12 MR. CONWAY: If you don't know, you don't
13 know.

14 THE WITNESS: (Shakes head.)

15 BY MR. MITNIK:

16 Q Well, would you see her come and go from the
17 home when she'd say I'm going to work and you'd have some
18 idea from what she was telling you when she was heading
19 to work?

20 A She worked at various schedules, sir.

21 Q How many days a week?

22 A I don't know.

23 Q Was she working weekends? Was she working a

24 traditional workweek?

25 A It could -- it could -- it could change.
□Rough Draft - 7

1 Q How about most the time during that year?

2 A I couldn't really answer that correctly as far
3 as how many hours and stuff.

4 Q Now, was she paying rent at the house?

5 A No.

6 Q Was she contributing to the household
7 expenses, groceries, those kind of things?

8 A She did occasionally, yes.

9 Q What's occasionally mean? How often?

10 MR. CONWAY: If you don't know, you don't
11 know.

12 A Let's put it this way. She would purchase
13 things for the household for her daughter and for us when
14 she felt she wanted to purchase something.

15 Q And how often, say, in a month would that
16 happen?

17 A Sir, that -- that could -- that could vary.
18 That -- that could vary.

19 Q Okay. On average how often in a month or was
20 it not -- not that frequently that it wouldn't be
21 every -- every month?

22 A It wouldn't be that frequently.

23 Q Okay. Maybe once every six months?

24 A I'm not going to have you put words in my
25 mouth, no, sir.

□Rough Draft - 8

1 Q I'm not trying to.

2 A Yes, sir, you are.

3 Q That's why I started the question maybe.

4 Maybe --

5 A Let's put it this way. She bought things when
6 she wanted to buy things, how about that? We'll just end
7 that conversation at that.

8 Q Actually, we won't. My question -- I'm trying
9 to get a range of how often she would add to the
10 household goods. You said not as frequently as once a
11 month. Would it be fair to say maybe once every six
12 months?

13 A How about every other month and we'll end it
14 at that. How about that?

15 Q So long as you're telling me under oath your
16 best estimate it was about once every other month?

17 A I'm telling you the best answer I can give
18 you, so I suggest you go to another question, sir.

19 Q All right. So are you telling me your best
20 recollection would be on average once every two months?

21 A That's what I just said.

22 Q Okay. And when she would do that on average
23 once every two months, give me an example of the types of
24 contributions she'd make? Like how much money, ballpark?

25 A I don't know. I don't know. I -- I don't --

□ Rough Draft - 9

1 I never saw the bills and stuff like that, what she paid
2 for. I don't think that's relevant here, sir.

3 Q What kind of things would she purchase?

4 A I'm not going to answer this any further with
5 that.

6 Q You won't tell me?

7 A No.

8 MR. CONWAY: Do you know?

9 THE WITNESS: I have no idea.

10 MR. CONWAY: There's your answer.

11 BY MR. MITNIK:

12 Q You have no idea -- then how would you know
13 she was purchasing things if you have no idea what they
14 are?

15 A When you see someone bring bags in from a
16 local grocery store, you know they purchased them.
17 wouldn't that say they're the ones that purchased it.

18 Q That's helpful. So, in other words, about
19 once every two months she would bring in some groceries?

20 A I just said --

21 Q Is that right?

22 A -- said that.

23 Q All right. What else -- what else -- do you
24 know if she had a checking account?

25 A As far as I know, she did.

□ Rough Draft - 10

1 Q Now, when you say as far as you know, other
2 than assuming she did, did you ever see her have a
3 checking account, have reason -- specific knowledge for
4 having a checking account?

5 A I know she had a checking account. As far as
6 how long she had one, I'm not really sure.

7 Q So within that last year, you don't know --

8 A I have no idea, sir.

9 Q -- whether she had one or not?

10 A I have no idea.

11 Q How about credit cards? Do you know if she
12 had credit cards?

13 A I have no idea.

14 Q During that year, did you give her money for
15 gas or expenses?

16 A Probably could have. Probably did.

17 Q On average, how often would you give her money
18 to sustain herself?

19 A I have no idea, sir. It could be -- again, it
20 could be once a week. It could be once a month. I
21 really don't recall.

22 Q And how about her clothing? Did you-all help
23 her buy her clothing during that year before?

24 A No, sir, I never did.

25 Q Do you know if your wife did?

□Rough Draft - 11

1 A You'll have to ask her.

2 Q Do you know one way or the other?

3 A You'll have to ask my wife.

4 Q But my question is do you know one way or the
5 other if she did?

6 A No, I do not know.

7 Q Now, the -- when is the first time you heard
8 of Zenaida Gonzalez, just heard the name?

9 A I never heard that name until July of 2008.

10 Q Okay. And what was the circumstances the very
11 first time you heard it?

12 A When my granddaughter came missing.

13 Q And was it -- how did you hear the name?
14 Zanny? Is that the way you heard it?

15 A You just asked me about Zenaida Gonzalez. I
16 didn't hear that name, sir, until July of 2008.

17 Q Okay. When is the first time you ever heard
Page 9

18 the name Zenny -- Zanny? would that be the same time?

19 A No, sir. I heard that about a year prior to
20 that.

21 Q Okay. Tell me what were the circumstances
22 when you heard Zanny a year prior to that.

23 A That was a lady that was watching my
24 granddaughter when my --

25 Q Tell me --
Rough Draft - 12

1 A -- when my daughter was working.

2 Q And when you say about a year earlier, you
3 mean earlier than July '08, so around the summer of '07
4 is when you say you heard that -- name?

5 A Yes, sir. That's probably an accurate
6 statement, yes.

7 Q And who did you hear it from?

8 A My daughter.

9 Q And what did she tell you?

10 A A lady by the name of Zanny was watching her
11 daughter occasionally when she went to work, and if it
12 wouldn't be for her, it would be my wife or I watching my
13 granddaughter.

14 Q Now, having read through some things, I
15 understand that it's your position about 99 percent of
16 the time if Caylee was not with Casey, it would be you or
17 your wife watching her; is that right?

18 A Absolutely.

19 Q So in this 1 percent of the time that you two
20 weren't watching it, who else would do the watching, to
21 your knowledge?

22 A I just answered that, sir. Supposedly a lady

23 by the name of Zanny.

24 Q well, are there any other friends or family

25 members other than --

□Rough Draft - 13

1 A That's a possibility, sir. I really don't

2 know.

3 Q If you would let me finish. It's just hard on

4 her if we talk over each other, and I'll try not to do it

5 to you.

6 Were other family members or friends, to your

7 knowledge, other than this lady named Zanny, watching

8 Casey at all in that 1 percent of the time in the year

9 leading up to the disappearance?

10 A I'm not going to answer your question because

11 what you just said if someone was watching my daughter

12 Casey.

13 Q I'm sorry. Was someone watching Caylee?

14 A I just answered that. Besides my wife and I,

15 one other person who was watching my granddaughter is

16 Zanny.

17 Q So the answer would be to your knowledge no

18 one --

19 A No one else besides the three of us were

20 watching my child -- watching our granddaughter.

21 Q There we go.

22 A Yes.

23 Q Now, when you heard this for the first time,

24 let's say, in the summer of '07 about Zanny, did you make

25 any inquiry as to who this person was watching your

□Rough Draft - 14

1 grandchild?

2 A Did not.

3 Q Did you make any inquiry as to how your
4 daughter was paying -- coming up with money to pay for
5 it?

6 A Did not ask that question.

7 Q Or how much it was costing?

8 A Did not ask that question.

9 Q Did she ever ask you for money to pay Zanny?

10 A No.

11 Q To your knowledge, did she ask your wife?

12 A You'll have to ask my wife. I have no
13 knowledge of that.

14 Q Now, in the year from the time you first heard
15 the name Zanny up to the time of the disappearance, how
16 many times would you have been -- heard that name?

17 A I have no idea, sir. I have no exact number
18 on times I probably heard it. I have no knowledge.

19 Q Ballpark?

20 A Maybe once a week. So I think within a year
21 period, I think it could have been 52 times.

22 Q Now, did this baby-sitter named Zanny ever
23 come to the house?

24 A No.

25 Q Um, to your knowledge, was she a paid

□Rough Draft - 15

1 baby-sitter?

2 A I just answered that to you.

3 Q Actually not.

4 A I have -- I have no idea, sir. I have no
5 idea. I just answered that for you.

6 Q I actually asked --

7 A No. You asked me, sir, if I had given my
8 daughter money to pay, and I said no. You asked me if my
9 wife did. I said I have no idea. You have to ask her so
10 I already answered that question. Be nice, now. Be
11 nice.

12 Q The question I'm asking you -- there's
13 actually a third person could be paying her which would
14 be your daughter. To your --

15 A That's a possibility, sir. How she got the
16 money, I have no idea, so let's just cut to the chase.

17 Q To your knowledge, did your daughter ever
18 indicate to you, directly or indirectly, that she was
19 paying her?

20 A You'll -- no. I have no idea.

21 Q How did she describe -- during that year
22 before the disappearance, did she ever describe Zanny to
23 you?

24 A I never heard a description of Zanny until all
25 this stuff happened in July of 2008.

□ Rough Draft - 16

1 Q Did she ever tell you how she knew her before
2 all this? I'm talking about before.

3 A She supposedly met her through Universal
4 Studios, another gentlemen and a young boy that she was
5 watching.

6 Q Now, is that something that you've heard since
7 the disappearance or would that have been back before, if
8 you remember?

9 A That was back before that. That was within
10 that year period.

11 Q Okay. It was someone she met through
12 Universal Studios is what she told you, before the
13 disappearance?

14 A Yes, sir. I just answered that.

15 Q Did she tell you before the disappearance
16 where she lived?

17 A I don't remember that at all, no.

18 Q Did she tell you where it was where she would
19 drop your granddaughter off, where it was she would leave
20 her with Zanny?

21 A No particular address, no.

22 Q How about just basic location, like Sawgrass
23 Apartments?

24 A Had to be somewhere in Orlando. Had to be
25 somewhere in Orlando. I have no idea, sir.

□Rough Draft - 17

1 Q Did she ever say anything about Sawgrass
2 Apartments?

3 A No, sir.

4 Q Everything you know today do you believe there
5 ever was a Zanny the baby-sitter?

6 A I have a belief in my daughter, yes.

7 Q My question isn't if you have a belief in your
8 daughter. Do you believe there really was someone named
9 Zanny who was babysitting during that year?

10 A Absolutely.

11 Q Have you ever discussed with your wife whether
12 or not she believes it?

13 A My wife and I believe there was a Zanny there.

14 Q As of today is my question, not back then.

15 A Yeah, I still believe there's a Zanny out

16 there, I do.

17 Q Have you had discussions with your wife in
18 which she raised questions of the truthfulness of the
19 story of Zanny or whether there was a baby-sitter named
20 Zanny?

21 A I'm not going to answer that.

22 Q How come?

23 A Because I don't have to answer it.

24 Q why not?

25 MR. CONWAY: Privilege, marital privilege.

□ Rough Draft - 18

1 Q When you have -- back when you were having
2 conversations with your wife about Zanny, did you
3 consider that to be a secret conversation?

4 A What are you talking about a secret
5 conversation.

6 MR. CONWAY: It's privileged. He's not going
7 to answer that question. It's privileged. Go on to
8 the next question.

9 Q Did you consider your conversations with your
10 wife about Zanny to be secret, private?

11 MR. CONWAY: The answer is, yes, Mr. Mitnik.
12 He is not going to answer the question. It's
13 privileged. It's a marital communication. He's not
14 going to answer it.

15 BY MR. MITNIK:

16 Q Did you, sir?

17 A Brad just answered in for me.

18 MR. MITNIK: I will just as a courtesy warn
19 you, please, for the sake of future hearings we're
20 going to have in this matter don't answer for the

21 witness. You can make --

22 MR. CONWAY: I'm not answering. I'm making an
23 objection.

24 MR. MITNIK: You can make your objection, but
25 you can't speak for the witness. That's dangerous

□Rough Draft - 19

1 territory. Beware.

2 BY MR. MITNIK:

3 Q Have you ever seen this lady before today in
4 person, Zenaida Gonzalez?

5 A Just on TV.

6 Q Never in person?

7 A No, sir.

8 Q So she had never been in your house?

9 A I just answered that. I said no.

10 Q And if I'm correct, you never laid eyes on
11 anyone named Zenny that was a baby-sitter in your life?

12 A Pronunciation, sir, is Zanny. No, sir.

13 Q Zanny.

14 A Instead of Zenny, what you're saying, so I
15 guess you have to pronounce things a little bit better,
16 sir, for people to understand you.

17 Q I don't want to confuse you.

18 A You won't confuse me, sir. I'm on the ball.

19 Q I can tell. Give me the pronunciation so I
20 can get it right.

21 A How about Z-A-N-Y. And if you can't pronounce
22 an A, there's something wrong with you.

23 Q Tell me how you say it.

24 A Zanny.

25 Q Zanny?

□Rough Draft - 20

1 A Z-A-N-Y, yes, sir. And the way you're
2 pronouncing it, you're saying Zenny. Am I upset, sir?
3 You're darn right I'm upset being here because I think
4 this is just uncalled for.

5 Q Now, do I understand correctly that never in
6 your life have you seen the alleged Zanny, the
7 baby-sitter?

8 A I just said I have not, sir.

9 Q No, actually, I was asking about this lady.

10 A I haven't seen her. I haven't seen her in
11 person until today except seeing her on television.

12 Q I'm asking you a different question. Have you
13 ever seen this alleged Zanny the baby-sitter --

14 A I just said no, sir.

15 Q -- in --

16 A I just said no. I said it five times to you
17 no.

18 MR. CONWAY: He answered the question already.
19 George, just go ahead and answers it again.

20 A I have not seen this Zanny who's the
21 baby-sitter of my granddaughter.

22 Q In your life?

23 A I have never -- no.

24 Q Did you ever ask -- during the year leading up
25 to this, when your granddaughter was being left with some

□Rough Draft - 21

1 other person you'd never met, did you ever ask can I meet
2 her?

3 A Did not.

4 Q were there incidences in the year leading up

5 to the disappearance where your daughter had taken money,
6 to your knowledge, that didn't belong to her?

7 A Not going to answer that.

8 MR. CONWAY: That's irrelevant. There are
9 criminal charges pending against her. It's going to
10 affect the ability of her to get a fair trial so
11 we're not going to answer that question in this
12 forum.

13 BY MR. MITNIK:

14 Q Just so we're clear so you can think about the
15 wisdom of taking that positions, the relevance here is
16 that if she's having to take money from others, then how
17 in the world does she have money to pay for a baby-sitter
18 once a week or every week, and it is highly relevant to
19 this case. So I'm going to ask one more time and see if
20 you want to answer the question so we don't have to come
21 back on another day because I know you'd probably rather
22 not on a motion to compel.

23 was your daughter taking money that did not
24 belong to her from others, to your knowledge, in the year
25 leading up to this?

□ Rough Draft - 22

1 A I'm not answering that.

2 Q You refuse to answer it?

3 A Take it any way you want to take it. Refuse
4 it. I'm not answering it. It's no concern about this
5 lady down here, sitting down here. It's no concern.

6 Q Did your daughter appear to be short on funds
7 in the year leading up to the disappearance?

8 MR. CONWAY: If you know.

9 A I have no knowledge of that, no knowledge.

10 Q Did you ever have any discussions with her
11 about -- with your daughter about her need for money or
12 her finances during that year?

13 A Never discussed it with her.

14 Q Did you ever discuss with her why she would
15 take money that didn't belong to her?

16 MR. CONWAY: Mr. Mitnik, that assumes that she
17 did. I mean, give him a fair question and he'll
18 answer it, if he can.

19 MR. MITNIK: Would you read that question
20 back, please?

21 (The record was read back as requested.)

22 MR. CONWAY: You're assuming she took money
23 that didn't belong to her.

24 BY MR. MITNIK:

25 Q You can answer.

□ Rough Draft - 23

1 A I have no knowledge of my daughter's taking
2 any money.

3 Q None?

4 A None.

5 Q Not from anybody -- any family member?

6 MR. CONWAY: He just said none, Mr. Mitnik.
7 That's pretty inclusive.

8 Q Not from any family member; is that correct?

9 A That's correct.

10 Q Is that your sworn testimony?

11 A Yep. I have no knowledge of it.

12 Q How about using credit cards that didn't
13 belong to her? Any knowledge of that?

14 A I have no knowledge of that whatsoever.

15 Q Have you reviewed anything before your coming
16 here today?

17 A No, sir.

18 Q Tell me, what -- was there any kind of
19 friction or argument that occurred within 24, 48 hours of
20 the time that your daughter and granddaughter went
21 missing?

22 A I have no knowledge of that.

23 Q You don't know anything about any kind of an
24 argument or voices getting raised the evening before
25 within 48 hours in your house?

□ Rough Draft - 24

1 A Did not.

2 Q It didn't happen or don't know about it?

3 A Didn't happen, and I know of no other
4 incidents at all in my house in that 24/48 hours.

5 Q The last time that you saw Caylee, tell me
6 what was going on. Tell me about that.

7 MR. CONWAY: I'm going to object to that.
8 what does that have to do with your defamation case,
9 Mr. Mitnik? Talking about very personal
10 information. The question, in my mind, is designed
11 to embarrass, to annoy and to harass this family,
12 and it's got nothing to do with clearing your
13 client, which is what we're here to do, absolutely
14 100 percent want to clear your client and restore
15 whatever good name she had.

16 MR. MORGAN: You want to do that?

17 MR. CONWAY: Absolutely, absolutely.

18 MR. MITNIK: I'm not going to spend my whole
19 deposition explaining to you what the relevance is

20 because, A, relevance isn't the standard here; but,
21 B, whoever took -- whoever took that child did harm
22 to that child. If it is not my client, it tends to
23 prove my case. So I want to find out all the
24 circumstances leading up to it to show it couldn't
25 have been her.

□ Rough Draft - 25

1 MR. CONWAY: Well, ask a question that's
2 designed to get there and he'll answer it directly.

3 MR. MITNIK: Gladly.

4 MR. CONWAY: It's clearly not your client so
5 get direct.

6 BY MR. MITNIK:

7 Q Good question. Let me ask a question leading
8 up to that so I can get to the circumstances that were
9 going on so I can show my client couldn't have had
10 anything to do with it.

11 Tell me, sir, the last time you saw your
12 daughter what was going on.

13 A I've seen my daughter a lot over these last
14 few years.

15 Q Your granddaughter. Tell me --

16 A No, I'm not --

17 MR. CONWAY: Daughter or granddaughter.

18 A I'm not going to discuss the last thought of
19 my granddaughter, last thought I had and last time I saw
20 her.

21 Q I didn't ask your last thought.

22 A Yes, you did. Yes, you did. You asked me the
23 last -- don't do that to me, sir.

24 Q Let me rephrase it.

25
Rough Draft - 26

A I'm going to cut to your chase right now so

1 you can get away with all these questions. Number one is
2 the Zanny that my daughter described to me is 24 to 25
3 years old, about 5 foot 7, 125, 130 pounds. She had
4 straight white teeth, long brown hair. On a scale of one
5 to ten, she's a ten, supposedly.

6 Q Okay.

7 A So let's just cut to the chase and why don't
8 we end this right now today.

9 Q When did she give you that description for the
10 first time?

11 A The first time I saw it was in July 15.
12 That's the time the sheriff department came to my house
13 and all the information was passed on to them. So let's
14 just stop the chase right now and be done with this.

15 Q Let me ask you, were you -- and we're going to
16 come back to the, quote, chase, but let me ask you
17 something about that while we're on it.

18 THE WITNESS: I'm not going to be able to
19 handle this too much longer, Brad.

20 Q Let me ask you a question, sir. When you --
21 were you there when your daughter -- at the jail when
22 your daughter was on the phone with your wife talking
23 about --

24 THE WITNESS: We're talking about a criminal
25 proceeding here, Brad. I can't answer this.

Rough Draft - 27

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

2 Q -- talking about the Zenaida Gonzalez who

3 lived in Kissimmee who the police interviewed.

4 MR. MITNIK: Brad, I'm getting ready to end
5 this. I'm getting ready to walk out.

6 MR. CONWAY: Just let him ask the question.
7 Take a deep breath, George. All right. Take a
8 breath.

9 BY MR. MITNIK:

10 Q This is very specific, so all you-all listen
11 close to this lady sitting right here.

12 A I've looked at her many times, sir, and I feel
13 sorry for her being here.

14 Q So let me ask you a very specific question.

15 A And I mean that from the bottom of my heart.
16 I feel sorry that you have to go through this. Really I
17 do. And I hope from this I'll be able to shake your hand
18 when this is all over with and just say that I'm sorry.

19 Q Okay. Very specific question about her. Your
20 daughter told, with you there in the room, we've got the
21 video clips, told your wife that she never looked at a
22 photograph of this Zenaida Gonzalez, the one that the
23 police went down and interviewed in Kissimmee, denied
24 having looked at a photograph of her which would have
25 cleared her name.

□ Rough Draft - 28

1 Did you know that she did that?

2 A Have no knowledge of that.

3 Q Do you have knowledge that your wife, Cindy
4 Anthony, went in front of cameras and told them that your
5 daughter said she denied ever looking at a photograph of
6 her there by clearing her? were you aware of that?

7 A I'll have to go back and look through stuff.

8 I don't remember that at all.

9 Q Now, before your daughter went missing -- your
10 daughter and granddaughter went missing, what had you
11 heard from your daughter just in the years leading up to
12 that about having any friends or acquaintances at
13 Sawgrass Apartments?

14 A I didn't know anything about Sawgrass
15 Apartments until this 15th of July 2008.

16 Q You'd never heard of it before, before then?

17 A I just said I didn't.

18 Q And how did you first hear about Sawgrass
19 Apartments?

20 A When the investigation itself started from my
21 missing granddaughter.

22 Q And who did you hear it from?

23 MR. CONWAY: George, need some water?

24 THE WITNESS: I'm fine.

25 Q Who did you hear it from?

□ Rough Draft - 29

1 A If I'm not mistaken, sir, you'll have to ask
2 the sheriff's department. That's their ongoing
3 investigation.

4 Q Did you hear it from your daughter Casey?

5 A I heard it from the sheriff's department.

6 Q Did you ever have a conversation with your
7 daughter relating to Sawgrass Apartments at all?

8 A No.

9 Q So she never relayed to you any story about
10 dropping Caylee off at Sawgrass Apartments with Zanny?

11 A No.

12 Q The investigator, Dominic Casey, did he work

13 for you or the family at any time?

14 MR. CONWAY: You can answer that.

15 A He's worked for us, I believe, since about
16 November of 2008.

17 Q And "us" would be who?

18 A The Anthony family, Cindy and I.

19 Q And would that mean you-all were paying his
20 bill?

21 MR. CONWAY: That's privileged. It's work
22 product.

23 MR. MITNIK: Work product why?

24 MR. CONWAY: It's attorney-client.

25 MR. MITNIK: Work product in what litigation?

□ Rough Draft - 30

1 MR. CONWAY: He was working for the Anthonys
2 in regard to the criminal investigation, as well as
3 the disappearance of their granddaughter.

4 BY MR. MITNIK:

5 Q All right. Did you -- your wife, as I
6 understand, indicated to investigators when they came to
7 serve a search warrant at the house, indicated to
8 investigators that she had sent someone out to the woods
9 ultimately where the body was found to look back in --
10 back in November.

11 Were you present when she made any such
12 statement?

13 MR. CONWAY: would you mind reading that back
14 just --

15 MR. MITNIK: I'll be glad to rephrase it.

16 BY MR. MITNIK:

17 Q Did you ever send anyone out to go look in the

18 woods back in November?

19 A No, I did not.

20 Q How about your wife?

21 A No, she did not.

22 Q Were you -- are you aware that she told
23 investigators that --

24 A She did not do that.

25 Q She do that?

□Rough Draft - 31

1 A She didn't do that.

2 Q She didn't tell investigators that? I'm not
3 asking did she actually say --

4 A Listen, my wife and I discuss everything about
5 my granddaughter and my daughter on a daily basis.
6 That's -- something like that we would have discussed.
7 She did not say that to me.

8 Q You didn't hear her say that, correct?

9 A I just answered that, sir. She did not say
10 that to me. I want to understand something. How can you
11 get involved in a criminal case when this is a civil
12 matter? Explain that to me, sir, when you keep on
13 fishing for more stuff? Is this 15 minutes fame so
14 important to you?

15 Q Sir, I don't have to explaining anything, but
16 I will.

17 A Yes, sir, you have to explain a lot to me.

18 Q Actually, I don't, but I will just as a
19 courtesy?

20 A Thank you. I'd appreciate some courtesy. I
21 don't appreciate you giving me the finger as you're
22 putting your foot down.

23 Q Sir, come on.
24 A Yes, sir, you have.
25 Q I'm pushing my glasses up?

□Rough Draft - 32

1 A No, sir, you've done it three or four times.
2 I don't appreciate the gesture.

3 Q I will continue. I push -- my glasses slide
4 down and up on my face. I wouldn't sit here and shoot a
5 bird at you. I'm sorry. I will be very careful to use
6 my pinky so there is no question now.

7 Let me explain you to --

8 A You can explain all you'd want and I'd
9 appreciate it.

10 Q I do represent someone --

11 A Yes, you do, sir.

12 Q -- that's been drug into something that's
13 really ugly for her, and I'm trying really hard to
14 represent her. Now, in order to clear her name --

15 A I've already cleared her name already today
16 for you. I've already -- I've already done that, sir.

17 Q And I appreciate you doing so. Now, your
18 daughter hasn't.

19 A Well, you know, sir, that's something you're
20 going to have to handle on your own with her and through
21 her counsel.

22 Q In any event --

23 A Go ahead, sir.

24 Q In order to prove up the case, since her

25 name's been drug into this, one of the things that I need
□Rough Draft - 33

1 to do is show it couldn't be her by showing who else it

2 could be, showing she couldn't have been involved, and go
3 into the circumstances. That's why I'm asking the
4 questions. I don't need your approval for them but as a
5 courtesy I want you to understand where I'm coming from.

6 I know you would like my questions to be
7 extremely narrow and simply be do you think she did it?

8 A No, sir. This whole thing could be handled
9 within five minutes. Don't need to go three, four,
10 hours, whole day, take up my time and his time and my
11 wife's time. This could be done in no time, sir.

12 Q Okay. I'm done with my explanation. I tried.
13 I'm going to go back to my business.

14 A Well, I hope I can sit here a little bit
15 longer for your business.

16 Q Did you with the investigator that was working
17 for you and your wife, did you -- Dominic Casey, did you
18 give him any leads as to where to go look?

19 A No.

20 Q How about your wife, to your knowledge?

21 A No.

22 Q Where did -- to your knowledge, where did he
23 get the lead?

24 A Just like on TV that I saw, supposedly from a
25 psychic.

□ Rough Draft - 34

1 MR. CONWAY: George, not going to answer the
2 question. It's privileged.

3 Q Is it your testimony that your only knowledge
4 as to where he got -- allegedly got his lead, only
5 knowledge would be from seeing something on TV?

6 A Absolutely.

7 Q Do you know who he's talking to on the phone?

8 A I have no idea.

9 Q Do you know if your wife knows?

10 A I have no idea.

11 Q Have you ever talked to your daughter about
12 why she won't say this Zenaida Gonzalez is not the person
13 I was talking about?

14 A I have not had a chance to talk to my daughter
15 since she's been incarcerated.

16 Q I thought I saw you on tapes on the phone with
17 her since she's been incarcerated.

18 MR. CONWAY: You haven't, Mr. Mitnik. He
19 hasn't talked to his daughter since she was
20 incarcerated, period.

21 BY MR. MITNIK:

22 Q Before the murder charge, you didn't talk to
23 her when all this was going on at the jail?

24 A In August I did, yeah, when she was
25 incarcerated, but I didn't ask her anything about anyone.

□Rough Draft - 35

1 I was just seeing how she was doing.

2 Q Have you ever had a conversation with your
3 daughter in which you questioned her about her whole
4 story about Zenaida, Zenaida or Zanny, Zenny, any of
5 team?

6 A Have not.

7 Q Let's talk about the time period, that 31 days
8 when your daughter and granddaughter were -- you didn't
9 see them. During that time, did you make any effort to
10 try and locate this Zanny?

11 A Did not.

12 Q After your daughter reappeared without Casey,
13 did you make any efforts to locate this Zanny?

14 A Think about what you just asked me.

15 Q Did you make any efforts to find Zanny
16 after -- while --

17 A That's not what you -- the question -- if she
18 could read it back --

19 Q I'll just rephrase it, make it quick.

20 Did you make any effort to find Zanny after
21 your daughter reappeared without your granddaughter while
22 she was missing before her remains were found?

23 A Did not.

24 Q why not?

25 A Because I did not.

□ Rough Draft - 36

1 Q why not?

2 A Because I did not. I don't have to give you a
3 specific answer, sir. I just did not.

4 Q Did you attempt to find your granddaughter at
5 all during that time?

6 A Sir, I've looked for my granddaughter every
7 single day 24 hours a day since she came up missing.

8 Q Okay. why 24 hours a day every single day up
9 to the time her remains were found, once she went missing
10 while you were searching for her, did you not once try to
11 find this Zanny that your daughter was saying had her?

12 A No, sir, because I put every bit of effort
13 that I thought was the best for the sheriff's department
14 and private investigators to do their job.

15 Q Was it because you didn't believe the Zanny
16 story?

17 A No, sir. It's because I wanted to control
18 myself as much as I could for what everything I was going
19 through to hold my family together.

20 Q Your daughter throughout that time was
21 indicating that Zanny had her, right?

22 A At the beginning, sir, that's what I was told,
23 yes.

24 Q Well, did some time during the time she was
25 missing before the remains were found, did you hear

□Rough Draft - 37

1 something different?

2 A If you say the remains one more time, sir, I'm
3 walking out this door. How dare you say that about high
4 granddaughter? How dare you? How dare you?

5 Q Since your granddaughter was found, during
6 that time frame, while she was missing, did you -- why
7 did you not in any way, shape or form, try to follow --
8 strike that.

9 At some point during the time your
10 granddaughter was missing, did your daughter back off the
11 claim that Zanny had her?

12 A My daughter's been incarcerated, sir, since --
13 three times since last year.

14 Q Did she at any time during that time?

15 A Sir, I haven't talked to my daughter since
16 August of last year. I haven't had conversation with my
17 daughter since August of last year.

18 Q So would the answer be no?

19 A The answer's absolutely no.

20 Q So the only story as to where your
21 granddaughter was was coming from your daughter that you

22 knew of was she was with Zanny?

23 A Yes, sir. I've answered that.

24 Q If you believe that, why would you not try to

25 locate the person who allegedly had her?

□Rough Draft - 38

1 MR. CONWAY: Mr. Mitnik, he answered that
2 question. You continue asking the same question
3 over and over again.

4 MR. MITNIK: Actually, he refused to answer
5 that.

6 MR. CONWAY: No, he did answer that.

7 MR. MORGAN: What's the answer?

8 MR. MITNIK: What's the answer?

9 MR. CONWAY: He said he did everything he
10 could to assist the sheriff's department and private
11 investigator in finding them.

12 MR. MITNIK: I heard all that. That's just
13 not an answer to the question.

14 BY MR. MITNIK:

15 Q why if your daughter --

16 A The last time I brought Zanny into my
17 conversation is when my granddaughter came up missing in
18 July of 2008 so let's just stop that that's the last time
19 I discussed it.

20 Q why if you believed your daughter's story
21 about Zanny would you not try to find the person who
22 allegedly had her?

23 A I just answered that because I trusted law
24 enforcement. I trusted the FBI and I also trusted the
25 private investigators to do their job.

□Rough Draft - 39

1 Q Now, it's my understanding you said you had
2 private investigators that you every waking hour 24 hours
3 a day the entire time you were searching for your
4 granddaughter. Did I hear that right?

5 A Yeah, I searched for my granddaughter 24 hours
6 a day, I did.

7 Q And my question to you is in that search, if
8 you have a name of a person who allegedly has her, why
9 would you not try to find that person?

10 MR. CONWAY: He answered that question, Mr.
11 Mitnik. He answered the question. It's been asked
12 and answered.

13 Q Answer it again because I don't understand it.

14 A The last person that I was told who had my
15 granddaughter was a lady by the name of Zanny. That's
16 it.

17 Q What did you do to locate the person who had
18 your granddaughter?

19 A Information was turned in to the sheriff's
20 department, private investigators and the FBI. Let them
21 do their job.

22 Q So you -- would it be your testimony that you
23 asked the private investigator to go find Zanny?

24 A The sheriff's department, the FBI and a
25 private investigator have the resources to go and find

□ Rough Draft - 40

1 this baby-sitter.

2 Q That wasn't my question. Did you tell the
3 investigators that you hired to go find her?

4 MR. CONWAY: Just answer it "yes" or "no,"

5 George.

6 A Yes.

7 Q And what information did you give them in an
8 effort to try and locate her?

9 A Just a name that I had. That was it.

10 Q Nothing more?

11 A Nothing more.

12 Q Okay. And what reports did you get back as to
13 their efforts to find --

14 A You'll have to ask sheriff's department about
15 that.

16 Q No, your investigators, what reports did you
17 get back?

18 MR. CONWAY: That's privileged information.

19 It's privileged information.

20 MR. MORGAN: Why is it privileged?

21 MR. CONWAY: Because he hired them. They
22 worked for him. Everything that was given to them
23 is work product.

24 MR. MORGAN: That isn't work.

25 MR. CONWAY: It had everything to do with the

□ Rough Draft - 41

1 fact they were being investigated by the sheriff's
2 office. They were obstructions of --

3 MR. MORGAN: You're taking the privilege based
4 on no pending lawsuit.

5 MR. CONWAY: I'm talking about the lawsuit
6 based on pending criminal charges at the time.

7 MR. MORGAN: Against the Anthonys?

8 MR. CONWAY: Yes, sir.

9 MR. MORGAN: George and Cindy?

10 MR. CONWAY: According to the sheriff's
11 office, they're being investigated and could be
12 charged with obstruction charges.
13 MR. MORGAN: Not now or still?
14 MR. CONWAY: At this point, no, absolutely
15 not.
16 MR. MORGAN: Then you have no privilege.
17 MR. CONWAY: We'll certify it to the judge and
18 deal with the judge on it.
19 MR. MITNIK: I don't want to hear about taking
20 up people's time when we're back here.
21 BY MR. MITNIK:
22 Q Did you get any leads on Zanny during this
23 time that your granddaughter was missing?
24 A I'm sure the sheriff's department, the FBI and
25 private investigators did.

□Rough Draft - 42

1 Q Did you hear of any leads?
2 A No, sir, I did not.
3 Q Were you screaming bloody murder this woman,
4 Zanny's, got my granddaughter, by gosh, why aren't we
5 chasing her or anything like that?
6 A Again, sir. You're going to have to ask the
7 sheriff's department, the FBI and private investigators.
8 MR. MITNIK: Read my question back.
9 (The record was read back as requested.)
10 MR. CONWAY: Just answer "yes" or "no."
11 A No.
12 BY MR. MITNIK:
13 Q would -- in the time period leading up to the
14 disappearance, would Caylee spend the night at Zanny's?

15 A Possibly.
16 Q To your knowledge, did she?
17 A Possibly. I don't know. That's possible.
18 Q I mean to your knowledge did she? Do you ever
19 remember that happening?
20 A It's possible. I believe my daughter said
21 maybe on an occasion or two she was staying at Zanny's
22 house.
23 Q When you say it's possible, do you actually
24 have a specific memory of it?
25 A Well, sir, I don't know the exact location

□ Rough Draft - 43

1 where this person was at. I don't have an exact date and
2 the time, no.
3 Q That's not my question. Do you have a
4 specific recollection in the time --
5 A My dad -- I'm sorry. My daughter said it make
6 once or twice to me that she was staying at Zanny's house
7 with my granddaughter.
8 Q Before the disappearance?
9 A Yes.
10 Q Did you ever go yourself during the time of
11 the disappearance -- I'm sorry -- after -- after you
12 first -- you heard the story about Zanny and Sawgrass,
13 did you ever go to Sawgrass?
14 A No.
15 Q Did you send Lee there?
16 A No.
17 Q Why not?
18 A Because I wouldn't send my son in to do
19 something that sheriff's department, the FBI and the

20 private investigators were supposed to do.

21 Q You used to work in law enforcement?

22 A Yes, sir. What relevancy does that have to
23 this?

24 Q What did you do in law enforcement?

25 A I don't believe that's any of your concern,
Rough Draft - 44

1 sir.

2 Q What did you do in law enforcement?

3 MR. CONWAY: Go ahead and answer.

4 A I was a deputy sheriff, sir, for ten years of
5 my life.

6 Q And how long ago?

7 A Over 20 years ago.

8 Q So how about you? Did you -- why didn't you
9 go to Sawgrass follow up?

10 A Because, sir --

11 MR. CONWAY: Mr. Mitnik, he answered that
12 question.

13 A -- the sheriff's department, FBI and private
14 investigators were going to do their job.

15 Q Did you believe from talking to your daughter
16 that she -- that Zanny allegedly lived there? Had you
17 heard that?

18 A Sir, I didn't hear anything about Sawgrass
19 Apartments until July 15th of 2008.

20 Q What'd you hear about it then?

21 A The sheriff's department.

22 Q I didn't say who. What did you hear?

23 A That they're investigating Sawgrass
24 Apartments. That's all I can tell you.

Q That's all you knew about Sawgrass is they

1 were investigating?

2 A That's all I knew.

3 Q It would be your sworn testimony that you did
4 not hear your daughter claimed that that's where she
5 dropped Casey (sic) off at with the baby-sitter?

6 A I didn't know until the sheriff department
7 showed me and also when I saw it on TV, sir, on July
8 15th.

9 Q And after you saw it on TV, you didn't go
10 yourself and look there?

11 A No, I did not.

12 Q Were you present, by the way, during any of
13 the 911 calls that your wife --

14 A No.

15 Q -- made?

16 A No, I was not.

17 Q Did you ever go to Blanchard Park?

18 A I've been to Blanchard Park numerous times,
19 sir, since this happened.

20 Q Did you ever go to Blanchard Park specifically
21 to investigate anything about Casey's missing -- Caylee's
22 missing?

23 A No.

24 Q Did you have conversations with your daughter
25 during that 31 days they were missing?

1 A Maybe a text message here or there or maybe a
2 brief conversation, maybe a minute in passing, just how
3 she was, how Caylee was, that's it.

4 Q How many times do you think you talked to her?
5 we'll talk about text --

6 A I have no idea.

7 Q More than five times?

8 A I have no idea.

9 Q More than once?

10 A I have -- I have no idea an exact number.

11 Q I don't want an exact number.

12 A You asked me for --

13 Q More than once?

14 A You asked me for one. You asked me for five.

15 I don't know. It could have been a thousand, sir. I

16 don't know.

17 Q More than one?

18 A Yeah, it probably was more than one, yes.

19 I'll answer more than one.

20 Q More than ten?

21 MR. CONWAY: If you don't know, don't --

22 A Ten is more than one, correct, sir?

23 Q Sure.

24 A I just said more than one.

25 Q But a thousand is hard for me to handle.

□Rough Draft - 47

1 A Come on. This --

2 Q Can you give me a reasonable range, sir?

3 A I'm not answering anything about that any
4 further. I've just answered your question.

5 Q And why won't you answer it any further trying
6 to give me a reasonable change?

7 MR. CONWAY: He's telling you he doesn't know.

8 A Because I already told you it was more than

9 once. You said more than ten. Ten is more than one.

10 Q I'm trying to get a range on the high end.
11 what's a reasonable high end?

12 A Oh, my God, unbelievable. Go to another
13 question. I'm not answering -- I'm not answering that
14 any further.

15 Q Okay.

16 MR. MORGAN: May I just say something, and in
17 respect for you, Mr. Anthony, please hear me out, is
18 the last thing we want to do for you to go to the
19 judge, have all these questions brought up and bring
20 you back. Please believe that. And the way for
21 this to be ended today is to answer these questions.
22 what you think is relevant, what we think is
23 relevant may be two different things, but out of
24 respect for you, I just want to let you know the
25 path we're going is going to have you back here in a

□Rough Draft - 48

1 month or so --

2 THE WITNESS: Mr. Morgan, I'm going to
3 interrupt you for a second.

4 MR. CONWAY: George, George.

5 THE WITNESS: I already told you this person
6 right here is not the person that was described to
7 me by my granddaughter.

8 MR. MORGAN: But your daughter hasn't said
9 that.

10 THE WITNESS: I'm sorry, by my daughter. That
11 lady's not 25 years old.

12 MR. MORGAN: Your daughter has been given a
13 picture of this woman.

14 THE WITNESS: Okay. If she has, she has.

15 MR. MORGAN: And she would not answer. That
16 could have ended it, as Mr. Mitnik said, a long time
17 ago. So this is not about what -- this is not about
18 you.

19 THE WITNESS: That's right. It's not.

20 MR. MORGAN: It's about your daughter. And
21 this woman has also been sued by your daughter as
22 well.

23 THE WITNESS: Sir, that's a separate issue
24 from me. I'm not concerned about that.

25 MR. MORGAN: But you have to understand where
□ Rough Draft - 49

1 we're coming from. We're not only representing
2 Zenaida, but we're also representing her in the
3 lawsuit by your daughter against her. So all I'm
4 saying is the precursor Keith has laid it out, we
5 don't want to come back here, and I know you don't
6 want to come back here.

7 THE WITNESS: I'm not coming back again.

8 MR. MORGAN: You'll do what the judge says.
9 And, you know, you're a police officer. The judge
10 tells you --

11 THE WITNESS: No, sir. I'm not a police
12 officer.

13 MR. MORGAN: You were a police officer.

14 THE WITNESS: 20 years ago.

15 MR. MORGAN: I want to lay that out for you,
16 Brad, because I do not want to bring -- my
17 sympathies are for you --

18 THE WITNESS: No, they're not, because this
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19 wouldn't be going on if there was sympathy.

20 MR. CONWAY: We're trying to answer the
21 questions as accurately as we can.

22 THE WITNESS: The whole thing could have been
23 handled in five questions, sir.

24 MR. MORGAN: No, it can't. The whole question
25 about Casey, this isn't her, that could be handled

□Rough Draft - 50

1 in one question.

2 MR. CONWAY: He's trying to answer as
3 accurately as we can.

4 MR. MORGAN: I know. I know.

5 MR. CONWAY: He doesn't want to guess. We
6 discussed that.

7 MR. MORGAN: I know. I'm just telling you how
8 this is going to play out in as nice a way as we
9 can.

10 BY MR. MITNIK:

11 Q Now, your daughter, during the time that your
12 granddaughter was missing, came into the house while you
13 were there; is that right?

14 A On one occasion, yes, I could think of.

15 Q And you at that point in time attempted to go
16 into the trunk of her car; is that right?

17 A I'm not going to answer that.

18 Q And she blocked you from getting into the car?

19 A I'm not going to answer that.

20 Q Okay. On what grounds?

21 A That's part of a criminal investigation that
22 has nothing to do with the civil matter here.

23 Q So any questions that I would ask you about

24 that incident, you won't tell us about?

25
□ Rough Draft - 51

MR. CONWAY: It's ooh our position that this

1 is videotape. There will immediately be copies
2 given out to the media. All of this affects the
3 criminal investigation that's ongoing as well as her
4 right to a fair trial. So anything that has to do
5 with Zenaida Gonzalez and the defamation suit, he
6 wants to answer on point correctly and accurately as
7 possible, but whatever has to do with the criminal
8 investigation and nothing to do with Zenaida
9 Gonzalez, he's not going to answer those questions.
10 We'll certify them and answer them under different
11 circumstances, if the judge orders that.

12 MR. MITNIK: So if I ask did she basically run
13 to the car and get in it and slam it down before you
14 could get into the trunk, he's not going to answer
15 any of those questions?

16 MR. CONWAY: He's not going to answer those
17 questions here today on videotape.

18 MR. DILL: What he's referring to has already
19 been part of the public record. This is -- hold on,
20 Brad. This is the interview that has already been
21 part of the public record that everybody has access
22 to and he's asking about that. So whatever
23 privilege you're talking about, whatever Fifth
24 Amendment right is not impacted by this at all,
25 sixth amendment right.

□ Rough Draft - 52

1 This is something that he can answer that is

2 reasonably calculated to lead to the discovery of
3 admissible evidence. In a civil case that's all we
4 have to have.

5 MR. CONWAY: What I'm talking about is the
6 videotape that you intend to release immediately at
7 the end of this deposition, and my position is that
8 the videotape is intended to harass, annoy and put
9 them in a position -- this is going to go on Nancy
10 Grace with Mr. Morgan, and we're not going to answer
11 those questions.

12 If you've got it, you've got it. He's given
13 his answer under oath to law enforcement, and I
14 don't think it's relevant to your civil suit.

15 MR. DILL: It's not under oath.

16 MR. MITNIK: Let's stop. We're trying to do
17 it once. It's not going to happen. Let's just let
18 him take the position.

19 MR. DILL: All right.

20 MR. MORGAN: But it wasn't under oath, Brad,
21 that's the difference.

22 MR. MITNIK: Some of this was. The fact of
23 the matter is we all know something under oath in a
24 statement somewhere else isn't the same as getting
25 it in a civil case under oath. It's apples and

□ Rough Draft - 53

1 oranges. It's not the same. I can't walk into
2 court and use a statement in another case. You take
3 it through a deposition. You bring it into this
4 case. We all know it.

5 You're taking your client down an erroneous
6 path, but I can't stop you. If you're not going to

7 answer, you're not going to answer.

8 MR. CONWAY: Mr. Mitnik, it has nothing to do
9 with the defamation case. These people have been
10 through a horrendous nine months, and this is
11 prolonging it and it's making it more difficult.
12 So, you know, we want to answer your questions, want
13 to clear your client, want to help you do your job.

14 BY MR. MITNIK:

15 Q Did you feel, sir, that for the two years
16 leading up to the disappearance you felt your daughter
17 really had not been working? Is that true?

18 A I already answered at the beginning, sir, I
19 believe my daughter was working at Universal Studios for
20 two years.

21 Q Do you recall your statement being taken under
22 oath back on 8/4/2008, by Edward -- Eric Edwards, Orange
23 County Sheriff's Department? Do you remember that, sir?

24 A Some parts of it, yes.

25 Q Do you recall on page 25, line 15, making the
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1 following statement: I felt for two years my daughter
2 hadn't been working. I felt that.

3 Did you say that to him?

4 A If it's in there, I probably did.

5 Q You want me to show it to you?

6 A No, sir, you don't have to. You've already
7 read it.

8 Q Was it -- was that under oath?

9 A Him and I were having a conversation that day,
10 yes.

11 Q Do you recall at the end of it him saying --

12 asking you the question would you raise your hand and --
13 raise your right hand for me? Do you swear everything
14 you said today was true, answered -- truly given and it's
15 true, correct?

16 A Yep, that was correct, then that's when I was
17 there.

18 Q Was it true when you said that that when you
19 said I felt for two years my daughter hasn't been
20 working, I felt that, were you telling the officer the
21 truth?

22 A Yeah.

23 Q Now, today you have told us you believe she
24 was working the whole time. Which one is the truth?

25 A I believe she possibly was working there.

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1 That's all I could say.

2 Q Why did you tell the officers you felt she was
3 not? The officers that were trying to get to the bottom
4 of finding your granddaughter, why did you tell them
5 that?

6 A No, sir. This whole thing has to do with Ms.
7 Gonzalez sitting down there.

8 MR. CONWAY: I believe your question was
9 whether -- whether she told him.

10 Q Why did you tell -- why did you tell the
11 police officers that you felt that your daughter had not
12 been working for the last two years?

13 A I'm not going to answer it any further, sir.

14 Q Why?

15 A I'm not going to answer it. That's part of a
16 criminal investigation, nothing to do with civil.

17 Q was there an incident where the ladder was
18 missing -- was not up -- I'm sorry -- was up on the
19 outside pool that you have, the out-of-ground pool that
20 you have --

21 THE WITNESS: Brad, I'm not answering. I'm
22 going to have to get up and go.

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

24 Q -- and you and your wife had a discussion
25 about that subject and you had concern in your mind that

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1 potentially your daughter had been in there with your
2 granddaughter and something could have happened?

3 A I'm not answering that.

4 MR. CONWAY: It's conversation between husband
5 and wife.

6 MR. MITNIK: And it's waived when given to
7 third-party. We'll just take it to the judge.

8 BY MR. MITNIK:

9 Q So you will not answer about concerns that
10 potentially some harm could have come to your
11 granddaughter in that pool with your daughter?

12 A Nope, not here today, I'm not, no.

13 MR. MORGAN: We have two minutes of tape.

14 Q Did you tell the detectives that maybe
15 something happened, you know, I hated to think about
16 that, but it was just because you don't talk to one
17 special little person in your life when you didn't hear
18 that little voice for weeks upon a time? Did you say
19 that?

20 MR. CONWAY: Mr. Mitnik, you know, these
21 questions go right into this man's heart, and they

22 have nothing to do with Zenaida Gonzalez. I mean,
23 have some compassion. I mean, let's clear your
24 client, but have some compassion for this guy.
25 You're bringing up things that are horrendous

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1 thoughts for anybody and you're needling it into
2 him, and it's not necessary, sir.

3 MR. MITNIK: Just for the record, the
4 continuous interrupting with my deposition, I'm
5 going to take to the judge.

6 MR. CONWAY: I understand.

7 MR. MITNIK: On your behavior so beware.

8 MR. CONWAY: I understand.

9 MR. MITNIK: We have very strict rules on what
10 comments should be made in a deposition and what
11 objections should be made. The rules have tightened
12 down from the old speaking objection and lecturing
13 and all that --

14 MR. MORGAN: Let's change tape.

15 MR. CONWAY: I'm just asking you to have some
16 compassion for this family.

17 THE VIDEOGRAPHER: Time is 11:20. We'll go
18 off the record.

19 (A 4-minute recess was had.)

20 THE VIDEOGRAPHER: Time is 11:24 a.m. We're
21 back on record.

22 BY MR. MITNIK:

23 Q What do you know about your daughter changing
24 the story of Zenaida Gonzalez being dropped off at
25 Sawgrass to being kidnapped at Blanchard Park?

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1 A I have no knowledge about that.

2 Q None?

3 A None.

4 Q Did you ever talk to your daughter about it?

5 A No, I have not.

6 Q Have you heard that there's a different story?

7 A I've heard a lot of stories, sir.

8 Q Have you heard that that particular one
9 changed from she voluntarily dropped her -- your
10 granddaughter off with Zenaida Gonzalez at Sawgrass and
11 then changed the story to Zenaida Gonzalez took her from
12 her, kidnapped her from her at Blanchard Park? Have you
13 heard of that change in your daughter's story?

14 A Have not.

15 Q So that's news you're hearing for the first
16 time here today?

17 A Yeah, yes.

18 Q Do you have a belief -- who would be on your
19 list of potential people currently that did this?

20 A I'm not going to discuss that with you, sir.

21 Q You have a list but you won't tell me?

22 A I'm not going to tell you.

23 Q Is your daughter on that list?

24 A I'm not going to discuss anything about my
25 daughter, sir, any further with you.

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1 Q Is any Zenaida Gonzalez, any Zenaida Gonzalez,
2 on that list?

3 MR. CONWAY: Answer that.

4 A No.

5 Q Is that because you now have concluded that

6 the Zenaida Gonzalez story was not true from the
7 beginning?

8 MR. CONWAY: You can answer that.

9 MR. MORGAN: And that's very relevant.

10 A This particular Zenaida Gonzalez that's here I
11 don't believe is involved taking my granddaughter.

12 Q That's not my question. Have you rejected
13 believe in your own mind the Zenaida Gonzalez story is
14 not true period; that there was no Zenaida Gonzalez that
15 your daughter left your granddaughter with who took her?

16 A That's who my daughter said she left her with.
17 That's who she left her with.

18 Q Okay. So my question is, if she is -- if no
19 Zenaida Gonzalez is on your list, is it because you've
20 rejected that story?

21 A I haven't rejected that story. I believe in
22 my daughter.

23 Q Can you explain to me how you can square I
24 don't consider any Zenaida Gonzalez to be on the list
25 anymore with I still believe my daughter?

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1 A This particular Zenaida Gonzalez over here is
2 not involved where involved with my daughter and my
3 granddaughter.

4 Q I hear you. Any -- I asked you any Zenaida
5 Gonzalez?

6 A I'm not answering any. I'm talking about this
7 particular. That's what we're here for today. We're not
8 talking about anyone else named Zenaida Gonzalez. Matter
9 of fact, if I'm not mistaken, your client is not Zenaida
10 Fernandez Gonzalez.

11 MR. CONWAY: Can I help you for a second?

12 MR. MITNIK: I don't need any help.

13 MR. MORGAN: Let me just say this. If you all
14 really want to put an end to this, he's asking a
15 very direct question which is does he believe any
16 Zenaída Gonzalez -- it's not on the list. It's not
17 on his list and a simple not I believe my daughter.

18 The simple question is do you believe any --
19 if you really are saying what you believe, that's a
20 very direct question and can stop a lot of other
21 questions.

22 MR. CONWAY: I understand your question, and
23 what I was going to explain to you is that Zanny is
24 the name he heard prior to July. Zenaída Gonzalez
25 is the name afterwards. So if we can ask your

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1 question on that premise.

2 MR. MORGAN: But the Zenaída Gonzalez was
3 questioned by the police.

4 MR. CONWAY: Right. Right. Just take it in
5 that time frame and if you could ask your questions
6 that way, I think it will --

7 BY MR. MITNIK:

8 Q who do you believe -- who do you believe Zanny
9 is? Is there a Zanny and who do you believe there is?

10 A I was told there was a Zanny and she was a
11 baby-sitter.

12 Q who is it then? who is the person? who do
13 you believe the person is?

14 MR. CONWAY: If you don't know, George, you
15 don't --

16 A I do not know.

17 Q I didn't ask you if you know. Who do you
18 believe it could be?

19 A I do not know.

20 Q You have no even suspicion?

21 A Nope, I do not, sir.

22 Q Do you think it's code for somebody else's
23 name?

24 A I have no idea, sir.

25 Q Have you -- have you thought it might be code
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1 for someone else?

2 A You know something? You're trying to badger
3 me here. I don't appreciate that.

4 Q Have you thought it might be a code for
5 someone else?

6 MR. CONWAY: Just answer.

7 A No.

8 Q Have you ever looked in the phone book --
9 we've heard about looking in the phone book for Zenaida?

10 MR. CONWAY: Have you ever looked --

11 A No.

12 Q -- in the phone book for -- hold on. Let me
13 finish.

14 A I've never looked in the phone book. I don't
15 use a phone book anymore.

16 Q Have you ever looked in the phone book for
17 Zenaida Gonzalez?

18 A No.

19 Q How about on the Internet the phone book?

20 A Possibly, I have.

21 Q How many did you find in Central Florida?

22 A Well, sir, if I'm not mistaken between Miami
23 and Jacksonville there is over a thousand of them.

24 Q Not my question. How many here in Central

25 Florida area did you find when you looked on the

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1 computer?

2 A Sir, there's like 140 of them.

3 Q 140 Zenaida Gonzalez --

4 A Yeah, there are.

5 Q -- in Greater Orlando area?

6 MR. CONWAY: If you know. If you know, answer
7 it. If you don't, you don't know.

8 A Yeah, in Greater Orlando, yeah, there's many.

9 Q And what did you search on? Not many, about
10 140?

11 A I don't remember the exact site, sir. I don't
12 remember the exact site.

13 Q But your home computer would show where you
14 searched for that, wouldn't it?

15 MR. CONWAY: Sheriff's department has that.

16 A Sheriff's department has all that information.

17 MR. CONWAY: I mean, they have the computer.

18 MR. MORGAN: But that computer would show
19 where he had searched for Zenaida Gonzalez. That's
20 what he said.

21 MR. CONWAY: I can only assume that it would.
22 They've got it.

23 MR. MORGAN: Let him answer that question.

24 A The sheriff's department has our equipment,
25 has our stuff in their possession. If you need to ask

1 that, you need to ask the sheriff's department.

2 MR. MORGAN: Is that the computer you searched
3 for Zenaida Gonzalez on?

4 THE WITNESS: Yeah, the one that I don't have.

5 MR. MORGAN: Okay.

6 BY MR. MITNIK:

7 Q Did you talk with -- during the 31 days when
8 Lee went looking for your daughter and granddaughter and
9 he went to the Dragon Room looking for her --

10 A I have no knowledge of that, sir.

11 Q Did you have any conversation with Lee about
12 his effort before or after?

13 A (Shakes head.) I talk to my son every single
14 day. During this thing right here, sir, I -- I don't
15 remember any of that kind of information about Dragon or
16 anything like that, no.

17 Q Do you remember him telling you that he was
18 searching for her and he thought she was in Orlando but
19 she was claiming to be in Jacksonville?

20 A Nope, I have no knowledge of that. If he did,
21 I don't remember.

22 Q How about the story that Zenaida or Zanny was
23 supposedly going to Tampa and was in a car crash? Did
24 you get a story like that from your daughter?

25 A Yeah, I did.

1 Q Tell me about it. What'd she tell you?

2 A She just told me that Zanny was coming back
3 from Tampa. She got involved in an accident with her

4 two -- her two children or two children -- I'm sorry.
5 Two children she was watching, I'm sorry. Not her
6 specific children but two children she was watching.

7 Q And as your daughter told it, was your
8 granddaughter in the car with her at the time of the
9 crash?

10 A No. My granddaughter was with my daughter.

11 Q And where was your daughter, following her?

12 A I believe so.

13 Q Okay. And what did she tell you why they were
14 going to Tampa?

15 A No, it was coming back from Tampa.

16 Q what did she tell you about that?

17 A I don't specifically remember.

18 Q Did you ask her why haven't you come by the
19 house? what's going on?

20 A No, did not, did not ask her then.

21 Q Did you talk at all to your granddaughter
22 during those 31 days on the phone or text or anything
23 like that?

24 A Number one as my granddaughter was only two
25 years old at the time, she doesn't text.

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1 Q Okay.

2 A I haven't talked to my granddaughter -- I have
3 not heard my granddaughter's voice since June 16th of
4 2008. Do not ask me that again, sir, because I will walk
5 out of here.

6 Q Okay.

7 A Do not do that to me again.

8 Q I don't want to make it hard on you.

9 A Yes, you are. Yes, you are. I've already
10 answered everything about this lady right here and I've
11 done it in the best possible way that I can, and I've
12 told you this is not the lady that my daughter described
13 to me. So we could end this right now.

14 This is -- all you're doing is fishing, sir.
15 You're fishing for information for a criminal
16 investigation that you have nothing to do with. I've
17 already answered everything. This is not the lady. When
18 I get up out of here, I want to walk over to her and
19 shake her hand and tell her I'm sorry.

20 Q And I appreciate that. I appreciate that.

21 A I will do that because that's the kind of
22 person that I am.

23 Q That's good of you.

24 A As far as --

25 Q I mean that. I'm not being sarcastic.

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1 A You better get this over in five minutes. I'm
2 giving you five minutes more of my time. Otherwise, sir,
3 I'm walking out of here. I know that's not what Brad
4 told me to do, but do you know something? I'm over this.
5 I'm over you and I'm over all this other stuff.

6 You guys have torn apart my family so much
7 every single one of you, every single one of you. You
8 don't realize what you've done to us and you don't care.
9 You don't care. And when you say you sympathize and all
10 that kind of stuff, you don't give -- anything about me.
11 You don't care. I hope you never have to go through what
12 I've had to go through. I hope another family member of
13 yours never has to go through what I've had to go

14 through.

15 Q Me too, sir. I wouldn't wish it on anyone?

16 A But do you know something? If you did, if you
17 need some help, I'd be there to help you. Do you know
18 why? Because I care. I care. That's more than I can
19 say about what's going on right now. So you've got five
20 more minutes of my time. Otherwise, I'm walking out of
21 here, sir, in five minutes. So make your next question
22 or two be relevant. If not, I'm leaving. I'm done.

23 THE WITNESS: I'm sorry, Brad. I'm done with
24 it.

25 MR. CONWAY: It's okay. It's all right.

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1 Listen to the question --

2 THE WITNESS: He's got five minutes.

3 MR. MITNIK: Okay. Let us do it this way.
4 We've got a lot of stuff, and what we're going to do
5 is we've got questions not answered. We're going to
6 suspend this and take it with the judge so we can
7 have some parameters on it so that we can -- because
8 what I need to have laid out there needs to be some
9 understanding that this is -- certainly appreciate
10 the painful nature of this. I hate having to ask
11 you the question. You can laugh about it, sir, but
12 I am deeply --

13 THE WITNESS: I am laughing about --

14 MR. MITNIK: I'm a kind-hearted person. I
15 hate asking these questions, but I also have an
16 obligation, a deep obligation to this lady here and
17 it doesn't simply end when you saying she wasn't the
18 person. I appreciate you saying that very much. If

19 you shake her hand and say I'm sorry, that will
20 touch my heart, but it doesn't change the fact that
21 I have more work to be done in this case for things
22 that your daughter did, not you or your wife. Your
23 daughter did.

24 And it creates a very difficult, hard job to
25 do what I have to do with her because of some bad

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1 things that happened to her daughter. So I need
2 some parameters from the Court, and I honestly think
3 you genuinely don't understand the limits of what
4 our jobs are here. And I think if we have some
5 parameters from the Court, we can come back with a
6 clear understanding and we can tant this down a
7 little bit, let me do my job that is an unpleasant
8 one.

9 I'd rather be doing many other things than
10 talking to you in this period of grieving but I have
11 a job to do and I need the judge to give some
12 guidance so we could come back in a less emotional
13 state, roll our sleeves up, get it done and we can
14 get out of your life.

15 MR. MORGAN: Brad, do we understand that we
16 only have two minutes -- he's walking out of here in
17 two minutes? Is that --

18 MR. CONWAY: If you guys have some relevant
19 questions.

20 MR. MORGAN: No, no. He said he's leaving in
21 four minutes.

22 MR. MITNIK: I don't care. We're down to a
23 minute.

24 MR. MORGAN: We're going to be here for hours.

25 If he's walking out in four hours --

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1 THE WITNESS: Let's go this over with. I
2 don't want to go in front of a judge no more. I'm
3 tired of judges. I'm tired of all this stuff. I
4 tell you what. I'm not going to answer anything
5 about the criminal part of this thing. I'm not
6 going to do that.

7 MR. MORGAN: But you're going to have to.

8 MR. MITNIK: Bottom line --

9 THE WITNESS: I have to do that when the
10 criminal case comes up, not in a civil case, I do
11 not. I do not. I do not have to answer in a
12 criminal case.

13 MR. MITNIK: Let me give you an example.

14 MR. MORGAN: Why don't you put him back on
15 record?

16 MR. CONWAY: Do you know what? Why don't we
17 take a little break and let everybody cool down for
18 a second.

19 THE WITNESS: I don't want to take a break. I
20 don't want to take a break.

21 MR. MORGAN: What Keith is said and I think
22 this is what Mr. Anthony is having trouble with. If
23 we prove who did do this, we prove she didn't do
24 this, and that is why we have to ask these questions
25 or we're not doing our job.

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1 THE WITNESS: I've already answered your
2 question that she's not the one that did it. I've

3 already answered that.

4 MR. MORGAN: We're getting ready to go into a
5 whole set of questions about the trunk, smell in the
6 car and that's where we're going next and so we have
7 to tell you that because we have to do that.

8 THE WITNESS: You've already done that.
9 You've already asked that question.

10 MR. MORGAN: You didn't answer.

11 MR. MITNIK: No, I didn't. I didn't ask that
12 question.

13 MR. CONWAY: I think we're probably better
14 off.

15 THE WITNESS: You asked about the trunk of the
16 car. You asked about me walking to the trunk of the
17 car. You already asked me about that.

18 MR. MORGAN: If you-all walk out, we're going
19 to move for contempt.

20 MR. MITNIK: Actually, I asked you about your
21 daughter blocking you going to the trunk --

22 MR. MORGAN: Let me say this. If you all
23 decide to back out, we're going to move to find Mr.
24 Anthony in contempt of court. We'll be seeking
25 attorney fees and again --

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1 MR. CONWAY: You can do that.

2 MR. MORGAN: He cannot answer if he doesn't
3 want to answer or if you tell him not to answer or
4 you can walk out. Walking out I don't think the
5 judge will look favorably upon.

6 MR. MITNIK: To be clear, not answering isn't
7 appropriate either, but, look -- I don't -- here's

8 what I want. Let me just be clear. I want to do my
9 job and get done and let him leave. Having a
10 lecture about my cold-heartedness when I'm a kind
11 heart human being every question for doing my job I
12 can't do.

13 On the other hand, I understand this is hard
14 for him. I'm a little disappointed, frankly, Brad,
15 you didn't have him prepared for this is relevance,
16 this is within the scope of discovery we're entitled
17 to.

18 He apparently thinks only question we get to
19 ask is that her and once I say, no, I'm out of here
20 in five minutes. He's said that. If that's the way
21 you led him to believe this was going to go, then
22 that didn't serve any purpose, but that's water
23 under the bridge.

24 where are we going from here? I'm going to
25 ask questions about who -- anything relevant to

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1 anyone else committing this murder in the
2 circumstances leading up to it because if it's
3 someone else, it's not here and it is not good
4 enough for him to simply say she didn't do it. I
5 appreciate he said it and it's certainly helpful to
6 clearing her name, but it's not the end of it.

7 His daughter put her in harm's way with it.
8 She refuses to look at a picture and say it's not
9 her when we've given the opportunity and we're going
10 to go on with this case and we're going to do our
11 job to show not only he says it wasn't, his son says
12 it wasn't, we're going to get everybody else to say

13 it wasn't and then we're going to prove it could not
14 have been her because it was someone else.

15 I am not going to be dictated as to what
16 questions I can ask or not. Is it sensitive? Is it
17 horrible to have to ask this man these questions?
18 Amen. But it doesn't change the fact that I've got
19 to put on my work hat and ask my questions.

20 I'm not going to sit here and be bereted and
21 argue every question I ask and be told what I can
22 and can't ask. So I've got a job to do. Let's take
23 a break. Either decide to come back --

24 MR. MORGAN: I don't think he wants to take a
25 break.

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1 MR. MITNIK: We're going to let you talk a
2 minute. Then we won't take a break. I'm either
3 going forward and doing my job and get questions and
4 answers and not get a lecture every question I ask.
5 I am empathetic of his situation, but I'm not going
6 to sit here and berated every question I ask.

7 Either be going to do this businesslike and
8 get it done or we're going to go to the judge and
9 ask him what he thinks about it. What do you want
10 to do? I've had it. What do you want to do?

11 MR. CONWAY: We're going to take a break and
12 I'm going to talk to my client.

13 MR. MITNIK: Okay.

14 THE VIDEOGRAPHER: Time is 11:41. We'll go
15 off the record.

16 (A 16-minute recess was had.)

17 THE VIDEOGRAPHER: Time is 11:56 a.m. We're
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18 back on the record.

19 MR. MITNIK: Okay. I want to -- we talked
20 about a subject before. I want to be clear, I think
21 I was, I want to make sure I'm clear, any questions
22 that I ask about Dominic Casey when he went out to
23 the woods and what he was told and what he told
24 you-all and all that you're taking the privilege on;
25 am I right?

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1 MR. CONWAY: Yes, sir.

2 BY MR. MITNIK:

3 Q From reading your statement that we referred
4 to earlier with sheriff's office, Mark Hussy, I saw
5 something in there about that there had been some
6 disputes over -- this isn't exact words, these are my
7 words -- of Caylee being somewhat attached to you and
8 your wife, and that that may have caused some level of
9 friction or some disputes with Casey in the past. Is
10 that fair?

11 A I don't ever think there was a dispute between
12 Casey and myself or with Cindy about our affection for
13 our granddaughter. I don't believe there ever was that
14 at all. I think that was something possibly could have
15 been drummed up or someone said something about it. No.
16 I mean, my gosh. My granddaughter lived with us from the
17 time she was brought home from the hospital until the
18 time she came up missing. My gosh. She was -- she meant
19 everything to me.

20 I think every family has a little bit of
21 dysfunction through it every once in a while. I mean, I
22 don't think everyone's perfect.

23 Q Let me tell you what I'm talking about and
24 maybe you can put it in context. I'm reading from page
25 44 -- oh, let me start on your answer on line 8 to put it

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1 in context.

2 90 percent of the time or more it was my wife
3 watching -- watching our granddaughter, you know, very
4 few times that I actually watched her by myself because
5 of scheduling.

6 Then the question: She was almost -- almost
7 more of a mom figure than --

8 Answer: Yeah.

9 Question -- than Casey?

10 Answer: Yeah. I think that happened from the
11 day she was born, as a matter of fact. I don't know if
12 my wife shared that with you guys or not, but the day
13 that she was born, after they got done cleaning my
14 granddaughter up and stuff like that, who do they hand to
15 her was my wife. And my daughter was always --

16 And the question was: Harboring ill feelings?

17 And the answer was: Yeah, there's been some
18 toughness right there, yeah. And, yeah, she's thrown
19 that in my wife's face a few times, yeah, to be honest
20 with you-all.

21 A Yes, sir. I definitely said that. I remember
22 saying that specifically, yes.

23 Q Is that accurate?

24 A That's accurate, absolutely. And if I can
25 expand upon that.

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1 Q Sure.

2 A When my granddaughter was born, my daughter
3 went through what they call an episiotomy. I'm not sure
4 if you're familiar with that at all --

5 Q I am.

6 A -- and the medical terminology of it. But,
7 yeah, when the lady who had cleaned up my granddaughter,
8 she could not give her to my daughter right away and my
9 wife was right there. We were both right there watching
10 our granddaughter because we were just in awe, and she
11 did. She handed it to my daughter and my daughter did
12 say, yes, oh, you got a chance to hold her before I do.
13 Yeah, that happened. I don't understand why that should
14 be a problem, sir.

15 Q I'm not suggesting that's a problem, sir. But
16 you stand by the answer I just read you to.

17 A Oh, yes, sir, absolutely. It's part of that
18 record, yes.

19 Q And while -- during that 31-day period when
20 your granddaughter and daughter had left the house, was
21 there a time where you followed or chased after your
22 daughter in a car?

23 A I thought I had, but I was mistaken about --
24 about the time. I think it was back in March or April
25 when my daughter had utilized my wife's vehicle. I was

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1 wrong on the dates, on the months, yes.

2 Q Now, this would have been August of 08. These
3 events that we're talking about occurred in July of '08,
4 right. So it was mix --

5 A No, actually, I think it was like April or May

6 when I said this about my daughter using my wife's
7 vehicle and I went -- I went to follow her one day. So
8 it was just a month or two different. No, nothing about
9 July. I was mistaken about that.

10 Q No, my question to you is your -- the time
11 frame where your daughter was missing was like a month
12 before this statement, right?

13 MR. CONWAY: Mr. Mitnik, it's his
14 granddaughter that was missing.

15 Q well, they both were gone from the house is
16 what I mean. When the two of them were gone from the
17 house, when your granddaughter was missing, that was
18 about a month before you gave this sworn statement to the
19 police; am I right?

20 A Yeah, about three weeks, yes, somewhere, yeah.

21 Q About three weeks?

22 A Yeah.

23 Q And you described it as you were going through
24 the stuff with Busch Gardens and Zanny, and it said: And
25 that's where Zanny got in her accident?

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1 Answer: Supposedly Zanny got in this car
2 accident. Casey was following, I guess, some distance
3 behind her and Zanny got involved in this accident.

4 Question: Hospitalized at Tampa General?

5 Answer: That's what we were told.

6 Question: Treated for a concussion?

7 Answer: Yes.

8 Question: But then the next day the ER nurse
9 discovered a large laceration behind the ear and had to
10 treat that?

11 Answer: And kept her, I guess, an extra day
12 or something like that, if I remember correctly.

13 Answer: Jeff comes to town as we slide down
14 through here, but I want -- this week of the 23rd to the
15 27th, from this conversation that you had with the FBI
16 the other day, apparently, there was an incident during
17 that window, that block, where you may have seen her in
18 your wife's truck on the 408.

19 Can you clarify that for me? What that -- was
20 that week even -- was that the week even? Answer: I'm
21 going to say it is -- we'll have to go back through these
22 E-PASS records. And you say because I went looking for
23 my daughter, I chased her. I mean, I saw her leaving
24 with my wife's vehicle.

25 Question: You saw her leave the house?

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1 Answer: Yeah, saw her leave the house driving
2 up Chickasaw getting on the 408. And I turned around and
3 I say I'm following her. George, I say, I'm following
4 her. I'm tired of this.

5 Question: I'm sorry to put new that position
6 because I know that that was something you told the FBI
7 in confidence, and your wife didn't know, and I was going
8 to approach it a little different the other day.

9 Did you -- when -- when that was mentioned to
10 your wife, she just completely denied any knowledge of
11 that.

12 Answer: Well, it would be easy to find an
13 E-PASS because her E-PASS, my E-PASS, we got two separate
14 accounts, but that would be fine, very easy to find out
15 because I remember my daughter. She drives as fast as

16 she could to get away. I think she knew I was behind
17 her. Maybe she did or not, but I was trying to stay at a
18 reasonable distance. Maybe it was a hundred yards away
19 from her trying to stay in straddle lanes and all going
20 back and forth. I know she got off somewhere off
21 Chickasaw or Kirkman and I couldn't get over fast enough
22 to find her.

23 A Did you say that?

24 A Oh, absolutely, I said that, yes. I remember
25 that. But I was just wrong about the dates when I

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1 thought that. I believe it was April or May when I did
2 that, not back in July.

3 Q But this is a month after this event where you
4 said I'm tired of this. I said to myself, George, I'm
5 following her. I'm tired of this and had this chase.
6 And you're saying you were confused. It was earlier in
7 the year and had nothing to do with this time period
8 while she was missing?

9 A Had nothing to do with this time period,
10 right. That was just a misquote on my part.

11 Q Well, I assume that was a pretty dramatic
12 event chasing your daughter and her getting away down the
13 highway, right?

14 A Uh-huh.

15 Q Is that yes?

16 A Yes.

17 Q Okay. And I assume the time period where your
18 granddaughter was missing was pretty -- obviously
19 traumatic?

20 A Right, but these two times are not the same

21 time.

22 Q You just confused the times?

23 A I just confused the times, yes.

24 Q Did you ever go look for those E-PASSs?

25 A The sheriff's department -- that was on our
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1 computer. I've always saved those. That would be in
2 their evidence.

3 Q All right. I'm going to apologize in advance.
4 This next subject is sensitive, but I need to ask you
5 about it. You can answer it or take whatever position
6 you deem you need to take.

7 There was -- when the car was found from
8 Johnson's Towing, did you smell a smell that was really
9 alarming to you?

10 A Again, that's part of the record that the
11 sheriff's department has. I'll have to say yes.

12 Q And did you tell them -- I'm just reading from
13 your statement -- I don't like that car in the smell?
14 I'm going to be straight with you guys. I'm being
15 straight and honest. I'm not going to hold back.
16 There's a reality here in this thing, and that's --
17 that's -- that's life? Did you say that?

18 A Yeah, because there was a decomposition smell,
19 yes, sir.

20 Q And you smelled that in the car?

21 A Uh-huh, yes.

22 Q And you were -- you were -- I know it's been a
23 long time ago, but you were in law enforcement. Is that
24 where you had the smell?

25 A There are certain smells, sir, you never
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1 forget.

2 Q Did you learn that through your law
3 enforcement years?

4 A Absolutely. There is certain things you just
5 never forget.

6 Q Okay. There was -- I don't have a whole lot
7 more here. You were at the -- let me ask you about are
8 you aware of any potential book deals or anything like
9 that being discussed that would create money about this
10 story that you're having to live this nightmare?

11 A Not that I have -- I have no knowledge of it,
12 no.

13 Q And I want to be clear. I'm not just talking
14 about one that's inked and signed and done, but even any
15 discussions or potentials?

16 A Okay. I can expand upon that just a little
17 bit.

18 MR. CONWAY: Wait a second. Are you asking
19 about in terms of Casey Anthony?

20 MR. MITNIK: Or them.

21 MR. CONWAY: What's your question? They're
22 not going to answer any questions in regard to
23 themselves. That's irrelevant to your lawsuit. In
24 regard to Zenaida --

25 THE WITNESS: If I could just say one thing.

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1 A There have been outside sources outside of our
2 family that are capitalizing on this situation, and
3 they're the people that are writing these books or having
4 these memoirs or selling items on ebay things like that.

5 As far as Cindy and I and anyone else connected with our
6 family, no, sir, we're not.

7 And if someone else outside of the family's
8 doing it, I have no knowledge exactly of that except what
9 I've seen has been put on the news like Caylee Dolls and
10 things of that nature. That's -- that's --

11 Q I would be --

12 A And photos that people might have taken off
13 the Internet and sold or something like that. As far as
14 my family, no, sir. I'm not -- I'm not into that.

15 Q Not your family or anyone on behalf of your
16 family to your knowledge?

17 A No, sir, no one that we would give
18 authorization to, no, sir. The people are doing it to do
19 it.

20 Q How about Mr. Baez?

21 A I have no knowledge of that, none whatsoever.

22 Q We've heard about the staying out at the Ritz
23 back after they found your granddaughter. Who was paying
24 for that?

25 A I believe that was someone from ABC is the one

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1 that felt compelled to help the family. That would be
2 something you'll have to ask them, sir. I knew nothing
3 of that, sir, until the date I was taken off the airport.
4 My wife and I -- that five hour trip to LA back home, not
5 having no communication at all, not knowing what's going
6 on and to get whisked off that plane and getting taken to
7 a location that we didn't even really realize until after
8 we got there where we were at.

9 Q And when you say taken off the plane and

10 whisked, did they have a car waiting or something like
11 that?

12 A Oh, there were numerous -- numerous cars,
13 numerous people. To say how many cars, how many people,
14 honestly, I have no idea.

15 Q Okay.

16 A Is that something someone had planned for us?
17 I guess so. But who did it all, I have no idea.

18 Q All right. So when you landed, you didn't
19 know that was coming?

20 A Did not.

21 Q You didn't know anything about going to the
22 Ritz. That was a surprise?

23 A Did not. All I know is when the flight
24 attendant came over to us when we were descending into
25 Orlando, a lady come up and asked if we were the Anthonys

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1 and I said yes. She said we're asking you to stay on the
2 plane until everyone has disembarked and that was it.
3 Next thing I know I see law enforcement, TSA and I don't
4 know who all else was there said you have to come with us
5 and that was it.

6 MR. MITNIK: I had a series of questions about
7 where Caylee's body was found and this time when
8 Dominic Casey and who he was talking to on the
9 telephone and who sent him out there and what the
10 tip really was that are really critical to what we
11 came here today and one of the main things I
12 honestly wanted to ask you about, but do I
13 understand correctly if I go into those things,
14 you're not going to let him answer any of those?

15 MR. CONWAY: Take it question by question.

16 MR. MITNIK: I'll be glad to.

17 MR. CONWAY: You can do that.

18 BY MR. MITNIK:

19 Q Do you have any information as to who Dominic
20 Casey was talking to on the phone?

21 A I have no knowledge of the exact person, no.

22 Q Have you heard who it may have been? I don't
23 mean off the media. From some source.

24 A No, I never heard a name specific. All I knew
25 it was a woman. That's all I can really say. I got

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1 that, again, off the -- off TV.

2 Q And did -- do you know -- tell me any sources
3 you have for hearing where he got his information to go
4 out there. Who gave him the tip. Any source. I
5 understand you said you heard on TV about a psychic.
6 Tell me any other source you heard.

7 A That's the only besides I believe you had Jim
8 Hoover here, if I'm not mistaken. That's the only --
9 that's it.

10 Q Did Dominic Casey ever tell you where his
11 source was?

12 A No, never did. I never had that conversation
13 with him.

14 Q He was working for you at the time?

15 A Yes.

16 Q Did you ask him?

17 A No, sir, I did not.

18 Q Why not? I mean, that sounds like the burning
19 question you'd want to know why.

20 A I just never asked him myself.

21 Q Were you curious?

22 A I'm curious about a lot of things, but I never
23 asked Dominic about that.

24 Q Were you curious about that, what the tip was?

25 A No, because I don't know anything about that
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1 until after we came back from LA. I knew nothing about
2 this stuff. I think that's about between sometime in
3 November whenever that was filmed until we came back in
4 December. I think that's about 30 days. I knew nothing
5 what was going on, nothing.

6 Q So at no point have you asked Dominic Casey
7 where he got that tip?

8 A No. I don't have a lot of conversation with
9 Dominic personally. I do not.

10 Q How often were you talking to him back at that
11 time?

12 A Maybe once a week, twice a week, possibly, but
13 don't really have an exact number of times.

14 Q Did you talk to him at all about him going out
15 there, not about --

16 A No, sir, I didn't. I never have.

17 Q Do you know if your son talked to him about
18 that?

19 A No. I believe my son would not or did not.

20 Q How about your wife? Did she?

21 A I can't answer for Cindy. I -- I cannot.

22 - - - - -

23 EXAMINATION

24 BY MR. MORGAN:

Q Mr. Anthony, it's my understanding that

1 Dominic Casey went out to the woods where Caylee was
2 ultimately found before she was discovered. Is that your
3 understanding as well?

4 A That's what I understand, yes, but I had no
5 knowledge of that until after we came back from LA which
6 was like December 11 or something like that.

7 Q And Dominic Casey had gone out into those
8 woods to your understanding weeks before; is that
9 correct?

10 A Just what I saw on TV, what's been released.
11 That's all I knew. I knew nothing about his
12 investigation day by day. I didn't know all that.

13 Q When he was working for you, he was not
14 required to give you a report or updates?

15 MR. CONWAY: I'm going to object to that.
16 It's privileged.

17 MR. MORGAN: That's how we need to answer
18 that, then.

19 MR. CONWAY: Okay.

20 BY MR. MORGAN:

21 Q And the day of -- the first day that Mr.
22 Anthony or Mr -- Dominic Casey went to the woods, is it
23 your understanding that he called Mr. Hoover to his
24 office before they went out there?

A That's a possibility, sir. I don't -- I don't

1 know the scenario or the circumstances how they got
2 together. I really don't know.

3 Q The day that he went out in the woods, did Mr.
4 Casey call you and say, we have received -- you or anyone
5 in your family, call you and say we have received a tip?
6 we have found the body?

7 A No, sir.

8 MR. CONWAY: I'm going to object to that.

9 That's privileged. Go ahead.

10 A No. I mean, Dominic -- I never received a
11 phone call from Dominic or Jim Hoover about any of this
12 stuff that was going on, never did.

13 Q And they were employed by you?

14 A Jim Hoover was not employed by us. That's one
15 specific thick we need to get correct. He was brought on
16 as a security individual, not as a private investigator.
17 He was assisting Mr. Casey in security matters around our
18 home. Okay? He was not involved in the investigation at
19 all for my granddaughter.

20 Q Who was paying Mr. Casey?

21 MR. CONWAY: Objection. Same thing,
22 privilege. Do you mean --

23 BY MR. MORGAN:

24 Q Was Mr. Anthony paying Mr. Casey?

25 MR. CONWAY: I'm going to object to that.

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1 BY MR. MORGAN:

2 Q And was any --

3 MR. CONWAY: Just read quick. He's been
4 employed by Mr. Baez as well as Ms. Anthony, so if
5 you guys --

6 MR. MORGAN: That's a different question
7 because you're making -- you're taking privileges

8 here that we just need to, you know. But the first
9 question is was Mr. Casey employed --

10 MR. MITNIK: At any time.

11 MR. MORGAN: -- at any time by Cindy Anthony,
12 George Anthony, Lee Anthony, any Anthony in that
13 home.

14 MR. CONWAY: You can answer that.

15 A Dominic has been our private investigator, I
16 believe, since about November of last year, you know,
17 give or take a week or so.

18 Q And that means -- by "our," you mean your and
19 Cindy's investigator?

20 A Uh-huh, yeah.

21 MR. MITNIK: That's a "yes."

22 THE WITNESS: That's a yes, yes.

23 Q And were you paying Mr. Anthony for his
24 services?

25 A Was I paying Mr. Casey, you mean?

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1 MR. MORGAN: I'm sorry.

2 A That's all right. We have an agreement set up
3 but then again, you know, no money's exchanged hands or
4 anything like that. He --

5 Q He has not been paid by you all as of yet?

6 A No, sir.

7 Q Now, on the day -- what is the arrangement to
8 pay --

9 MR. CONWAY: I'm going to object to that.
10 It's privileged.

11 Q Is the payment to Mr. Casey contingent on a
12 source of money coming in at a later date as a result of

13 this case?

14 MR. CONWAY: You can go ahead and answer it.

15 A No, because I don't think there is any moneys
16 contingent on this particular case.

17 MR. CONWAY: Just answer the question and let
18 them ask the next question.

19 A No, no.

20 Q Contingent on any third-party bringing money
21 to the family?

22 A No. Mr. Casey was employed by us just to
23 bring our granddaughter home.

24 Q How did you find Mr. Casey?

25 A Through -- met him through José Baez at José's
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1 office one day. That's going back months. Specific
2 dates, I have no idea what the date was.

3 Q Did José Baez hire Mr. Casey was well?

4 A That's something you'd have to ask him. I
5 have no idea.

6 Q Has money ever exchanged between Mr. Casey and
7 Mr. Baez?

8 A You'll have to ask them, sir. I have no idea.

9 Q Your answer is I don't know?

10 A No, I don't know.

11 Q And how often -- when was the first time that
12 you were introduced to Mr. Casey?

13 A Oh, God. That's going back months. I'm not
14 specific. It could -- I don't know. I'm not really
15 sure. It was one time last year after this stuff
16 happened.

17 Q Just so I understand Mr. Casey was brought you

18 to by Mr. Baez?

19 A I just -- I just met him through his office,
20 and that was -- that was it. I'm not --

21 Q And then you -- and then you hired him as a
22 result of that meeting?

23 A Dominic came to us and wanted to assist us, so
24 it's --

25 Q Dominic came and asked you to hire him?

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1 A Well, maybe not that specific things but we
2 just had met Dominic through José and I just know he
3 was -- he was there wanting to find our granddaughter and
4 put forth the effort to look for her.

5 Q Did you sign a retainer with him?

6 A I didn't sign a retainer with him, no.

7 Q So everyone is verbal between you and him as
8 far as payments go, not to get into specific payments,
9 but just as far as payments go?

10 A Yes.

11 Q So the day he first searched the woods with
12 Mr. Hoover, that morning he never called you and said --
13 he never called you and anyone else in your household and
14 said I have received a tip. I know where the body is?

15 A No, sir, never received a phone call or
16 anything like that from him.

17 Q And you never knew about this search until the
18 day you -- or the day after you returned from California?

19 A Yes. Like I said, it was almost a month
20 period from the time that I saw -- again, I saw it on TV
21 of when he was in that particular area.

22 Q Had you ever in your home done any work around

23 your pool or yard that involved laying pavers anywhere at
24 your house or pool area?

25 A I've got plenty of pavers, concrete work I've
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1 done all myself.

2 Q Where do you do -- where do these pavers --
3 are these pavers that you put in the pool?

4 A They're than the north side of my pool, just
5 to walk around the pool.

6 Q Where did you buy these pavers?

7 A I bought these, O, my gosh, whoever had the
8 best deal, Home Depot, Lowes, something like that.

9 Q And you still have the pavers in your garage?

10 A No, sir. I have no pavers in my garage.

11 Q They're all gone?

12 A I never had any pavers inside my garage at
13 all.

14 Q All the pavers you bought from Loews or Home
15 Depot you used --

16 A Oh, yes, as soon I bought them and put them
17 right up. They've been there for years.

18 Q -- at your house? And what color were they?

19 A They were like a pinkish color, like that
20 color.

21 Q Did you understand -- did you subsequently
22 understand after you turned from California that the
23 person who gave Dominic Casey the tip told him to go into
24 the woods and that he would find pavers that would lead
25 him -- I'm sorry.

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1 A Like, again, that's something I saw on -- on
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2 television.

3 Q Did you ever go into the woods yourself?

4 A No, sir. I haven't been down at that section
5 since my granddaughter's been missing.

6 Q So the pavers that Mr. Casey found down there
7 you've never looked at?

8 A No, sir. I haven't been down there at all. I
9 can't go down there.

10 Q I understand. Mr. Casey received this tip,
11 and you've heard about that. Have you ever had a
12 conversation with Mr. Casey about that tip?

13 A No, sir, never discussed it with him at all.

14 Q Even after the fact?

15 A Not even after the fact. I haven't discussed
16 it with him.

17 Q So as we sit here today, you -- I'm about
18 ready to ask this question twice. I apologize. I want
19 to make sure we button it down. You have never had a
20 conversation with him about who made that phone call that
21 made him get Mr. Hoover up out of bed and meet at his
22 office at 8:00 that morning?

23 A Never -- never did. Never had a conversation
24 with Dominic or Jim Hoover about that, never.

25 Q And you probably have heard that Mr. Hoover
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1 believes that the tip came from Lee Anthony. Have you
2 heard that?

3 A If I'm not mistaken, I think that was the
4 deposition you had with Mr. Hoover that was released in
5 the media.

6 Q Have you ever spoken to your son about that

7 tip and is he the person that made that tip?

8 A No. My son -- my son wouldn't have done that,
9 no.

10 Q The question is, with all due respect, have
11 you ever had a conversation with your son about that tip
12 and was he the person that made that tip?

13 A I've never had the conversation about my son
14 about -- about that -- him making that tip or being that
15 specific to it, no, I never have.

16 Q So have you ever seen the videotape that Mr.
17 Hoover took of Mr. Casey searching the woods?

18 A Only one time.

19 Q When was that, sir?

20 A When it first was released.

21 Q And how many times do you understand that Mr.
22 Casey actually went into those woods searching?

23 A I only know of just the one occasion.

24 Q So if he went there a second time, that would
25 be news to you today?

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1 A would be total news to me.

2 Q Do you know of any other place that Mr. Casey
3 ever went himself searching other than the woods -- I
4 hate to even say -- where they found your granddaughter?

5 A I have no knowledge of any other place he
6 might have went to. I have no knowledge of that.

7 Q So to your knowledge, the only place that you
8 know that Mr. Casey ever went searching was the woods
9 where your granddaughter's body was ultimately found?

10 A That's the only one that I know of, yes.

11 Q And as your private investigator, what

12 information was he relaying to you on a daily basis, if
13 any, about his search about his findings?

14 MR. CONWAY: That's privileged. It's
15 information specifically related to the
16 investigation, so privileged.

17 Q Was he giving you information -- was he
18 reporting to you on a daily basis?

19 A No, sir, no. I didn't have daily contact with
20 him, no.

21 Q In the whole time that Mr. Casey was working
22 for you, did he ever report to you about his search for
23 Zenaida Gonzalez?

24 A Not specifically, no, not on a daily basis or
25 anything like that. I think every once in a great while

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1 we would probably talk about maybe --

2 MR. CONWAY: George, just answer yes or no and
3 if they want to follow up, they can follow up.

4 A Not really, no.

5 MR. MORGAN: Brad, with due respect --

6 MR. CONWAY: Go question and question and he
7 can answer yes or no and then follow up with
8 whatever you want.

9 MR. MORGAN: You told him several times and I
10 think he understands.

11 MR. CONWAY: I'm going to keep telling him.

12 MR. MORGAN: Telling and answering is two
13 different things, but --

14 BY MR. MORGAN:

15 Q Did you ever have a conversation with Dominic
16 Casey about his investigation of Zenaida Gonzalez at the

17 Sawgrass Apartments?

18 A No.

19 Q What about his investigation at Blanchard
20 Park?

21 A No.

22 Q What was it your understanding, without
23 getting into the privilege, what was it your
24 understanding that he was doing all day long, Dominic

25 Casey?

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1 A We never had really a set agenda, stuff that
2 he really specifically did for us. I know besides
3 working for us, I'm sure there were other clients he was
4 working with also. I mean, I never had daily contact
5 with him. I never -- I never did from day one.

6 Q Do you find it odd that as your private
7 investigator for your family that he only received one
8 tip the whole time he was investigating; he went to the
9 woods, we now know more than once, twice, I'll tell you
10 that; and that is where your granddaughter's body was
11 ultimately found and he never told you that?

12 A He never -- he never told me that.

13 Q What explanation do you have for that?

14 A Lack of communication, I guess, maybe on his
15 part and my part. Maybe not wanting to find out a little
16 bit more possibly.

17 Q Now, you said it's your understanding that the
18 tip came to him from a psychic?

19 A That's what I understood, but then again, I
20 got that off the -- off the news, off the media.

21 Q And what media did you hear that from?

22 A I'm not really sure what particular channel.
23 I mean, just flipping different channels.

24 Q But you heard Dominic Casey say that on TV?

25 A No. As a matter of fact, I just happened to
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1 see the particular tape and whoever -- whatever channel I
2 was watching that particular time is the one that said
3 that.

4 Q And where did they get that information from?

5 A That's a great question. I don't know. I
6 can't -- I can't answer that.

7 Q So let's talk about two different things. A
8 cycle may have called Dominic Casey, said go to the
9 woods, there will be pavers that will lead you to the
10 body. That's one story, correct?

11 A From what I understand, yes.

12 Q The only other possibility would have been,
13 then, that the tip did not come from a psychic, but, in
14 fact, came from a person who had placed the body in the
15 woods or had been told by the person that placed the body
16 in the woods?

17 A That's a probable yes.

18 Q That's a yes. Now, in retrospect, the fact
19 that Dominic Casey went to those woods twice, and that
20 fact that that's the only place that he ever went to, do
21 you find it coincidental or alarming that that's where,
22 in fact, your granddaughter's body was ultimately found?

23 MR. CONWAY: Mr. Morgan, your question assumes
24 that that's the only place he ever went.

25 MR. MORGAN: I asked him if he ever searched
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1 any place else, he said no.

2 MR. CONWAY: He doesn't know.

3 Q You don't know?

4 MR. CONWAY: He said he doesn't know.

5 A Honestly, I --

6 Q I'm asking hypothetically. I'm asking as a
7 hypothetical.

8 A As far as what Dominic did on a daily basis
9 for us, I really don't know. I didn't have daily contact
10 with him.

11 Q Mr. Hoover testified to his knowledge Mr.
12 Casey never searched any other place other than these
13 woods, so I guess my question is a hypothetical.

14 A Right.

15 Q And a hypothetical is this. Do you find it
16 coincidental or alarming that the only place that Mr.
17 Casey searched, according to Mr. Hoover, were these
18 woods, and that these woods in a very close proximity to
19 these pavers is where --

20 MR. CONWAY: Don't answer that question. It
21 assumes -- assumes, assumes. He can't answer that
22 question.

23 Q What I'm getting at is this so I can explain
24 it in the nicest way possible, and going back to what
25 Keith said about Zenaida. If somebody was trying to

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1 develop an alibi by saying go to the woods, look around,
2 you'll find a body, follow the pavers and there's no
3 body, that person who sent them to the woods would be
4 part of this alibi and part of obstruction of justice.

5 So the person who gave this man this tip is
6 very critical and so that's what I'm trying to focus on
7 because it's either a psychic who saw in her own mind
8 these pavers in these woods or it's a third-party who is
9 involved in the coverup, the development of an alibi, and
10 the obstruction of justice.

11 MR. CONWAY: Okay. If you can just make your
12 question clear in terms of -- and make it a question
13 he can answer, he'll answer it.

14 MR. MORGAN: Okay.

15 BY MR. MORGAN:

16 Q The question would be with all that said do
17 you have any information in the regard of everything that
18 I've just said to you that the third person that called
19 Mr. Casey was not a psychic, but, in fact, could have
20 been a person developing an alibi, developing a coverup,
21 and being a participant in the obstruction of justice?

22 MR. CONWAY: Do you understand the question?

23 A I understand the question. I guess, again,
24 thinking of hypothetical things, yeah, possibly could
25 have been. I really don't know. I mean, I can't answer

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1 for Dominic. I can't answer for Jim Hoover or who
2 Dominic might have been talking to on the phone. I have
3 no idea who he was speaking to. I don't have that
4 knowledge.

5 Like I said, I never talked to Dominic about
6 what that date that he was in the particular woods or how
7 many times he was there. I don't have any of that
8 information. That I don't have.

9 Q Have you had any time heard, overheard, José

10 Baez tell Dominic Casey in the event that you ever do
11 find your granddaughter, do not call 911?

12 A I never heard any of that, never, no.

13 Q Do you have any explanation why Mr. Casey
14 would not have called the police the morning that he was
15 going out to the exact spot where your granddaughter was
16 ultimately found?

17 A I have -- I have no answer for that. I mean,
18 I have no -- I can't answer for Dominic. I cannot answer
19 for him.

20 Q I appreciate that. Do you have any
21 explanation for why Mr. Casey went out the second time to
22 the exact place and followed those pavers, that exact
23 path a second time, he did not call the police?

24 A I -- like I said, I cannot answer for Dominic.
25 I cannot.

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1 Q And do you have any explanation why he never
2 shared with you the video that Mr. Hoover had taken of
3 him going into these woods?

4 A No. I have no answer for that either.
5 Honestly, I don't.

6 Q Do you believe now that Dominic Casey is
7 involved in the coverup, the creating of an alibi and the
8 obstruction of justice into this case involving your
9 granddaughter?

10 A No. Dominic's not covering anything up.
11 Dominic had no reason to except to do the right thing.
12 Dominic's always done the right thing with us as far
13 as -- as far as I'm concerned.

14 Q And then so we circle back to maybe to ask you

15 the question I've asked again, so then it was either a
16 psychic who led him there that day or a third-party that
17 we don't know about?

18 A That's a possibility, yes. I guess sheriff's
19 department, FBI, whatever would have to go through phone
20 records and see exactly who he was speaking to. I have
21 no idea who he was speaking to. I have no idea.

22 Q And if it was not the psychic, the tip then
23 came from the person who knew that the body was in those
24 woods?

25
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MR. CONWAY: Mr. Morgan, he answered your

1 question.

2 Q Two minutes.

3 A Answer your question, yeah, it would have to
4 be something 245 the their I have's department would have
5 to investigated further something like that. I -- I
6 can't answer for what Dominic was doing or who he was
7 speaking to and who was on the phone. I have no idea,
8 sir. I have no idea. I found out about it basically
9 like everyone else did on the news.

10 MR. MORGAN: We're going to change tape.

11 MR. DILL: I think we're inside a minute on
12 the tape.

13 THE VIDEOGRAPHER: Go off the record. Time is
14 12:36. We'll go off the record.

15 (A 1-minute recess was had.)

16 THE VIDEOGRAPHER: Time is 12:37 p.m. We're
17 back on the record.

18 - - - - -

19 DIRECT EXAMINATION

20 BY MR. MITNIK:

21 Q Just briefly, I had asked you before, and
22 there was something from your statement and I left out
23 something that I wanted to add to the question from the
24 second page. It was from page 44 of the sworn statement
25 you gave with detective Edwards and it was where we

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1 talked about -- the question was, referring to your wife,
2 she was almost more of a mother figure than Casey, and
3 you said yes. And they talked about at birth your wife
4 taking Caylee. And then the question was was it
5 harboring -- did she harbor ill feelings, and you said,
6 yeah, there's been some toughness right there, yeah.
7 Yeah, she's thrown that in my wife's face a few times, to
8 be honest. She has. And she says, you a -- 24 is in
9 quotes, seems like Caylee goes to you guys more than she
10 does to me, end quote. And then you said well, it's
11 not -- to her, it's not that we're trying to take her
12 away from her.

13 was that -- was that an issue that you-all had
14 some tough times over and harbored some ill will that
15 Caylee seemed to go to you guys more than her and your
16 wife was like a mother figure?

17 A I don't think there's actually any ill will.
18 My gosh, we're with that little girl every day when she
19 woke up and went to bed at night. I mean, it's -- my
20 gosh. I was the -- I was the guy she saw every day, you
21 know, in her life. I mean, my gosh. My wife was there
22 and -- my wife's a good mother. She's a fantastic
23 grandmother. Geeze oh guy --

24 Q It appears that way. These were -- the

1 harboring ill feelings, and you said, yeah, there's been
2 some toughness right there. Yeah, she's thrown that in
3 my wife's face a few times, to be honest, and said seems
4 like Caylee goes to you guys more than she does.

5 And when I hear you saying throws it in my
6 wife's face, some toughness the question under those
7 circumstances, was that an issue where there was some --
8 some conflict over that subject?

9 A No. I think just in the -- maybe something
10 might have happened in the daily aspect of all living
11 together and maybe something happened just to trigger
12 something for some words being possibly said, but --

13 Q But those were your -- I'm reading that --

14 A Oh, absolutely, yeah.

15 Q -- yeah there were some tough times and yeah,
16 she through that in my wife's face, that seems like
17 Caylee goes to you guys more than she does me and you
18 responded we're not trying to take her away?

19 A Yeah, I think just because we're around her so
20 much. I mean, my gosh, to say we're loving grandparents,
21 that's probably typically sometimes. To watch that girl
22 grow up is watching my daughter grow up again. It's good
23 stuff.

24 Q And I'm just about done. This is a bit of a
25 tough question, but I need to ask has there ever been any

1 incidents where there's been any -- for example, where
2 your daughter was choking Caylee or anything -- I'm
3 sorry. I misspoke -- where your daughter and your wife

4 got into it where there was any physicality?

5 A That's something that someone has said that on
6 their own, no. Nothing ever happened.

7 Q There is no truth to that?

8 A No. I mean, granted on any household,
9 especially our household or anyone, husbands, wives,
10 daughters, fathers, sons, father, mothers, you have some
11 altercations every once in a while, verbally. It's part
12 of life, but as far as physical confrontation.

13 Q My question is physical --

14 A No, physical --

15 Q -- between your wife and your daughter?

16 A No, never, no.

17 MR. MORGAN: I don't think we have anything
18 else other than that we'll go back to the judge for
19 some of the privileged.

20 MR. MITNIK: Other than the stuff that was
21 privileged, we'll suspend the deposition. We're
22 done with those questions, and I appreciate that
23 everything calmed down and we got through this
24 latter part and I sincerely, whether you believe it
25 or not, hate to have brought you in here. I feel we

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1 can agree to disagree, but I feel I have a job to
2 do.

3 You probably view my job different than I do
4 it, but I mean to cause you no more pain than you
5 already have to live with every day. That was not
6 my intent and I'm sorry to have to do it.

7 THE WITNESS: Like I said, I want to go over
8 and wish the best for Zenaida here, I really do.

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9 And I don't want to see her have to go through any
10 more of this stuff that she's going through. That's
11 not fair to her. That's not fair to all the people
12 that have gotten involved in this thing. It's not
13 fair. It's not right.

14 MR. MORGAN: You want to explain -- I guess he
15 doesn't need to read or waive yet.

16 MR. CONWAY: We'll read.

17 MR. MITNIK: Regardless, he'll read.

18 THE VIDEOGRAPHER: Time is 12:42 p.m. Off the
19 record.

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