

1 VIDEOTAPED INTERVIEW OF

2

PATSY RAMSEY

3

Volume I

4

5

August 28, 2000

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1 APPEARANCES

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3 On behalf of John and Patsy Ramsey:

4 L. LIN WOOD, Esq.

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10 On behalf of The United States:

11 MICHAEL KANE, Esq.

12 BRUCE LEVIN, Esq.
13 MITCH MORRISSEY, Esq.
14 MARK R. BECKNER
15 TOM WICKMAN
16 TOM TRUJILLO
17 JANE HARMER
18 .

19 Also present:
20 Ollie Gray
21 John San Agustin
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3 CHIEF BECKNER: Let me say we
4 appreciate the opportunity to talk to you and
5 ask you questions, and we appreciate your
6 willingness to do this. Mr. Wood, I
7 appreciate your cooperation as well.

8 MR. WOOD: Thank you, Chief. I
9 appreciate that.

10 THE WITNESS: We appreciate you
11 being here too.

12 CHIEF BECKNER: I will just
13 extend again, one of the reasons I made this
14 trip is based on your request that I come.
15 I normally don't do this. Normally I leave
16 it up to my investigators and to the D.A.
17 prosecutors, but I made this trip partially
18 because of your request. So if, after this,
19 after today or tomorrow, whenever we get
20 done, you want to meet just to talk in
21 general, I am willing to do that.

22 MR. WOOD: Thank you.

23 CHIEF BECKNER: I believe we had
24 introductions. Do you need everybody to
25 introduce themselves again to refresh

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1 yourself?

2 MR. WOOD: I got it.

3 CHIEF BECKNER: Primarily today,

4 at least to start off, Bruce Levin and Mike
5 Kane are going to be asking the questions.
6 We may chime in at times if we have a
7 follow up question or something, but
8 primarily they will be asking most of the
9 questions.

10 MR. LEVIN: Mrs. Ramsey, we have
11 a lot of questions today. A lot of the
12 questions we will ask are simple
13 informational questions. Some of the
14 questions you may take as tough questions, if
15 I can use that term, quote/unquote.
16 Two years ago when you came out
17 to Boulder and we interviewed you in
18 Broomfield, I told Mr. Ramsey that if we
19 ever were to charge an intruder, Mr. Wood
20 will tell you this, every prosecutor in the
21 room will tell you, that the best defense is
22 if you can find an alternative suspect. And
23 if an intruder were ever charged in this
24 case, there is no doubt that their defense
25 would be I didn't do it, that Mr. and Mrs.
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1 Ramsey did it.
2 And in order to raise the
3 reasonable doubt about their own guilt, they
4 would harp on that through the entire trial.
5 And, as a result, those types of questions
6 that would be asked by defense attorney
7 representing an intruder need to be answered,
8 and we need to ask you those questions. We
9 need to know what is the answer to those
10 questions.
11 Do you understand that? Do you
12 appreciate that we ask the question, we need
13 to have an absolutely honest answer, because
14 if we don't, if we don't get a -- if we
15 get a defensive answer, if we get an evasive
16 answer, all we are doing is playing into a
17 defense sometime down the road, some defense
18 attorney is going to use that to say my guy
19 didn't do it, John and Patsy Ramsey did it.
20 Do you understand that?
21 MR. WOOD: Let me say this for

22 your benefit, Michael. I don't know that
23 Patsy understands the intricate nature of a
24 defense in a criminal case, but I can tell
25 you this. We are here to answer any
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1 questions as represented by the chief and
2 you. She is going answer those questions as
3 honestly as she can. That is all she is
4 here to do today. So why don't we go ahead
5 and get going.

6 MR. KANE: Well, I just want to
7 make it clear, though, because it is not
8 going to do anybody any good to give a
9 defensive answer. Don't take --

10 MR. WOOD: She is not going to
11 be offended by any questions.

12 MR. KANE: Okay. Fair enough.

13 MR. WOOD: If she is, we will
14 tell you. But I think we're going to do
15 fine and she's going to give you answers.

16 MR. KANE: But I would like Mrs.
17 Ramsey to assure me that. Not --

18 MR. WOOD: She is going to answer
19 your questions honestly, Michael.

20 MR. KANE: Mrs. Ramsey, do you
21 understand everything I just said?

22 THE WITNESS: I believe I do,
23 yes.

24 MR. KANE: Do you have any
25 questions about that?

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1 THE WITNESS: Not at this time.

2 MR. KANE: Okay. And if you do,
3 just simply bring it up. Okay?

4 THE WITNESS: Okay.

5 MR. KANE: Mr. Levin is going to
6 start off.

7 Q. (By Mr. Levin) Mrs. Ramsey, what
8 I would like to do, your attorney said
9 uh-huh, uh-uh. Yes, no works. The other
10 thing -- Do you understand that?

11 A. Uh-huh (affirmative).

12 Q. Let's do a practice.

13 A. Yes.

14 Q. We are going to play sort of like
15 we are in court because we have a court
16 reporter. I don't know if you have given
17 interviews where they are transcribed. So
18 that we don't drive this man insane, it is
19 important that you wait until the question is
20 finished, then you give your answer so that
21 we don't talk over each other.

22 We are all going to ask you
23 questions, but we are going to try to do
24 that so that he knows - it is very
25 difficult to take somebody, two people at
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1 once. Do you understand that?

2 A. Yes.

3 Q. I have just some background stuff
4 I would like to ask you, and I don't have
5 any intention of embarrassing you, but I know
6 from reading other interviews that in the
7 past you have taken some medication. I just
8 want to make a record on it. Are you
9 taking any medication now?

10 A. Yes, I am.

11 Q. What do you take?

12 A. Zoloft.

13 Q. And what's Zoloft?

14 A. Zoloft is for treatment of
15 posttraumatic stress disorder.

16 Q. Antidepressant type thing?

17 A. Yes.

18 Q. I am assuming, you look very
19 bright eyed and very alert, that it doesn't
20 affect your ability to comprehend what is
21 going on around you?

22 A. That's correct.

23 Q. Okay. The other thing is, too, if
24 we ask you a question, whether it is from me
25 or Mr. Kane or Mr. Morrissey, and you are
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1 not clear what we are asking you, instead of
2 trying to guess, just be very honest and
3 say, I don't have a clue what you are
4 saying, Mr. Levin, can you ask that in
5 English, because lawyers have a tendency to

6 talk like lawyers instead of people, and we
7 will try to talk like people here.

8 A. All right. Thank you.

9 Q. Where I would like to start is we
10 have heard that you and your husband have,
11 in effect, funded or conducted kind of a
12 parallel personal investigation into the death
13 of your daughter. Is that correct?

14 A. Yes, it is.

15 Q. What I would like you to do is
16 just kind of lay out, let's start with who
17 you have been in touch with, who has been
18 assisting you. Just list those people.

19 A. Mr. Ollie Gray, who is here in
20 the room, is working for us in the
21 investigation.

22 Q. Is there anyone else?

23 A. John, his assistant, who I think
24 you met earlier.

25 Q. Okay. And how long have you been
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1 associated with Mr. Gray, or has he been
2 employed by you?

3 A. I don't remember exactly. Quite
4 some time.

5 Q. Can you give us an approximation?

6 Are we talking months?

7 A. Several months.

8 Q. Months?

9 A. Uh-huh (affirmative).

10 Q. And before you started your
11 association with Mr. Gray, were there other
12 investigators that performed services for you?

13 A. Yes.

14 Q. And who were they?

15 A. Ellis Armistead & Associates.

16 Q. And your association with Mr.
17 Armistead goes back to '97; is that correct?

18 A. Yes.

19 Q. And how long was he in your
20 employ?

21 A. Up until fairly recently.

22 Q. By fairly recently, we are

23 talking --

24 A. Probably --

25 Q. -- a couple of months when

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1 Mr. Gray became in your employment?

2 A. Yes. Somewhere around that time.

3 Q. Does that correspond to when you

4 terminated your professional relationship with

5 Hal Haddon's firm and Pat Burke and Pat

6 Furman, or did Mr. Armistead work for you

7 after you terminated your professional

8 relationship with Mr. Haddon's law firm?

9 A. I am really fuzzy on all that.

10 I just -- John would probably know that

11 answer more clearly. He kind of --

12 Q. Why don't you give us your best

13 recollection.

14 A. What was the question again?

15 Q. When did you terminate your

16 relationship with the law firm of Hal Haddon,

17 and then we'll do Pat Burke and Pat Furman?

18 A. Well, it was after the grand jury

19 was concluded.

20 Q. Did Mr. Armistead still perform

21 services for you after you terminated your

22 professional relationship with those attorneys?

23 A. I don't know exactly.

24 Q. Okay.

25 A. I don't know, you know, exactly

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1 which dates, when it happened.

2 Q. Oh, I understand that. Let me

3 give you something that is really pertinent,

4 probably, to all the questions I am going to

5 ask you. I understand that we are talking

6 now about questions dealing with a period of

7 time three and a half years, going on four

8 shortly. I understand that you are not in

9 every situation going to be able to tell me

10 a day and sometimes not a month. And that

11 is okay. Do you understand that? Remember,

12 it is yes or no.

13 A. Yes.

14 Q. Okay. But what I would like you

15 to do is, to the best of your recollection,

16 when I am asking you questions like this, if
17 you can give me spring of '99, fall of '96,
18 that type of thing, and that is fine.

19 MR. WOOD: If you know.

20 Q. (By Mr. Levin) If you know.

21 Obviously I don't want to put words in your
22 mouth.

23 A. I will try. I will try my best.

24 MR. WOOD: Let me help a little

25 bit because if you are looking for this

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1 information, I think I am correct in stating
2 this, that Ellis Armistead was employed by
3 Hal Haddon and Bryan Morgan, not technically
4 employed by John and Patsy, but obviously
5 employed by their lawyers.

6 Mr. Gray's involvement predates
7 the time when those lawyers withdrew, no
8 longer representing John and Patsy. And Mr.
9 Armistead's resignation from the case, I
10 think, coincides in time with Mr. Morgan's
11 and Mr. Haddon's termination.

12 Q. (By Mr. Levin) So essentially
13 contemporaneous with the end of the grand
14 jury?

15 MR. WOOD: Yeah -- well, no.

16 Actually, the end, first part, somewhere
17 between mid to end of May actually they
18 continued to be involved.

19 Q. (By Mr. Levin) Mrs. Ramsey, are
20 there other professionals that you have
21 contacted or that were contacted at your
22 request? For example, forensic pathologists.

23 A. I believe so. I believe that we
24 had a group of experts who had put together
25 some information which we were hopeful could

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1 be presented to the police department and
2 investigators last January.

3 Q. Who was in that group of experts?

4 Who do you remember?

5 A. I don't know all the names. I

6 just know they were, you know, they were
7 forensic type people.

8 Q. Why don't you tell me the names
9 you do recall? Do you remember a Dr. Sperry
10 from Georgia, Kris Sperry? He is a forensic
11 pathologist.

12 A. I believe that was one of the
13 names.

14 Q. Did you ever personally meet with
15 him?

16 A. No.

17 Q. Was there anyone else that you
18 recall? And if you don't recall their
19 names, can you tell us what area of
20 expertise?

21 A. There again, that is kind of John
22 was sort of involved with that more than I.
23 I really don't. That is about all I know.

24 I just know that the meeting was declined.

25 Q. The meeting?
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1 A. We had requested to meet and
2 present this information.

3 Q. And were you involved in that?

4 Did you directly contact the Boulder Police
5 Department or contact a member of the
6 prosecution team?

7 A. No, I did not personally. I
8 believe one of our lawyers sent a letter to
9 that effect saying we would like to meet and
10 present some findings, and it was not
11 accepted.

12 Q. One of the things that we are
13 very interested in is that, since you do
14 have and have had investigators working for
15 you on this case, and, as you refer to them
16 as forensic experts or group of experts I
17 believe is what you are calling them, what
18 have they presented to you that you think is
19 significant that would assist us in getting a
20 prosecutable case against the killers of
21 your daughter?

22 A. They haven't presented anything to
23 me.

24 Q. Have they presented things to
25 John?

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1 A. I don't know.

2 Q. If I understand you correctly, you
3 are saying that these people have been, and
4 I am assuming at a fairly large expense,
5 been retained by your family and that, that
6 you -- and obviously you have a great
7 interest in having -- in helping solve the
8 murder of your daughter; correct?

9 A. Correct.

10 Q. But if I understood your response,
11 you are saying that you've never sat down to
12 talk to these people to discuss their
13 findings?

14 MR. WOOD: She said they haven't
15 presented anything to her in way of a
16 presentation. I don't think she said she
17 wasn't aware, generally, of their finding.

18 MR. LEVIN: You are on realtime,
19 I assume; is that correct?

20 MR. WOOD: Yes, I am.

21 MR. LEVIN: Do you know what we
22 are talking about? Realtime is the term of
23 art for, he is reading off the court
24 reporter's transcript, rough draft, which we
25 don't have.

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1 MR. WOOD: But which we will be
2 glad to hook you up to if you would like
3 it.

4 (Discussion ensued off the
5 record.)

6 Q. (By Mr. Levin) What your
7 attorney told me is that there hasn't been a
8 formal presentation. Let's talk about
9 informal. Have you sat down personally and
10 talked to any of these people that were
11 retained in order to find out what they have
12 uncovered in this case?

13 A. I have not, no.

14 Q. Have you received secondhand
15 information concerning what information they
16 have concerning possible alternative suspects?
17 And that is an alternative to you and John,

18 obviously.

19 A. I don't remember them saying

20 anything about specific suspects.

21 Q. You have in the past suggested,

22 during interviews, possible suspects, people

23 that you in your mind think may have been

24 involved in the murder of your daughter;

25 correct?

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1 A. Correct.

2 Q. Why don't you list those for us.

3 Who have you stated you believe at some

4 point in time was involved with the murder

5 of your daughter?

6 MR. WOOD: Now, that -- you have

7 those prior statements.

8 MR. LEVIN: Yes, I do.

9 MR. WOOD: Then I - excuse me.

10 MR. LEVIN: Pardon me, sir.

11 MR. WOOD: Then in all fairness,

12 you are asking her to simply repeat what

13 she's already told you, which is exactly what

14 we said we weren't going to do here today.

15 MR. LEVIN: That is correct. And

16 the follow-up questions will make it clear

17 why this is not repetitive.

18 MR. WOOD: But the problem is,

19 how in the world can she sit here and play

20 a memorization game with you about who she

21 may have discussed, when she discussed it.

22 I mean, if you have got her

23 statements, you know who she has named. And

24 she can't sit here and be expected to

25 remember each and every person because

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1 sometimes you would ask, you know, if anybody

2 had a key and they would give you names.

3 Is that a possible suspect? I don't know

4 what the term necessarily means. But she

5 has given you those names, Bruce. You

6 have --

7 MR. LEVIN: I understand that.

8 MR. WOOD: Excuse me. If you

9 are here to get additional information, that

10 question is not necessary. You already have
11 that information.

12 MR. KANE: Let me follow up on
13 that.

14 MR. WOOD: Sure.

15 MR. KANE: Obviously the last
16 statements that we have are two years ago.
17 So maybe if we ask.

18 MR. WOOD: Ask if there is
19 anybody that she knows by name since when
20 she last talked with you all. That is
21 absolutely fair. I would, you know, let her
22 answer that, but to ask her who she's told
23 you about in the past would almost require
24 her to be familiar with every statement she
25 has given you all over four days or so.

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1 And she hasn't prepared to do that today
2 because we weren't going to go into those
3 areas.

4 MR. KANE: Well, but also, I
5 think it is also relevant to ask what, what
6 information has subsequently been developed
7 about people that were named before. I
8 mean, two years is a long time.

9 MR. WOOD: Well, I mean, I would
10 think then you all ought to go straight -- I
11 am not telling you how to ask your
12 questions, but I would think if you have a
13 name and you want to know if she is aware
14 of any information developed since June of
15 1998, throw the name out there and ask her
16 have you learned anything that you know about
17 this person since June of '98. She will
18 answer that.

19 MR. LEVIN: That is fine.

20 MR. WOOD: I am not trying to be
21 difficult. I just don't want --

22 MR. LEVIN: I understand. What
23 I'll do --

24 MR. WOOD: - to put her in the
25 awkward position of trying to somehow

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1 remembering what she said over four days two,

2 three years ago because I don't think she
3 could do that. She certainly didn't prepare
4 to do that today, and I wouldn't ask her to.
5 MR. LEVIN: No, and I, I
6 certainly, Mr. Wood, do not expect her to do
7 that. That's not where I was going. But
8 if it makes you more comfortable, I'll ask
9 the question another way.

10 MR. WOOD: Thank you very much.

11 Q. (By Mr. Levin) You've named
12 Priscilla White in the past as a possible
13 suspect. During the course of the last two
14 years, have you rejected that as a possible
15 suspect in the murder of your daughter, have
16 you rejected Priscilla White?

17 A. No.

18 Q. You've named Fleet White, I
19 believe, as a suspect. Same question, have
20 you rejected him as a possible suspect?

21 A. No.

22 Q. Bill McReynolds?

23 A. No.

24 Q. No, you have not rejected him?

25 A. No, I have not rejected him.

0022

1 Q. And I believe Chris Wolf you
2 also --

3 A. No, he has not been rejected.

4 Q. I assume then that that is a
5 function of the fact that you have not
6 received any significant information concerning
7 the murder of your child in the last two
8 years that differs from the information that
9 you received prior to your interviews with
10 representatives of the Boulder district
11 attorney's office?

12 MR. WOOD: Hold on before you
13 answer.

14 Do you understand that?

15 THE WITNESS: Not really.

16 Q. (By Mr. Levin) Okay. I'll
17 rephrase it for you. In June of 1998, the
18 individuals that I've named were, in your
19 mind, potential suspects in the murder of

20 your child; correct?

21 A. Uh-huh (affirmative). Correct.

22 Q. You tell us that today, in August

23 of the year 2000, those individuals remain

24 suspects. Correct?

25 A. Correct.

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1 Q. I am assuming, based on that,

2 that you have not received, through your

3 investigators or through your experts, any

4 significant new information about the killing

5 which caused you to abandon those opinions or

6 suspicions?

7 MR. WOOD: Let me just caution

8 you. Because he tells you it is something

9 that he assumes, Patsy, I think what he

10 really wants to know is, why have you not

11 necessarily rejected these people in my own

12 mind. Do you follow me? I think that is

13 an easier question.

14 Isn't that what you are driving

15 at, Bruce?

16 MR. LEVIN: Well, not, no, it is

17 not.

18 MR. WOOD: For example, Chris

19 Wolf, why do you still think he is not in

20 your mind rejected as a suspect, isn't that

21 what you are trying to get her to answer?

22 Q. (By Mr. Levin) What I want to

23 know is, it would seem to me that if you

24 had people who are working on this case for

25 you to develop information concerning the

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1 killing, that if they had developed anything

2 significant, that it might impact your belief

3 that Priscilla or Fleet or McReynolds or Wolf

4 was involved. Do you understand that so

5 far?

6 A. Yes.

7 Q. Is it a fair statement that you

8 have not received any significant information

9 concerning the murder of JonBenet in two

10 years?

11 MR. WOOD: About?

12 THE WITNESS: We have significant
13 information about the murder.

14 Q. (By Mr. Levin) Okay. Why don't
15 you tell us what is the significant
16 information that you have been provided in
17 the past two years. And again, I am not
18 going, you know, I'm not going to ask you
19 months and days, when did you find this out,
20 but I would like --

21 MR. WOOD: Specific information as
22 to specific people?

23 Q. (By Mr. Levin) Specific
24 information concerning the killing generally.
25 And you can block it out any way you want.
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1 A. Well, I don't know a whole lot of
2 detail. John will, perhaps, be much better
3 to answer that.

4 What I know is that we know --
5 how do I want to say it, forensically,
6 pathologically, or whatever, how JonBenet
7 died.

8 Q. Why don't you explain what your
9 belief is concerning her death.

10 MR. WOOD: See, hold on a second.
11 You got one question she is trying to
12 answer, and now you -- are you withdrawing
13 that question?

14 MR. LEVIN: No, I am following it
15 up.

16 MR. WOOD: Well, but you haven't
17 let her finish the first answer, in fairness,
18 and you are throwing another question out.

19 THE WITNESS: I was going to tell
20 you the rest of what I know.

21 MR. WOOD: And if I go back and
22 look at this record, it looks like she's
23 completed her answer and then you've asked
24 her a new question and you've stopped her in
25 the middle. Do you want her to go back and
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1 tell you generally what she's learned --

2 MR. LEVIN: Sure, you can list
3 them.

4 MR. WOOD: - for the last two
5 years and then you can move to the second
6 question?

7 Q. (By Mr. Levin) Go ahead.

8 A. Well, I believe that from this
9 group of experts we know the sequence of the
10 way in which she died. I am not sure -- I
11 don't think I know. There may be other
12 things that that group had to present, but
13 that is the one thing that I can remember.
14 Otherwise, I think Mr. Gray has
15 turned over everything, any piece of anything
16 that he thinks is significant to the police
17 department, including just recently a pair of
18 Hi-Tec boots that were obtained from one of
19 the suspects. We don't know what has
20 happened with that since, and we would like
21 to know that.

22 Q. Anything else?

23 A. No.

24 Q. Why don't you explain to us your
25 understanding concerning the sequence of
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1 events which led to your -- and I am talking
2 from a medical perspective, the sequence of
3 events that led to your daughter's death as
4 it was explained to you by your forensic
5 experts.

6 A. That she died of asphyxiation, and
7 the blow to her head was subsequent to that
8 act. And the reason that they know that is
9 because something to do with the very minute
10 presence or negligible presence of blood at
11 the fracture.

12 Q. Now, this belief that you have,
13 Mrs. Ramsey, was that a product of a
14 conversation that you had directly with Dr.
15 Sperry?

16 A. No.

17 Q. What is the source of your
18 information then?

19 A. I believe my attorney Pat Burke
20 explained that to me.

21 Q. Dr. Sperry is the source of that

22 information, though, through your lawyer; is
23 that your understanding?

24 MR. WOOD: If you know that.

25 THE WITNESS: I don't know that
0028

1 for sure.

2 Q. (By Mr. Levin) What is your
3 belief?

4 MR. WOOD: If you have a belief,
5 Patsy.

6 THE WITNESS: Well, he was among
7 a group of experts. I mean, it was he and
8 several others is my understanding who, you
9 know, thoroughly looked at all of this. And
10 that was the gist of, in my layman's terms,
11 I am sure it is much more technical than
12 that, but --

13 MR. WOOD: And I think that,
14 Bruce, that Sperry was one of the people
15 that was offered to you all back in January
16 of 2000. I was not involved in that offer,
17 but I understood that they were willing to
18 have --

19 THE WITNESS: They had a complete
20 presentation ready for all of you all.

21 MR. WOOD: I think that offer
22 still stands.

23 Q. (By Mr. Levin) Are you aware of
24 what information he was in possession of,
25 that is, Dr. Sperry?

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1 A. No, I am not.

2 MR. LEVIN: Are you, Mr. Wood?

3 Do you know what he had?

4 MR. WOOD: Well, I think I have
5 a general idea. I haven't sat here and
6 tried to come up with it in my mind's eye,
7 but again, my understanding is, I will check
8 this for you, but you all are welcome to
9 sit down and listen to him and talk with
10 him. He would be better able to tell you
11 that than me.

12 Q. (By Mr. Levin) Other than --

13 well, let's talk about the Hi-Tec boots.

14 You said you believe that a suspect had a
15 pair of Hi-Tec boots that were sent to us.

16 A. (Witness nodded head
17 affirmatively).

18 Q. Who was that?

19 A. His name is Helgother or Gogather.

20 Q. This is the man who committed
21 suicide?

22 A. Yes.

23 Q. How is it that your team, for
24 lack of a better word, how is it that your
25 team came into possession of those? Do you
0030

1 know?

2 A. No, I do not.

3 Q. Have you been told or offered an
4 explanation?

5 A. Of how?

6 Q. Of how you got into possession of
7 a pair of boots that belonged to someone who
8 committed suicide several years ago.

9 A. I believe Mr. Gray obtained them.

10 Q. I don't believe that I have ever
11 heard you discuss him as a potential suspect
12 in this case. Can you tell us what
13 information you are in possession of that
14 causes you to hold that belief?

15 A. I understand that he committed
16 suicide on the 14th day of February '97. He
17 was in the possession of a stun gun, and we
18 believe, as best we can tell, that it was an
19 AirTaser stun gun, and that apparently
20 matches the markings that were found on
21 JonBenet's body. And he owned a pair of
22 Hi-Tec boots that appeared to be the same
23 size as the footprint found at the crime
24 scene.

25 Q. That information, I am assuming,
0031

1 comes from the work that was done by Mr.

2 Gray? Is that the source of that? If I

3 am incorrect, tell me what the source is.

4 A. Yes, I think.

5 MR. LEVIN: Mitch or Mike, do you

6 want to do some more on their investigation?

7 MR. KANE: Sure.

8 Q. (By Mr. Kane) Let me just follow
9 up the last question. What was the name of
10 the suspect?

11 A. It is an unusual name. It is
12 Helgoth or Golgath.

13 MR. WOOD: I think you all asked
14 her about him in June of 1998 by name.
15 Michael Helgoth.

16 MR. LEVIN: For the Reporter, I
17 believe it's H-e-l-g-o-t-h.

18 THE WITNESS: Lin just said it is
19 Michael Helgoth.

20 Q. (By Mr. Kane) What else do you
21 know about Mr. Helgoth?

22 A. That is all, that is all I know.

23 Q. Did you ever hear that name
24 before?

25 A. No.

0032

1 Q. It was not somebody who was known
2 to your family?

3 A. No.

4 Q. Besides Mr. Gray, do you have any
5 information, has anyone else given you any
6 information about him?

7 A. Not that I can think of, no.

8 Q. Besides the fact -- where did
9 you --

10 Did Mr. Gray tell you that he had
11 an AirTaser stun gun on him when he
12 committed suicide?

13 A. Yes. I believe there is a
14 photograph that he had.

15 Q. And was it Mr. Gray who told you
16 that he had Hi-Tec boots? Was he wearing
17 those? I am sorry, that is a double
18 question. Was it Mr. Gray who told you that
19 he had Hi-Tec boots?

20 A. Yes.

21 Q. And was he wearing them at the
22 time? Is that your understanding?

23 A. I don't know that.

24 Q. Outside of the fact that he
25 committed suicide, he had a pair of Hi-Tec
0033

1 boots, and an AirTaser, is there any other
2 information you have that connects him to
3 this crime?

4 A. Not that I have, no.

5 Q. (By Mr. Morrissey) Have you seen
6 this photograph where Mr. Helgoth has the
7 stun gun? Have you actually seen that
8 photograph?

9 A. No, I don't believe so.

10 Q. (By Mr. Kane) Do you know how
11 Mr. Gray came into possession of these boots?

12 A. I don't know exactly, no.

13 MR. WOOD: I think that was
14 explained in a memo to Chief Beckner by Mr.
15 Gray that he sent to him in the last couple
16 of weeks.

17 THE WITNESS: You all have the
18 boots now.

19 MR. KANE: That wasn't my
20 question. I want to know what you know
21 about those.

22 Q. (By Mr. Kane) So you don't know
23 how he came into possession of those boots?

24 A. I think he said he might have
25 gotten them from a family member, or --
0034

1 Q. When did you learn this?

2 A. Some time ago. A couple of
3 months ago.

4 Q. And was that the first time you
5 heard about Mr. Helgoth having Hi-Tec boots?

6 A. Yes.

7 Q. All right. And did you learn
8 about that in a personal conversation with
9 Mr. Gray or did you learn it indirectly
10 through somebody else?

11 A. I think I probably heard it from
12 John.

13 Q. Have you ever talked to Mr. Gray
14 about those Hi-Tec boots?

15 A. Yes.

16 Q. You mentioned this group of
17 forensic experts, and I think that -- maybe
18 you have answered this question, but did you
19 ever meet Mr. Sperry, or Dr. Sperry, the
20 GBI, Dr. Kris Sperry?

21 A. I think Mr. Levin asked me that a
22 couple of times. No, I have not.

23 Q. Okay. Have you met with any of
24 the other forensic experts?

25 A. No.

0035

1 Q. Have you ever asked any of these
2 to give you a briefing of what they
3 concluded?

4 A. No.

5 Q. Why not?

6 A. Well, I was hoping to be in this
7 meeting that we were going to have with you
8 folks in January, but that never took place.

9 Q. Now, I got a letter from an
10 attorney in Oregon about that. I can't
11 remember his name. Do you remember what his
12 name was?

13 MR. WOOD: Why don't you show us
14 the letter. If we can see it --

15 MR. KANE: No, I am asking if
16 she remembers the letter.

17 MR. WOOD: How would she know the
18 name of somebody who wrote you a letter from
19 Oregon?

20 MR. KANE: Because it was an
21 attorney hired by her and her husband.

22 MR. WOOD: Who was the attorney?

23 MR. KANE: Well, that's what I'm
24 asking --

25 MR. WOOD: I am not aware of an
0036

1 attorney hired in Oregon. I could be wrong.

2 Q. (By Mr. Kane) Do you remember an
3 attorney hired who lived in Oregon who was
4 involved in setting up that meeting?

5 A. Oh, yes. John -- John something.

6 He is a colleague of Pat Burke's.

7 Q. Okay. Have you ever talked to

8 him yourself?

9 A. Yes.

10 Q. That attorney?

11 A. Yes.

12 Q. Okay. And it was your

13 understanding that you were going to be part

14 of that meeting between Dr. Sperry and the

15 Boulder law enforcement authorities?

16 A. I just presumed I would be. I

17 was hoping to. I don't know that it

18 actually came to the point where, you know,

19 you are in, you are not, you know.

20 Q. Dr. Sperry, is it your

21 recollection that Dr. Sperry was the one who

22 gave the opinion that, because of the lack

23 of blood, that would indicate that the

24 strangulation occurred before the blow to the

25 head?

0037

1 A. I don't know who exactly gave

2 what information. My understanding was there

3 were several on this team of experts.

4 Q. You don't know who any of the

5 other people were?

6 A. No. I am sorry.

7 Q. You never spoke with any of the

8 other people?

9 A. No.

10 Q. Did you have a curiosity to speak

11 with them firsthand?

12 A. I felt that that time would come,

13 but they had work to do.

14 Q. I guess I don't understand why

15 you didn't speak with them before this

16 planned or suggested meeting with the Boulder

17 law enforcement authorities?

18 MR. WOOD: That is not a

19 question. That's just your problem with

20 understanding something. I have expert

21 witnesses in cases every day, Michael, that

22 never talk to my client. I give them the

23 information. I have clients that have lost

24 their daughter, please, sir. I have had

25 clients that have had children seriously

0038

1 injured. I don't sit there and give them
2 the benefit of sitting down and talking with
3 the experts that I retain. No lawyer does
4 that, necessarily.

5 MR. KANE: Well, I am not asking
6 whether your lawyer did.

7 MR. WOOD: You are expressing a
8 problem understanding it. You are not asking
9 her.

10 MR. KANE: I will ask her.

11 MR. WOOD: She is not going to
12 be able to help you whether you're able to
13 understand something or not. You have to
14 work that out. All I am saying is that
15 from my perspective as a lawyer, it happens
16 every day.

17 MR. KANE: That is fine. And I
18 am not asking you, Mr. Wood. I am asking
19 Mrs. Ramsey.

20 MR. WOOD: I know that. In
21 fairness, it is nothing sinister to it.
22 Q. (By Mr. Kane) Mrs. Ramsey, why
23 didn't you ask to sit down and talk with
24 these experts?

25 MR. WOOD: I think she's already
0039

1 told you that two or three different times,
2 Michael.

3 MR. KANE: No. She said that
4 she anticipated going --

5 Q. (By Mr. Kane) Why didn't you ask
6 to speak with them before this meeting that
7 was trying to be set up in January?

8 A. I didn't feel like there was a
9 need for me to speak with them before until
10 they were finished with what their objective
11 was, and then we would all be presented the
12 material together.

13 Q. Okay. Now, and that meeting
14 never took place in January?

15 A. That's right.

16 Q. Have you met with them since?

17 A. No, I have not.

18 Q. Why not?

19 A. Because everything fell through.

20 Q. The meeting fell through, but what

21 about your own becoming aware of what these

22 experts had to say about the death of your

23 daughter, did you ever request to meet with

24 them for a briefing yourself?

25 A. I did not request a meeting, no.

0040

1 Q. You identified Priscilla White as

2 a suspect back in June of '98. Is there

3 anything since that time that -- is there

4 any additional information that keeps her on

5 your suspect list?

6 MR. WOOD: And, you know, you got

7 a lawsuit from Chris Wolf. I am not sure

8 of the terminology, Michael, that was used

9 precisely as I sit here, but I know you all

10 asked a lot of questions in the course of

11 your investigation, and information that is

12 provided to you may be in your minds

13 indicating someone is a, quote/unquote,

14 suspect. I am never sure what a suspect is

15 other than somebody that might be someone

16 that should be investigated.

17 I don't really think there is a,

18 quote/unquote, suspect list. I think that

19 carries with it a connotation that there is

20 reason to have evidence to say somebody did

21 this, and I think it is more of a list of

22 people that are leads or possibilities that

23 should be investigated. And I just don't

24 want somehow somebody to start, besides Chris

25 Wolf, filing lawsuits claiming that we've

0041

1 identified them as a, quote/unquote, suspect.

2 That is my concern. I think you would

3 appreciate it.

4 Q. (By Mr. Kane) Well, obviously

5 this is not -- I mean, we don't intend to

6 make this information public, but in the

7 course of the investigation, we need to know

8 if there is additional evidence other than

9 what we -- what you offered back in June of

10 1998 that would suggest that Priscilla White
11 was a viable suspect in this case, or
12 someone that cannot be excluded?
13 A. Well, it is kind of like Lin
14 said. We early on provided a list of people
15 who were, A, in our home, B, worked for us.
16 You know, we wracked our brains about, you
17 know, who this might have been because we
18 were told early on that it, you know,
19 possibly was someone that was close to us.
20 And, you know, those were -- they were close
21 friends of ours.

22 Q. Was Susan Stein ever a suspect?

23 MR. WOOD: By who, the police?

24 Q. (By Mr. Kane) No, by you.

25 A. No. I mean, the reason the

0042

1 Whites, I think, kind of came up on the
2 radar screen was subsequent to JonBenet's
3 death they just seemed to act, to us, in a
4 very unusual manner in terms of being very
5 confrontational, and, you know, jumping in on
6 meetings with our priest, and writing
7 voluminous letters to the governor. To me
8 that just seemed unusual, and I wondered to
9 myself why someone would act that way.

10 Q. And it was this, the way they
11 were acting, is what, in your mind, made
12 them suspects, potential suspects?

13 A. Well, potentially, yes. But, I
14 mean, if I knew from you or from whomever
15 about a lot of people, whether, you know,
16 handwriting has thoroughly been checked, DNA
17 has been checked, et cetera, et cetera, you
18 know, that would help it cross off in my
19 mind.

20 Q. Other than the thing that you
21 talked about the amount of blood indicating
22 that the asphyxiation occurred before the
23 blow to the head, are there any other
24 details that you have that would suggest the
25 sequence that you know of?

0043

1 MR. WOOD: From the forensic

2 people?

3 MR. KANE: From any source.

4 THE WITNESS: That a stun gun was
5 used to silence her.

6 Q. (By Mr. Kane) Where was that
7 information? Where did you get that
8 information?

9 A. I believe that came from Lou
10 Smith.

11 Q. Have you talked to anybody other
12 than Lou Smith -- well, let me ask you that.

13 Have you talked to Lou Smith directly
14 yourself?

15 A. Yes.

16 Q. About that?

17 A. Yes.

18 Q. Have you talked to anybody else
19 other than Lou Smith about a stun gun having
20 been used?

21 A. Yes.

22 Q. And who was that?

23 A. Ollie Gray.

24 Q. Was Mr. Gray, did he offer up
25 conclusions about that, that a stun gun was
0044

1 used?

2 A. Yes.

3 Q. And have you talked to any
4 medical people about whether a stun gun was
5 used?

6 A. I have not myself.

7 Q. Have you heard indirectly from any
8 medical people about a stun gun having been
9 used?

10 A. I believe so.

11 Q. Who was that that you heard it
12 from?

13 A. I don't know the names.

14 Q. What have you heard from these
15 people?

16 A. I have heard that it has been
17 substantiated that a stun gun was used.

18 Q. What was it that substantiated the
19 use of a stun gun?

20 A. Whatever they do to test markings
21 against known markings of a particular stun
22 gun.

23 Q. And so that is what it is, the
24 markings?

25 A. (Witness nodded head
0045

1 affirmatively).

2 Q. Have you ever, to your knowledge,
3 you or Mr. Ramsey, ever hired a forensic
4 expert to look at that issue, to look at the
5 autopsy report or look at any other evidence
6 that might be available that would have a
7 bearing on whether a stun gun was used?

8 A. I can't say for sure. John may
9 know that.

10 Q. But to your knowledge, you
11 haven't?

12 MR. WOOD: I think she told you
13 she hasn't.

14 MR. KANE: She said she can't say
15 for sure.

16 THE WITNESS: I don't know.

17 MR. WOOD: I think when you say
18 you can't say for sure, is there anything to
19 add to that, Patsy?

20 THE WITNESS: No. I don't know.

21 Q. (By Mr. Levin) Mrs. Ramsey, in
22 the course of your conversation with Mr.
23 Schmidt concerning the stun gun, do you
24 recall whether or not he sat down and showed
25 you photographs of the injuries he believed
0046

1 to be stun gun injuries?

2 A. I believe he did.

3 Q. Did you or, at your request, were
4 copies of those provided to any other medical
5 people, copies of the photographs to assist
6 them?

7 A. I don't know.

8 MR. LEVIN: Are you done, Mike?

9 MR. KANE: Yes. I have other
10 questions, but take a minute.

11 Q. (By Mr. Morrissey) We know what

12 you said about Priscilla White. I am just
13 -- my question is, since we talked to you
14 last, have you developed any evidence that
15 would confirm your suspicion as far as
16 Priscilla White is concerned, anything that
17 you know of in the course of the
18 investigation that you have conducted that
19 would keep her on this list, independent of
20 what you might think we know, that kind of
21 thing?

22 A. No.

23 Q. How about Fleet White, anything
24 that you have developed since the last time
25 we spoke to you that would keep him on this
0047

1 suspect -- or that would keep him on this
2 list?

3 MR. WOOD: Are you talking about
4 whether their investigators have developed
5 information as opposed to like an event
6 occurring such as filing a criminal civil
7 case, which is a little odd?

8 Q. (By Mr. Morrissey) Anything new
9 that we don't know about Fleet White that
10 you have developed or your investigators have
11 developed?

12 A. I can't remember any. The only
13 -- I just heard recently that we have come
14 across a copy of his statement to you folks
15 or to the police department on or the day
16 after JonBenet's death and that he was asked
17 about the ransom note and could very closely
18 recite the content, which seemed unusual.

19 Q. The same, I guess, the same
20 question in regard to Mr. McReynolds, and I
21 am sorry I don't remember Mr. McReynolds'
22 first name.

23 MR. WOOD: Is it Bill?

24 MR. LEVIN: Yes.

25 MR. MORRISSEY: William, yes.

0048

1 Q. (By Mr. Morrissey) Anything, I
2 know his name came up, and I was wondering
3 if anything since the last time you spoke

4 to, I believe it was the Boulder district
5 attorneys, I think after the formal
6 discussion you had on tape and everything,
7 then you went -- and I heard an audiotape --
8 where you were focusing on Mr. McReynolds
9 himself with Mr. DeMouth and a couple of
10 other people. I was wondering if anything,
11 any follow-up had been done as far as your
12 investigation is concerned, any new
13 information on Mr. McReynolds' possible
14 involvement.

15 A. I don't know.

16 Q. And Mr. Wolf? I mean these,
17 Bruce asked you these kind of in a group of
18 four. I was interested specifically, since
19 we last spoke to you, what have you
20 developed, if anything, about Mr. Wolf?

21 A. Well, I think subsequent to that,
22 I know we have a tape from his one-time
23 girlfriend.

24 Q. Ms. Dilson?

25 A. Dilson. She videotaped herself
0049

1 imploring John and me to help her. She is
2 very frightened of him. She believes that
3 he did this. She is in hiding.

4 Q. Have you ever spoken to Ms.

5 Dilson in person or --

6 A. I can't, I can't remember.

7 Q. Okay. But you viewed this tape
8 of her asking for your help?

9 A. Yes, uh-huh, uh-huh.

10 Q. Anything other than the tape that
11 would indicate to you or keep Mr. Wolf in
12 that position that he was in last time we
13 spoke?

14 A. I just can't think of anything
15 right now.

16 MR. KANE: Can I ask a question?

17 MR. LEVIN: I was going to just
18 follow-up on that, Michael.

19 Q. (By Mr. Levin) Have you sent
20 your investigators out to interview Ms.
21 Dilson or try to locate her to follow up on

22 this tape?

23 MR. WOOD: Well, let me help you

24 a little bit. Chris Wolf has filed a

25 lawsuit against John and Patsy Ramsey, so you

0050

1 can rest assured that Chris Wolf and Ms.

2 Dilson, in terms of information, are being

3 developed about that in terms of the defense

4 to that case, among other things. So if we

5 come across anything in the course of that

6 civil litigation, we will get it as quickly

7 as we can copy it and get it to you.

8 Obviously we have begun to study a lot of

9 his appearances in some other things.

10 Q. (By Mr. Levin) So, Mrs. Ramsey,

11 I take it then that the answer to my

12 question as far as to date is no, that no

13 one has gone out and attempted to interview

14 Ms. Dilson on your behalf?

15 MR. WOOD: If you know.

16 MR. LEVIN: If you know.

17 THE WITNESS: I don't know.

18 Q. (By Mr. Levin) Have you received

19 any reports or any summaries from any

20 investigator that would cause you to believe

21 that she was contacted directly by your

22 representatives?

23 A. I just don't know. That would be

24 -- John, perhaps, would know.

25 Q. You have no recollection, as you

0051

1 sit here, of seeing any follow-up information

2 in any form?

3 A. That is correct.

4 Q. This tape, was that unsolicited on

5 the part of your family?

6 A. Oh, yes.

7 Q. When did you receive that?

8 A. Probably sometime last spring.

9 Q. The spring of '99?

10 A. No. Spring of -- I think spring

11 of 2000 or maybe fall of 2000.

12 Q. Well, it wouldn't be fall. So

13 maybe spring of this year?

14 A. I mean spring, yes.

15 Q. Or fall of '99?

16 A. I'm just thinking of, I know we
17 saw it in our apartment. I am trying to
18 think when, how long we have been in that
19 apartment.

20 MR. LEVIN: Michael.

21 Q. (By Mr. Kane) Have you had any
22 forensic people look into the issue of the
23 pineapple that was found in JonBenet's
24 digestive tract?

25 MR. WOOD: Let me ask you this,
0052

1 Michael. Are you stating as a matter of
2 fact that it was pineapple without any
3 question?

4 MR. KANE: That was stated two
5 years ago in the interview. Yes. There is
6 no doubt about it.

7 MR. WOOD: Are you stating it as
8 fact?

9 MR. KANE: Lou Smith told Mr.
10 Ramsey that too.

11 MR. WOOD: I just want to make
12 sure it's clear that you're stating it as a
13 matter of fact and not opinion that it is
14 pineapple.

15 MR. KANE: It is pineapple.

16 Q. (By Mr. Kane) Why did you state,
17 let me ask you, why did you state in your
18 book that it was pineapple?

19 MR. WOOD: Are you going to
20 withdraw the last question?

21 MR. KANE: Lin, look, this is not
22 -- we are not in court.

23 MR. WOOD: But we are making a
24 record, and it is important, because I looked
25 at some of the stuff in the past, and it is
0053

1 jumping back and forth. I want to make sure
2 that, if there is a question pending, the
3 record accurately reflects that she either
4 has answered it or at this point in time
5 you're not insisting upon an answer and you

6 will come back to it later.

7 I think from what you are telling
8 me is you are going to hold off on the last
9 question about forensics and go to the book.

10 MR. KANE: I'll ask it, but I
11 was going to preface it with the book, but I
12 will do it in the reverse order.

13 MR. WOOD: Okay.

14 Q. (By Mr. Kane) Have you talked to
15 anybody about findings of pineapple in her
16 digestive system?

17 A. No.

18 Q. In your book you said that this
19 was -- that that became an urban legend.

20 MR. LEVIN: Hang on a second.

21 MR. WOOD: Hang on one second,
22 Michael.

23 MR. LEVIN: Do you want to have
24 him change the tape?

25 MR. WOOD: He's got about nine
0054

1 minutes, I guess.

2 MR. MORRISSEY: Can I ask a
3 question or are we just on break or
4 something?

5 MR. WOOD: While he goes to get
6 a book, yes, of course.

7 Q. (By Mr. Morrissey) Mrs. Ramsey,
8 will you have any trouble, problems with us
9 seeing this Dilson tape, at some point
10 getting us a copy of that?

11 A. Sure. That would be fine.

12 MR. MORRISSEY: I mean, I don't
13 know if --

14 THE WITNESS: I am not sure where
15 it is right now, but I am sure we can run
16 it down.

17 MR. WOOD: Rest assured that, if
18 you have any kind of request like that, if
19 you'll make it to me, you know, I'll
20 carefully consider it. And if in any way
21 possible, I will try to get that stuff to
22 you. That is the kind of thing that's gonna
23 be clearly coming out in the civil case,

24 so --

25 MR. MORRISSEY: Right. That is
0055

1 why I wasn't sure. I just wanted to ask
2 her, but I wasn't sure what your position
3 was going to be --

4 MR. WOOD: Well, you know --

5 MR. MORRISSEY: --because I know
6 that is kind of a shadow case, but I would
7 sure like to see that tape.

8 THE WITNESS: She was very upset.

9 MR. WOOD: All right. We're back
10 to Mr. Kane's question now. Did you have a
11 page, Michael?

12 MR. KANE: Yeah, on Page 273 in
13 the middle.

14 Q. (By Mr. Kane) You say
15 apparently, during the autopsy, an issue was
16 raised about the possibility of JonBenet
17 having eaten pineapple. Do you recall -- do
18 you recall, during the interviews in June of
19 1998, being told that there was, in fact,
20 pineapple in her system?

21 A. I don't remember the specific
22 discussion. I believe someone said there may
23 have been something that looked like
24 pineapple.

25 Q. Okay.

0056

1 A. I'm not - no one ever has told
2 me that it was definitively pineapple.

3 Q. All right. Did John -- so John
4 never told you that Lou Smith told him that
5 it was definitely pineapple?

6 A. No.

7 Q. Have you, whether it was pineapple
8 or any other type of fruit, it is your
9 understanding that you haven't asked any
10 forensic experts to, gastroenterologist or
11 someone of that nature, someone with a
12 medical background, what their opinion of
13 that being in her system is?

14 A. I don't know. That may have been
15 part of the presentation that was being

16 prepared.

17 Q. Well, the presentation was Dr.

18 Sperry. Let me just clarify this. Was

19 anybody else besides Dr. Sperry going to take

20 part in that presentation, to your knowledge?

21 A. To my knowledge, there were

22 several people involved.

23 Q. But you don't know who these

24 people are?

25 A. No.

0057

1 Q. Do you know what their fields of

2 expertise were?

3 A. I am sorry, I don't.

4 Q. And you didn't learn subsequent to

5 January who these people are and what their

6 fields of expertise are?

7 MR. WOOD: Specific names, I

8 think she's told you.

9 THE WITNESS: I mean, I think, I

10 think I was told, probably, you know, this

11 name, this name, and this is who he is and

12 that is and that is. They are all like

13 names with degrees this long. I just knew I

14 was very impressed by the caliber of the

15 individuals consulting on this.

16 Q. (By Mr. Kane) Okay. All right.

17 And you don't have any problem with giving

18 us those names, do you, afterwards if you

19 and Mr. Ramsey --

20 MR. WOOD: Whatever names were

21 offered to you and Pat Burke, I will tell

22 you, whatever names were offered in January

23 of 2000 by Pat Burke when that offer was

24 rejected, we will certainly provide you with

25 those names if you don't already have them.

0058

1 MR. KANE: Well, I'll tell you

2 right now there was only one name that was

3 offered to me, and that was Dr. Sperry from

4 GBI.

5 MR. WOOD: That may be true, but

6 my understanding is there were other

7 individuals either contemplated in that

8 presentation, that it was more than one, but
9 you've got his name and if there were
10 others --

11 THE WITNESS: And if we want to
12 do the presentation, we can do it.

13 MR. WOOD: - we will get those
14 names to you, no question. In fact, what we
15 can do at some point, if we can figure out
16 an appropriate time, but like this Dilson
17 tape, or these names, et cetera, if you can
18 get a list and you all can get it to me,
19 and then we will try to go through it and
20 see what we can get to you if you don't
21 have it.

22 MR. LEVIN: Mr. Wood, I am taking
23 maybe incorrectly, I am taking your statement
24 that if we wanted to personally just directly
25 contact Dr. Sperry that we can do that?
0059

1 MR. WOOD: I would have to make
2 that decision. I haven't thought about it.

3 MR. LEVIN: I don't want to --

4 MR. WOOD: I wouldn't make a seat
5 of the pants decision on something like that.

6 MR. LEVIN: Sure.

7 MR. WOOD: Obviously he is a
8 retained expert.

9 MR. KANE: Can I clarify that?

10 Q. (By Mr. Kane) Has he been
11 retained by you? That was the whole issue
12 that was presented to us when Pat Burke was
13 suggesting this meeting. I asked whether he
14 had been retained by you. Was he retained
15 by you?

16 MR. WOOD: If you --

17 MR. KANE: If you know.

18 THE WITNESS: I don't know.

19 MR. WOOD: That is probably
20 something she wouldn't know the legal
21 niceties of.

22 THE WITNESS: I mean, I don't
23 know who.

24 MR. WOOD: Listen, we'll sort out
25 the question of Sperry's status.

0060

1 MR. KANE: Okay.

2 MR. WOOD: And you know,
3 unfortunately I don't have the direct
4 knowledge that Pat Burke has, but we will
5 sort out that in terms of what he
6 contemplated offering you all and what their
7 status is and how available they will be. I
8 will get those answers to you one way or the
9 other.

10 MR. KANE: I just have one thing
11 to follow up on, Bruce.

12 Q. (By Mr. Kane) Bruce said that
13 Ellis Armistead had been hired in 1997. Do
14 you recall that Mr. Armistead, in fact, was
15 hired in December of 1996?

16 A. I can't say for sure. I don't
17 know.

18 MR. WOOD: I think that he was,
19 just if that helps you.

20 MR. KANE: Yeah, I just wanted to
21 clarify, Mr. Levin said '97.

22 MR. WOOD: He said as far back
23 as '97, as I recall.

24 MR. KANE: But it was as far
25 back as 1996.

0061

1 THE WITNESS: I just remember he
2 was there very -- you know, my days are
3 really foggy then. I just remember we were
4 intensely afraid for our safety, and he -- I
5 just remember, you know, in my trauma,
6 looking up at this big guy and thinking,
7 boy, am I glad he is here. So I don't
8 know what day that was, or --

9 Q. (By Mr. Kane) Did he ever
10 interview you?

11 A. Quite possibly. I can't remember.

12 Q. You don't have any recollection of
13 ever being interviewed by Mr. Armistead or
14 anybody else working for him?

15 A. I mean, we talked, certainly. I
16 don't know if you would say it was an
17 interview.

18 Q. Did Mr. Armistead or any other --
19 I guess it was Jennifer Getty worked for
20 him. Do you recall her?

21 A. Uh-huh, uh-huh (affirmative).

22 Q. John Foster, do you recall him?

23 A. Yes.

24 Q. David Williams, do you recall him?

25 A. Yes.

0062

1 Q. Did any of these people ever take
2 statements from you about what happened?

3 MR. WOOD: Subsequent to June of
4 1998?

5 MR. KANE: No.

6 Q. (By Mr. Kane) Of the events of
7 December 25th, 26th, of 1996.

8 A. I can't remember.

9 Q. You don't have any recollection of
10 being interviewed?

11 MR. WOOD: She told you she can't
12 remember.

13 MR. KANE: Lin, if you are going
14 to object to every question --I asked you --

15 THE WITNESS: I can go back and
16 look.

17 MR. KANE: Because I am asking a
18 clarifying question.

19 MR. WOOD: No, no. I am not
20 objecting. I am just making sure that we
21 are fair here. You know, when she says I
22 can't remember and you look over and go, you
23 mean you can't remember, I mean, the tone of
24 that implies that there is something wrong
25 with a truthful answer being I can't

0063

1 remember. That is all -- she tells you
2 something, you know, you don't have to beat
3 her over the head with her answer. Once
4 ought to be enough.

5 MR. KANE: Well, is that your
6 objection, that I am beating her over the
7 head?

8 MR. WOOD: It is not an
9 objection. No, no.

10 MR. KANE: I think, you know, we
11 came down here with the understanding that we
12 could ask questions. And what you are
13 trying to do is channel those questions into
14 a certain tone. And I --

15 MR. WOOD: No, I am not. I
16 really am not. I mean, you came down here
17 under the request of Chief Beckner to ask
18 new questions about information that has been
19 obtained by you since June of 1998 or
20 developments that have arisen since June of
21 1998. That was the request. We agreed to
22 that.

23 MR. KANE: Okay.

24 MR. WOOD: And all I am saying
25 is that, in the process of giving

0064

1 information, there may be an answer that to
2 you strikes you, as you can't remember that.
3 If she can't remember, Mitch, that is the
4 truth, and, you know.

5 MR. MORRISSEY: I am Mitch.

6 MR. WOOD: I don't mean the
7 phrase, I am sorry, Michael. I don't mean
8 to use the phrase -- I don't think you beat
9 her over the head. I am just using the
10 phrase that sometimes lawyers do tend to beat
11 witnesses over the head when they don't
12 either like or necessarily react favorably to
13 an answer. You haven't beat her over the
14 head here today. I wouldn't let you do
15 that. And I don't mean to suggest otherwise
16 on the record.

17 MR. KANE: Okay.

18 MR. LEVIN: Lin, if I, if I can
19 just follow up your statement a little bit,
20 we are, the four of us, extremely experienced
21 trial lawyers, and I can't imagine that, in
22 the course of your practice, you have not
23 either, during the course of a deposition or
24 in formal interview with a witness or in a
25 courtroom, gotten a witness who says I can't
0065

1 remember and then not follow it up to see if

2 you can kind of spark their memory. I think
3 that is all we are trying to do.

4 MR. WOOD: I am not going to
5 prevent that type of follow-up, and I know
6 you guys are experienced. And I have
7 managed to do a little bit of that myself
8 over the last 23 years. So I fancy myself
9 as quite experienced in trial law also.
10 And I understand the difference,
11 though, between an interview and a
12 cross-examination. In a cross-examination,
13 you might follow up and, as we lawyers say,
14 beat on the witness a little bit. This is
15 not a cross-examination of my client. And
16 there is a difference.

17 This is an interview where you
18 are here to get information about the new
19 questions, as I have earlier stated. But I
20 am not sitting here saying, Patsy Ramsey has
21 been offered up for you skilled trial lawyers
22 to cross-examine her.

23 MR. LEVIN: We have no intention.

24 MR. WOOD: That is the
25 difference.

0066

1 MR. LEVIN: I'm sure it is
2 apparent to you that we are not
3 cross-examining your client.

4 MR. WOOD: Listen, I think we are
5 doing very well so far. I am pleased.

6 MR. LEVIN: I'm just saying that
7 we try to prod her memory a little bit, if
8 we get a --

9 MR. WOOD: I have no problems
10 with you trying to jog someone's recollection
11 at all.

12 MR. LEVIN: Great. I appreciate
13 that.

14 THE VIDEOGRAPHER: We need to
15 make a tape change. One moment.

16 (A recess was taken.)

17 THE VIDEOGRAPHER: We are rolling.

18 MR. LEVIN: Mrs. Ramsey, I
19 believe that Chief Beckner has a couple of

20 questions for you concerning your
21 investigation, and then we're gonna move onto
22 another area.

23 Q. (By Chief Beckner) Now, I am
24 just a little bit confused because it
25 certainly had been our impression through
0067

1 public statements and communications that you
2 and John have had very publicly about having
3 a secondary investigation conducted by your
4 people, hiring a team of experts to do
5 follow-up investigation, and had really
6 expressed a desire to share this information
7 with us.

8 I get the sense that you are not
9 controlling that investigation, sitting here
10 today, which is a different sense. So I
11 wanted to ask you if you are in charge of
12 that investigation.

13 A. Am I personally in charge of the
14 investigation?

15 Q. Are you and John heading up that
16 investigation into JonBenet's death?

17 A. Well, we are having the
18 investigation done.

19 Q. Who is directing it? Who is
20 directing that investigation? In other
21 words, who is making the day-to-day
22 decisions, we need to do this, we need to
23 hire this person, those sorts of things?

24 A. Ollie Gray.

25 Q. So you have hired Ollie Gray with
0068

1 instructions to conduct an investigation, and
2 he is given a free hand to do whatever that
3 takes?

4 A. Yes.

5 MR. WOOD: He is employed
6 full-time on that at the present time.

7 Q. (By Chief Beckner) Has that
8 always been the case or has that been a
9 recent development? Because we talked about
10 a lot of other people that have been
11 involved from '96 on.

12 A. Right.

13 Q. Is that a recent development?

14 A. Well, within the past year.

15 MR. WOOD: You are talking about
16 with Ollie?

17 CHIEF BECKNER: Yes, with Ollie.

18 Q. (By Chief Beckner) Is John more
19 involved than you are --

20 A. Yes.

21 Q. - in terms of getting
22 information?

23 A. Yes.

24 Q. And knowing where the
25 investigation is going?

0069

1 A. Yes.

2 Q. But John does not share that with
3 you?

4 A. He shares some of it with me.

5 Q. But not all of it?

6 A. That is right.

7 MR. KANE: Can I ask a follow-up
8 to that then?

9 Q. (By Mr. Kane) What is your
10 understanding of the reason that Ellis
11 Armistead is no longer working on the case?

12 A. Well, I think -- I don't know
13 exactly why he is not and why Ollie is, but
14 Ollie is full-time. They were I don't
15 believe capable of continuing it on on a
16 full-time basis.

17 Q. Is that your understanding?

18 A. That is my understanding.

19 Q. They couldn't do it full-time, so
20 you got somebody else?

21 A. Correct.

22 MR. WOOD: Let me just correct,
23 when you say -- Ollie has been involved
24 before Ellis left. And I think Ellis's
25 leaving was tied to the fact that Bryan and
0070

1 Hal would no longer be in the case and the
2 question of how much could really be done
3 effectively and whether it could be done by

4 one full-time person and whether there was
5 really anything else for Ellis to do.

6 CHIEF BECKNER: Let me follow-up.

7 Q. (By Chief Beckner) Who was in
8 charge of the investigation prior to Ollie?

9 A. Ellis Armistead, John Foster, and
10 Williams, David Williams.

11 Q. So when Mr. Gray came on the
12 investigation, Ellis Armistead was still on
13 at that time?

14 A. Yes. There was a transition in
15 time.

16 Q. So Ellis was still in charge at
17 that time?

18 A. I don't know who was in charge.
19 I think it was kind of a change in command.

20 Q. And what was John's involvement at
21 that time?

22 A. I don't know exactly, but he
23 basically has been the point man.

24 MR. WOOD: And don't leave out
25 Pat Burke and Bryan Morgan, Chief. I think
0071

1 they were taking on a more active role in
2 making decisions about things that could or
3 should be done as opposed to what now is
4 more Ollie's area.

5 CHIEF BECKNER: Yeah, I was just,
6 because the impression was that, based on
7 some of the statements that you've made
8 publicly and John specifically about spending
9 all of his time trying to find the killer of
10 JonBenet, I am trying to get at, you know,
11 what are you doing and how involved are you.

12 Because I was getting the sense here that
13 you aren't particularly involved in that.

14 THE WITNESS: Well, I am not
15 day-to-day involved with it. John speaks
16 with Ollie, I would say, on a daily basis.

17 You know, where we are, what's been --

18 CHIEF BECKNER: On a daily basis?

19 MR. WOOD: You sure about that?

20 THE WITNESS: I don't know if it
21 is daily, but it is frequently.

22 MR. MORRISSEY: Okay.

23 MR. KANE: Can I ask, is

24 Mr. Gray employed by you or employed by

25 Mr. Wood?

0072

1 MR. WOOD: Employed by me, which

2 would be standard handling, as I understand

3 it.

4 Q. (By Chief Beckner) So the

5 decisions to hire the forensic people, those

6 were not made by you or John?

7 A. I, you know, I don't know who

8 actually says, you know, let's hire him and

9 him and him. I am sure that it was, this

10 is what we want to do. We want to have

11 people look at this and that and the other,

12 you know, competent experts, and we said

13 great.

14 I mean, we entrusted them to make

15 the decisions. I mean, we don't know how to

16 investigate.

17 Q. No, I understand that. Experts

18 can be quite expensive.

19 A. Yes, they are.

20 Q. Quite costly. So I am just, I'm

21 trying to figure out whether whoever is in

22 charge of the investigation at whatever

23 particular time has a free hand to hire

24 those experts. I mean, is it kind of like

25 an open checkbook kind of thing or do they

0073

1 have to come back?

2 THE WITNESS: No, not --

3 MR. WOOD: I don't think it is

4 an open checkbook.

5 THE WITNESS: No.

6 MR. WOOD: Certainly not now. I

7 don't think it ever has been, Chief. I

8 think that there was a -- Pat Burke and

9 Bryan Morgan were out there and dealing more

10 directly with that issue. I am quite

11 confident John, you all can ask him, he can

12 tell you, but I am quite sure that, as any

13 lawyer would do with any major expenditure

14 first, it has to be approved by the client.

15 So that is my understanding.

16 CHIEF BECKNER: That is what I am

17 getting at.

18 THE WITNESS: Yes.

19 Q. (By Chief Beckner) It was

20 somebody, whether it was you or John,

21 somebody had to be aware of who was being

22 hired to do work for the investigation?

23 A. Yes.

24 Q. And you think it was John who was

25 well aware of those decisions?

0074

1 A. Yes.

2 CHIEF BECKNER: Okay.

3 Q. (By Mr. Morrissey) Mrs. Ramsey,

4 what does Mr. San Agustin do?

5 A. He assists Ollie.

6 Q. So he works for Ollie?

7 A. Now, there again, I don't know

8 who signs whose paychecks or whatever.

9 Q. Right. I am not asking you that.

10 A. But Ollie brought him in.

11 Q. What does he do? Do you know?

12 A. He is, in lay terms, a computer

13 whiz.

14 MR. WOOD: Business partner.

15 THE WITNESS: Business partner,

16 yeah, but he --

17 Q. (By Mr. Morrissey) He is a

18 computer guy?

19 A. He is a computer guy.

20 Q. Okay.

21 MR. WOOD: I don't know if he

22 would necessarily agree with computer guy --

23 THE WITNESS: I mean, I know

24 that's probably not fancy enough.

25 MR. GRAY: He is basically, as

0075

1 you know, Mitch, an evidence specialist as

2 far as courtroom evidence goes.

3 MR. MORRISSEY: Demonstrative

4 evidence type stuff, yeah, that has been my

5 experience with him. I just thought he was

6 in the employ of the El Paso County
7 Sheriff's Office.

8 Q. (By Mr. Levin) Ms. Ramsey, we
9 are going to move on to another area. And
10 what I want to discuss with you is the
11 underpants that JonBenet was wearing at the
12 time that she was discovered on the 26th.
13 We are going to try to get some background
14 information on those from you. Hopefully you
15 can help us out a little bit. Okay?

16 I don't, I'll be perfectly honest
17 with you, I don't follow all of the media
18 developments in this case, so I am not quite
19 sure what is out in the public sector. But
20 what I would like to get a feel for is just
21 what your belief is with regard to the
22 significance of the underpants that your
23 daughter was wearing at the time that she
24 was found murdered.

25 MR. WOOD: With all due fairness,
0076

1 didn't you cover that in June of 1998?

2 MR. LEVIN: I don't believe so,
3 and I think that will become apparent.

4 MR. WOOD: Okay. Well, maybe if
5 you help me, just so I understand, when you
6 say what is the significance of it, are you
7 really just trying to find out what she
8 might know about why she was wearing them?
9 I am not sure what significance, with regard
10 to significance --

11 MR. LEVIN: What I would like to
12 know is what Mrs. Ramsey's belief, as she
13 sits here, is significant about the
14 underpants. In a normal homicide case, what
15 kind of underpants someone is wearing is
16 typically not national news. Fair enough?

17 THE WITNESS: Yes.

18 MR. LEVIN: But apparently it has
19 become national news, and I just want to get
20 a sense, before I start asking some specific
21 questions, which I hope she can help us
22 with, why you think, what is your
23 understanding of what the significance is.

24 MR. WOOD: Bruce, I don't know,
25 just so it is clear, I don't know that her
0077

1 underwear has become national news.
2 Now, I don't know, sitting here
3 today, I may want to go back and look at
4 them, but it may be something that the
5 tabloids have written about, but I don't know
6 of any national news from reputable news
7 agencies that have made that a major issue.
8 But I am not arguing with that.
9 I just want to make sure I don't agree with
10 you by acquiescence, but --

11 MR. LEVIN: I understand.

12 MR. WOOD: - the question is, I
13 think he wants to know, and maybe I am still
14 not clear, you assume she attaches some
15 significance to it, but I am not sure. If
16 you asked her a factual question, maybe she
17 will understand.

18 Q. (By Mr. Levin) Well, let's start
19 with what - I will make it very simple for
20 you, Mrs. Ramsey. What information are you
21 in possession of or what do you know about
22 the underwear that your daughter was wearing
23 at the time she was found murdered?

24 A. I have heard that she had on a
25 pair of Bloomi's that said Wednesday on them.
0078

1 Q. The underwear that she was
2 wearing, that is Bloomi's panties, do you
3 know where they come from as far as what
4 store?

5 A. Bloomingdales in New York.

6 Q. Who purchased those?

7 A. I did.

8 Q. Do you recall when you purchased
9 them?

10 A. It was, I think, November of '96.

11 Q. In the fall of 1996, how many
12 trips did you make to New York?

13 A. Two, I believe.

14 Q. Do you recall, and again, the
15 same, same qualification I gave you when we

16 started, which is, I understand that you are
17 not going to give me exact dates, but the
18 two trips you made, did you make those with
19 different groups of people?

20 A. Yes.

21 Q. The first trip, who was that trip
22 with?

23 A. The first trip was a
24 mother-daughter trip with my mother Nedra
25 Paugh, my sister Pam Paugh, friends Susan
0079

1 Flanders from Charlevoix, Michigan, and her
2 daughter and a friend of Susan's, Ms.

3 Kirkpatrick I believe was her name, and her
4 daughter, and JonBenet and myself.

5 Q. And the second trip you made was?

6 A. The second trip we made was with
7 Glen and Susan Stein.

8 Q. Is that the trip -- which trip
9 was the November trip?

10 A. With the children.

11 Q. Was that -- that is the first
12 trip?

13 A. Yes.

14 Q. And the second trip that you and
15 your husband and the Steins took, was that
16 also November, but later in the month, or
17 was that a December trip?

18 A. I think it was December.

19 Q. And maybe this will help jog your
20 memory as to time. I believe that was the
21 time of the Christmas parade in Boulder.

22 A. Yes.

23 Q. Is that correct?

24 A. Yes.

25 Q. Were you out of town?
0080

1 A. I remember that.

2 Q. Which of those two trips did you
3 purchase the Bloomi's?

4 A. The first trip.

5 Q. Was it something that was selected
6 by JonBenet?

7 A. I believe so.

8 Q. Was it your intention, when you
9 purchased those, for those to be for her,
10 not for some third party as a gift?

11 A. I bought some things that were
12 gifts and some things for her. So I
13 don't --

14 Q. Just so I am clear, though, it is
15 your best recollection that the purchase of
16 the underpants, the Bloomi's days of the
17 week, was something that you bought for her,
18 whether it was just I am buying underwear
19 for my kids or these are special, here's a
20 present, that doesn't matter, but it was your
21 intention that she would wear those?

22 A. Well, I think that I bought a
23 package of the -- they came in a package of
24 Monday, Tuesday, Wednesday, Thursday, Friday.
25 I think I bought a package to give to my
0081

1 niece.

2 Q. Which niece was that?

3 A. Jenny Davis.

4 Q. They came in, if you recall, do
5 you remember that they come in kind of a
6 plastic see-through plastic container.

7 A. Right.

8 Q. They are rolled up?

9 A. Yes.

10 Q. So if I understand you correctly,
11 you bought one package for Jenny Davis, your
12 niece, and one for JonBenet?

13 A. I am not sure if I bought one or
14 two.

15 Q. Do you remember what size they
16 were?

17 A. Not exactly.

18 Q. JonBenet was found wearing the
19 Wednesday Bloomi's underpants, and your
20 understanding is correct, that is a fact, you
21 can accept that as a fact, when she was
22 found murdered. Those underpants do not fit
23 her. Were you aware of that?

24 MR. WOOD: Are you stating that
25 as a matter of fact --

0082

1 MR. LEVIN: I'm stating that as a
2 matter --

3 MR. WOOD: - for a six-year-old
4 child?

5 MR. LEVIN: I am stating that as
6 a matter of fact.

7 MR. WOOD: Don't fit her
8 according to whose standard?

9 MR. LEVIN: By --

10 MR. WOOD: I mean, I have got an
11 11-year-old boy, and he wears underwear that
12 potentially hangs down to his knees, Bruce.
13 I mean, I don't know how you can come up
14 with that as a fact. That sounds to me
15 like more of an opinion. Who states that as
16 fact?

17 Q. (By Mr. Levin) Ms. Ramsey, your
18 daughter weighed, I believe, 45 pounds;
19 correct?

20 A. Uh-huh (affirmative).

21 Q. She was six years old?

22 A. Uh-huh (affirmative).

23 Q. What size underpants would you
24 normally buy for her?

25 A. 8 to 10.

0083

1 Q. Ms. Ramsey, would you say that it
2 would, it is safe to assume that, if she is
3 wearing underpants designed for someone who
4 weighs 85 pounds, who is 10 to 12 years old,
5 that those would not fit her?

6 A. Those -- I mean, I am sure she
7 could wear them, yes, but they wouldn't fit
8 as well as a smaller pair.

9 Q. And as a mother, you would know
10 that someone who is 85 pounds is
11 significantly larger than your little
12 six-year-old?

13 MR. WOOD: Can't we assume that
14 as a matter of 85 is more than 45 without
15 her having to document a mathematical fact,
16 Bruce?

17 Q. (By Mr. Levin) 40 pounds is the

18 wrong size pair of underpants, would you
19 agree?

20 A. Yes.

21 Q. Okay. What we are trying to
22 understand is whether -- we are trying to
23 understand why she is wearing such a large
24 pair of underpants. We are hoping you can
25 help us if you have a recollection of it.

0084

1 A. I am sure that I put the package
2 of underwear in her bathroom, and she opened
3 them and put them on.

4 Q. Do you know if -- you bought
5 these sometime in mid to early December, is
6 that correct, as far as -- no, I am sorry,
7 you bought them in November?

8 A. Right.

9 Q. Do you recall, was she wearing
10 these? And I don't mean this specific day
11 of the week, but was she wearing, were you
12 aware of the fact that she, you know, was in
13 this package of underpants and had been
14 wearing them since the trip to New York in
15 November?

16 A. I don't remember.

17 Q. Ms. Hoffman Pugh generally did the
18 laundry for the family, that is part of her
19 duties; is that correct?

20 A. Correct.

21 Q. Exclusively, or did you wash
22 clothes on occasion?

23 A. I washed a lot of clothes.

24 Q. Do you have any recollection of
25 ever washing any of the Bloomi panties?

0085

1 A. Not specifically.

2 Q. Was it something that, the fact
3 that she is wearing these underpants designed
4 for an 85-pound person, did you ever -- and
5 I will give you a minute to think about it
6 because I know it is tough to try to pin
7 down a couple of months of casual
8 conversation -- do you recall ever having any
9 conversations with her concerning the fact

10 that she is wearing underwear that is just
11 too large for her?

12 A. No.

13 Q. Knowing yourself as you do, if it
14 was, if it had caught your attention or came
15 to your attention, do you think you might
16 have said, JonBenet, you should, those don't
17 fit, put something on that fits, that is
18 inappropriate? Do you think, if it came,
19 had come to your attention --

20 A. Well, obviously we, you know, the
21 package had been opened, we made the
22 decision, you know, oh, just go ahead and
23 use them because, you know, we weren't going
24 to give them to Jenny after all, I guess,
25 so.

0086

1 I mean, if you have ever seen
2 these little panties, there is not too much
3 difference in the size. So, you know, I'm
4 sure even if they were a little bit big,
5 they were special because we got them up
6 there, she wanted to wear them, and they
7 didn't fall down around her ankles, that was
8 fine with me.

9 MR. MORRISSEY: Did you ever see
10 if they fell down around her ankles or not?

11 THE WITNESS: No.

12 MS. HARMER: But you specifically
13 remember her putting on the bigger pair?

14 And I am not saying --

15 THE WITNESS: They were just in
16 her panty drawer, so I don't, you know, I
17 don't pay attention. I mean, I just put all
18 of her clean panties in a drawer and she can
19 help herself to whatever is in there.

20 MS. HARMER: I guess I am not
21 clear on, you bought the panties to give to
22 Jenny.

23 THE WITNESS: Right.

24 MS. HARMER: And they ended up in
25 JonBenet's bathroom?

0087

1 A. Right.

2 Q. (By Ms. Harmer) Was there - I'm
3 sorry. Do you recall making a decision then
4 not to give them to Jenny or did JonBenet
5 express an interest in them; therefore, you
6 didn't give them to Jenny? How did that --

7 A. I can't say for sure. I mean, I
8 think I bought them with the intention of
9 sending them in a package of Christmas things
10 to Atlanta. Obviously I didn't get that
11 together, so I just put them in her, her
12 panty drawer. So they were free game.

13 Q. (By Mr. Morrissey) At the time,
14 how old was Jenny?

15 A. I don't know. Probably -- I
16 don't know. She is older than JonBenet, but
17 I don't know exactly how old she was.

18 Q. Would these panties, size wise, be
19 more appropriate for -- is she an older
20 girl?

21 A. Yes.

22 Q. And I assume a larger girl?

23 A. Well, at that time, no, not -- I
24 mean, she is not -- I mean, today she is a
25 young woman, but then she was a little girl.
0088

1 Q. How old is she now?

2 A. She is now 15, I believe.

3 Q. So she would have been about 12
4 or somewhere --

5 A. 11.

6 Q. -- 11, 12?

7 A. Yeah.

8 Q. And based on the, I guess,
9 dimensions that Mr. Levin has talked about,
10 these would have been a size appropriate for
11 her?

12 A. Uh-huh (affirmative).

13 MR. WOOD: Do you know that?

14 Q. (By Mr. Morrissey) Based on your
15 knowledge of her? I mean, I never have seen
16 this girl, so --

17 MR. WOOD: Guys, I think -- if
18 you all have kids, I mean, I just think you
19 are making assumptions based on poundage,

20 apparently, that isn't necessarily, you know,
21 in touch with the realities with kids and
22 their clothes. But you know, if you know
23 that, Patsy, please tell them.
24 Why don't you go ahead and
25 restate your question.

0089

1 Q. (By Mr. Morrissey) You purchased
2 these specifically for a person?

3 A. Okay.

4 MR. WOOD: Is that your
5 recollection?

6 THE WITNESS: Yes.

7 MR. WOOD: Okay.

8 Q. (By Mr. Morrissey) And I assume
9 you wanted them to fit her and she be able
10 to wear them or there would be no sense in
11 purchasing them; right?

12 A. Right.

13 Q. Okay. Would the size that has
14 been described here be appropriate for the
15 size of the girl you purchased them for?

16 A. I was guessing at her size, so I
17 had hoped that they would be.

18 Q. Now, we have talked -- you know,
19 the fact that a boy may wear boxer shorts
20 that go down to his ankles --

21 A. Uh-huh (affirmative).

22 Q. --has nothing to do with girls,
23 when you purchase girl's panties; right?

24 MR. WOOD: Come on, Mitch.

25 Mitch --

0090

1 THE WITNESS: I mean, if --

2 MR. WOOD: Don't answer that.

3 That's not a --

4 MR. MORRISSEY: It is different.

5 MR. WOOD: I made the statement
6 because of my kids, but let me just tell
7 you, my nine-year-old daughter likes to wear
8 my XL T-shirts. I mean, you are asking now
9 about the realm of kids, and I don't think
10 that is a factual question that she is
11 really here to give you information about.

12 MR. MORRISSEY: Mrs. Ramsey, I
13 never purchased a pair of girl's panties.

14 Okay.

15 Q. (By Mr. Morrissey) What do you
16 do, I mean, when you do that, what do you
17 think about as far as the person you're
18 purchasing them for?

19 A. Well, you just look, small,
20 medium, large, you know, and you pick the
21 one you think would most likely fit.

22 Q. And do they have age groups or
23 are they suggested for like a 10-year-old
24 through a 12-year-old or a 13-year-old
25 through a 15-year-old? Do they do it that
0091

1 way too?

2 A. I never paid any attention if
3 they do.

4 MR. MORRISSEY: Okay.

5 Q. (By Mr. Kane) Let me ask it
6 this way. Did you say you bought more than
7 one set of Bloomi's?

8 A. I can't remember.

9 Q. You bought some for JonBenet?

10 A. I can't remember.

11 Q. Why is it that you remember
12 buying Bloomingdale's panties in November of
13 1996?

14 A. Because --

15 MR. WOOD: Because she remembers
16 it. I mean --

17 MR. KANE: Wait a second, Lin.

18 Would you please let her answer the question?

19 It is a simple question.

20 MR. WOOD: Why is it that you
21 remember something?

22 MR. KANE: Yes, why do you
23 remember --

24 MR. WOOD: Because she remembered.

25 Q. (By Mr. Kane) - that, that
0092

1 detail?

2 A. Well, for starters, it has been
3 made such a big detail.

4 Q. Okay, well, that is my question.

5 A. I remember that I -- and I, you
6 know, we were kind of shopping around, and
7 it was close to Christmas season, so we
8 might pick up a little souvenir. I
9 bought -- I think I picked up a little
10 something for a baby-sitter, you know.

11 Q. Where was it that you became
12 aware that this was -- where was it that it
13 was made a big deal? What was the source
14 of your information that Bloomingdale's
15 panties somehow were significant that made
16 you then say, wait a second, did I ever buy
17 those?

18 MR. WOOD: Do you have a precise
19 recollection of that event occurring where
20 all of a sudden something happened and you
21 decided it was some big deal?

22 THE WITNESS: I don't know. I
23 mean, my first thought is something in the
24 tabloids, but, you know, they get everything
25 wrong, so --

0093

1 Q. (By Mr. Kane) Okay. Were you
2 aware that these were the size of panties
3 that she was wearing, and this has been
4 publicized, it is out in the open, that they
5 were size 12 to 14? Were you aware of
6 that?

7 A. I have become aware of that, yes.

8 Q. And how did you become aware of
9 that?

10 A. Something I read, I am sure.

11 Q. And I will just state a fact
12 here. I mean, there were 15 pair of panties
13 taken out of, by the police, out of
14 JonBenet's panty drawer in her bathroom. Is
15 that where she kept -

16 A. Uh-huh (affirmative).

17 Q. -- where you were describing that
18 they were just put in that drawer?

19 A. Yes.

20 Q. Okay. And every one of those was
21 either a size four or a size six. Okay?

22 Would that have been about the size pair of
23 panties that she wore when she was six years
24 old?

25 A. I would say more like six to
0094

1 eight. There were probably some in there
2 that were too small.

3 Q. Okay. But not size 12 to 14?

4 A. Not typically, no.

5 MR. KANE: Okay.

6 Q. (By Mr. Morrissey) And you
7 understand the reason we are asking this, we
8 want to make sure that this intruder did not
9 bring these panties with him, this was
10 something --

11 A. Right.

12 Q. - that was in the house.

13 A. Yes.

14 Q. And we are clear that, as far as
15 you know, that is something that was in this
16 house?

17 A. Yes.

18 Q. -- that belonged to your daughter,
19 these panties?

20 A. Correct.

21 Q. (By Ms. Harmer) Mrs. Ramsey,
22 have you ever seen a crime scene photo of
23 the underwear that your daughter was found
24 in?

25 A. No.

0095

1 Q. Did Lou Schmidt ever show you a
2 photo?

3 A. No.

4 Q. (By Mr. Kane) I want to follow
5 up with something you said earlier. You
6 said she would have just gone in and gotten
7 a pair herself?

8 A. Uh-huh (affirmative).

9 Q. Okay. Was she -- did she usually
10 dress herself?

11 A. She was pretty much able to dress
12 herself.

13 Q. And I can't recall if you've

14 ever, and forgive me if you have answered
15 this before, but did she have a bath that
16 day, Christmas Day?

17 MR. WOOD: You have asked that
18 before, several times.

19 Q. (By Mr. Kane) What was the
20 answer? Can you refresh my memory?

21 MR. WOOD: You know that I'm sure
22 better than I do.

23 MR. KANE: Oh, come on, Lin, I
24 was just asking a question so that I can
25 follow up on the thing. If you are going
0096

1 to start getting into you asked that one
2 time, I just don't have a recollection of
3 it.

4 MR. WOOD: Sure I am. Calm
5 down.

6 Q. (By Mr. Kane) Did she have a
7 bath that day?

8 MR. WOOD: Excuse me one second,
9 Patsy. Calm down, Michael. I am not trying
10 to create a problem for you.

11 MR. KANE: You certainly are.

12 MR. WOOD: No, I am not.

13 MR. KANE: You certainly are.

14 MR. WOOD: Let me finish. I am
15 not going to interrupt you. Please don't
16 interrupt me.

17 The fact that you know it has
18 been asked --

19 MR. KANE: I don't know that it
20 has been asked.

21 MR. WOOD: Are you going to let
22 me finish?

23 MR. KANE: No, because I did not
24 say that --

25 MR. WOOD: Then let's take a
0097

1 break, and when you can let me speak without
2 being interrupted, we'll start again.

3 MR. KANE: You mischaracterized
4 what I said. I said I don't remember if it
5 has been asked. Forgive me if it was.

6 MR. WOOD: Let me go back and
7 let's look at it.

8 It is not clear. Why don't we
9 take a break and look and see if it has
10 been asked.

11 MR. KANE: We don't need to take
12 a break. It is just a simple question.

13 MR. WOOD: Listen. All of the
14 questions should be simple.

15 MR. KANE: It is a very simple
16 question. Did she have a bath that day?

17 MR. WOOD: Right. But please
18 remember that I have to make sure that we
19 abide by what you requested.

20 MR. KANE: Well.

21 MR. WOOD: I really am going to
22 take a break.

23 MR. KANE: Go ahead. Make your
24 speech.

25 MR. WOOD: I am not making a
0098

1 speech.

2 MR. KANE: That is exactly what
3 you are doing, Lin.

4 MR. WOOD: I am not making a
5 speech. Chief Beckner asked us to come down
6 here, you all to come out here to ask new
7 questions about developments that have
8 occurred since June of 1998 and information
9 that has been obtained since June of 1998.

10 And I am confident that the
11 question about JonBenet taking a bath or a
12 shower has been asked before, and I would
13 simply say let's don't start, even when it
14 seems like it is not important at the
15 moment, let's don't start going down the road
16 of asking questions that have been asked
17 before because that is specifically what you
18 and Chief Beckner told me you weren't going
19 to do.

20 And so I will be glad at a break
21 to look that up and see if we can find the
22 answer for you. And then we can come back,
23 give her a chance to look and see what she

24 said before, put that in the context of your
25 question and she will answer the question if
0099

1 it is a new one.

2 MR. KANE: Okay, so in other
3 words what you are doing is, and just to
4 make this clear, you're directing your client
5 not to answer that until she's had a chance
6 to go back and look to see whether she's
7 asked and answered that before.

8 MR. WOOD: No. It's really more
9 of a chance for you and I to look and see
10 if she's answered it.

11 MR. KANE: You are directing her
12 not to answer the question?

13 MR. WOOD: I am asking you to --

14 MR. KANE: No. Are you directing
15 her not to answer the question?

16 MR. WOOD: I am asking you to,
17 in the spirit of why you all wanted to come
18 here and we agreed for you to come here
19 about new questions on information developed
20 or obtained since June of 1998, I am asking
21 you, on what appears even to you to be a
22 situation where it probably was asked in June
23 or, if not, April of '97, to let's take a
24 time at a break. You're well prepared here.
25 You've looked at this.

0100

1 MR. KANE: All right.

2 MR. WOOD: If she has been asked
3 that, then you will have your answer. And
4 if she hasn't been asked that, then she will
5 give you that answer today; although, I don't
6 know why you wouldn't have asked her that
7 before.

8 MR. KANE: So you are directing
9 her not to answer that question?

10 MR. WOOD: I am asking you to
11 defer it.

12 MR. KANE: Yes or no, are you
13 directing her not to answer the question?

14 MR. WOOD: I am asking you to
15 defer it, Michael. That's all.

16 MR. KANE: Let me, let me just
17 say something. We are down here to solve a
18 murder. Are you telling me that you are
19 going to tell her not to answer that
20 question, whether it has anything to do with
21 this murder, you are directing her not to
22 answer that question?

23 MR. WOOD: I have not direct --

24 MR. KANE: Because of some,
25 because of some rule that has been
0101

1 established for this?

2 MR. WOOD: Are you through?

3 MR. KANE: Yeah.

4 MR. WOOD: I understand that you
5 are investigating a murder. Do you
6 understand that I understand that?

7 MR. KANE: I hope you do.

8 MR. WOOD: I understand it, Mr.

9 Kane. Now listen to me.

10 I was asked, and my clients
11 agreed to answer new questions about
12 information that has been obtained since June
13 of 1998 after three full days of interviews
14 which had been followed by April of 1997 in
15 almost a full day of an interview by Patsy
16 Ramsey, new questions about new information
17 since June of 1998 or developments that have
18 come up since June of 1998.

19 That was the request made by
20 Chief Beckner. That was what we agreed to
21 do because that is what we were asked to do.
22 Now, if you want to change the
23 format, then let's consider that after we
24 finish this format. But I didn't ask Patsy
25 Ramsey or John Ramsey to go back and study
0102

1 what they had said before to try to memorize
2 it or refresh their recollections, period,
3 because it was represented to me that you
4 weren't going to do that.

5 So if you do it, I am not really
6 directing her not to answer it. I am
7 directing you that you are outside of the

8 scope of your request and, therefore, your
9 question is not fair and appropriate. It is
10 as simple as that. I am not trying to be
11 difficult.

12 MR. KANE: If that is your
13 definition of what is fair, then that is
14 fine. All right. You've made your record.
15 I withdraw that question.

16 MR. WOOD: I think it is very
17 fair. I made my statement. It is not
18 meant to be a record, necessarily.

19 Q. (By Mr. Kane) Here's a question
20 that was not asked, Mrs. Ramsey. Did you
21 dress JonBenet Christmas Day?

22 A. I can't remember.

23 Q. (By Mr. Levin) Mrs. Ramsey, do
24 you know whether or not she changed her
25 underwear Christmas Day?

0103

1 A. I don't know.

2 Q. We are going to assume the fact
3 that she did not take a bath because you
4 previously stated that. Would she change her
5 underwear if she didn't take a bath on
6 Christmas Day?

7 MR. WOOD: Excuse me. You
8 remember that she has been asked that now.

9 MR. LEVIN: I have known that.

10 MR. WOOD: Why didn't he know
11 that?

12 MR. LEVIN: I can't speak for Mr.
13 Kane.

14 MR. KANE: I don't have a big
15 catalog of every single question and answer.

16 MR. LEVIN: I don't either. I
17 can assure you Mr. Kane knows many facts I
18 don't know.

19 MR. WOOD: Well, you all planned
20 the interview. You have got him over here
21 claiming he doesn't know if a question's been
22 asked. Why didn't you pop up and look over
23 and say she had answered that.

24 MR. LEVIN: I didn't want to
25 interrupt you, Mr. Wood. You were very

0104

1 upset.

2 MR. WOOD: I am not upset.

3 MR. LEVIN: You were upset that

4 you were interrupted by Mr. Kane.

5 MR. WOOD: I'm upset that when I

6 tried to speak I was interrupted, but why

7 didn't you look over and say, Mitch, I mean,

8 Michael, she has answered that.

9 MR. LEVIN: I was just going to

10 let each of you speak and then ask my

11 question.

12 Q. (By Mr. Levin) Do you know if

13 she changed her underwear?

14 A. I do not know.

15 Q. Would it be her routine habit or

16 practice, if she is going out for dinner at

17 friends, for her to change from head to toe,

18 including her underwear, getting dressed to

19 go out for the evening, even if she didn't

20 take a bath?

21 A. I don't know that there is any

22 particular routine. She may have. I don't

23 know.

24 Q. If she listened to mom, would she

25 have done that? I mean, we are going out,

0105

1 you change from head to toe, wash up?

2 MR. WOOD: You are saying if she

3 had said that?

4 MR. LEVIN: No. I am saying,

5 this child was raised by Mrs. Ramsey, and I

6 am assuming that, in the course of your

7 raising your child, that it was JonBenet, we

8 are going out, even if she hadn't taken a

9 bath, you wash up, you change your clothes,

10 and that would include if she hasn't bathed,

11 change your underwear because she is running

12 around and playing all day.

13 MR. WOOD: Are you stating that

14 is what you do with your children?

15 MR. LEVIN: No. I am asking

16 her.

17 THE WITNESS: I don't, I don't

18 remember the course of events --

19 MR. LEVIN: Okay.

20 THE WITNESS: - really.

21 Q. (By Mr. Levin) So you just don't
22 know whether or not she changed her
23 underpants?

24 A. I don't know.

25 Q. During the course of one of the
0106

1 prior interviews, I think it was '98, but I
2 am not certain, you were asked and stated
3 that, on occasion, she would leave her
4 underclothes at a friend's house if they had
5 gone swimming or gotten wet. Do you
6 remember that?

7 MR. WOOD: Hold on. Do you have
8 a copy of that?

9 MR. LEVIN: I don't have it right
10 here.

11 MR. WOOD: I mean, I asked you
12 all to be able to produce those prior
13 statements so we can look at it in context.

14 MR. LEVIN: We've got it in the
15 computer. Mr. Wood, I will represent to you
16 that that is a statement that your client
17 made. I have a clear recollection. I am
18 not -- this is not an attempt to make her
19 -- I am developing a question that assumes
20 that to be true. I will represent to you
21 that, to a near certainty, as certain as
22 someone can be, in reviewing statements and
23 working on this case for two years, I
24 believe that statement to be made. And I am
25 not trying to trick you or your client. I'm
0107

1 trying - as Mr. Kane said, I am here to
2 try to solve the murder of a young child.
3 And I'm not --

4 MR. WOOD: We are here to help
5 you.

6 MR. LEVIN: And I understand that
7 and I appreciate that.

8 MR. WOOD: Within the request as
9 made and the request as agreed to.

10 MR. LEVIN: I understand that.

11 And if you were a judge, I would look you
12 in the eye and say as an officer of the
13 court, Your Honor, I have no -- I believe in
14 my heart that statement was made. Okay?

15 MR. WOOD: And the judge would
16 look at you, Bruce, and say, Mr. Levin, it
17 is your responsibility, when asking about a
18 prior statement, to produce the statement for
19 the witness to look at to put it into
20 context. Am I right, Mr. Levin? That is
21 all I asked you to do.

22 MR. LEVIN: My judge would take
23 my word because my word is my bond, sir.

24 MR. WOOD: Well, my judge would
25 say the proper examination would give the
0108

1 witness an opportunity, not only to take your
2 statement as you set it forth, which you
3 admit may or may not be exactly accurate,
4 but to take that statement and look at it in
5 context because I don't know what question
6 you will necessarily follow up with, Bruce.
7 That is all. We are not judges. We are
8 lawyers. But I did ask Chief Beckner, if
9 there were going to be prior statements for
10 you all to bring them so that we could look
11 at them and put her, put them into context.
12 That is all.

13 MR. LEVIN: And we have them. If
14 you want to take time --

15 Q. (By Mr. Levin) I mean, there is
16 a simple way. You recall saying that, don't
17 you? Isn't that the easy way to do it?

18 MR. WOOD: That may be fine, but
19 I think she is entitled to see it anyway.
20 That is all I am saying so she can look at
21 it.

22 MR. LEVIN: If I was in a
23 courtroom and she was under oath. It is not
24 a deposition. This is an interview. That
25 is all.

0109

1 MR. WOOD: She is not. It's an

2 interview. And all I asked going into the
3 interview is, if this came up, because there
4 has been so many hours and days of
5 interviews and statements that, fairly, now
6 two years plus since June of 1998, three
7 years plus since April of 1997, that if
8 there is statements, media or otherwise, put
9 them out there, she will look at it, she
10 will answer your question.

11 MR. LEVIN: Why don't we just ask
12 her if she recalls it, and then we can save
13 some time.

14 MR. WOOD: Well, we can ask her
15 that, and I will let her answer that, Bruce,
16 but I want to set the procedure correctly
17 that, when we get into these things about
18 prior statements, that I really did expect
19 and think it fair that you all have them for
20 her to look at it and put it into context.
21 It may not be of consequence here, but it
22 certainly may be later when there are more
23 difficult questions. Okay?

24 MR. LEVIN: I understand.

25 Q. (By Mr. Levin) Do you remember
0110

1 saying that during one of your interviews?

2 A. Tell me what --

3 Q. That on occasion JonBenet may go
4 over to a friend's house, I think you talked
5 about the White's daughter Daphne, and they
6 could go swimming or do something and she
7 might leave her underwear there, get a clean
8 pair from a friend and then be laundered,
9 returned, you would do the same for her
10 girlfriends who may have been -- got wet
11 from swimming or doing, got dirty playing
12 outside. Do you recall saying that?

13 A. Not specifically.

14 Q. Do you recall that occurring then?

15 A. Probably did. I can't say for
16 sure, but --

17 Q. Okay. What I am interested in is
18 whether or not you have a recollection as to
19 whether or not any of the Bloomi panties,

20 and I certainly wouldn't want to pin you
21 down to the day or the week, all right, but
22 do you ever recall any of the Bloomi panties
23 from November to the time of JonBenet's
24 murder being left at a friend's house and
25 then returned to you?

0111

1 A. No.

2 Q. Do you recall any occasions where
3 JonBenet had an accident at school and -- I
4 know that they kept at her school like I
5 think they do at most grammar schools, they
6 have a box of like clean underpants if a kid
7 has an accident at school, do you ever
8 remember her getting to that situation and
9 borrowing panties from the school and having
10 to return them?

11 A. No.

12 Q. Okay. I am slightly confused,
13 and I would like this clarified. When I
14 first started to ask you about the purchase
15 of the panties in November, I got the
16 impression that you were somewhat unclear as
17 to whether you bought two sets or one.
18 In follow-up questions, I got the
19 impression that you felt confident that you
20 only bought one. Do you know?

21 A. I really can't remember.

22 Q. Do you recall that you did -- you
23 never mailed this pair out to --

24 A. Jenny, yes.

25 Q. Okay. So if there was an

0112

1 unopened package, it would have been left in
2 the house?

3 A. Yes.

4 Q. (By Mr. Morrissey) Mrs. Ramsey,
5 prior to going to the Whites, did you see
6 JonBenet in panties? In other words, were
7 you at any point, prior to going to the
8 Whites, in the process of her getting
9 dressed, did you ever see if she was wearing
10 panties?

11 A. I mean, I just probably didn't

12 notice. I would, she must have had them on
13 or I would have certainly noticed if she
14 didn't have any on.

15 Q. When you came home and you got
16 her ready for bed, did you notice if she was
17 wearing panties? When you changed her out
18 of the black velvet --

19 A. Uh-huh (affirmative).

20 Q. - type pants --

21 A. Right.

22 Q. -- and into the long underwear
23 pants --

24 A. Uh-huh, right.

25 Q. -- the White ones, did you notice
0113

1 if she had a pair of panties on?

2 A. Yes, she did. I believe she did.

3 Q. Why do you remember that? I

4 mean, what do you remember? I just want to
5 know what you remember about that.

6 A. Well, I took the jeans off and
7 put the long leggings on.

8 Q. And you noticed that she had
9 panties on in that process?

10 A. Uh-huh (affirmative).

11 Q. You have to answer yes or no.

12 A. Well, I noticed -- I mean,
13 nothing was unusual. I mean, if she hadn't
14 had panties on, it would have been unusual.

15 So --

16 Q. So there was nothing unusual
17 there?

18 A. Correct.

19 Q. When you actually removed those --
20 you have -- they are black velvet pants?

21 A. Yes.

22 Q. And did the panties come down
23 with them when you removed those pants, if
24 you remember?

25 A. I don't remember.

0114

1 Q. If they had, would you remember,
2 or is that too long ago?

3 A. It has been a long time.

4 Q. But did you change -- did you put
5 a fresh pair of panties on her at that point
6 when you were getting her ready for bed?

7 A. No.

8 Q. (By Mr. Wickman) Mrs. Ramsey, I
9 have a daughter myself, and kids do strange
10 things, but was it her habit, when she
11 changed clothes, did she have a routine to
12 put them in a basket if they were dirty?
13 How did that work?

14 A. She usually probably dropped them
15 wherever they came off.

16 MR. WICKMAN: Okay. Thank you.

17 Q. (By Mr. Levin) Was that pretty
18 much her practice with most of her clothes?

19 A. Uh-huh (affirmative).

20 Q. I mean, not just her underwear,
21 just they are off, new pair?

22 A. (Witness nodded head
23 affirmatively).

24 MR. WOOD: Wait until he
25 finishes and then answer.

0115

1 Q. (By Mr. Levin) For the record,
2 you were nodding your head, and I take that
3 as a yes.

4 A. Yes.

5 MR. LEVIN: Anything else on that
6 topic?

7 MR. KANE: No. Go ahead.

8 Q. (By Mr. Levin) Mrs. Ramsey, I
9 would like to ask you some questions on an
10 area that actually you started to talk about
11 when we were talking about the investigation
12 being conducted at your behest, and that is
13 the Hi-Tec shoes.

14 You are, I would assume, aware of
15 the fact that there is a Hi-Tec shoe
16 impression in the wine cellar?

17 A. Yes, I am.

18 Q. How did you become aware of that,
19 if you can recall?

20 A. I don't remember if I read it in
21 the paper or one of our lawyers told us.

22 Q. Was it something you have been
23 aware of for a substantial period of time,
24 though?

25 A. Yes.

0116

1 Q. And do you recall, I know you had
2 several conversations with Lou Schmidt or
3 other investigators working for you, is it
4 something, prior to your interviews in 1998,
5 that you had discussed either with your
6 lawyers or with your investigators? And I
7 don't want to know about the conversations
8 between you and your attorneys, obviously,
9 but something that you talked about?

10 A. I can't remember if I knew about
11 it before then or not.

12 Q. When you were interviewed in 1998
13 by the Boulder D.A.'s office and some of
14 their helpers, were you at that time aware
15 of the fact that the Hi-Tec existence or non
16 existence of an identifiable source for the
17 Hi-Tec shoes was something that seemed to be
18 important to the investigation?

19 A. Are you asking me if they were
20 wanting to know if I knew anyone with Hi-Tec
21 boots?

22 Q. No. What I'm ask --see, I am
23 talking like a lawyer. Let's see if we can,
24 I'll talk like a person, if I can. You
25 were interviewed --

0117

1 MR. WOOD: That assumes that
2 lawyers are people. Some would disagree that
3 they are sharks or whatever.

4 Q. (By Mr. Levin) In June of 1998,
5 you were interviewed by the Boulder D.A.'s
6 office; right?

7 A. That was Hannay, Mr. Hannay.

8 Q. Yes. Mr. DeMouth?

9 A. Yes.

10 Q. Prior to commencing that
11 interview, did you know that identifying the
12 source of the Hi-Tec shoes was a priority
13 for the investigation? That would be more

14 than two years after, a year and a half
15 after your daughter's murder.

16 MR. WOOD: Are you asking her if
17 she knew what was a priority in your all,
18 the investigator's minds?

19 MR. LEVIN: No, no, no. In her
20 mind. Did she believe --

21 Q. (By Mr. Levin) Did you believe,
22 and if I didn't throw that in, I thought it
23 was clear, did you believe that, in the
24 course of the investigation, that identifying
25 the source of the Hi-Tec shoes was important?
0118

1 A. Well, I would think it is
2 important, yes. I mean, I can't remember at
3 that time if I knew about the Hi-Tec shoes
4 or not. I don't remember when all that
5 surfaced.

6 Q. You have since then, since 1998,
7 become aware that the source of the Hi-Tec
8 shoes is important?

9 A. Yes.

10 Q. You know that today?

11 A. Yes.

12 Q. And you thought that one of the
13 things that made Helgoth viable was the fact
14 that you believe he had Hi-Tec shoes?

15 A. Correct.

16 Q. Have you, whether it was before
17 the interview in 1998 or subsequent to the
18 interview in 1998, have you personally made
19 attempts to find possible sources for the
20 Hi-Tec shoe impression?

21 A. You mean like ask around if
22 anybody had --

23 Q. Pick up the phone and call some
24 friends, for example.

25 A. I didn't, no.

0119

1 Q. Had you at any time, for example,
2 some of the kids, like the Colby kids ever
3 come over, did you ever go and just pick up
4 the phone or walk across the alley and say,
5 do you guys have Hi-Tec shoes? Did you ever

6 do anything like that?

7 MR. WOOD: You are assuming she
8 may have learned about it at the time she
9 still lived there. She told you she wasn't
10 sure when she first learned that.

11 THE WITNESS: No, I did not call
12 the Colbys to ask if their children had --

13 Q. (By Mr. Levin) Whether it was
14 from Boulder or Atlanta?

15 A. Right.

16 Q. Okay. Did you sit down and
17 discuss with Burke at any length whether or
18 not he ever had Hi-Tec shoes?

19 A. No.

20 Q. Did it cross your mind that he
21 might be the source of that, for the Hi-Tec
22 shoes?

23 A. No. Because my understanding was
24 that it was an adult footprint. He was nine
25 years old at the time.

0120

1 Q. Do you know the source of your
2 belief that it was an adult's foot,
3 footprint?

4 A. Whoever told me about it or
5 wherever I learned it in the first place.

6 Q. Did you get any details concerning
7 how much of a shoe impression was present?

8 A. No. It was just a footprint.

9 Q. Did you take that to, to be a
10 full footprint, and by that I mean like a
11 shoe, a complete shoe impression?

12 A. That is what I imagined, yes.

13 Q. And that, whether you were told
14 that directly or you just assumed that, you
15 believe is the source of your belief that it
16 was an adult's shoe?

17 A. Yes.

18 Q. You have been asked about whether
19 or not anyone in your family owns Hi-Tec
20 shoes or ever owned Hi-Tec shoes?

21 A. Yes.

22 Q. And I am not restating a
23 question, Mr. Wood. And do you recall you

24 said no one ever did?

25 A. Yes.

0121

1 Q. You have had -- and that was in
2 '98, more than two years ago. You have had
3 an opportunity to, now that you are in
4 possession of knowledge causing you to
5 believe this is a significant fact in the
6 investigation, you have had almost, we will
7 assume, at least a year to rethink that.
8 Have you given it some thought as to maybe
9 someone in the family had Hi-Tec shoes?

10 MR. WOOD: Are you asking her
11 whether she thought about whether somebody in
12 the family -- I mean, all of the prefatory
13 comments leading up to that.
14 Is the question, since June of
15 1998, Ms. Ramsey, have you given any thought
16 as to whether someone in your family had
17 Hi-Tec shoes?

18 MR. LEVIN: That is correct.

19 That is the question.

20 MR. WOOD: All right. You can
21 answer that question.

22 THE WITNESS: No.

23 Q. (By Mr. Levin) Did you try, in
24 your mind, and perhaps to assist your
25 investigator, identify sources close to your
0122

1 family that might be the origin of the
2 Hi-Tec shoe impression?
3 A. I think, you know, I may have
4 asked Susan if she had ever seen any. I
5 mean, I didn't, I don't know what a Hi-Tec
6 boot looks like, per se. I have tried to
7 kind of, as I am in shoe stores, look around
8 trying to see what, what's the significance
9 and special about a Hi-Tec boot, and I
10 haven't, haven't even seen any yet. But I
11 may have asked Susan, did you know anybody
12 that looked like they wore Hi-Tec shoe,
13 boots, or whatever.

14 Q. Do you recall a period of time,
15 prior to 1996, when your son Burke purchased

16 a pair of hiking boots that had compasses on
17 the shoelaces? And if it helps to
18 remember --

19 A. I can't remember.

20 Q. Maybe this will help your
21 recollection. They were shoes that were
22 purchased while he was shopping with you in
23 Atlanta.

24 MR. WOOD: Are you stating that
25 as a fact?

0123

1 MR. LEVIN: I am stating that as
2 a fact.

3 Q. (By Mr. Levin) Does that help
4 refresh your recollection as to whether he
5 owned a pair of shoes that had compasses on
6 them?

7 A. I just can't remember. Bought so
8 many shoes for him.

9 Q. And again, I will provide, I'll
10 say, I'll say this as a fact to you, that,
11 and maybe this will help refresh your
12 recollection, he thought that -- the shoes
13 were special because they had a compass on
14 them, his only exposure for the most part to
15 compasses had been in the plane and he kind
16 of liked the idea of being able to point
17 them different directions. Do you remember
18 him doing that with the shoes?

19 A. I can't remember the shoes. I
20 remember he had a compass thing like a
21 watch, but I can't remember about the shoes.

22 Q. You don't remember him having
23 shoes that you purchased with compasses on
24 them?

25 MR. WOOD: She will tell you that
0124

1 one more time. Go ahead and tell him, and
2 this will be the third time.

3 THE WITNESS: I can't remember.

4 Q. (By Mr. Levin) Okay. Does it
5 jog your memory to know that the shoes with
6 compasses were made by Hi-Tec?

7 MR. WOOD: Are you stating that

8 as a fact?

9 MR. LEVIN: Yes. I am stating
10 that as a fact.

11 THE WITNESS: No, I didn't know
12 that.

13 Q. (By Mr. Levin) I will state this
14 as a fact. There are two people who have
15 provided us with information, including your
16 son, that he owned Hi-Tec shoes prior to the
17 murder of your daughter.

18 MR. WOOD: You are stating that
19 Burke Ramsey has told you he owned Hi-Tec
20 shoes?

21 MR. LEVIN: Yes.

22 MR. WOOD: He used the phrase
23 Hi-Tec?

24 MR. LEVIN: Yes.

25 MR. WOOD: When?
0125

1 MR. LEVIN: I can't, I can't give
2 you the source. I can tell you that I have
3 that information.

4 MR. WOOD: You said Burke told
5 you.

6 MR. LEVIN: I can't quote it to
7 you for reasons I am sure, as an attorney,
8 you are aware.

9 MR. WOOD: Just so it is clear,
10 there is a difference between you saying that
11 somebody said Burke told them and Burke
12 telling you because Burke has been
13 interviewed by you all December of 1996,
14 January of 1997, June of 1998.

15 Are you saying that it is within
16 those interviews?

17 MR. LEVIN: No.

18 MR. WOOD: So he didn't tell you,
19 he told somebody else you are stating as a
20 fact because I don't think you all have
21 talked to him other than those occasions,
22 have you?

23 MR. KANE: Mr. Wood, we don't
24 want to get into grand jury information.
25 Okay?

0126

1 MR. WOOD: Okay.

2 MR. KANE: Fair enough?

3 MR. LEVIN: I am sorry, I should
4 have been more direct. I thought you would

5 understand --

6 Q. (By Mr. Levin) Fleet Junior also

7 says that he had Hi-Tec shoes.

8 A. Okay. Now --

9 Q. Does that jog your memory?

10 A. Is, are you talking like Hi-Tec

11 like --

12 Q. The brand name.

13 A. These are really high tech or the

14 brand name? Did the children understand the

15 difference, or are they --

16 Q. I was talking brand name.

17 A. They knew like a brand name like

18 Nike, whatever?

19 Q. Yes, yes, ma'am.

20 A. Okay.

21 Q. That doesn't jog your recollection

22 at all?

23 A. No.

24 MR. WOOD: You are answering no

25 for the reporter?

0127

1 THE WITNESS: No, it does not.

2 MR. WOOD: You gave it a nod of

3 the head.

4 Q. (By Mr. Morrissey) Just so we

5 are clear, these boys may have referred to

6 them as boots. Does that make any

7 difference to you as far as distinguishing

8 between shoes and boots?

9 MR. WOOD: She would have to see

10 what those boys said in context, in all

11 fairness, Mitch, before she can comment on

12 what they might have meant and how it

13 affects her.

14 THE WITNESS: I mean, I just, I

15 can't remember shoes with compasses, and I

16 don't know all of the brand names of all the

17 shoes that I buy for my children. So --

18 Q. (By Mr. Morrissey) And I am just
19 asking do you remember a pair of boots with
20 compasses?

21 MR. WOOD: For the fourth time
22 now.

23 THE WITNESS: I don't remember
24 compasses on any shoes.

25 MR. WOOD: Fair enough. Shoes,
0128

1 boots, compasses.

2 THE WITNESS: I have a picture in
3 my mind of a compass on a watch, but --

4 Q. (By Mr. Morrissey) Shoes, boots,
5 you don't remember a compass on footwear?

6 A. No, I can't.

7 CHIEF BECKNER: I have a
8 follow-up question.

9 Q. (By Chief Beckner) You said you
10 had never seen the photograph of a footprint?

11 A. Right.

12 Q. Have you seen some of the crime
13 scene photos?

14 A. I have seen photographs of her
15 bedroom, and I think I have seen photographs
16 of the downstairs bathroom, basement bathroom.

17 A few.

18 Q. (By Mr. Levin) Just to follow-up
19 on Chief Beckner's --

20 MR. WOOD: You all asked her, you
21 all gave her a ton of photographs in June.

22 MR. LEVIN: Right, and that's
23 what I was going to ask her, if you've seen
24 photos.

25 Q. (By Mr. Levin) I mean, they
0129

1 spent days, day and a half going through
2 photographs with you. Other than in that
3 setting in June of '98, have you ever been,
4 have you ever had a sit down with someone
5 and gone through some of the crime scene
6 photographs other than that, that particular
7 experience, which we don't need to rehash?

8 A. I don't think so. No.

9 Q. (By Chief Beckner) Lou Smith has

10 never shown you any photographs that he has?

11 A. I can't remember if he has. I

12 am sure I would have remembered if they

13 were.

14 Q. How about Ellis Armistead?

15 A. I just can't remember.

16 Q. Ollie Gray?

17 A. No.

18 Q. Any of your attorneys?

19 MR. WOOD: Well, you are going

20 into what attorneys may have shown her, I

21 think that may be infringing into the

22 attorney-client privilege. I don't want to

23 go there.

24 THE WITNESS: I can't, I mean, if

25 you would show me something and say have you

0130

1 seen this before, maybe I can remember if I

2 have seen it before.

3 Q. (By Chief Beckner) You just

4 don't recall sitting down and having any of

5 your investigators show you any photos?

6 MR. WOOD: Well, you were asking

7 about crime scene photos, Chief, I thought.

8 CHIEF BECKNER: Yes.

9 THE WITNESS: They have shown me

10 photos of people and said do you recognize

11 this person.

12 Q. (By Chief Beckner) Okay. I am

13 specifically referring to photos taken inside

14 the house or outside the house.

15 A. Yeah. Right. Well, certainly

16 when we did that interview.

17 Q. Yeah, I am not talking about the

18 photos we showed you.

19 A. Yeah.

20 Q. I am just asking -

21 A. Other ones.

22 Q. - other photos that your

23 investigators may have shown you.

24 A. No.

25 Q. (By Mr. Kane) You said at one

0131

1 point you might have asked Susan. Are you

2 talking about Susan Stein?

3 A. Uh-huh (affirmative).

4 Q. You said you might have asked
5 her. Do you have any recollection of asking
6 her about Hi-Tec? Is there anything that
7 makes you think that you might have asked
8 that? What made you --

9 A. Well, we just spent quite a lot
10 of time together, and she is very interested
11 in the case. And we kind of hung around
12 the same people.

13 Q. Uh-huh (affirmative).

14 A. And I could have asked her, you
15 know, do you know anybody with Hi-Tec boots
16 or something.

17 Q. But you don't have any specific
18 recollection of that?

19 A. I don't specifically remember
20 saying that.

21 Q. Okay. Is this the first time
22 that you've heard that Burke says that he
23 had Hi-Tec?

24 A. Yes, it is.

25 Q. This is the very first time?
0132

1 A. Yes.

2 Q. When you said in your book and
3 then you said at other times too that you
4 didn't own either brand --

5 MR. WOOD: Hold on. If you have
6 got a reference of the book.

7 MR. KANE: I'm sorry. Page 232.

8 MR. WOOD: And then you said at
9 other times, too. Be more specific to it.

10 MR. KANE: Okay. Well, I will
11 stick to the book.

12 Q. (By Mr. Kane) But I don't think
13 it is any big

14 secret that you've said that a bunch of
15 times.

16 A. I don't remember --

17 MR. WOOD: Okay. What is the
18 question?

19 Q. (By Mr. Kane) When you made that

20 statement in your book -- I mean, maybe I
21 ought to authenticate. You wrote this book,
22 is that -

23 A. Sure.

24 MR. WOOD: We are not asking you
25 to authenticate it. We are just asking you
0133

1 to refer us to the page.

2 Q. (By Mr. Kane) Okay. Well, I
3 just want to make it clear that this wasn't
4 written by somebody else or a ghost writer
5 or something like that.

6 MR. WOOD: I think they had some
7 help, but I don't think it was like Mr.
8 Davis who wrote Mr. Thomas's book.

9 THE WITNESS: I think we were
10 referring that John or I didn't, did not
11 ever have -- were not in possession of --

12 Q. (By Mr. Kane) So when you said
13 we, you were referring to John or you?

14 A. Yes. It never occurred to me
15 about Burke's shoes.

16 MR. WOOD: You are assuming,
17 number one, Burke said it. You said, and I
18 accept your representation in terms of what
19 is clear in terms of when, but the question
20 obviously still remains whether Burke is
21 accurate or not. But be that as it may,
22 next question.

23 Q. (By Mr. Kane) But I mean, but
24 my question was, when you said we, you were
25 talking about you or John?

0134

1 A. Well, what is the, what size
2 print is the Hi-Tec? Is it a child's or is
3 it an adult's?

4 Q. I don't think there is any
5 difference between the two. And I think
6 that has been pretty well publicized too.

7 MR. WOOD: Well, you all can
8 debate that another day, if necessary.

9 MR. KANE: Yeah, I mean. That
10 is obvious, yes.

11 MR. WOOD: The point is, it would

12 probably be of some consequence to know the
13 context of what Burke said, at age, at age,
14 at age what?

15 THE WITNESS: Nine.

16 MR. KANE: Nine.

17 MR. WOOD: No, he didn't say it
18 at age nine.

19 THE WITNESS: Eight.

20 MR. WOOD: You are telling me he
21 said it sometime late fall of 1999, and I
22 think his age would have been closer in the
23 neighborhood of 12.

24 MR. LEVIN: I think 11 going on
25 12.

0135

1 MR. WOOD: No, I think he turned
2 13 January of 2000. So he was 12, and it
3 was some three years after the murder of his
4 sister, if that is when he first said it.

5 THE VIDEOGRAPHER: Pardon me. We
6 need to make a tape change.

7 (A recess was taken.)

8 THE VIDEOGRAPHER: All right.

9 Q. (By Mr. Kane) I just want to
10 follow up, Mrs. Ramsey. How many times have
11 you spoken with Lou Schmidt personally?
12 Let's put it this way, since the grand jury
13 ended to narrow it down.

14 A. Oh, half a dozen.

15 Q. Was that here in Atlanta or back
16 in Colorado or both?

17 A. Both.

18 Q. During any of those discussions,
19 did you ever talk about the Hi-Tec shoeprint
20 that was found?

21 A. Probably. Not -- I can't
22 remember specifically what we talked about
23 each time.

24 Q. Okay. I mean, what was your,
25 were your -- the times that you did talk to

0136

1 him, was it about the investigation or about
2 evidence and that kind of thing or was it
3 more social? Maybe that is an unfair

4 question.

5 MR. WOOD: That is a bunch of
6 things. I think he wants to know what you
7 talked to him about, generally.

8 Q. (By Mr. Kane) Did you talk about
9 the investigation?

10 A. Yes.

11 Q. Okay. But you don't have any
12 recollection of the shoeprint being part of
13 those discussions; is that what you are
14 saying?

15 A. Well, not specifically. I am
16 sure we talked about it. I mean, you know,
17 I've just heard many references made to the
18 Hi-Tec shoeprint.

19 Q. Okay. I think you said that you
20 don't recall whether Lou showed you any
21 photographs. Did he ever show you, on a
22 computer image, of any of the photographs?

23 A. I think so.

24 Q. Have you seen a photograph of the
25 Hi-Tec shoeprint yourself?

0137

1 A. I can't remember. I have this
2 vague image, but I don't know whether I am
3 imagining it in my mind or if I saw the
4 picture.

5 Q. (By Mr. Levin) Mrs. Ramsey, on,
6 I believe it was Saturday the 28th of
7 December, your sister Pam went and was
8 permitted to take personal property out of
9 the house. Do you recall that?

10 A. Yes.

11 Q. Can you give us -- and again I
12 don't want to be unfair to you. I am not
13 certainly expecting you to itemize what came
14 out, but can you just give us kind of an
15 overview of what you recall what types of
16 things were brought out?

17 MR. WOOD: Let me just ask, in
18 fairness to the request, isn't that long
19 since knowledge? We are talking about
20 developments and information since June of
21 1998. I mean, that seems to me you all

22 were aware of that long ago, discussed in
23 Thomas's book.

24 MR. LEVIN: Well, I haven't read
25 Thomas's book, and to be perfectly honest
0138

1 with you, Mr. Wood, we are not exactly
2 certain what was taken out of the house.
3 And there are some things, some specific
4 things I am going to get into, but I am
5 trying to get a sense beyond what is
6 documented in the police reports of what came
7 out of the house.

8 And I think it is helpful for the
9 investigation. I think it will move things
10 forward.

11 MR. WOOD: Well, I am going to
12 let her answer. I just wanted to make sure
13 that it was clear that, in my mind, that
14 would not, would not be -- I am going to
15 let her go, I am going to let her answer
16 the question, but it does go back to areas
17 that clearly were available for examination
18 for three days.

19 MR. KANE: Let's clarify that. I
20 am under the understanding that you said the
21 purpose of this was to ask new questions
22 which means we are not going to plow old
23 ground again, but there are certainly a lot
24 of questions that have developed that involve
25 evidence that may have been known day one.
0139

1 MR. WOOD: I understand that. I
2 am trying, I'm going to be, I'm going to be
3 extremely liberal in the definition of events
4 that have occurred since or developed since
5 or information developed since with the
6 emphasis in my mind on what was asked in
7 terms of new questions. So I am going to
8 let her answer that. But I did want to
9 just make it clear that that was something
10 that you all I thought had known about from
11 long ago.

12 MR. LEVIN: I am unaware of it.

13 MR. WOOD: Do you want to restate

14 it or, Patsy, I will read it back to you.
15 He said, can you give us, and again, I don't
16 want to be unfair to you, I'm certainly not
17 expecting you to itemize what came out, but
18 can you just give us kind of an overview of
19 what you recall what kinds of things were
20 brought out. Do you understand the question?
21 If you know the answer, go ahead and answer
22 it for him.

23 THE WITNESS: I think the kinds
24 of things that were brought out were --
25 well, Pam asked me, what did I need from the
0140

1 house. And I told her the only thing I
2 cared about in that house were my things in
3 the little baby curio cabinet where I kept
4 the children's baby shoes and christening
5 gown and locks of hair and little special
6 little things. And aside from that, I don't
7 know what came out.

8 I know that there is a list
9 because she didn't take anything that wasn't,
10 you know --

11 MR. WOOD: Inventoried.

12 THE WITNESS: -- inventoried as
13 she --

14 Q. (By Mr. Levin) Did you provide
15 her, you personally or John at your request
16 or some third party at either your or John's
17 request, did you provide a list of clothing
18 that you needed, that you had an immediate
19 need for that you asked for?

20 A. No.

21 Q. She brought, she did bring
22 articles of clothing out though?

23 A. I don't know that she did. I
24 don't know.

25 Q. Just so that I am clear, what you
0141

1 are saying is you just don't have a present
2 recollection of whether or not she brought
3 clothes out, not that she did not; is that
4 right?

5 A. I don't know whether she did or

6 not. I know Susan Stein had to go out to
7 -- she said that she went to Foley's to buy
8 me some clothes and some shoes because I
9 didn't have any, so -- except what I had on
10 leaving the house, so --

11 Q. After the funeral, you move back
12 to Atlanta, that house is packed -- and the
13 police released the house back to the family
14 after they finished their search, the
15 contents is packed up and shipped to Atlanta;
16 is that what happened?

17 A. Yes.

18 Q. So anything not taken out by your
19 sister Pam or seized by the Boulder Police
20 Department during their search was returned
21 to you?

22 A. I think so. I don't know if our
23 -- I think our investigators spent time in
24 the house after the police investigators were
25 finished. I don't know. They may have
0142

1 taken some things.

2 Q. Were there things that your
3 investigators took that was done at your
4 direction or John's direction that you are
5 aware of?

6 MR. WOOD: Are you talking about
7 a specific request for an investigator to get
8 something?

9 MR. LEVIN: Yes.

10 Q. (By Mr. Levin) For example, take
11 this particular coat, it might be important,
12 or take this jacket, it might be important,
13 any of those types of conversations?

14 A. No. The only things I cared
15 about in that house were my baby things. It
16 could have burned to the ground.

17 Q. So I take that as saying, no, I
18 never had a conversation with the
19 investigators to assist them in seizing
20 things that might be of evidentiary value?

21 A. Correct.

22 Q. To your knowledge, did John have
23 a conversation of that nature with the

24 investigators suggesting items that might be
25 important to your investigation?

0143

1 A. Not to my knowledge.

2 Q. In December of 1998, there was a
3 fairly well publicized request from the
4 Boulder Police Department for assistance in
5 identifying and perhaps retrieving a Santa
6 Bear. Do you recall that?

7 A. Yes.

8 Q. Was it your understanding that the
9 bear that was sought was the same bear that
10 you were shown photographs of in 1998 June?

11 A. Yes.

12 Q. The same bear that you were
13 unable to identify?

14 A. Yes.

15 Q. We collectively, the prosecution
16 team, received from either Mr. Morgan or Mr.
17 Haddon the bear, the bear. Is that your
18 understanding?

19 A. Yes.

20 Q. How did we get it? I mean, what
21 was your participation in the chain of events
22 that led to the recovery of that bear?

23 A. The -- well, I think our lawyers
24 asked Gene Matthews, who was a local retired
25 police officer who had helped us with some
0144

1 security at our home --

2 Q. Your home in Atlanta?

3 A. In Atlanta.

4 -- to go through boxes and look
5 for the bear.

6 Q. Did you assist him or is it her?

7 A. It is a him.

8 Q. Okay. Did you assist Mr.
9 Matthews, you personally?

10 A. You mean in digging through boxes?

11 Q. No. In offering suggestions to
12 where to look.

13 A. Well, I believe at that time we
14 were in the throes of a remodeling session,
15 and JonBenet's things that had come out of

16 her room in Colorado were packed and were in
17 the basement at my mother and father's house
18 in Roswell, Georgia.

19 So I told him that is where he
20 should start looking.

21 Q. Mrs. Ramsey, you emphatically
22 denied, in June of 1998, knowledge of that
23 bear. Did you have a change of
24 recollection, following the interviews in
25 1998, as to whether or not you had prior
0145

1 knowledge of that bear?

2 MR. WOOD: Do you know what he
3 is asking you?

4 THE WITNESS: Do I recognize the
5 bear?

6 MR. WOOD: The emphatic part is
7 the only thing that concerns me. I am not
8 denying that it was emphatic, but I think
9 the point is you denied it in June of 1998,
10 and the question I think he is asking you is
11 when you found it, did that jog your
12 recollection that you might remember the
13 bear. Is that what you are asking?

14 MR. LEVIN: That is not quite the
15 question, but it is pretty close.

16 Q. (By Mr. Levin) What I am asking
17 you is, in June of 1998, you stated I do
18 not recognize this bear?

19 A. Correct.

20 Q. You recall that. The cry went
21 out for help in locating the origin of the
22 bear. Did you, at some point between our
23 request for assistance and in June of 1998,
24 have an opportunity to rethink the origin of
25 the bear and realize that that was, in fact,
0146

1 JonBenet's Santa Bear?

2 MR. WOOD: I think you meant
3 between your request and December of 1998.

4 Q. (By Mr. Levin) Between June of
5 1998 and our request for help in December of
6 1998 --

7 MR. WOOD: That's right.

8 Q. (By Mr. Levin) -- did your
9 recollection get jogged and you realized that
10 you did, in fact, own the bear?

11 A. No. I mean, it was still a bear
12 that I did not recognize.

13 Q. Have you since that time had
14 anything that has refreshed your recollection
15 in that regard so that you now presently
16 know the source of that bear?

17 A. No.

18 Q. I am going to provide you with
19 some information to see if we can jog your
20 memory. I have seen a videotape taken at a
21 pageant in December, in fact, December 14,
22 1996. I think that was -- was that the
23 last -- I believe that was the last pageant
24 that JonBenet participated in.

25 MR. WOOD: Is that right?
0147

1 Q. (By Mr. Levin) I am asking you
2 if that is your recollection as well.

3 THE WITNESS: Is that the
4 Christmas, one of the Christmas ones down by
5 the --

6 Q. Yes.

7 A. All right.

8 Q. Was that the last formal pageant
9 she participated in?

10 A. Uh-huh (affirmative).

11 Q. I have seen a videotape of that.

12 A. Uh-huh (affirmative).

13 Q. And in the videotape it shows the
14 prizes.

15 A. Uh-huh (affirmative).

16 Q. And that bear is in the videotape
17 with you in the videotape?

18 A. Oh, really?

19 Q. And JonBenet won that bear at
20 that pageant. Assuming that that is a
21 fact --

22 MR. WOOD: And you represent it
23 as fact.

24 MR. LEVIN: I'm representing that
25 it is my belief that that is true, and I

0148

1 I have seen videotape that shows what appears
2 to be that bear.

3 MR. WOOD: The question, though,
4 is are you representing it is that bear
5 because there is a difference, and I think
6 you understand it. I haven't seen the
7 videotape that you are referring to, but I
8 mean, you are saying it appears to be.

9 THE WITNESS: Yeah, I would like
10 to see that too because it was my
11 recollection that she won a bear, but it had
12 a little banner on it, and it was like a
13 little angel bear or something. It was all
14 white.

15 Q. (By Mr. Levin) Assuming that
16 that is correct, that, and, of course,
17 perhaps my observations are incorrect, just
18 assuming that, does that refresh your
19 recollection as to the origin of the Santa
20 Bear that we saw?

21 A. Well, this bear that I think she
22 was presented at that pageant did not have
23 Santa, Santa attire. It was a little angel
24 bear, which I have someplace.

25 Q. And just, I don't want to mislead
0149

1 you because I am trying to jog your memory
2 to see if you can help us out here.

3 A. I appreciate that.

4 Q. And Detective Harmer is the one
5 that came up with the videotape.

6 MR. WOOD: I don't suppose we
7 have it.

8 MS. HARMER: No, I don't have it.

9 THE WITNESS: But it is the one
10 in the Santa outfit?

11 MS. HARMER: Can I --

12 MR. LEVIN: Yeah, because we are
13 trying to get Ms. Ramsey to see if we can
14 jog her memory.

15 MS. HARMER: The person who
16 provided the gifts is LaDonna Graygo.

17 THE WITNESS: All right.

18 MS. HARMER: Is she with All
19 Stars or America? I can't remember which.
20 THE WITNESS: I don't remember
21 either.
22 MS. HARMER: Whatever pageant she
23 was in on the 14th of December, and LaDonna
24 was involved in it, that is where the bear
25 came from.

0150

1 THE WITNESS: Oh, okay.
2 MR. WOOD: According to?
3 THE WITNESS: LaDonna?
4 MS. HARMER: Yes.
5 MR. WOOD: Just so we are clear,
6 we are now talking about two things.
7 MS. HARMER: And the video.
8 MR. WOOD: The video shows a
9 Santa Bear.
10 MS. HARMER: Yes. The video is
11 taken at the same pageant where LaDonna
12 passed out these prizes, one of which was
13 the bear.
14 MR. WOOD: Again, I am just
15 trying to make sure, do you have a video of
16 JonBenet holding or receiving a Santa Bear or
17 are you saying that Santa bears were given
18 out to some of the people there?
19 MS. HARMER: The video shows the
20 Santa Bear on the table.
21 MR. WOOD: Well, the table, who
22 all is in the picture?
23 MR. KANE: Maybe I can clarify
24 it. LaDonna Graygo purchased the bear,
25 purchased the Santa Bear. It was the prize

0151

1 to JonBenet, and she told us the prize that
2 JonBenet was awarded for winning little Ms.
3 Christmas. That was the prize and it was
4 the only bears that she had, and she got it
5 from someplace in Nebraska, a mail order
6 company. I can't remember the name.
7 THE WITNESS: Okay.
8 Q. (By Mr. Kane) Did you look at
9 the bear when it was found by -- what is

10 her name?

11 A. Gene.

12 Q. Gene, or his?

13 MR. LEVIN: Mr. Matthews.

14 THE WITNESS: Uh-huh

15 (affirmative).

16 Q. (By Mr. Kane) You looked at it

17 before it was shipped off to Colorado?

18 A. Yes.

19 Q. And that didn't ring any bell

20 with you?

21 A. Uh-uh (negative).

22 Q. But you remember getting -- she

23 won a bear at that pageant?

24 A. I thought it was the little white

25 angel bear, but maybe it was, maybe she got

0152

1 that some other time.

2 Q. (By Mr. Levin) If I understand

3 you correctly, Mrs. Ramsey, you do recall, my

4 sense is, and if I am wrong, tell me, you

5 do recall with some degree of certainty she

6 won a bear at that pageant, her last

7 pageant?

8 A. Yes.

9 Q. And then what I am understanding

10 you to say is, what you are not certain of

11 is the type of bear?

12 MR. WOOD: No, she is not saying

13 she is not certain. She is saying I thought

14 it was the little white angel bear, but

15 maybe she got that some other time.

16 Q. (By Mr. Levin) And I took that

17 to mean that you are not certain that it was

18 the angel bear --

19 A. Or the Santa Bear.

20 Q. -- or the Santa Bear?

21 A. Right.

22 Q. So if I understand you correctly,

23 you are saying that you don't have an

24 independent memory today to state emphatically

25 she didn't win the Santa Bear?

0153

1 A. Right.

2 Q. Did you, when you directed Mr.
3 Matthews where to look for the bear, that
4 is, in the box of things from JonBenet, did
5 you know that that bear had been taken out
6 of the house with your other property? I
7 suppose what I am getting at is, had you
8 been able to go through all of the things
9 that were removed from the Boulder house --
10 A. No.

11 Q. -- prior to December of '98?

12 A. No.

13 Q. Did you go through any of the
14 property at all, if you recall?

15 A. No.

16 Q. You were shown, I believe,
17 photographs that were taken -- and this is
18 during your '98 interview -- photographs that
19 were taken at the White's house Christmas
20 night at dinner. In that you are wearing a
21 red coat, kind of a wool, wool jacket. Do
22 you recall seeing that?

23 A. It is kind of a black and red
24 and gray fleece.

25 Q. Cut more like a blazer than --
0154

1 A. Like a peacoat.

2 MR. WOOD: Well, the picture is
3 the picture, isn't it?

4 Q. (By Mr. Levin) Right, like a
5 peacoat. I just want to make sure we are
6 talking about the same thing. Do you
7 remember that jacket?

8 A. Uh-huh (affirmative).

9 Q. I would like you to give us a
10 little background on that coat, and again I
11 am not going to hold you to days of the
12 week, but do you recall, first of all, where
13 you purchased it?

14 A. Well, Priscilla had had one like
15 it that I admired. And she told me, I
16 believe she told me she got hers at EMS.
17 So I went there to look. And they didn't
18 have one or I didn't want to get one exactly
19 like hers. So I think I got that one at

20 Marshals in Boulder.

21 Q. Do you recall what year you

22 purchased it?

23 A. No.

24 Q. Let's -- I can understand that.

25 Now I am going to -- we will take a time
0155

1 frame. Was it a fairly, by your
2 recollection, was it a fairly recent purchase
3 that you had or was this a coat you'd had
4 for some period of time prior -- and, of
5 course, I am using it as the date of
6 JonBenet's murder.

7 A. Well, I can't remember. I am
8 sure I bought it in -- as it was getting
9 colder. So it was either probably fall of
10 '96 or '95.

11 Q. That, the coat that you wore the
12 night to the Whites, was it something that
13 was -- I mean, the primary color is red.

14 MR. WOOD: Well, don't fight over
15 -- excuse me, Patsy. Don't you have a
16 picture?

17 MR. LEVIN: I don't have a
18 picture with me.

19 MR. WOOD: Why characterize it.
20 It is what it is.

21 THE WITNESS: There is a picture.

22 MR. WOOD: It is in the picture.

23 Let's look at that.

24 MR. LEVIN: Just to expedite
25 things, because I am not fighting over the
0156

1 color, what I want to know is --

2 MR. WOOD: I think she said it
3 was red and black and gray.

4 THE WITNESS: A red and black and
5 gray check.

6 Q. (By Mr. Levin) What I am, what
7 I am interested in is, I am certainly not
8 going to debate concentration of colors. It
9 is irrelevant. What I am interested in, is
10 it something that you wore exclusively during
11 the Christmas season or is this a coat that

12 you wore anytime it was appropriate for the
13 weather?

14 A. Anytime it was appropriate.

15 Q. So it is not like a special

16 Christmassy type, type of Christmas sweater,

17 I know you talked about Christmas?

18 A. (Witness shook head negatively).

19 MR. WOOD: Your answer is not,

20 because you are nodding your head.

21 THE WITNESS: No, it is not.

22 MR. WOOD: So the record is

23 clear.

24 Q. (By Mr. Morrissey) We were

25 provided that coat by, I believe, Ellis

0157

1 Armistead.

2 MR. TRUJILLO: Correct.

3 Q. (By Mr. Levin) What I would like

4 you to help us with is to understand how the

5 coat got from you to Ellis, if you know.

6 A. The -- I think you all requested

7 it.

8 Q. That is correct.

9 A. So I went to my closet, dug it

10 out, put it in a box, and sent it to Ellis.

11 Q. Was that coat something that was

12 taken -- you didn't wear that coat out of

13 the house when the police took you out of

14 the house the afternoon of the 26th. Do you

15 recall?

16 A. No, I don't think I did.

17 Q. Do you know how you came into

18 possession? Was that something that came

19 through Pam when she picked up some clothes

20 for you or was that something that was boxed

21 up and shipped when the house was packed?

22 MR. WOOD: Just so I am clear,

23 when was the request made?

24 MR. TRUJILLO: It was received

25 January of '98. So it was --

0158

1 MR. WOOD: Are we talking about

2 sometime between December of '96, and then

3 you all asked for it when, a year later?

4 MR. TRUJILLO: I don't have the
5 exact date.

6 THE WITNESS: It was a long time
7 later. We were in the house in Atlanta when
8 the request was made.

9 CHIEF BECKNER: December of '97.

10 MR. WOOD: So a year later you
11 all asked for the clothes, and they produced
12 it in January of '98?

13 MR. TRUJILLO: Yes.

14 MR. WOOD: Okay. Does that help
15 just put it in the time context of when it
16 might have been?

17 MR. LEVIN: And because everyone
18 needs a computer whiz, we have Mr. Kane.
19 We're talking about that coat.

20 THE WITNESS: Yes.

21 CHIEF BECKNER: Is that a, just
22 for clarification, is that a coat or a
23 sweater?

24 THE WITNESS: It is kind of a
25 little jacket, coat.

0159

1 CHIEF BECKNER: We called it a
2 sweater in the past.

3 THE WITNESS: It is a jacket.

4 CHIEF BECKNER: Ellis Armistead
5 called it a sweater in his letter to us.

6 So I just want to clarify we are talking
7 about the right piece of clothing.

8 THE WITNESS: Well, we are
9 talking about that. You can call it
10 whatever you want. It is kind of a jacket
11 more.

12 MR. WOOD: I'd go with jacket.

13 THE WITNESS: I mean, I, you
14 know, it is something you put on to go
15 outside in the cold.

16 MR. WOOD: All right. Now, I
17 had to interrupted you to try to figure out
18 if we can put it into context of time.

19 Your question was?

20 THE WITNESS: You want to know
21 did it come to --

22 MR. WOOD: Let's let him figure
23 out what it was. Hold on a second. He
24 asked, was that something that came through
25 Pam when she picked up some clothes, which I
0160

1 am taking to be back early right after
2 the --

3 MR. LEVIN: I'm talking about,
4 yes.

5 MR. WOOD: Pam picked up some
6 clothes right after.

7 MR. LEVIN: Saturday the 28th of
8 December, 199 -

9 MR. WOOD: Right. Was that
10 something that was boxed up and shipped when
11 the house was packed? Does that help you?
12 Do you know the answer?

13 THE WITNESS: No.

14 MR. WOOD: If so, tell him.

15 Q. (By Mr. Levin) When the request
16 came to you, though, from, either I suppose
17 your lawyers, about turning that jacket over,
18 it was, if I understand you correctly,
19 hanging in your closet?

20 A. Uh-huh (affirmative), in Atlanta,
21 yes.

22 Q. And that would be, the request is
23 made approximately a year after your daughter
24 is murdered. Is it something that was just
25 hanging in your closet or something that you
0161

1 continued to wear if you recall during the
2 one-year period or any portion thereof?

3 A. I don't remember.

4 Q. I will take -- tell me if this
5 is correct. I am taking that as saying you
6 may have worn it, but some point in time
7 between the murder of JonBenet and when you
8 turned it over, you may not have; you have
9 no independent recollection?

10 A. Correct.

11 Q. Did you, if you recall, did you
12 clean it at any time -- I believe it is
13 wool, primarily wool -- dry-clean it from

14 when you -- which may sound like a silly
15 question, but I will put it in a larger
16 context. The clothing that came boxed, did
17 you -- those items that you kept, continued
18 to use or at least have available, did you
19 clean them all before you put them away,
20 take them all to the cleaners?

21 MR. WOOD: I am going to ask you
22 to go back and redo that one because that
23 one kind of went in about three different
24 directions, Bruce.

25 MR. LEVIN: Okay.

0162

1 MR. WOOD: You started off asking
2 about whether she had this jacket cleaned and
3 then you started talking about clothes that
4 were boxed up. And I don't know if she
5 knows whether this one was boxed up or not.

6 MR. LEVIN: Right. And I
7 understand that.

8 Q. (By Mr. Levin) So what I am
9 trying to do is just to, because I
10 understand you can't identify a particular,
11 whether it was this particular item.

12 A. Uh-huh (affirmative).

13 Q. Let's start with the clothes that
14 were boxed up. The clothes that were boxed
15 up that you then reintegrated into your
16 wardrobe, did you clean all of those before
17 you did that?

18 A. No.

19 Q. Do you have any recollection as
20 to this particular coat, whether or not you
21 ever cleaned it before giving it to Mr.
22 Armistead?

23 A. No.

24 Q. It is a coat that you would
25 dry-clean, though?

0163

1 A. I am not so sure about that. I
2 think, I think it is able to be thrown in
3 the washing machine.

4 MR. KANE: I believe it was made
5 of acrylic, if that helps.

6 THE WITNESS: Yeah.

7 MR. WOOD: You all gotta decide,
8 he says wool, you say acrylic.

9 MR. LEVIN: It was acrylic.

10 MR. WOOD: It ought to say
11 dry-cleaning only on it, if it is, or if it
12 doesn't, sometimes it'll get washed. Do you
13 know for a fact, that is the key, do you
14 know whether you dry cleaned it or washed it
15 as you sit here today, Patsy?

16 THE WITNESS: No, I don't.

17 MR. MORRISSEY: Do you know if
18 Mr. Armistead did before he sent it to us?

19 THE WITNESS: No, I don't.

20 Q. (By Mr. Levin) I will take that
21 as a statement that, once you turned the
22 coat over or may have boxed it up and
23 shipped it to Mr. Armistead, that your
24 personal knowledge of what happens to it is
25 none?

0164

1 A. Correct.

2 Q. It is not something that you and
3 he ever discussed during the course of maybe
4 a briefing or something like that?

5 A. No.

6 Q. Was it a jacket that you wore
7 around the house? I know this is an indoor
8 picture. Did you do that commonly?

9 A. Sometimes, if it was particularly
10 chilly.

11 Q. Do you recall whether or not you
12 wore that on either the 23rd of December
13 1996, the 24th, or the 20-- well, we know
14 you wore it on the 25th. The 23rd or the
15 24th?

16 A. I don't remember.

17 Q. Was it something that you would
18 frequently wear inside the house?

19 A. Sometimes I would, but what is
20 frequently? You know, I don't --

21 Q. Frequently would be three or four
22 times -- I mean, was it, if you are chilly,
23 was this the item that you always threw on?

24 That is what I am getting at.

25 A. Not necessarily, no.

0165

1 Q. You talked about, in your '98
2 interview, that you, on the 24th, that you
3 were in the basement and you were wrapping
4 presents. Do you know, when you were doing
5 that, whether or not you had on that coat?

6 A. I don't know.

7 Q. You have told us that you painted
8 as a hobby. Would you wear this coat to
9 paint?

10 A. No.

11 MR. LEVIN: Mitch?

12 MR. MORRISSEY: Nothing about the
13 coat.

14 Q. (By Mr. Levin) Mrs. Ramsey, we
15 were sent, and Detective Trujillo probably
16 can give me dates on this to orient
17 everyone, two black shirts.

18 CHIEF BECKNER: Same time. It
19 was January 28, 1998.

20 MR. TRUJILLO: Same date.

21 MR. LEVIN: Received the same
22 date as the red coat?

23 CHIEF BECKNER: Yes.

24 Q. (By Mr. Levin) We have asked for
25 -- we had also requested, through your
0166

1 attorneys, that we be sent a black shirt, a
2 black shirt that John was wearing at the
3 Whites on Christmas of 1996. Were you aware
4 of that request in addition to the request
5 for your red coat?

6 A. I am sure I was.

7 Q. Did you participate in collecting
8 that? What I mean by that is you said,
9 well, I went in my closet and grabbed my
10 jacket. Did you go and grab what you
11 thought was John's shirt? How did that come
12 about? Why don't you just tell us in your
13 own words?

14 A. I don't remember. More likely he
15 found his shirt, I found my jacket.

16 Q. He sent us two black shirts. I
17 am going to show you a photograph here. It
18 shows you wearing your red coat and then
19 John wearing a black shirt. He sent us two,
20 two different black shirts. This one, does
21 this have a collar, this shirt?

22 A. I can't tell.

23 Q. While Mr. Kane tries to get a
24 little closer, I have some more questions.
25 John sent us two black shirts. One had a
0167

1 collar and one did not. Was there any
2 discussion that he had with you in which he
3 tried to obtain your assistance in refreshing
4 his memory as to which of those two shirts
5 he wore Christmas of 1996?

6 A. I don't remember.

7 Q. If it took place, you just don't
8 recall it?

9 A. I don't remember, no.

10 Q. I think this is a little better
11 shot.

12 MR. WOOD: I don't believe
13 there's contrast.

14 THE WITNESS: I can't tell, you
15 know, which one that was. He has got
16 several.

17 MR. WOOD: You are talking about
18 the question of the collar, though, on that
19 one. I don't think you can tell, even from
20 the zoom I can't tell.

21 THE WITNESS: You can't tell if
22 there's a collar.

23 Q. (By Mr. Levin) And the sheriff,
24 this is just, the two he sent us, the one
25 that this appears to be, it is a wool shirt
0168

1 that is made in Israel, which is kind of
2 unusual. It wasn't a gift that maybe you
3 bought for him, something like that, that
4 would make it stand out?

5 MR. WOOD: Let me stop. You are
6 saying this one appears to be. You are
7 talking about the picture that Mr. Kane has

8 just shown us?

9 MR. LEVIN: Yes. And then we
10 are --

11 MR. WOOD: You say it is a wool
12 shirt that is made in Israel.

13 MR. LEVIN: The shirt that your
14 husband sent us.

15 MR. WOOD: Which is kind of
16 unusual. I don't know if that is true or
17 not. But the point is, are you asking if
18 this shirt was one that was made -- are you
19 asking her if she knows whether this is a
20 wool shirt that was made in Israel?

21 MR. LEVIN: Yes.

22 MR. WOOD: The one that you see
23 in this photograph, are you able to know
24 that?

25 THE WITNESS: No, I don't know.
0169

1 Q. (By Mr. Levin) The wool shirt
2 that he sent us was made in Israel. Is it
3 a shirt that maybe you bought him as a gift?

4 A. I don't remember.

5 Q. I am not going through, from the
6 minute you walked in the door Christmas
7 coming back from dropping presents off, but
8 what I would like to do, and I don't believe
9 you have been asked this, if you can recall
10 when you got upstairs, had John hung up his
11 clothes that he had worn on the 25th, if you
12 remember?

13 MR. WOOD: Had he hung them up?

14 MR. LEVIN: Yes.

15 THE WITNESS: You mean when I
16 came up to get ready for bed?

17 Q. (By Mr. Levin) Yes. Do you
18 remember if he had just left them laying
19 around or if he had hung them up?

20 A. I don't remember. I mean, my
21 dressing room, bathroom, was this direction
22 and his was that direction. So I didn't, I
23 didn't see it.

24 Q. Your husband's routine practice
25 and habit, as far as when he would get

0170

1 undressed, if things needed to be hung up,
2 did he generally hang things up or if they
3 needed to go into the hamper or the laundry
4 chute, would he put them right in the
5 laundry chute?

6 THE WITNESS: Usually.

7 MR. WOOD: Hold on a second.

8 You were going to say something else.

9 MR. LEVIN: We can, we can take
10 it one at a time.

11 MR. WOOD: Well, I mean, her
12 answer doesn't give you any information as I
13 see it because you asked her, did he
14 generally hang it up or if they needed to go
15 into the -- why don't you ask a specific
16 question. I'm not sure --

17 MR. LEVIN: I was going to split
18 it.

19 MR. WOOD: I think she jumped on
20 top of you actually. Let him finish the
21 question, Patsy, and then go ahead and do
22 it.

23 MR. LEVIN: Let's do it, we will
24 do it one step at a time.

25 Q. (By Mr. Levin) Your husband's
0171

1 routine practice and habit, if he had
2 clothing that he was changing out of that
3 could be worn again, would he normally hang
4 them up?

5 A. I don't know if he has a routine.

6 Sometimes he does. Sometimes he doesn't.

7 Q. When he had clothes that were not
8 going to -- that he'd just worn that he was
9 changing out of that he was not going to
10 wear again, was it his habit, routine habit
11 and practice, to just leave them laying
12 around or would he normally throw them in
13 the laundry chute?

14 A. Both. Sometimes he puts some in
15 the laundry chute and sometimes he left some
16 in the bathroom.

17 Q. Do you have any recollection with

18 regard to the clothing that he wore on
19 January -- excuse me, December 25th if they
20 went in the laundry chute, hung up, any
21 recollection whatsoever?

22 A. No.

23 Q. (By Mr. Morrissey) What was your
24 practice in your house when things that were
25 dry cleaned would go out? How did you
0172

1 handle that, not laundry items, but
2 dry-cleaning items?

3 A. Yeah.

4 MR. WOOD: You mean like did she
5 put it in a special place to make the run
6 to the dry cleaner?

7 Q. (By Mr. Morrissey) Was there
8 like a bag or how did that work?

9 MR. WOOD: Do you understand what
10 he is asking you, Patsy?

11 THE WITNESS: Yeah. I don't know
12 that we had a particular routine. I mean,
13 if -- I think if I was going to the dry
14 cleaners, I would kind of check around and
15 see if anything was left, and I would pick
16 it up and take it.

17 Q. (By Mr. Morrissey) Did you have
18 like a dry-cleaning bag? I know some people
19 have --

20 A. No.

21 Q. - like a bag that is
22 specifically for that or a place that is
23 specifically for those kinds of items.

24 A. I wasn't that organized.

25 Q. Well, and some people have dry
0173

1 cleaners that come to their house, pick the
2 stuff up, and then bring it back in a couple
3 of days and hang it on their door. Did you
4 have any of that kind of service in Boulder
5 there?

6 A. I think I tried that a couple of
7 times, but it just never -- I could never
8 promise when I was going to be there to pay
9 them and all of that.

10 MR. MORRISSEY: Thank you.
11 Q. (By Mr. Levin) You told us
12 that -- I believe you said you didn't help
13 JonBenet get dressed for the Whites'
14 Christmas Day '96?

15 MR. WOOD: When did she tell you
16 that?

17 MR. LEVIN: I thought she told
18 that to Mr. Kane.

19 MR. WOOD: Earlier today?

20 MR. LEVIN: I thought so. I
21 could be mistaken. We don't need to go
22 through it. I can just ask her the
23 question.

24 MR. WOOD: Let's just make sure
25 of what she said.

0174

1 MR. LEVIN: Okay.

2 MR. WOOD: How do you search,
3 Mr. Gallo?

4 MR. GALLO: F1.

5 MR. WOOD: F9?

6 MR. GALLO: F1.

7 MR. WOOD: F1, search down? I
8 am not finding it under dress. Why don't
9 you just ask the question again, if you
10 don't mind, Bruce.

11 MR. LEVIN: No problem.

12 Q. (By Mr. Levin) Did you help
13 JonBenet get dressed for the Whites'
14 Christmas Day '96?

15 A. Yes.

16 Q. Did you do this by yourself or
17 did John help you too?

18 A. No, John did not help me.

19 Q. You told us that you changed
20 JonBenet's clothing when she came home to put
21 her in clothes to sleep?

22 A. Correct.

23 Q. Did John assist in that process?

24 A. He, I believe, took her coat off,
25 maybe her shoes.

0175

1 Q. Okay. As far as putting the

2 longjohns on her for sleeping purposes, did
3 you do that alone?

4 A. Yes.

5 Q. While you were at the Whites'
6 house, if JonBenet went to the bathroom, did
7 either you or he ever go in to help her for
8 some reason that you can recall?

9 A. I did not.

10 Q. Do you have a recollection of
11 John having to go in and help her for any
12 reason?

13 A. No.

14 Q. And under normal -- barring a
15 problem, under normal circumstances, she would
16 just go on her own?

17 A. Yes.

18 Q. Mrs. Ramsey, you told us that the
19 red coat that we showed you in the
20 photograph, that you didn't paint with it, to
21 the best of your recollection?

22 A. To the best of my recollection.

23 Q. And you have told investigators
24 before that, as the holiday season began,
25 that the painting equipment which is normally
0176

1 kept in the butler's pantry was transferred
2 to the basement by Ms. Hoffman Pugh. Do you
3 remember that?

4 MR. WOOD: Why don't you give her
5 the statement so she can look at that. You
6 now are directly asking her to reaffirm
7 something she's already apparently said.

8 MR. LEVIN: I didn't think it was
9 a matter of discussion. Let me ask a second
10 question.

11 MR. WOOD: I don't know whether
12 it is or not, Bruce, but I mean, it is not,
13 apparently by the nature of your question,
14 something new. You already have gotten the
15 information from a question, so --

16 Q. (By Mr. Levin) Let me just, let
17 me just ask another question. We will just
18 drop that one.

19 At the time of JonBenet's death,

20 your painting supplies were found in the
21 basement. Did you ever paint in the
22 basement?

23 A. No.

24 Q. When you were helping JonBenet get
25 ready for bed, were you still wearing the
0177

1 red coat -- excuse me, the red, black, and
2 gray coat?

3 MR. WOOD: Well, from what I saw,
4 it looked like the red and black jacket.

5 THE WITNESS: I don't remember.

6 MR. WOOD: The one we have been
7 discussing that Mr. Kane had a picture of.

8 THE WITNESS: I don't remember.

9 MR. WOOD: Did you get your
10 answer?

11 MR. LEVIN: Yes, I did.

12 Q. (By Mr. Levin) I believe you
13 said you don't remember.

14 Was that the outer coat that you
15 were wearing Christmas, or did you have a
16 heavier coat that you wore on top of that?

17 MR. WOOD: For outdoors?

18 MR. LEVIN: For outdoors.

19 THE WITNESS: I don't remember.

20 I think, I think that was the only one I
21 wore. Because we were in the car and out,
22 but I don't remember exactly.

23 MR. MORRISSEY: Mrs. Ramsey, I am
24 sorry to interrupt you. Before you get
25 going too far, when was the last time you
0178

1 remember using the paint set?

2 THE WITNESS: Oh, god. Oh, you
3 know, probably that fall sometime, I --

4 MR. WOOD: Do you remember that,
5 Patsy? Be sure of your answer.

6 THE WITNESS: No, I don't
7 remember the last time I used it.

8 Q. (By Mr. Morrissey) Right. I am
9 not asking for a date.

10 A. Yeah.

11 Q. A season.

12 A. Yeah.

13 Q. And you indicate the fall? I

14 don't want to put words in your mouth.

15 A. Well, the last time I used it was

16 in conjunction with this art class that I

17 signed up to, and I can't remember when that

18 was exactly from CU. And all of my stuff

19 was there in the butler's pantry. But then

20 the holidays came, we needed that space, and

21 we moved all of the junk to the basement.

22 Q. Once it was moved to the

23 basement, you never hauled it up and painted

24 or anything? You never used it again?

25 A. No.

0179

1 Q. (By Mr. Levin) Mrs. Ramsey, you,

2 you had cut evergreens, I believe, in a

3 bucket of water in your house during the

4 holidays. Do you recall that during

5 Christmas of '96, like boughs or --

6 A. Greenery, yeah, I decorate with

7 greenery.

8 Q. Greenery. Did you have garden

9 gloves that you wore when you were, when you

10 were -- I assume, you tell me if I am

11 wrong, I assume that you cut them off some

12 of your Evergreen trees outside?

13 A. Yeah.

14 Q. Do you wear gloves when you do

15 that?

16 A. No.

17 Q. And I know that you -- there were

18 some flower beds I believe that you

19 occasionally worked with, that you worked on

20 that were on, is it, the south side of the

21 house?

22 A. The rose, I think the roses.

23 Q. Did you wear gardening gloves when

24 you worked out in the yard?

25 A. Not usually.

0180

1 Q. Did you own gardening gloves?

2 A. I don't think so, no.

3 Q. Do you recall ever seeing in your

4 house brown kind of work gloves, cotton?

5 A. Brown cotton? John had -- I

6 don't remember brown work gloves.

7 Q. Can you picture what I am talking

8 about?

9 MR. WOOD: Do you have a photo

10 maybe or something?

11 MR. LEVIN: No, I, we, we don't.

12 Q. (By Mr. Levin) Have you ever

13 seen, they are kind of a --

14 MR. WOOD: No, I don't think so.

15 You got to do better than that. You can

16 conjure up a zillion different brown work

17 gloves.

18 Q. (By Mr. Levin) Cotton brown work

19 gloves.

20 A. Cotton brown work gloves?

21 Q. Costs you about three bucks in

22 the grocery store. I am not creating any

23 images for you?

24 A. No.

25 Q. Okay.

0181

1 MR. WOOD: Me either.

2 MR. LEVIN: We will just leave

3 that.

4 CHIEF BECKNER: Before we go too

5 far, for clarification for me, when you were

6 asked about wearing garden gloves, you said

7 not usually, I believe. Does that mean

8 sometimes you would?

9 THE WITNESS: I don't remember

10 doing that. I mean, I do wear them now

11 because now I am wearing these funny

12 fingernails, I don't want to get them messed

13 up, but I don't think I was doing it then.

14 So I don't, I don't ever remember -- I am

15 not a big gardener, so I didn't have all of

16 the trappings, you know, all of that stuff.

17 So I do not remember having any gardening

18 gloves.

19 Q. (By Mr. Kane) You started to say

20 that John had. John had what?

21 MR. WOOD: Let's see exactly what

22 she said.

23 MR. KANE: Lin, she said John had

24 30 seconds ago. What did John have?

25 MR. WOOD: Excuse me. The

0182

1 question was, do you recall ever seeing in

2 your house brown kind of work gloves, cotton,

3 and you went brown cotton, and you said John

4 had, and you said I don't remember brown.

5 All I want to do is put it in the context

6 of what she said. Do you remember saying

7 that?

8 THE WITNESS: Yes.

9 MR. WOOD: Now, Mr. Kane, go

10 right ahead.

11 Q. (By Mr. Kane) Now that you've

12 had time to think about it for a minute,

13 what did John have?

14 A. What kind of gloves did he have?

15 Q. What were you about to say? You

16 said John had.

17 A. John had ski gloves.

18 Q. (By Mr. Levin) In addition to

19 his ski gloves, Mrs. Ramsey, do you recall

20 John having any kind of work gloves that he

21 might have kept in the car if he had to

22 change a tire or anything like that?

23 A. No.

24 Q. Just for clarification, for the

25 record, when you say no, does that mean no,

0183

1 you don't recall whether he did or didn't or

2 no, he did not own any work gloves?

3 A. I don't recall that he did. You

4 will have to ask him if he did.

5 Q. Fair enough. Thank you.

6 Mr. Morrissey?

7 Q. (By Mr. Morrissey) What color

8 were the ski gloves that you were thinking

9 about?

10 A. It seems to me like they were

11 black. I can't be sure, but I think they

12 were black. They were the puffy kind.

13 Q. (By Mr. Levin) Now, Mrs. Ramsey,

14 you -- are you aware, I should say, that
15 your paint kit was found very close to the
16 wine cellar door?

17 A. I have heard that.

18 Q. Did you recall at any time that
19 you were shown photographs in that regard?

20 A. No.

21 Q. We have found, and I want you to
22 help us, maybe you can offer an explanation
23 for this. We have found fibers in the paint
24 tray that appear to come off of the coat in
25 the photograph we showed you.

0184

1 A. In the paint tray?

2 Q. Yes.

3 A. What's a paint --

4 MR. WOOD: Hold on. Let him ask
5 you his question and then answer his
6 question. What is your question?

7 MR. LEVIN: I did.

8 MR. WOOD: You got your answer?

9 MR. LEVIN: Well, I got, she said
10 what's a paint tray.

11 MR. WOOD: No, she didn't. She
12 was following your question, in the paint
13 tray because you said we have found, and I
14 want you to help us, maybe you can offer an
15 explanation for this. We have found fibers
16 in the paint tray that appear to come off of
17 the coat in the photograph we showed you.
18 What is the question?

19 Q. (By Mr. Levin) Can you explain
20 for us how the fibers from the coat got in
21 the paint tray?

22 MR. WOOD: Are you stipulating as
23 a fact that the fibers that you say are in
24 the paint tray, in fact, came from that coat
25 that we earlier discussed, or is it simply a
0185

1 matter that you say they may have? Because
2 I am not going to let her answer
3 argumentative, hypothetical opinions. I will
4 let her answer if you are going to state it
5 as a matter of fact that that fiber came

6 from that jacket.

7 MR. LEVIN: I can state to you,
8 Mr. Wood, that, given the current state of
9 the scientific examination of fibers, that,
10 based on the state of the art technology,
11 that I believe, based on testing, that fibers
12 from your client's coat are in the paint
13 tray.

14 MR. WOOD: Are you stating as a
15 fact that they are from the coat or is it
16 consistent with? What is the test result
17 terminology? Is it conclusive? I mean, I
18 think she is entitled to know that when you
19 ask her to explain something.

20 MR. KANE: It is identical in all
21 scientific respects.

22 MR. WOOD: What does that mean?
23 Are you telling me it is conclusive?

24 MR. KANE: It is identical.

25 MR. WOOD: Are you saying it is
0186

1 a conclusive match?

2 MR. KANE: You can draw your own
3 conclusions.

4 MR. WOOD: I am not going to
5 draw my own conclusions.

6 MR. KANE: I am saying it is
7 identical.

8 MR. WOOD: Well, what you are
9 saying in terms of how you interpret a lab
10 result may or may not be the lab result.
11 If you have it, let's see it. I would be
12 glad to let her answer a question about it,
13 but I don't want to go into the area of
14 where we are dealing with someone's
15 interpretation of something that may not be a
16 fact and have her explain something because
17 she can't explain something that might be
18 someone's opinion or someone's interpretation.
19 She can try to answer something
20 if you are stating it as a matter of fact.

21 MR. LEVIN: Well, I believe that
22 Mr. Kane's statement is accurate as to what
23 the examiner would testify to.

24 MR. WOOD: Will he testify that
25 it is a conclusive match?

0187

1 MR. KANE: Yes.

2 MR. WOOD: Everybody is -- you
3 all want to take a minute and confer on
4 that?

5 MR. KANE: No.

6 MR. WOOD: Because I want to make
7 sure, if I am going to let her answer this,
8 that you are representing and stipulating
9 that it is a conclusive match.

10 MR. KANE: Well, come on, Lin, we
11 have been around a long time. You know, you
12 know exactly what I am saying.

13 MR. WOOD: No, I don't. I
14 honestly do not.

15 MR. KANE: Well, I am telling
16 you, it is -- is it conclusive in the sense
17 that, that there is something unique about it
18 that could only come from a particular item,
19 then the answer is no.

20 Is it that it is identical in all
21 respects to the fibers off of the jacket,
22 then the answer is yes.

23 Now, does that mean it is
24 conclusive?

25 MR. WOOD: It doesn't sound like
0188

1 it to me.

2 MR. KANE: Then you have got your
3 answer.

4 MR. WOOD: It sounds like to
5 me --

6 MR. KANE: Then you have your
7 answer.

8 MR. WOOD: Then it is a matter
9 of opinion. It is not a matter of fact.

10 MR. KANE: Then you have your
11 answer.

12 MR. WOOD: I want to make sure,
13 because this is an area that you are asking
14 her to explain something that may or may not
15 be a fact because you are representing to

16 her, Ms. Ramsey, a fiber from your red and
17 black and gray jacket was found in the paint
18 tray, how do you explain it.

19 I mean, if it is a matter of
20 fact, I will let her answer that.

21 MR. LEVIN: Well, Mr. Wood, let
22 me -- I thought I made it as clear as
23 possible. I will try to clarify for you.
24 I assume that, in your practice,
25 that you have dealt with --

0189

1 MR. WOOD: Don't assume anything
2 about my practice. I am asking you a
3 question. You used the term in your
4 question, Mr. Levin, you used the term in
5 your question, and I am sure that you have
6 precisely framed your questions. You said
7 appears.

8 Now, "appears to be" and "is," in
9 my practice, are two different things. I
10 want to make very clear what the question is
11 before I let her answer. That is all I am
12 asking.

13 MR. LEVIN: Given -- and I want
14 to answer your question. I am going to try
15 to answer your question before I phrase it
16 to your client.

17 Given the status of fiber
18 analysis, the state of the art, that fiber
19 is identical in all respects to fibers from
20 your client's coat; however, as is the case
21 with any type of scientific evidence, even
22 DNA evidence, where you get numbers that say,
23 for example, the likelihood of a random match
24 would be 1 in, say, 14 trillion. An expert
25 is not going to get up, they'll talk about

0190

1 numbers, but they are not going to get up
2 and say that that is the DNA from that man.

3 MR. WOOD: Maybe you should give
4 us the numbers on this fiber.

5 MR. LEVIN: There are no numbers
6 on the fiber.

7 MR. WOOD: Give us that, whatever

8 you got, and we will look at it.

9 MR. LEVIN: Do you understand
10 what I'm saying? I don't want to, I don't
11 want to mislead you because scientific
12 evidence is always subject to --

13 MR. WOOD: That's why I don't
14 think she should be put into the position of
15 explaining something that scientists may
16 differ on.

17 MR. LEVIN: Well, scientists will
18 differ on many, many things.

19 MR. WOOD: Well, then -- that is
20 my point. She shouldn't be explaining
21 something that one person may say this
22 appears to be the case and the other person
23 may say no, it doesn't appear to be the
24 case. You are putting her in an incredibly
25 awkward situation.

0191

1 CHIEF BECKNER: Let me try to
2 offer a compromise.

3 MR. WOOD: We are ready to hear
4 it.

5 CHIEF BECKNER: Instead of wording
6 the question in terms of fibers from the
7 jacket or appear to be from the jacket,
8 maybe if you word it fibers that by
9 scientific analysis are identical to fibers
10 from the jacket and not say, not identify
11 those fibers from the jacket but say
12 identical to fibers --

13 MR. WOOD: What if we left out
14 the fiber problem altogether and just simply
15 ask her whether or not she ever had the
16 jacket, the red and black, gray jacket in
17 the proximity of the paint tray. We don't
18 have to fight the question of what the fiber
19 is or isn't. Isn't that what you really
20 want to find out?

21 CHIEF BECKNER: Well, I think
22 that is probably what Bruce and Mike were
23 trying to get to is is there an explanation.

24 MR. WOOD: Well, but again, I am
25 not trying to prevent there from being an

0192

1 explanation as to the question of the jacket
2 in proximity to the paint tray, but I am
3 very much concerned about her trying to
4 explain something that may or may not be the
5 case scientifically based on opinion.

6 MR. LEVIN: I will rephrase the
7 question and maybe this will satisfy you.

8 MR. WOOD: Okay.

9 Q. (By Mr. Levin) Mrs. Ramsey, I
10 have scientific evidence from forensic
11 scientists that say that there's fibers in
12 the paint tray that match your red jacket.
13 I have no evidence from any scientist to
14 suggest that those fibers are from any source
15 other than your red jacket.

16 MR. WOOD: Well, you can't ask
17 her -- Come on. What other sources did they
18 test? How many other red jackets and red
19 and black jackets did they test? That is an
20 unfair question on the face of it, Bruce.
21 Did they test anything other than that red
22 and black jacket?

23 I mean, they can't have
24 information that it could come from another
25 source if they didn't test another source,

0193

1 for gosh sakes. So, I mean, that doesn't
2 help solve the dilemma.
3 I think what you want to know is,
4 you suspect, apparently, for whatever reason,
5 that there may be a match or there may be a
6 fiber from her red and black jacket that was
7 on the paint -- in the paint tray, but we
8 are not at all clear whether that is a fact
9 or whether that's just something that you
10 believe may or may not be the case.

11 MR. LEVIN: Well, I told you in
12 the question and I told you face-to-face
13 that, given the most sophisticated testing
14 available at this time, there is fiber
15 evidence in that paint tray that matches.

16 MR. WOOD: Then fairly we would
17 like to see that evidence so we can then let

18 her answer it so she can fairly know what
19 the actual results are.

20 I think that is a fair request.

21 MR. LEVIN: Whether it is her
22 fiber or not, I mean, if she can say I
23 can't explain it, I can't explain it, it
24 doesn't matter what the test says.

25 MR. WOOD: No, no, I think it
0194

1 would be fair for her to be able to
2 recognize the question of whether this is
3 something that she even has to explain.

4 MR. MORRISSEY: Lin.

5 MR. WOOD: You know, a red fiber
6 can be in a paint tray from any number of
7 sources. I mean, we don't, you are asking,
8 specifically you are trying to attach
9 apparently a red fiber, I take it from her
10 jacket to the paint tray.

11 MR. MORRISSEY: Lin, if we charge
12 an intruder in this case, this is a question
13 that is going to get asked her.

14 MR. WOOD: Well, I mean, but
15 you're going to be able, that intruder's
16 defense lawyer is going to have the benefit
17 of knowing what result, the test result that
18 you are looking at; true? So why shouldn't
19 Pat --

20 MR. MORRISSEY: And he is going
21 to be asking her this very same question.

22 MR. WOOD: Wouldn't that person
23 have the benefit of knowing your test result?

24 MR. MORRISSEY: Exactly.

25 MR. WOOD: And I think Patsy
0195

1 ought to have the benefit too because I am
2 not going to let her speculate, and I don't
3 think you want her to speculate, that is all
4 I am saying. We will let her answer the
5 question, but I would like for her to fairly
6 know exactly what the factual underpinning is
7 or even if it is a factual underpinning or
8 whether it is a disputed issue in the case.
9 And then if you all -- why don't

10 we tag that and come back to it maybe after
11 lunch and let me think about it a little bit
12 and then you all think about it. And then
13 maybe after, we will resolve it, I think, in
14 a way that gets you the information that you
15 want.

16 MR. MORRISSEY: The problem is,
17 even if it is somewhat in dispute, it is
18 going to get asked. I mean, a judge is,
19 would, would allow that. And, and these are
20 questions, these kinds of questions are the
21 things we need to know the answer to if we
22 are confronted with a scenario where we have
23 to put Mrs. Ramsey on the witness stand and
24 subject her to, explain to us how is it that
25 fibers that are identified back to your,

0196

1 quote, coat as the source. Now, you know --

2 MR. WOOD: But her answer may be,

3 you know, did you check anything else?

4 MR. MORRISSEY: Well --

5 MR. WOOD: I mean, you know, the

6 intruder, what was, if you find the intruder

7 and you find clothing there, did you check

8 the intruder's clothing to see if it matches

9 the same, better, or whatever. I mean,

10 there are so many hypotheticals there that we

11 just have to know what we are talking about,

12 in all fairness, Mitch.

13 MR. MORRISSEY: But you understand

14 the position we are in as far as that is

15 going to get asked.

16 MR. WOOD: Yeah, but I also

17 understand that the body or universe of

18 evidence that may be in existence when that

19 is asked is totally different than what

20 exists here today. We don't even know what

21 other items were tested. We don't even know

22 what the test results are. And I am just

23 very hesitant to have Patsy speculate over

24 something that we don't know whether it is

25 true or not, we don't know what other things

0197

1 were tested, et cetera.

2 That is my dilemma. Let me think
3 about it. We won't take a hard position on
4 it yet, but you all think about it in terms
5 of whether you might be able to can get some
6 additional information on it and we can come
7 back at a later date and answer it or we
8 can do it in a different fashion.

9 THE VIDEOGRAPHER: We need to
10 make a tape change.

11 MR. LEVIN: I think it is a good
12 lunch break and you can think about it
13 because there are other similar questions, so
14 the answer, your decision on this will
15 dictate what happens with a series of coming
16 questions, just so you know what is coming.

17 MR. WOOD: Well, and fairly, I
18 anticipated there might be something because,
19 I mean, the forensics issue is one that I
20 think everyone is aware of, tests that have
21 been done subsequent to June of 1998, and I
22 just wanted to make sure that we were not
23 asking her to answer questions that are based
24 on what could be differing opinions on
25 forensics --

0198

1 THE VIDEOGRAPHER: Audio cassette
2 has ended.

3 MR. WOOD: -- versus fact.

4 MR. LEVIN: I understand, I
5 understand your position.

6 MR. WOOD: Okay, thank you.

7 (A recess was taken.)

8 MR. KANE: Are you ready to roll?

9 CHIEF BECKNER: Yes.

10 MR. LEVIN: Yes. Mr. Wood, we
11 left off with, I had posed the question to
12 Mrs. Ramsey concerning her offering an
13 explanation for fiber or fibers found in her
14 paint tray. You did not want her to answer
15 prior to the break. You wanted some time to
16 think about it. I assume that you've had
17 that opportunity. So the question now is
18 will she answer the question?

19 MR. WOOD: Not as phrased. And

20 let me explain just quickly why.
21 I do not want, nor do I think
22 you should expect for Mrs. Ramsey, for Patsy,
23 to speculate. Pure speculation is always
24 fraught with peril in anybody's part. And
25 your question not only calls for, I think,
0199

1 gross speculation, but it is at best a
2 hypothetical that reasonably may not even be
3 based on fact. Here is what I would offer
4 in terms of a compromise, and that is, you
5 have indicated, at least by your questions,
6 that you are comfortable in giving us, at
7 least, your verbal statement of the results
8 of these tests.

9 I think, if you would give us,
10 subsequent to this or if you want to do it
11 today, this afternoon, or tomorrow, you can
12 get those, if you can give us the actual
13 result, not looking for the details of the
14 testing, but just the results, the
15 terminology used, we will then consider,
16 reconsider, and maybe we can get you some
17 additional information.

18 But right now as it stands, I am
19 just not willing to let Patsy sit here and
20 speculate about scenarios that may not, in
21 fact, be based in fact. I just don't think
22 that is fair.

23 MR. LEVIN: Just so you know,
24 what I would like to ask her is the
25 following, and you will have this in case
0200

1 you have a change of heart in the future.

2 MR. WOOD: Okay.

3 MR. LEVIN: I think that is
4 probably fair. Based on the state of the
5 art scientific testing, we believe the fibers
6 from her jacket were found in the paint
7 tray, were found tied into the ligature found
8 on JonBenet's neck, were found on the blanket
9 that she is wrapped in, were found on the
10 duct tape that is found on the mouth, and
11 the question is, can she explain to us how

12 those fibers appeared in those places that
13 are associated with her daughter's death.
14 And I understand you are not going to answer
15 those.

16 MR. WOOD: Right. Not, not
17 without -- I mean, with all due respect,
18 Bruce, even the discussion we had, as I can
19 best recall it, we didn't get a consistent
20 description of the fiber results on the
21 question of the paint tray. You are sitting
22 here making a record saying that it is a
23 fact, and I don't know that.

24 MR. LEVIN: I understand that,
25 and I'm just --
0201

1 MR. WOOD: And I think what we
2 will probably find, more likely than not, is
3 when we look at your test results, we will
4 find that there was -- there were fibers
5 that were consistent with or similar to
6 fibers that you believe were found on Patsy's
7 sweater or jacket.
8 I think we will also find, if you
9 put all of the information out there, that
10 there were an extraordinary number of fibers
11 that are not, in fact, in any way similar to
12 any item associated with Patsy Ramsey on
13 these very items.

14 And to single out now in this
15 record and say a fiber was found on the
16 ligature that was consistent with Patsy
17 Ramsey's jacket, fairly, I think if asked,
18 you would say, Mr. Wood, there were an
19 extraordinary number of other fibers that we
20 do not relate in any way to Mrs. Ramsey and
21 probably you would tell me you don't have an
22 explanation for.

23 So I don't want this record to be
24 accusatory based on your statements about the
25 fibers. Fiber evidence, as you know, is
0202

1 pretty, pretty -- I won't say weak, but
2 let's just say that it is subject to a great
3 amount of debate in the profession. And

4 that is why I am just not comfortable
5 leaving your statements there without, I
6 think, putting a more accurate picture,
7 Bruce, on the whole record.

8 MR. LEVIN: I understand your
9 position.

10 In addition to those questions,
11 there are some others that I would like you
12 to think about whether or not we can have
13 Mrs. Ramsey perhaps in the future answer. I
14 understand you are advising her not to today,
15 and those are there are black fibers that,
16 according to our testing that was conducted,
17 that match one of the two shirts that was
18 provided to us by the Ramseys, black shirt.
19 Those are located in the
20 underpants of JonBenet Ramsey, were found in
21 her crotch area, and I believe those are two
22 other areas that we have intended to ask
23 Mrs. Ramsey about if she could help us in
24 explaining their presence in those locations.

25 MR. WOOD: And again, you state
0203

1 that on this record as fact, and I really
2 think that is unfair. I think if you would
3 produce the full truth of the fibers that
4 you have collected that it would probably be
5 at best similar to, which is not uncommon.
6 And I think you would also probably have to
7 admit that there are any number of other
8 fibers found in these areas that you have no
9 explanation for, and I don't want this record
10 to be distorted down the road as being a
11 situation where somehow there is greater
12 weight given to these similar fibers you
13 represent in terms of their location and
14 their alleged origin than really is fair
15 under the truth of fiber evidence and the
16 total fiber evidence in this case.
17 So I mean, I understand your
18 position, and we may very well be able to
19 get over it. You all are willing verbally
20 to tell us the result. I think you clearly,
21 in fairness, should be perfectly willing to

22 show us the result. And when you do that,
23 that would give us an opportunity to perhaps
24 reconsider and answer the question.

25 Would you all be willing to do
0204

1 that, Bruce?

2 MR. LEVIN: I think that is
3 something we'd have -- I would have to
4 discuss with Chief Beckner. And I think you
5 can appreciate why, when we are talking about
6 physical evidence in an ongoing investigation,
7 which is not a filed case, that we are
8 reluctant to release reports.

9 MR. WOOD: Well, in fairness to
10 John and Patsy, though, you are willing to
11 state that these fibers, you believe, match,
12 and it seems to me then you are not giving
13 away anything by simply giving us the actual
14 result. What did the forensic expert say?

15 What is the actual result?

16 If you are willing to say it
17 verbally and characterize it, it seems to me
18 you don't jeopardize anything in an ongoing
19 investigation not filed by giving us the
20 result and letting us see if, in fact, what
21 the result says is consistent with the way
22 you represent it today. It seems to me that
23 would be fair and wouldn't hurt you in the
24 slightest.

25 MR. LEVIN: I understand your
0205

1 position.

2 MR. WOOD: Okay.

3 Q. (By Mr. Levin) Mrs. Ramsey, your
4 son Burke, when he was attending grammar
5 school in Boulder, there was a weekly sort
6 of report that was sent by the teacher to
7 the parents. Do you recall that?

8 A. Vaguely.

9 Q. And you were, as a parent, given
10 the opportunity or asked to provide some
11 input or response to teacher's little report
12 that was sent out once a week. Do you
13 remember doing that? The Friday folder I

14 think is what --

15 A. Oh, Friday folder, yeah, I

16 remember the Friday folder.

17 Q. Okay. Up until the murder of

18 your daughter, your, as a parent, your

19 response in the Friday folder was always

20 handwritten. Following the death of your

21 daughter, your responses were always typed.

22 Can you explain why you changed that?

23 A. I didn't -- I wasn't aware that

24 they were typed.

25 MR. WOOD: Do you have any that

0206

1 you can let her look at?

2 THE WITNESS: Do you have any of

3 those?

4 MR. LEVIN: I don't think we have

5 any in the computer.

6 MR. KANE: Not in the computer.

7 MR. LEVIN: No, no, we don't have

8 those.

9 MR. WOOD: Are you representing

10 that every one afterwards was in fact typed?

11 MR. KANE: That is what Burke's

12 teacher has told us.

13 MR. WOOD: Do you have them, the

14 actual reports?

15 MR. KANE: We certainly don't

16 have them here. I am not sure if we have

17 them.

18 MR. WOOD: Well, I --

19 THE WITNESS: I don't ever

20 remember -- I mean, I don't have any

21 recollection of ever typing anything in the

22 Friday folder, but --

23 MR. WOOD: I mean, if we can see

24 them somewhere down the road, that might help

25 refresh and give us some indication of an

0207

1 explanation if they, in fact, are as you say

2 or as his teacher says.

3 Q. (By Mr. Levin) So I am assuming,

4 Mrs. Ramsey, then the answer to my question,

5 which was, can you explain why the change,

6 you can't offer one because you don't recall
7 the change occurring --

8 A. Correct.

9 Q. -- as you sit here today?

10 A. Right.

11 MR. LEVIN: Mike, do you have
12 some more questions.

13 MR. KANE: Yes.

14 Q. (By Mr. Kane) Mrs. Ramsey, in
15 your book, and it is in here numerous times
16 on television programs after you wrote your
17 -- first of all, why did you write the book?
18 What was your primary purpose in writing this
19 book?

20 A. Primary purpose was to get
21 information out about who we think the
22 intruder was so that more people would be
23 aware of that profile and could help us.

24 Q. Okay. And that was your number
25 one goal?

0208

1 A. Yes.

2 Q. All right. In that book you talk
3 about a chronology, I think you call it, of
4 cooperation, something along that line, a
5 chronicle of cooperation. Actually the
6 second line, this is on page 393, Mr. Wood,
7 it says police interviewed and questioned,
8 police interviewed and questioned John and
9 Patsy on December 27 and John again on
10 December 28. Did you give any interviews to
11 the police on the 27th? It was the day
12 after you found her body.

13 MR. WOOD: Are you talking about,
14 what do you mean by, a sit down interview?

15 MR. KANE: Well, it says here,
16 police interviewed and questioned John and
17 Patsy.

18 THE WITNESS: Police were there
19 in the home where we were staying, and we
20 were talking with them all the time.

21 Q. (By Mr. Kane) Were you
22 interviewed and questioned on the 27th, to
23 your recollection?

24 A. To my best recollection, yes.

25 Q. Do you remember having a meeting
0209

1 with, I am not sure if it was at Barbara
2 Furner's house, but you met with Linda Arndt
3 one time and I believe your mother was
4 there? Do you remember that?

5 A. My mother?

6 Q. There was a meeting that was set
7 up between sort of within the first couple
8 of months of the homicide.

9 MR. KANE: I don't know the date.

10 MR. WOOD: January, February of
11 '97?

12 MR. KANE: Yeah. You met with
13 Linda Arndt. And it was you and your mother
14 and I believe Barbara Furner was there.

15 THE WITNESS: Okay.

16 MR. KANE: Remember that?

17 THE WITNESS: I don't remember my
18 mother being there, but I don't remember a
19 lot from those days.

20 Q. (By Mr. Kane) Okay. Why was it
21 at that meeting that one of the ground rules
22 was that you couldn't talk about the case?

23 A. I don't know.

24 Q. Well, that was your ground rule.

25 MR. WOOD: Wait a minute. Help
0210

1 us know that. Whose ground rule was it?
2 Linda Arndt? How was it conveyed? Who was
3 it conveyed to?

4 MR. KANE: Well, Linda Arndt was
5 told.

6 MR. WOOD: By whom?

7 MR. KANE: By your lawyer.

8 MR. WOOD: That is different.

9 Come on.

10 MR. KANE: During that meeting,
11 do you recall at one point telling her that,
12 when the subject matter of the case came up,
13 that you couldn't talk about that?

14 MR. WOOD: Do you have a
15 statement? Do you have a recorded statement?

16 Q. (By Mr. Kane) I am asking if
17 you have a recollection of it.
18 THE WITNESS: I have a
19 recollection --
20 MR. WOOD: Excuse me a second,
21 Patsy. Do you have a statement that she
22 made?
23 MR. KANE: Yes, I do.
24 MR. WOOD: Well, let her see it.
25 MR. KANE: No, I don't, I don't
0211

1 I have, there is no statement made just because
2 there was no statement made. That was the
3 point, there was no discussion --
4 MR. WOOD: Was the discussion
5 that you are talking about recorded?
6 MR. KANE: No.
7 MR. WOOD: No report was entered
8 by Linda Arndt?
9 MR. KANE: There was a report.
10 MR. WOOD: Can we see that?
11 MR. KANE: I don't have it here.
12 It is Linda Arndt's report. It's not your
13 client's report.
14 MR. WOOD: But it's a statement
15 you are trying --
16 MR. KANE: I am asking if it is
17 true or false.
18 MR. WOOD: Let me finish. If
19 you have a report, we can look at it in
20 context. I think that would be fair.
21 MR. KANE: No. Well, I am
22 asking if she recalls it.
23 MR. WOOD: I mean, if you are
24 telling her that her lawyer told Linda Arndt
25 that she didn't want her to discuss a
0212

1 certain area of questioning, are you asking
2 her basically did you follow your lawyer's
3 advice?
4 MR. KANE: I am asking if she
5 recalls having a meeting and recalls that
6 that was one of the ground rules?
7 MR. WOOD: Mr. Kane, when did

8 this develop after June of 1998?

9 MR. KANE: Once again, we are
10 back to the question that I asked you
11 earlier.

12 MR. WOOD: It is a new question.

13 Excuse me. It is a new question, based,
14 though, on developments that have occurred or
15 information that has been obtained since June
16 of 1998.

17 MR. KANE: So in other words, if
18 it was something that was available at the
19 time, you are saying you won't answer any
20 question to anything that was available to us
21 since June of 1998?

22 MR. WOOD: Here is the question.

23 Chief Beckner's letter to me of May the
24 10th, since the last interviews you gave to
25 law enforcement in June, a lot of information
0213

1 has been developed in the continuing
2 investigation in JonBenet's death. This has
3 resulted in many new questions.

4 MR. KANE: Okay.

5 MR. WOOD: Now, this information
6 had to be known to Linda Arndt and to all
7 of you back in 1997.

8 MR. KANE: Well, I wasn't on the
9 case until June of 1998, so it was news to
10 me.

11 MR. WOOD: Whether you were on
12 the case or not does not dictate whether
13 someone else on the case would know this.

14 MR. KANE: Let's stop arguing.
15 Are you telling her she can't answer any
16 questions about this?

17 MR. WOOD: No.

18 MR. KANE: I don't want to debate
19 it. It's either yes or no.

20 MR. WOOD: It is not always black
21 and white, Michael. Sometimes there is an
22 in between.

23 MR. KANE: That's what I'm
24 saying, I'm asking the question and are you
25 telling her not to answer or are you telling

0214

1 her to answer?

2 MR. WOOD: Why don't you give me

3 a minute.

4 THE WITNESS: Why is it

5 important --

6 MR. KANE: There is nothing to

7 debate, there is nothing to debate.

8 MR. WOOD: I am not debating. I

9 am looking through my notes here.

10 This is Chief Beckner's letter of

11 July the 13th. I believe we have made it

12 clear in our telephone conversation on

13 Friday, July the 7th, that our intent was to

14 not rehash old questions but that we still

15 had new questions on the prior evidence based

16 on new information and additional forensic

17 testing.

18 Now, I don't think it can be any

19 clearer. That is not a statement that we

20 have new questions based on information we

21 had prior to June of 1998 but we either

22 forgot to ask or Mr. Kane was not involved

23 in the case and would now like to ask.

24 I didn't come in here with my

25 client prepared to go into areas that I was

0215

1 never told we would go into. This is very

2 clear that we are talking about subsequent to

3 June of 1998.

4 MR. KANE: So in other words --

5 MR. WOOD: Don't you agree it is

6 as clear as a bell, Mike?

7 MR. KANE: We have been talking

8 about December 26, 1996 all morning.

9 MR. WOOD: Well, now, wait a

10 minute, that's what I don't want to get into

11 where you're going to start claiming that

12 you're talking about a date certain now

13 you've got the right to do it. I made it

14 very clear when we talked about those dates

15 today that you were asking about forensic

16 tests that you got --

17 MR. KANE: Lin, you made it

18 clear.

19 MR. MORRISSEY: The new
20 information is in the book.

21 MR. KANE: And that's where I am
22 getting that.

23 MR. WOOD: Well, tell us where in
24 the book. That is not the question you
25 asked. You are talking about Linda Arndt.
0216

1 MR. KANE: Okay. I am not going
2 to ask that question, Lin, because it's clear
3 you are not going to let her answer it.

4 MR. WOOD: It is not clear.

5 MR. KANE: So let the record
6 reflect you will not let her answer the
7 question.

8 MR. WOOD: No, no, no. We will
9 take a break. Let's take a break and make
10 sure we don't get off track.

11 MR. KANE: I said I'm withdrawing
12 the question.

13 MR. WOOD: We have been doing
14 pretty well today. Let's take a moment and
15 let everybody make sure we gather ourselves
16 and then let's take a five-minute break. I
17 don't want a problem that would disrupt this.

18 MR. KANE: You don't want a
19 problem, then let's get down to the
20 bottom --

21 MR. WOOD: Don't point your
22 finger or we will have a problem with this.

23 MR. KANE: Let's get down to the
24 bottom line of this. We're down here
25 purportedly because Mr. and Mrs. Ramsey want
0217

1 to solve the murder of their daughter. To
2 get to that point, there is one prosecuting
3 authority that's got any -- that's got any
4 say in who gets prosecuted and when they get
5 prosecuted, and that's the Boulder Police and
6 the Boulder D.A.

7 Now, unless we get beyond Mr. and
8 Mrs. Ramsey, we are never going to get to
9 the end of this case. And if the purpose,

10 if your purpose in objecting is because you
11 don't want to answer any questions that might
12 reflect badly on them, well, then just simply
13 state it. But if the purpose --

14 MR. WOOD: That is so, pardon my
15 language, asinine, Michael.

16 MR. KANE: Then why are you not
17 letting, why are you throwing up these
18 artificial barriers?

19 MR. WOOD: No, sir.

20 MR. KANE: That is what you are
21 doing.

22 MR. WOOD: When you are finished,
23 then I'll respond. You let me know when you
24 are finished.

25 MR. KANE: You are throwing up an
0218

1 artificial barrier to a simple question.

2 MR. WOOD: You are misrepresenting
3 what is happening here. Now, when you are
4 finished, I don't want to interrupt.

5 MR. KANE: The record will
6 reflect it.

7 MR. WOOD: The record will
8 reflect what Chief Beckner asked my clients
9 to do. I just read it verbatim from his
10 July the 13th letter. That's what he made
11 clear to us, that's what we agreed to do,
12 that's what I brought them in here prepared
13 to do.

14 MR. KANE: Okay.

15 MR. WOOD: I didn't, excuse me.
16 I did not bring them in here prepared to go
17 back and answer questions about things that
18 occurred prior to June of 1998 that you all
19 have known about all along and questioned
20 them about in June of 1998 for three days,
21 in April of 1997 for a day, and, fairly, if
22 that's what you wanted to do, then you
23 should have asked me that. I could have
24 discussed it with them. They could have
25 made a decision, which may very well have
0219

1 been to come in and do that with you. I

2 don't know. But you didn't ask that.
3 Now, you can't sit in here today
4 and change the scope of what you asked for
5 and turn around, because we say you didn't
6 ask for it and we didn't agree, and then
7 make this accusatory statement that is
8 totally unsupported, and again, pardon my
9 language, it's an asinine statement, that I'm
10 objecting to questions the answers of which
11 might reflect adversely on my client.
12 I am going to try, and I've been
13 doing, to give you all of the leeway I can
14 within the framework of your request, but you
15 don't have the right, Mr. Kane, to come in
16 here and ask unfair questions, and you don't
17 have the right to come in here and ask
18 questions in subject matters that the Chief
19 didn't ask for when he asked for the
20 request. That's unfair, and I am not going
21 to let it happen today, and it doesn't mean
22 one thing in terms of it reflecting adversely
23 or otherwise on my clients. It's simply not
24 what you asked to do. Okay?

25 MR. KANE: I said I withdrew the
0220

1 question.

2 MR. WOOD: No, but then you made
3 a speech. And then, well, usually as
4 lawyers go, one good speech deserves another.
5 Let's take two minutes now just so we can
6 try and catch some water and take a break.
7 All right? Because I usually, when we get
8 into a little back and forth, it's better to
9 get calmed down, stay focused and get the
10 information that you came here to do. Let's
11 take five minutes. All right?

12 MR. KANE: It is your office.

13 You do what you want.

14 MR. WOOD: Well, I'm not being
15 unfair about that. Anytime you say the same
16 thing, just look over to me and say let's
17 take five, okay?

18 MR. KANE: That is fine.

19 (WHEREUPON, a brief recess was

20 taken.)

21 THE VIDEOGRAPHER: All right.

22 Q. (By Mr. Kane) Mrs. Ramsey, after
23 the homicide, I mean, you mentioned several
24 times in the book on several occasions where
25 you wondered if the killer was watching you
0221

1 or following you. You know, I think you
2 described one time when you had some cable
3 that was cut at your house by some workmen
4 and the lights were out or something like
5 that, and Mr. Ramsey wondered if the killer
6 might be in there.

7 I mean, you had a concern about
8 this person being out there and coming after
9 you and your family after the homicide?

10 A. Yes.

11 Q. All right. And I take it your
12 biggest concern was for Burke; is that
13 correct?

14 A. Yes.

15 Q. All right. And you got -- there
16 were some security arrangements for Burke
17 when he went back to school, I believe, at
18 the end of January. Were you involved in
19 those discussions --

20 A. Absolutely.

21 Q. -- of the security arrangements?

22 Do you remember who those took place with or
23 where they took place?

24 A. At the High Peak School, we made
25 arrangements for Tracy Temple to be in there.
0222

1 She is with a security company in Colorado.
2 There were also parent volunteers who sat
3 outside the classroom and basically watched
4 him at all times.

5 Q. All right. And so you wanted to
6 have security in the school in case somebody
7 were to come in and try to do harm to
8 Burke?

9 A. And we set up a 911 system. The
10 teacher, I believe the teacher and one of
11 the parents would always have a little

12 medallion that they could press in an
13 emergency.

14 Q. Why was Tracy Temple only hired
15 for one week?

16 MR. WOOD: Why was she what?

17 Q. (By Mr. Kane) Why was Tracy

18 Temple only employed for one week to be at
19 the school?

20 A. Well, we wanted her to stay
21 longer, but the school felt like it was a
22 disruption to the children.

23 Q. So it was the school's decision,
24 not yours?

25 A. Yes. So we compromised and had
0223

1 the Burke watch set up.

2 Q. Why did you insist that Ms.
3 Temple be inside the classroom rather than
4 out in the hall?

5 A. She wasn't in the classroom.

6 Q. No, no, no. Why did you -- but
7 there was discussion that you had with the
8 school authorities that Tracy be allowed to
9 be inside the classroom, and the school
10 authorities objected to that. Do you recall
11 that?

12 MR. WOOD: Do you represent that
13 as fact?

14 MR. KANE: Yeah, that's a fact.

15 THE WITNESS: I don't, I --

16 Q. (By Mr. Kane) Do you remember
17 that?

18 A. I don't remember that.

19 Q. Okay. What was your concern? I
20 mean, what was in your mind when you were
21 trying to construct these security
22 arrangements with the 911 thing, with
23 Ms. Temple, with the moms and all? What was
24 the scenario you had in mind that you were
25 trying to protect against?

0224

1 A. One of my children had just been
2 brutally murdered in the sanctity of our
3 home. I have one remaining child, and I

4 didn't want him let out of my sight. I
5 didn't want him to return to school. I
6 didn't want to return to Boulder. I was
7 frightened for all of our safety.
8 Then it became apparent that it
9 would be in Burke's best interest to be back
10 in a routine in his normal environment with
11 his friends, and I saw the benefit of that.
12 And I said the only way I will let him go
13 is that if there is a great deal of security
14 put in place.

15 Q. And that's why you hired
16 professionals such as Tracy Temple?

17 A. Yes.

18 Q. I think Ellis Armistead also had
19 some involvement in that; correct?

20 A. Well, together or somehow they
21 installed that wiring system and all that
22 kind of stuff.

23 Q. Why did you allow Burke to go to
24 school without a guard and have Susan Stein
25 transport him?

0225

1 A. Well, Susan had the medallion.

2 The medallion was in Burke's proximity at any
3 given time.

4 Q. That medallion worked in the
5 school, it was tied into something in the
6 principal's office; is that correct?

7 A. Right, right.

8 Q. So on the way to school it
9 wouldn't work. Why did you allow her to go
10 without any security and against Tracy
11 Temple's advice, as a matter of fact, to be
12 transported to and from school when he was
13 most vulnerable?

14 A. Well, he left the garage in a
15 locked car and drove straight to school and
16 then was escorted into the school.

17 Q. You didn't have any concerns about
18 somebody at a stop sign?

19 MR. WOOD: Mr. Kane, Michael --

20 MR. KANE: What is the objection

21 now?

22 MR. WOOD: I just wonder what
23 does this have to do with the investigation
24 into finding who killed JonBenet Ramsey?

25 MR. KANE: The very fact that I'm
0226

1 asking it means it has something to do with
2 it.

3 MR. WOOD: What?

4 MR. KANE: I don't have to, I
5 don't have to, if you're now going to make
6 me justify every question that I ask, now
7 we're so, you know, in the very beginning,
8 Lin, you sent a letter --

9 MR. WOOD: Don't point.

10 MR. KANE: I am not. I am just
11 emphasizing. You sent a letter --

12 MR. WOOD: I point sometimes.

13 MR. KANE: You know, this is
14 nothing personal. You are doing your job
15 and I am doing mine.

16 In the very beginning you sent a
17 letter to us, and you laid down this fair
18 and objective, as long as these questions are
19 fair and objective you'll answer, and I wrote
20 back to you, I wrote a letter back, and
21 within five minutes of you getting that
22 letter off your fax machine, you were on the
23 phone with me. And then the next thing you
24 said --

25 MR. WOOD: You know, I wrote a
0227

1 letter to Chief Beckner, which I would be
2 glad to make part of this record, and then I
3 got a letter from you, and I called you.

4 MR. KANE: That's right. And we
5 spoke about that the next day.

6 MR. WOOD: We talked for over an
7 hour and a half.

8 MR. KANE: And the next day you
9 wrote another letter saying that there would
10 be no conditions on this interview.

11 MR. WOOD: Now, wait a minute.

12 MR. KANE: Oh, yes, you did.

13 MR. WOOD: I didn't impose any

14 conditions.

15 MR. KANE: You are now. Now
16 you're asking me what's the purpose of me
17 asking a question. That's a condition.

18 MR. WOOD: No, it's not.

19 MR. KANE: What do you call it?

20 MR. WOOD: Just what it was.

21 I asked you a question.

22 MR. KANE: And I'm saying I don't
23 have to explain my purpose. I am asking the
24 question.

25 MR. WOOD: Mr. Kane --

0228

1 MR. KANE: If you don't want to
2 answer the question, don't answer it, but I
3 don't have to justify the question.

4 MR. WOOD: Mr. Kane, you
5 misrepresent my letter to you. You
6 misrepresent our conversation. You
7 misrepresent your statements that I have
8 imposed conditions. Let me finish.

9 MR. KANE: You know, Mr. Wood,
10 this is a sham.

11 MR. WOOD: No, it's not.

12 MR. KANE: This is a big
13 publicity stunt on your part.

14 MR. WOOD: No, it's not.

15 MR. KANE: You want to go out
16 there and say my clients answered every
17 question. Well, don't say that because you
18 are not letting your client answer this
19 question.

20 MR. WOOD: Mr. Kane, why don't
21 you sit down and let's try --

22 MR. KANE: You are obstructing.
23 You are obstructing, Lin. You are asking me
24 now to justify why I am asking the
25 questions.

0229

1 MR. WOOD: Mr. Kane, sit down.
2 Sit down.

3 MR. KANE: Yes or no, can she
4 answer that question?

5 MR. WOOD: Mr. Kane, life does

6 not always turn on what Michael Kane thinks
7 is fair. Just give me a second. I don't
8 think I am being unreasonable.
9 MR. KANE: I think you are.
10 You're asking me to justify.
11 MR. WOOD: Give me a chance to
12 talk without jumping up and making your
13 preplanned speeches.
14 MR. KANE: You stated your
15 objection.
16 MR. WOOD: Now wait a minute.
17 You all made the request and you all set the
18 conditions, and I agreed to them at the
19 direction of John and Patsy. I got the
20 letters that demonstrate and document that.
21 The only thing I asked for was the courtesy
22 of whether you would consider this being done
23 in Atlanta, and you quickly said yes. I
24 asked for a stenographic reporter because of
25 the concern over an accurate transcript
0230

1 because there never had been one in the
2 prior interviews in April of '97 and in June
3 of 1998.
4 And that's it. I didn't impose
5 any conditions, and I don't want to be
6 misrepresented in that connection.
7 All I've done today, because I
8 thought we were here to be productive, in
9 looking for the killer of this child, the
10 parents want to come in here and help you,
11 but when you start asking questions about why
12 did you let Burke go to school with Susan
13 Stein, I mean, with all due respect, I mean,
14 I haven't instructed that she can't answer
15 it, but I don't think it's unfair and
16 unreasonable for me to say, what in the
17 world does that have to do with the question
18 of moving this investigation forward on who
19 killed this child.
20 MR. KANE: Let's go back to what
21 I said.
22 MR. WOOD: I didn't mean to get
23 you all upset and hot and bothered. I just

24 thought it was a fair question. To my mind,
25 Susan Stein drove Burke Ramsey to school in
0231

1 a locked automobile and dropped him off, I
2 am having a lot of trouble finding something
3 sinister about that or inconsistent with a
4 parent's love and protection of their son.

5 MR. KANE: Well, I think it is
6 inconsistent, number one. Number two, it
7 doesn't matter what I think.

8 MR. WOOD: It does. You are the
9 special prosecutor.

10 MR. KANE: What matters is, if
11 you ever think an intruder is going to be,
12 and I'm going to go back to the speech I
13 made in the very beginning that I made two
14 years ago to John Ramsey, if you ever expect
15 for us to be able to put a case against an
16 intruder together, the intruder is going to
17 ask that question. The intruder is going to
18 say, why is it that the parents of a month
19 after their child is murdered allow their son
20 to be transported at a time when he is most
21 vulnerable, at a time when their own security
22 people said this is crazy to be transported
23 with no protection. And that is a
24 legitimate question.

25 Now, are you going to let her
0232

1 answer or not?

2 MR. WOOD: Let me say this to
3 you. That, again, Mr. Kane -- and I don't
4 mean, Mr. Kane -- Michael, you know, you
5 have a perspective. I just think that what
6 you are trying to represent about the lack
7 of security --

8 MR. KANE: Mr. Wood, you are an
9 obstructionist.

10 MR. WOOD: Let me finish, Mike.
11 I'm not an obstructionist.

12 MR. KANE: You go out there and
13 you tell these press people that they
14 cooperated, and I will go out and tell them
15 what really happened in here.

16 MR. WOOD: Mr. Kane, what's
17 happened here is you are looking to storm
18 out for no reason.
19 MR. KANE: I'm looking to go
20 storm out because I can't ask a question --
21 MR. WOOD: Take five, take five
22 minutes and be reasonable enough to listen.
23 MR. KANE: Look, I don't need
24 this. It is a game. You're playing a
25 game.

0233

1 MR. LEVIN: Take five minute.
2 MR. WOOD: Take five minutes.
3 MR. KANE: Are we going to take
4 every five minutes every time I ask a
5 question because you want to, you want to
6 know what it is that's in my mind. I just
7 told you what's in my mind.
8 MR. WOOD: Mr. Kane, we are both
9 trying to do our jobs under very unusual and
10 difficult circumstances.
11 MR. KANE: Right. And my job is
12 not to stand in the way of the truth.
13 CHIEF BECKNER: Let us take a
14 time out.
15 MR. LEVIN: Let's take five
16 minutes.
17 MR. WOOD: If you are implying my
18 job is to obstruct the truth, I take that as
19 a professional insult. And you will not be
20 staying in my office. I pay the rent here.
21 I will not be insulted by you.
22 MR. KANE: That's fine.
23 CHIEF BECKNER: Time out. Time
24 out.
25 (A recess was taken.)

0234

1 (Mr. Morrissey is no longer
2 present).
3 MR. WOOD: It is my
4 understanding, and, Chief Beckner, correct me
5 if I am wrong, I will try to state it and
6 see if we can get at least an accurate
7 record of the ending of Patsy's interview.

8 It is my understanding that the
9 only area that you did not cover with Patsy
10 Ramsey that you wanted to discuss with her
11 today was the area of Burke's security.
12 Other than the issue of the fiber results
13 that we discussed right after lunch and just
14 before lunch that we talked about we can
15 address and perhaps come back and be able to
16 deal with another day.

17 CHIEF BECKNER: Correct.

18 MR. WOOD: And you decided,
19 because of my questions that resulted in the
20 colloquy of counsel, that you do not wish to
21 complete your questioning of Patsy on the
22 issue of Burke's security, but it is my
23 understanding that that was it in terms of
24 what you wanted to talk to her about today
25 is what you told me in the hallway, isn't
0235

1 it? Didn't you tell me that in the hall?

2 CHIEF BECKNER: I told you that
3 there was no reason to go further with
4 Patsy. That was the consensus of the group.

5 MR. WOOD: Well, I thought you
6 told me -- but, Chief, you told me the only
7 areas you had to wrap up with her anyway was
8 the security and the fibers. The fibers we
9 already agreed to disagree for the moment
10 with the chance of resolution. Didn't you
11 tell me that?

12 CHIEF BECKNER: I don't know that
13 I was that clear, and if I was, then I
14 apologize.

15 MR. WOOD: What other areas are
16 there that you have to talk to Patsy Ramsey
17 about? And if so, I want to make sure you
18 understand, she is here, she is available,
19 she is ready. The only question we had that
20 has come up that has been an area to defer
21 has been the area of the fibers.

22 MR. LEVIN: Mr. Wood, let me
23 address that issue, if I might, with you.
24 We did have an opportunity, because it was
25 left up in the air as to whether or not we

0236

1 would provide you with reports from our
2 forensic experts, and we have discussed that,
3 and we are not going to do that. And I
4 understand that you will not permit her
5 without seeing those reports, to answer those
6 question, which we understand.

7 CHIEF BECKNER: I will also say
8 that was not a condition prior to this
9 interview, that you had to see police reports
10 or lab reports in order to answer questions
11 based on evidence.

12 MR. WOOD: No, no, no. The idea
13 never was discussed. I mean, it's not a
14 condition now.

15 CHIEF BECKNER: So it was not a
16 condition.

17 MR. WOOD: And it's not a
18 condition now. I simply said that it would
19 be unfair to have a witness speculate about
20 a scenario's explanation based on a
21 representation of the significance of a
22 forensic test on the fibers when it seems to
23 me very simple, if you're going to sit here
24 and say that it appears to be her jacket, a
25 fiber from her jacket, and we are trying to
0237

1 figure out what "appears to be" means because
2 it was one of the weak areas of evidence in
3 the law, fiber evidence when you are talking
4 about appears to be and similarities, that,
5 you know, with all due respect, I wanted to
6 see not the full report, just the conclusion
7 of the person that did the test to find out
8 if that is really an accurate
9 characterization.

10 And based on knowing that, in
11 terms of it being in the examiner's words
12 versus the prosecutor's words, we might very
13 well be able to answer the question. That's
14 not a condition. That's a fair request.
15 You all don't want to be unfair, I wouldn't
16 think.

17 CHIEF BECKNER: Well, it is a

18 condition, whether you think it is fair or
19 unfair.

20 MR. WOOD: You all throw around
21 the word condition. If I ask a question, it
22 becomes a condition. If I ask a question,
23 in this man's mind, Mr. Kane's, it becomes
24 an objection or instruction not to answer,
25 which this record will not bear out.

0238

1 I mean, if you're telling me you
2 have other areas for Patsy Ramsey and it's
3 not what you just represented to me in the
4 hallway, and I don't know if you were there
5 or not, Ollie, but, Chief, you told me that
6 was all you wanted to ask about anyway was
7 the security and then the fibers and you
8 were done.

9 And you know, then I said, if
10 that's the case, let's make that record and
11 we will move on to John, but now Mr. Kane
12 is saying there are other areas.

13 MR. KANE: Well, I think given
14 the fact that you put on three types of
15 objections during the questioning, and let me
16 just answer, the three objections that you
17 raised are no question that has been covered
18 before, and we have no problem with that
19 from the very beginning, we don't want to
20 plow old ground.

21 MR. WOOD: Don't fault me for
22 that one.

23 MR. KANE: No, I am not. But
24 there were two others that became clear
25 today. And one was that you wouldn't

0239

1 entertain any question that involved
2 information that was available to us before
3 June of 1998 but not asked, and you made
4 that specific --

5 MR. WOOD: Don't fault me for
6 that one because I read the Chief's
7 letter --

8 MR. KANE: Let me finish.

9 MR. WOOD: You are making it

10 sound like I did something wrong. All I'm
11 doing is stating what we agreed to.
12 MR. KANE: No. Well, see that's
13 where we had the disagreement.
14 MR. WOOD: Have I misread this
15 letter?
16 MR. KANE: That's where we have a
17 disagreement.
18 MR. WOOD: I am reading the
19 letter that says, of July 13th, I think it's
20 mis-dated June 13th --
21 MR. KANE: Lin, Lin, you've
22 already made a record of this. We don't
23 need to, we don't need to hash this out.
24 MR. WOOD: You are accusing me of
25 doing something improper in my objection and
0240
1 yet you won't --
2 MR. KANE: I am just stating, no,
3 I am saying that's what you're interpreting
4 your letter to mean that no question that
5 could have been asked before June of 1998
6 that wasn't asked.
7 MR. WOOD: That is what it says.
8 MR. KANE: Okay. That's all I
9 am saying.
10 MR. WOOD: It says our intent was
11 not to rehash old questions but that we
12 still had new questions over prior evidence
13 based on new information and additional
14 forensic testing. Asking old questions would
15 be a waste of our time.
16 That's what the Chief told me he
17 wanted to do. Now you're making a record
18 that says I'm somehow improper in objecting.
19 MR. KANE: I am saying that's
20 your -- no, I'm saying that's your
21 interpretation of it.
22 MR. WOOD: It is plain language.
23 MR. KANE: We are debating an
24 abstract of that.
25 CHIEF BECKNER: In interpreting
0241
1 that, you are interpreting it differently.

2 Over prior evidence, prior evidence can be at
3 any time.

4 MR. WOOD: But prior evidence
5 based on new information and additional
6 forensic information.

7 CHIEF BECKNER: Sure.

8 MR. WOOD: You can't leave that
9 out.

10 CHIEF BECKNER: No, I know. But
11 you develop new information on old evidence
12 oftentimes as we continue the investigation.

13 MR. WOOD: And we got into the
14 question about Linda Arndt on a meeting with
15 her in February of '97, and I asked about
16 whether that was based on new information or
17 additional forensic testing, which wouldn't
18 apply, and it seemed to me that Mitch
19 Morrissey was getting ready to show us
20 something in the book and then you all
21 didn't want to go there.

22 CHIEF BECKNER: Without debating
23 that particular issue, I just want to make
24 clear that --

25 MR. WOOD: Let me tell you
0242

1 something, I know exactly what we came here
2 to do, there's no doubt in my mind, it was
3 documented by our letters. My clients are
4 willing to do it. Patsy Ramsey is willing
5 to complete any areas within what you ask
6 and we agreed to do.

7 MR. KANE: Okay. No. All I am
8 saying --

9 MR. WOOD: And if you're really
10 telling me now that you've got a number of
11 other areas for Patsy, different as I
12 understood what you told me in the hall,
13 Chief, and maybe I misunderstood, I thought I
14 did understand. But I'll --

15 CHIEF BECKNER: I said they
16 didn't have any additional questions, and
17 without the explanation it goes beyond that.

18 MR. WOOD: Well, do you have any
19 areas for Patsy Ramsey other than the

20 security of Burke when he returned to school
21 or what we've already made I think a clear
22 record on about the fibers?

23 MR. KANE: Yes, absolutely.

24 MR. WOOD: Well, why don't we get

25 her back in here and finish.

0243

1 MR. KANE: Fine, as long as
2 you're not going to object, but if are you
3 going to object and say, if the question
4 could have been asked in June of '98 but it
5 wasn't and the information that would have
6 prompted that question was available in June
7 of '98, but the question wasn't asked, if
8 that's going to be your objection, then, no,

9 I don't, but if that's the way you are
10 interpreting what is agreed to --

11 MR. WOOD: Why don't you, Mr.

12 Kane, why don't you just state in plain
13 English what you want to do. I thought it
14 was clear as a bell from Chief Beckner's
15 letters that you wanted to ask these new
16 questions based on new information or
17 information developed since June of 1998.

18 MR. LEVIN: Mr. Wood, let me,

19 I'll make this --

20 MR. WOOD: That is what the
21 letter says.

22 MR. LEVIN: -- I will make this
23 as clear as possible.

24 MR. WOOD: That would help.

25 MR. LEVIN: What we want to do

0244

1 is we would like to ask some questions of
2 John Ramsey. The reason why we choose to
3 ask additional or not additional questions of
4 Patsy is not going to be productive to go
5 back and forth.

6 MR. WOOD: It is going to
7 determine whether we can legitimately move
8 forward with John. If you are going to walk
9 out, in effect, of Patsy's interview, what's
10 the difference? I am going to take the same
11 position with John.

12 MR. LEVIN: For whatever
13 reason --
14 MR. WOOD: I am going to make
15 you live up to what you said you came here
16 to do.
17 MR. KANE: We keep debating.
18 Okay. You're not even interpreting --
19 MR. WOOD: Why don't you leave
20 for a minute and let the lawyers work this
21 out, John.
22 (Mr. Ramsey leaves the deposition
23 room).
24 MR. WOOD: It's just not fair for
25 John and Patsy to sit here and listen to us
0245
1 haggle back and forth.
2 Let me say this, Michael, it
3 makes no sense to me at all that you don't
4 want to finish with Patsy.
5 MR. KANE: It makes no sense at
6 all --
7 MR. WOOD: Make your record.
8 MR. KANE: It makes no sense to
9 me at all that you were going to object when
10 we ask the question that could have been
11 ask -- is this not what your objection is?
12 Please. Tell me.
13 I think you have raised three
14 objections. We already went over the first
15 one, nothing that was covered before. But
16 the other two objections that you've raised
17 are nothing that involved information that
18 was available in June of '98 but that we
19 didn't ask a question about.
20 In other words, we are not going
21 to get a second bite of the apple, something
22 that could have been asked in June of 1998.
23 Is that your objection? Is that how you are
24 interpreting that?
25 MR. WOOD: I really, with --
0246
1 MR. KANE: Is it or isn't it?
2 Because if it's not the way you are
3 interpreting it, let me ask the question.

4 MR. WOOD: I told you I accepted
5 on the face of what Chief Beckner asked us
6 to do, and I think he put it in writing and
7 I answered him back and said it, and this
8 whole idea was to deal with new questions
9 based on information developed since June of
10 1998.

11 MR. KANE: Right. And that's --

12 MR. WOOD: Now, that's what you
13 asked us to come here to do. John and
14 Patsy directed me to agree to that. That's
15 what they came in here prepared to do. It
16 seems like what's happened is you would like
17 to do more than that, and now you are upset
18 with me because I won't say okay, let's go
19 beyond what you asked for and they were
20 prepared to do.

21 MR. KANE: That's all I am saying
22 is we have a disagreement. We have a
23 disagreement.

24 MR. WOOD: Why are you stopping
25 it is what makes no sense. Maybe I will
0247

1 object to 10 questions out of the next 100.
2 You will get 90 answers, Michael. Don't you
3 want those 90?

4 MR. KANE: Lin, that's not what
5 you're --

6 MR. WOOD: You came out here, we
7 are ready to do it. Don't you want the
8 information?

9 MR. KANE: Absolutely. So why
10 are you raising objections?

11 MR. WOOD: Why are you abandoning
12 the ability to --

13 MR. KANE: All I'm saying is that
14 I don't even know why we are having this
15 discussion.

16 MR. WOOD: Because you stormed --
17 you threatened to storm out of the room and
18 leave. You were packing your bag.

19 MR. KANE: We are having this
20 discussion because you said just a minute ago
21 that it's your understanding that we only had

22 one more area to cover, and I am telling
23 you, and I'm telling you --
24 MR. WOOD: I misunderstood what
25 Chief -- I think Chief Beckner will come
0248

1 slightly to my defense in what I thought he
2 told me was not unreasonable.

3 CHIEF BECKNER: No, it is not.

4 MR. WOOD: It is not.

5 MR. KANE: Okay. That's fine.

6 That's fine. But all I am saying to you is
7 that that is not the case with me. Is that
8 I have a lot of other questions, but if you
9 are not going to, if you are going -- let
10 me finish.

11 If you are going to interpret
12 that, because it's not clear, if you are
13 going to interpret that to mean that no
14 question that could have been asked but
15 wasn't, then I have no further questions in
16 that area, particularly when the third
17 objection that you have raised is that we
18 now have to explain what the relevance of a
19 question is to further the investigation,
20 which was the last objection that you raised.
21 So given that, given that, those
22 conditions, no, there is nothing further that
23 we have of her.
24 Okay? I mean, now we've made our
25 record.

0249

1 MR. WOOD: Well, I didn't come
2 here to make a record.

3 MR. KANE: That's exactly what
4 you said, that you want to make a record.

5 MR. WOOD: Well, I didn't come
6 here to make a record.

7 MR. KANE: Neither did I. I
8 came here to ask questions.

9 MR. WOOD: I may be forced to
10 make a record, which apparently I have been
11 forced to do so, but I didn't come here to
12 do it. I came here to present John and
13 Patsy Ramsey to you and the other six

14 interrogators to ask your questions and get
15 answers to move this investigation forward.
16 Okay?

17 Now, I thought it was very clear
18 what the request was. We spent some time
19 clarifying it. It's documented. It seems
20 to me that there shouldn't be any fighting
21 over it. Maybe it's not what you thought
22 coming in, Michael. Maybe you wanted more,
23 but that's not what I was asked to give, and
24 that's not what my clients came prepared to
25 give. And what your request was, Chief, I
0250

1 thought and my clients thought, even though I
2 had my lawyer concerns, that they thought it
3 was reasonable and they would come here to
4 help.

5 I didn't make an objection about
6 Burke's security. I asked a question. And
7 I think it's a fair question. You could
8 have said, Mr. Wood, I am not going to
9 answer your question, and you could have
10 forged on --

11 MR. KANE: Which I did, and you
12 still didn't let her answer it.

13 MR. WOOD: I really think, I
14 really -- I don't think you're going to
15 find --

16 MR. LEVIN: Just hang on a
17 minute.

18 MR. WOOD: -- where I instructed
19 Patsy not to answer that question. I think
20 what happened is you took off after me
21 because you didn't like me asking you the
22 question.

23 MR. KANE: Whatever.

24 MR. WOOD: I just, I hear
25 everything you are saying, Michael, and with
0251

1 all due respect, it makes no sense to me,
2 when we're here and Patsy is here, you
3 brought six people out from Colorado -- well,
4 six from Colorado, one from Pennsylvania, and
5 you say you got other subject matters.

6 Let's ask her the questions.
7 If you -- look, so what if
8 something comes up that as a lawyer I feel I
9 have to give her instruction to protect my
10 client's interests or to do what I think is
11 fair in terms of the parameters of the
12 agreement. You can't deny me that right.
13 It doesn't mean that you're still not going
14 to get information about things to do with
15 this investigation that I think you would
16 want to have.

17 But you are saying, Mr. Wood,
18 unless you agree to let her answer every
19 question, even if you think it's unfair or
20 outside the scope of the agreement, we are
21 not going to ask her any questions. That,
22 Michael, makes no sense to me, and I don't
23 think it makes sense to any reasonable
24 person.

25 MR. KANE: Do you remember the
0252

1 letter I sent to you?

2 MR. WOOD: I do. Painfully
3 remember.

4 MR. KANE: And where I said, you
5 will remember, we object, Chief Beckner and I
6 object to your placing a condition that as
7 long as the questions are fair and objective,
8 and I said that definition can be used to
9 exclude anything.

10 MR. WOOD: You haven't been
11 excluded on hardly anything here today.

12 MR. KANE: And you wrote -- and
13 then you called me, and then you wrote the
14 next day. You called me and said you're
15 misinterpreting what I am saying.

16 MR. WOOD: You were. You are
17 misinterpreting what is happening here today.

18 MR. KANE: You assured us, you
19 assured us that was not designed and it was
20 not going to be used to exclude questions.

21 Look, you made your record. I made my
22 record. There really is no record here.

23 This isn't a deposition.

24 MR. WOOD: I'm not, but I'm

25 not --

0253

1 MR. KANE: We don't have a judge
2 that we can go to with a motion to compel.

3 Okay? We are used to civil cases, I think,
4 you and I. We are not in front of a --

5 this is simply questioning of individuals,
6 and there is no reason to --

7 MR. WOOD: I still haven't heard
8 a reason why you don't want to ask Patsy
9 other questions.

10 MR. KANE: I stated my position,
11 you stated your position, so I have no
12 further questions based on what I stated.

13 MR. WOOD: I am not sure what
14 you stated.

15 MR. KANE: It doesn't matter.

16 MR. WOOD: It does matter. It
17 does matter. It does matter.

18 MR. KANE: Oh, Jesus, Lin. Let's
19 go, guys.

20 MR. WOOD: I sat here for a day,
21 Michael --

22 MR. KANE: Let's go.

23 CHIEF BECKNER: Take five.

24 MR. KANE: We're going to take
25 five.

0254

1 CHIEF BECKNER: Let's take five.

2 MR. KANE: We are going to take
3 five.

4 MR. WOOD: Stay on the record.
5 I will say what I was going to say and we
6 will come back and get going one way or the
7 other.

8 MR. KANE: Could we have a
9 conference here?

10 MR. WOOD: I mean --

11 MR. KANE: You just said you --
12 come on, Lin, five minutes ago you said I
13 will extend the courtesy to you.

14 MR. WOOD: I think you came here
15 to leave. I don't think you came here to

16 question.

17 MR. KANE: I came here to ask
18 questions, and I thought they had been
19 answered --

20 MR. WOOD: You have got them, you
21 got them all, you got them, you got them,
22 and now I am offering you more and you don't
23 want them.

24 MR. KANE: Lin, I'm not going to
25 debate the point. I'm not going to debate
0255

1 the point. You have your interpretation.

2 You have your spin.

3 MR. WOOD: I don't have spin.

4 MR. KANE: That is what it is.

5 MR. WOOD: Listen to me, I don't
6 have spin.

7 MR. KANE: Don't point.

8 MR. WOOD: I told you a minute
9 ago, I do point occasionally. I don't have
10 spin.

11 MR. KANE: Okay. It doesn't
12 matter.

13 MR. WOOD: You people put a spin
14 in this thing for three and a half years
15 before I ever get involved with this thing.

16 MR. KANE: I have never ever,
17 ever -- the only time I have gone on the
18 public record in this case, Lin, was to
19 clear your client, Burke Ramsey, and to tell
20 the world that it was outrageous what they
21 did to Burke Ramsey, and you settled for
22 probably millions a week later. So don't
23 ever say that we spun anything. You're on
24 every nightly television show for the past
25 two weeks telling the public --

0256

1 MR. WOOD: That is a total
2 exaggeration of the truth. I was on one
3 series of days.

4 MR. KANE: -- telling the public
5 that you're here to say -- you are here,
6 that your clients, against your advice, are
7 going to answer any question, and we are

8 finding out that is not the case.

9 MR. LEVIN: Mr. Kane, let me

10 interrupt for a second. Mr. Wood, let's --

11 MR. WOOD: By the way, I didn't

12 settle the case in December when your

13 interview was published. It settled several

14 months after.

15 MR. KANE: Right. After I made

16 the statement. Yeah.

17 MR. WOOD: And I appreciated your

18 candor with respect to that interview, and I

19 so stated to you.

20 MR. KANE: But it's the only time

21 I've ever said anything publicly.

22 MR. WOOD: I painted too broad of

23 a brush when I said you all. You all

24 probably meant the Boulder Police Department,

25 at times the Boulder district attorney,

0257

1 former members of the police department.

2 MR. KANE: Nobody present here.

3 MR. WOOD: It's hard for me

4 to -- well, I am not going to agree with

5 that. It's hard for me to sit here and be

6 accused of spin when all I do is turn on

7 Good Morning America and get spin --

8 MR. LEVIN: Mr. Wood, I've

9 been --

10 MR. WOOD: -- from the other

11 side.

12 MR. LEVIN: I am sorry, I did

13 not mean to interrupt you. Are you

14 finished?

15 MR. WOOD: Yes, for the moment.

16 MR. LEVIN: This is the bottom

17 line. The bottom line is, for whatever

18 reason, we have made a decision that we no

19 longer wish to ask questions of your client,

20 Mrs. Ramsey. We are asking you if we may

21 begin to ask questions of John Ramsey,

22 regardless of whatever is going on in your

23 mind -- and no one is accusing you of any

24 misconduct or ill purpose in any way, shape,

25 or form -- all we are saying is we would

0258

1 like to begin questioning John. And we can
2 do --

3 MR. WOOD: And I would like you
4 to finish with Patsy.

5 MR. LEVIN: I understand that.

6 We are finished with Patsy for whatever
7 reason, and we stated what we believe is our
8 reasons. We will not state any more. We
9 would like to start questioning John --

10 MR. WOOD: It is 4:15.

11 MR. LEVIN: -- if we can do
12 that, we will do that.

13 MR. WOOD: It is 4:15. I am
14 tired. I spent more time talking today than
15 I thought I would have to. Why don't we
16 come back at 9:00 and get John in the
17 morning if that works. I mean, that seems
18 to me reasonable.

19 MR. KANE: It is a quarter to,
20 we've taken a break every hour. We have
21 taken an hour and a half.

22 MR. WOOD: I am going to talk to
23 John and Patsy and make a decision whether
24 or not, when you come in here and you create
25 what I think is an artificial record to

0259

1 somehow justify --

2 MR. KANE: Okay. Go ahead. Go
3 ahead, Lin.

4 MR. LEVIN: Would you give us a
5 couple of minutes to collectively discuss
6 your timing proposal, please, sir?

7 MR. WOOD: Okay. Let me have a
8 couple of minutes while you are doing that
9 to make sure because I have spoken without
10 talking to John and Patsy.

11 MR. LEVIN: We understand.

12 MR. WOOD: Let me finish this by
13 saying something to you, Michael. I don't
14 know your background, but we are all trying
15 to do our jobs, and I am not going to laugh
16 at you. If you want to laugh when I say
17 something, that is your prerogative. I just

18 don't think that's productive because I
19 think, of all the people, of all the
20 people --
21 MR. KANE: You are doing your
22 job.
23 MR. WOOD: -- who get involved,
24 well I -- doing my job is not to laugh at
25 another professional.
0260

1 But I think that, of all of the
2 people who have been involved with this, that
3 I have tried more, whether you think I have
4 done everything that you wanted me to do, I
5 think I have been on the phone and I have
6 made a greater effort to try to get your
7 side and my side together than anybody else.
8 That doesn't fault anyone else
9 involved. They made very good decisions in
10 my judgment for their reasons. I don't
11 criticize any other lawyer in this case. I
12 only speak for myself. And I think that I
13 have tried to be extremely reasonable. And
14 I didn't physically block the door for John
15 and Patsy to come in here. I didn't feel
16 good about it. You know that one of the
17 reasons that I didn't feel good about it was
18 because you were going to be involved.
19 I went to the Chief after your
20 letters and our discussions and I said I
21 have some real concerns about Michael Kane's
22 objectivity, and I think it might be better
23 if he were not involved, and I was told that
24 your involvement would be a deal breaker.
25 Either you got to be involved or nobody
0261

1 wanted to talk to John and Patsy.
2 And I've got to tell you, with
3 all due respect again -- I hate to use that
4 phrase because usually you figure something
5 bad is coming, and it usually does -- I
6 think you came here on a self-fulfilling
7 prophecy. I think you came in here ready to
8 jump on me the minute I opened my mouth.
9 If I made a request, it was going to be

10 called a condition. If I asked a question,
11 it would be deemed an objection. You kept
12 trying to get me to say that I was
13 instructing Patsy not to answer, and I don't
14 think that is what I have done.
15 I'll tell you this, if I did it,
16 boy, I am going to be unhappy with myself
17 because I sure didn't mean to do it. I
18 wanted to facilitate your getting these
19 questions answered. I still would like to
20 do that. You haven't gotten on the plane to
21 go back yet. I think it is still serves a
22 purpose to try to sit here and answer some
23 questions.

24 So you all talk about timing, let
25 me talk to John and Patsy, and let's see if
0262

1 there is any place to go. I hope there is.
2 I hope we can still go forward and be
3 productive. Okay?

4 (WHEREUPON, a brief recess was
5 taken.)

6 MR. WOOD: Everybody ready? I
7 don't know what you all decided, but I have
8 spoken with John and Patsy. It was your
9 condition, Chief and Mr. Kane, that Patsy
10 Ramsey be finished first before John Ramsey
11 was interviewed. It is my understanding that
12 you've got a number of areas to inquire of
13 Patsy Ramsey. She is here, and we are
14 prepared to go forward and complete her,
15 understanding that the fiber issue is one
16 that we would, although you say you have
17 made your decision, I would urge to you
18 reflect upon it, perhaps reconsider it.
19 But we are here for any and all
20 other areas, but in all fairness to my
21 clients, after you imposed this condition, I
22 think it is proper that you finish with
23 Patsy Ramsey before you do John Ramsey. And
24 if you are unwilling to do that, then
25 unfortunately your decision will end this
0263

1 day. So I will ask John to step out. I

2 will let Patsy finish. It's your call.

3 CHIEF BECKNER: If you have no
4 other questions, then you have no other
5 questions.

6 MR. WOOD: If you are willing to
7 stipulate that you had no further questions
8 beyond the security and the fibers that we've
9 already talked about ad nauseam, pardon my
10 language, I think that is probably accurate,
11 then John can go forward, but if you are
12 telling me you have other questions, but for
13 the reasons you've stated you are not going
14 to ask them today, then we are done because
15 I am going to insist that you live up to
16 your demand that Patsy go first and be
17 finished. I am not going to change my
18 position about my right to defend my clients
19 in what I think is a very clear
20 understanding of what we agreed to do at
21 your request.

22 MR. KANE: Given what I --

23 MR. WOOD: It is your call.

24 MR. KANE: -- said about the
25 parameters that you placed on it, I don't
0264

1 have any further questions.

2 MR. LEVIN: And I am in the same
3 position.

4 MR. WOOD: But you acknowledge,
5 absent my parameters, you have other areas
6 for Patsy.

7 MR. KANE: Yes.

8 MR. WOOD: Well, she's here.

9 We'll sit here for you to ask questions.

10 MR. KANE: Okay. Well, then let
11 me ask you this, are you going to raise
12 those objections?

13 MR. WOOD: I am going to continue
14 to make sure that we play by the rules you
15 all established, yes, sir.

16 MR. KANE: I mean, we are back
17 into the debate.

18 CHIEF BECKNER: Now that is not
19 fair if you say, based on those parameters

20 they don't have any further questions. I
21 don't know how it can be fair then to say,
22 well, go ahead and ask those questions
23 because you have parameters of what you are
24 going to let her answer.

25 MR. WOOD: I have not. That is
0265

1 not true. The only thing that I have told
2 you that we will not answer today are the
3 issues of the fiber based on what I think
4 are potentially mischaracterizations of
5 laboratory results that I would like to have
6 verified just by the result itself so that
7 we could then know exactly what facts we are
8 testifying to as opposed to speculation on
9 issues that may be hypothetical and not based
10 in fact. And that's it. You won't find
11 where I've instructed her not to answer
12 another question.

13 So she is here. We are prepared
14 to go forward. You all insisted that there
15 was some mystical, magical reason that she
16 had to be finished before John could done,
17 and if you didn't finish her you didn't want
18 John. You either are going to do what you
19 said you're going to do, gentlemen, or we
20 are done.

21 CHIEF BECKNER: I don't know
22 where we ever said that.

23 MR. WOOD: Let me just say
24 this --

25 MR. WOOD: You said it was a
0266

1 deal breaker, Patsy would go first or you
2 wouldn't take John --

3 MR. KANE: This is a just a
4 tennis game.

5 MR. WOOD: We assumed you
6 wanted --

7 CHIEF BECKNER: You assumed, but
8 you are stating as though there were some
9 statement somebody said that --

10 MR. WOOD: Were you telling me
11 you just wanted to start with her but not

12 finish before you started John?

13 CHIEF BECKNER: I didn't say

14 that.

15 MR. WOOD: Don't you think it is

16 a reasonable assumption, when you insist on

17 her going first, that I would have assumed

18 you were going to finish her before you did

19 John?

20 CHIEF BECKNER: Not necessarily.

21 MR. WOOD: Well, you changed --

22 CHIEF BECKNER: -- ask her some

23 additional questions.

24 MR. WOOD: You can have John and

25 Patsy back in an ongoing dialogue if we

0267

1 weren't involved in this kind of stuff. But

2 this stuff is not going to be productive.

3 It is unfortunate, but as they say, it --

4 look, I do not believe that I ever agreed or

5 you requested that Patsy start, not finish,

6 John come back, Patsy come back. I don't

7 think it ever was going to be a ping pong

8 match with these people coming back and

9 forth.

10 I thought it was clear you wanted

11 her first or you wouldn't talk to either

12 one. I think it was a reasonable assumption

13 on my part that meant you would finish her

14 back to back as you called it, and then we

15 would move on with John.

16 Now you're telling me that's not

17 necessarily the case, then I really am

18 concerned about whether we can agree on

19 anything in terms of what you mean when you

20 talk plain and simple English. That is not

21 meant to be defensive.

22 CHIEF BECKNER: You said it was a

23 condition. That was never a condition.

24 MR. WOOD: It wasn't. It was an

25 assumption on my part, when you said you

0268

1 wanted Patsy first, that we would finish her

2 and go back to back with John. I don't

3 think it was an unreasonable assumption on my

4 part.

5 But the point is, she is here,
6 you have got, as you say, Mr. Kane, a murder
7 you want to try to solve. You've all
8 represented that you need to ask her
9 questions. She may not be able to answer
10 all of them because I may feel like that
11 there are areas where I am not comfortable,
12 for legitimate reasons in my mind, we may
13 not reach agreement on the legitimacy of
14 those. I am comfortable with what I have
15 done so far. If you don't want the other
16 part, then just say so.

17 MR. KANE: I am not going to say
18 a word, Mr. Wood, because every time I say a
19 word, I hear a ten-minute speech.

20 MR. WOOD: Well, then I think
21 your characterization shows your lack of
22 objectivity. Do you want to ask questions
23 or not? Let's go. If you want to ask
24 them, ask the next question.

25 MR. KANE: Is Mr. Ramsey going to
0269

1 step out?

2 MR. WOOD: All right.

3 (Mr. Ramsey leaves the room.)

4 MR. WOOD: Ready to go?

5 MR. KANE: I am ready.

6 Q. (By Mr. Kane) Mrs. Ramsey, the
7 last question I asked you was, you had this
8 concern about Burke and this killer and the
9 potential that he could be harmed, and in
10 spite of concerns by your security people,
11 you had him transported to and from the
12 school by Susan Stein. Did Ms. Stein have
13 any kind of training in self-defense, to your
14 knowledge?

15 A. I don't know.

16 Q. Does she have any kind of
17 training in taking evasive maneuvers if
18 someone were to try to get into her car at
19 a stop sign or anything like that?

20 A. I don't know if she had any
21 formal training in that.

22 Q. Was there a discussion, when you
23 talked about security issues with either
24 Tracy Temple or with Ellis Armistead, were
25 you privy to discussions about the potential
0270

1 for harm to come to Burke while being
2 transported to or from school?

3 A. No.

4 Q. And in your recollection, that
5 never came up as an issue? Is that what
6 you are saying?

7 A. No.

8 Q. No, it didn't come up or --

9 A. I was unaware if it ever came up.

10 Q. Okay. When I asked you about
11 what it was that you had in mind in setting
12 up a security system, I take it that you
13 thought somebody could come into the school
14 and do harm to Burke inside the school; is
15 that correct?

16 A. Correct.

17 Q. Okay. The --

18 A. That's inconclusive of media as
19 well.

20 Q. Oh, okay. But was it more media
21 than the killer?

22 A. Well, it was all of those. You
23 know, the media would alert -- their presence
24 there would alert everyone that Burke was at
25 the school, so I wasn't crazy about them
0271

1 hanging around the school. Of course, the
2 killer was still out there; although, we had
3 been advised that he probably would not, you
4 know, come out because now everybody is
5 alerted and looking for him.

6 You know, and then there is what
7 they call copy cat people, you know, who
8 want to get a piece of the publicity, and
9 they would be lurking around.

10 Q. And who was it who gave you this
11 advice that the killer would probably not
12 want to come back?

13 A. John Douglas.

14 Q. Okay. And did Mr. Douglas tell
15 you that -- or what did he tell you?

16 A. Well, he said we had to be aware
17 of three situations. One, obviously the
18 killer was at large; two, what you call a
19 copy cat killer, somebody that says, oh, that
20 looks like an interesting idea, I think I
21 will try to do the same thing; and, three,
22 what he termed vigilante perpetrators or
23 whatever term you want to use for them. You
24 know, somebody that says, oh, you know, the
25 police aren't taking care of this, I will
0272

1 take care of it.

2 In other words, just alerting us
3 that there are a lot of crazy people out
4 there.

5 Q. And the first, so the first
6 concern he said was that it was probably
7 unlikely that the killer would come back, the
8 person that perpetrated the crime; is that
9 what he said?

10 A. He said it was very unlikely.

11 Q. Okay. But how about the copy cat
12 killer, what kind of opinion did he offer
13 about the potential for that?

14 A. He said it was very great.

15 Q. And this would be somebody who
16 would try to pattern what had already
17 happened to JonBenet, to do the same thing
18 to Burke?

19 A. Uh-huh (affirmative). Right.

20 MR. LEVIN: Can I interrupt you
21 just a second, Mike? I am sorry.

22 MR. KANE: Yes.

23 Q. (By Mr. Levin) Mrs. Ramsey, as I
24 understand it, at this point in time, which
25 would be early 1997, your belief was that
0273

1 the murder of your daughter was an act of
2 retaliation for some unknown reason towards
3 either you or your husband?

4 A. Right.

5 Q. You no longer hold that belief;

6 correct?

7 A. Not necessarily.

8 Q. I was under the impression that,
9 in your book, you stated you thought it was
10 a pedophile.

11 A. Well, it could be one in the
12 same.

13 Q. I see.

14 MR. LEVIN: Thank you, ma'am.

15 Q. (By Mr. Kane) In the third, the
16 vigilante, what was Mr. Douglas' opinion
17 about the probability or possibility about
18 somebody feeling that the authorities weren't
19 getting to the bottom of this so that they
20 would do harm?

21 A. Uh-huh (indicating affirmatively).

22 Q. What was his opinion about how
23 strong of a threat that was?

24 A. He just thought it was very
25 strong because, in his years of experience,
0274

1 there are lots of those kinds of strange
2 people out there.

3 Q. Did he talk to you about where
4 your copy cat killer or vigilante might
5 strike and where you should be careful?

6 A. No.

7 Q. But you thought that school was
8 certainly one of the places that a person
9 could come in?

10 A. Well, since that's where Burke
11 spent the greatest part of his day.

12 Q. Okay.

13 A. You know, I'm the mother of a
14 murdered child. I was fearful, just fearful
15 of everything. Most particularly about my
16 child, my husband, and myself.

17 Q. Okay. And, I mean, did you have
18 discussions either with Mr. Douglas or with
19 Ellis Armistead or any of the other security
20 people that you had, had you had discussions
21 with them about how somebody might pose a
22 threat to Burke while he was in school?

23 A. Not specifically.

24 Q. Did you have any kind of security
25 on Burke outside of school?

0275

1 A. Well, he was with us all the
2 time. You know, he was pretty much in a
3 protected environment other than the time he
4 was in school.

5 Q. When you say a protected
6 environment, other than the fact that his
7 parents were there, was there any protection
8 afforded to him outside of school? You
9 hired Tracy Temple, obviously, who was a
10 trained martial arts person, I believe.

11 A. Yeah. Well, we had, you know,
12 for many days, we had security people, you
13 know, with us at the homes where we were
14 staying for quite some time.

15 Q. Where, which homes?

16 A. Jay Olowksi's. I know we had
17 somebody there then. And I believe there
18 might have been someone when we were at Mike
19 Bienam's house.

20 Q. Who were these people? Who were
21 the security people?

22 A. Somebody Ellis's group sent.

23 Q. So Ellis Armistead hired somebody
24 to be at Jay Olowksi's house?

25 A. Yes.

0276

1 Q. Did they stay in the house or
2 outside the house?

3 A. Inside.

4 Q. Inside the house?

5 A. Mostly at night.

6 Q. And you moved into Mike Bienam's
7 house at some point?

8 A. Uh-huh (affirmative).

9 Q. Was that after Jay Olowksi?

10 A. No. That was before.

11 Q. Okay. And then how about the
12 Stein's, did you have anybody there?

13 A. I can't remember. I don't think
14 we did as much. We may have for a few
15 days when we first got there.

16 Q. The people, the security people
17 that were hired while you were at Mike
18 Bienam's, let me -- how long did you stay at
19 Bienam's after?

20 A. My memory is real fuzzy with
21 those days, but -- I can't remember that. A
22 few days. Maybe a week or something.

23 Q. And then you went to Jay
24 Olowski's?

25 A. Right.

0277

1 Q. And you were there for a month or
2 so?

3 A. A couple of months, right.

4 Q. And then you went to the Stein's?

5 A. Right.

6 Q. And this person or these people,
7 how many -- was it one person that you had
8 as security at Jay Olowski's or was it a
9 series of people?

10 A. It might be different people.

11 Q. Was this 24 hour a day coverage?

12 A. No. It was mostly at night.

13 Q. And you say they were inside?

14 They were hired to be inside the house?

15 A. Yes.

16 Q. For the whole time that you
17 stayed at Jay Olowski's house?

18 A. I don't remember. I don't know
19 if it was the whole time.

20 Q. Did these people -- this security,
21 you don't remember who it was?

22 A. No.

23 Q. Did they have any -- did you
24 discuss with them transporting Burke to
25 school?

0278

1 A. No.

2 Q. Did you discuss with anybody
3 having a professional security person
4 transport Burke to school?

5 A. I don't know. John may have. I
6 don't know.

7 Q. How about you, though? You were

8 involved in discussions with the school and
9 with the school district and with the
10 principal, I believe, is that correct, about
11 security arrangements while Burke was in
12 school?

13 A. I think so, yes. I mean, part
14 of the concern was I wanted him protected,
15 but at the same time I didn't want him made
16 paranoid, you know. And he didn't want -- I
17 didn't want him -- he didn't like Tracy
18 Temple being there. He said, mom, why is
19 this woman watching me all the time, and he
20 knew the kids knew that she was watching.
21 And so I am trying to walk a
22 fine line to keep me happy and peace of mind
23 about the security of my child, at the same
24 time not making him overly paranoid. So
25 the, you know, the best situation that we
0279

1 could come up with that was satisfactory to
2 both John and me was that he would be, you
3 know, picked up by Susan Stein. She began
4 taking him to school when we were at the
5 Olowski's. She would take him, and I
6 believe at that time nobody really knew where
7 we were. And he would duck down, you know,
8 and she would get him to the school and that
9 kind of thing.

10 Q. So you made a conscious decision
11 then not to have security --

12 A. In the transport.

13 Q. -- because Burke didn't feel
14 comfortable having security; is that what you
15 --

16 A. Right. He was, you know, he
17 was --

18 MR. WOOD: You are talking about
19 the lady Temple?

20 Q. (By Mr. Kane) No. You said
21 that --

22 A. Well, Susan, you know -- see, we
23 were -- the objective was to try to give him
24 as much normalcy as possible, but at the
25 same time putting, you know, security,

0280

1 security measures in place that would, you
2 know, ensure his security.

3 Q. Why was the decision made to have
4 the security inside the classroom versus to
5 and from school?

6 A. Well, because -- and she -- I
7 don't believe Tracy was inside the classroom.
8 I think she was standing in the hall like
9 near close to the front doors so she could
10 kind of be watching doors.

11 Q. Well, inside the school proper.

12 A. Yeah.

13 Q. Why was the decision made, as you
14 said --

15 A. Well, it was much more of an
16 uncontrolled environment. I mean, when you
17 go from a locked garage to locked car to,
18 you know, adult escort into the classroom,
19 you know, that's pretty safe.

20 Q. Is that what was represented to
21 you, was that it was more secure -- it was
22 more unsecure inside the school than it was
23 going to and from school?

24 A. Yes.

25 Q. And who represented that to you?

0281

1 Who told you that? I mean, when you say
2 that, let me ask it this way.
3 When you say that was represented
4 to you, was this represented to you by a
5 security consultant or Tracy Temple or Ellis
6 Armistead?

7 A. I don't remember. You know, I
8 just remember saying that I wanted somebody
9 at the school watching, you know. And at
10 first, you know, we put Tracy Temple there,
11 and then, you know, Burke was bothered by
12 her being there, the children didn't know who
13 she was, and the school said, you know, this
14 is kind of becoming disruptive.

15 And I said, well, you know, if
16 there is nobody there, he's coming out. And
17 then is when Susan and Roxy Walker got

18 together with the principal, I believe, and
19 said, you know, could we set up what they
20 call a Burke watch.

21 And they had a team of volunteer
22 parents, all of whom I knew, who volunteered
23 around the clock to be right at the door,
24 right outside the door of his fourth grade
25 classroom.

0282

1 And if he went to the bathroom or
2 somewhere, somebody would (indicating), you
3 know, without being right on his back, but
4 they were watching.

5 Q. And what were they expected to do
6 if somebody came into the school and tried
7 to harm Burke?

8 A. The first thing was to punch that
9 Lavalier, and call 911 and start screaming.

10 Q. And then what were they expected
11 to do after doing this, while the 911
12 response came in?

13 A. I don't know --

14 MR. WOOD: I don't want to stir
15 this up, but, you know, you guys got all the
16 meat off this chicken you are going to get.
17 Come on, move on to something else. I am
18 sitting here listening. You know, this is
19 just absurd. This doesn't have anything to
20 do with JonBenet's murder.

21 MR. KANE: Are you asking her not
22 to answer the question?

23 MR. WOOD: I am asking you to
24 move on to something productive. You just
25 beat this one to death, man. Let's go.

0283

1 THE WITNESS: I don't know what
2 they were supposed to do. They were
3 supposed to be there as a pair of eyes on
4 him and at a, you know, at an arm's length
5 without disrupting him, necessarily, but
6 keeping him as safe as possible.

7 Q. (By Mr. Kane) Well, Mr. Douglas
8 was brought into the case early, back in
9 January of 1997, and why was he brought into

10 the case?

11 A. I --

12 MR. WOOD: Mr. Kane, you don't
13 really want to ask questions on stuff
14 subsequent to June of 1998, do you?

15 MR. KANE: I made the record. I
16 said if the objection is going to be that I
17 can't, then I have no further questions.
18 And you said go ahead and ask your
19 questions.

20 MR. WOOD: No. I told you that
21 I was not going to change my position. You
22 were either going to do what Chief Beckner
23 asked to be done and we agreed to --
24 CHIEF BECKNER: Before we go on,
25 time out, time out.

0284

1 MR. WOOD: Mr. Kane just wants a
2 free-for-all. We didn't come here prepared
3 to do that. Maybe we would have done it if
4 you asked for it. I don't know. But this
5 is not in good faith what you asked me to
6 do, Chief.

7 CHIEF BECKNER: Hang on here. I
8 believe the questions you are leading up to
9 are based on, while it goes back to an event
10 prior to June of 1998, it is based on
11 information from interviews that you got
12 subsequent to June of 1998; isn't that
13 correct.

14 MR. KANE: Correct.

15 MR. WOOD: Well, you all can work
16 that out amongst themselves, but asking why
17 they hired John Douglas, I mean, you know,
18 that's just not going to get it, so I am
19 going to ask you to move on to something
20 that is new, a new question based on
21 information developed or evidence since June
22 of 1998.

23 I'm going to draw the line now
24 with you, and I am going to draw it very
25 firm. Okay?

0285

1 If you want to make a record with

2 me making that statement, I will be glad to
3 make it each and every time, and maybe you
4 will catch a question I will let her answer
5 and maybe you won't.

6 Q. (By Mr. Kane) Did John Douglas
7 interview you?

8 A. Yes.

9 Q. Did he interview you individually?

10 A. Individually? You mean like
11 without anybody else in the room?

12 Q. Well, when I say individually,
13 without Mr. Ramsey being present.

14 A. I believe so.

15 Q. That's your recollection?

16 A. Yes. I can't remember exactly.

17 I mean, we have been with him, you know,
18 more than once. So --

19 Q. I am talking about back in
20 January of 1997.

21 MR. WOOD: Did you know that
22 Mr. Douglas had been involved in January of
23 1997?

24 MR. KANE: I knew he was, but I
25 was never given access to him until probably
0286

1 January of 1999.

2 MR. WOOD: Is that --

3 MR. KANE: I never got access to
4 him until January of 1999. I asked.

5 CHIEF BECKNER: So that's new
6 information.

7 MR. WOOD: What is new
8 information, that he got access to him in
9 January of 1999?

10 MR. KANE: I got to ask him
11 questions in January of 1999.

12 MR. WOOD: What does that have to
13 do with asking her questions?

14 MR. KANE: Here we go again.

15 Okay. Let's move on. I don't want to sit
16 and debate this all day. I'll move on and
17 note your objection.

18 MR. WOOD: Thank you.

19 Q. (By Mr. Kane) Okay. The

20 JonBenet Ramsey Foundation, is that still in
21 existence?

22 A. Yes.

23 Q. Does it have any money in it?

24 A. A little.

25 Q. What is the most it has had in
0287

1 it since it was started? Do you know?

2 A. I don't know.

3 Q. Do you have any idea?

4 A. Not really. I don't keep the
5 books.

6 Q. Have you ever looked at the books
7 of the Foundation or looked at any kind of a
8 financial statement about it?

9 A. I don't know that I have. I
10 don't think so.

11 Q. Have you ever conducted any kind
12 of efforts to raise money for the Foundation?

13 A. No.

14 Q. Has the Foundation, to your
15 knowledge, ever spent any money on any of
16 the things that the purpose of it, you know,
17 is stated --

18 MR. WOOD: Other than what she
19 told you about back in June of 1998?

20 MR. KANE: I never asked anything
21 in June of 1998.

22 MR. WOOD: Are you representing
23 to me that the Foundation was never discussed
24 in June of 1998?

25 MR. KANE: I don't know if it
0288

1 was or not. I don't think it was.

2 MR. WOOD: Why don't you find
3 that out, and then we will decide whether to
4 answer it.

5 THE WITNESS: I think I --

6 MR. WOOD: Wait. He's going to
7 find out whether he discussed it or not.

8 MR. KANE: Okay. Here's
9 another --

10 MR. WOOD: I personally am
11 getting disgusted that we are talking about

12 the finances of the JonBenet Ramsey
13 Foundation when we are supposed to be talking
14 about information about the death of the
15 child. I just am getting to the point where
16 maybe I had enough.

17 Do you want to ask something to
18 move this investigation forward or do you
19 want --

20 MR. KANE: I feel this is moving
21 it forward.

22 MR. WOOD: I am sure you do,
23 sir.

24 MR. KANE: You know what, we are
25 the only law enforcement agency that has the
0289

1 authority to --

2 MR. WOOD: You are still a law
3 enforcement agent?

4 MR. KANE: I am under contract
5 with the Boulder D.A.'s office.

6 MR. WOOD: Do you have a copy of
7 that contract?

8 Are you being paid by the hour
9 for your time here or are you doing it pro
10 bono?

11 MR. KANE: No. I'm being paid.

12 I am being paid to be here.

13 Q. (By Mr. Kane) What, to your
14 knowledge, if any, money was spent for any
15 purposes that the Foundation was being set up
16 to advance?

17 MR. WOOD: This is your last
18 question on the Foundation unless you can
19 relate it to who murdered the child. I am
20 going to draw the line.

21 THE WITNESS: There have been
22 gifts donated if that's what you are asking.

23 Q. (By Mr. Kane) No, I'm not asking
24 about donations. I am asking about money
25 going out.

0290

1 A. That is what I am saying. There
2 have been gifts given to non-profits.

3 Q. Do you know what those are?

4 MR. WOOD: Didn't I just say that
5 we need to move on to another subject? I
6 think that --

7 THE WITNESS: I do know some of
8 them.

9 MR. WOOD: Can you go on to
10 something that will help us figure out who
11 killed the child?

12 MR. KANE: Lin, how do you, let
13 me ask you then, will you please define --

14 MR. WOOD: I mean, I'm so
15 disgusted at what you are doing, I am not
16 going to define anything for you, Mr. Kane.

17 MR. KANE: Well, then I have no
18 idea of whether any questions --

19 MR. WOOD: I don't think you have
20 any idea what is a relevant question in a
21 murder investigation.

22 MR. KANE: Now you're --

23 MR. WOOD: I just think I'm
24 just tired.

25 MR. KANE: I think you are right.
0291

1 MR. WOOD: It's been a long day
2 and I've had to listen to a lot of back and
3 forth. It's five minutes to 5:00. Maybe
4 I'm just wearing down. But, you know, why
5 don't we just close it up --

6 CHIEF BECKNER: Just keep going.

7 MR. WOOD: Why don't we close it
8 down for the day. 5:00 was my kind of cut
9 off time anyway. I don't know about you
10 all, but I am pretty tired.

11 MR. KANE: I can go on all
12 night.

13 MR. WOOD: Mr. Kane, that
14 doesn't -- I don't want to -- you may be
15 Superman, but I'm not.

16 MR. KANE: So are you saying you
17 want to stop it? Obviously --

18 MR. WOOD: No, I mean, I'm
19 just --

20 MR. KANE: Well, then tell me, do
21 you want to stop it or keep going?

22 MR. WOOD: My goal coming in was
23 to go to 5:00, and it's five minutes to
24 5:00.

25 MR. KANE: Okay. Five more
0292

1 minutes.

2 Q. (By Mr. Kane) All right. Since
3 I can't ask my questions about the
4 Foundation, I'll move on to something else.
5 When you said in your book and
6 you said recently in interviews that the
7 reason, I don't know the specific page, but
8 let me ask you.

9 MR. WOOD: Let's try to find one.

10 Q. (By Mr. Kane) The reason that
11 you went on CNN in January of 1997 was
12 because Fleet White insisted --

13 MR. WOOD: Let's find that now.

14 MR. KANE: I mean, is it --

15 MR. WOOD: No, no, Patsy, please
16 wait. You've got something in the book or
17 some interview, please let us see it, put it
18 in context.

19 Q. (By Mr. Kane) Let me ask you
20 this way, did you say that in your book?

21 MR. WOOD: No. You already
22 represented it's in the book and you're
23 coming from there. So let's just find it in
24 the book and let her look at it in context.

25 MR. KANE: Okay. I will find
0293

1 it. I will find it.

2 MS. HARMER: It is around 45, 44.

3 Around 45, 44.

4 MR. KANE: Thank you.

5 Q. (By Mr. Kane) All right. Mr.
6 Ramsey's statement on page 43.

7 MR. WOOD: Hold on. We found
8 it. Let me just take a look at it.

9 Okay. We are with you.

10 Q. (By Mr. Kane) This was obviously
11 Mr. Ramsey stating this in the book, the
12 last paragraph on page 43, but was that your
13 understanding too? Is that why you went to

14 see him, partially because Fleet had
15 insisted?

16 A. That was a large part of it.

17 Q. Okay. Now, that was January the
18 1st of 1997; is that correct? It was the
19 day after the funeral.

20 A. Was it? Okay. I don't remember
21 what day it was.

22 Q. All right. And this, you
23 described, in that same chapter, that same
24 page, about confrontations you had with
25 Fleet.

0294

1 MR. WOOD: What page are you
2 talking about now?

3 MR. KANE: This whole, that's the
4 whole chapter.

5 MR. WOOD: The chapter Facing the
6 Cameras?

7 MR. KANE: Yes. I mean, the two
8 paragraphs before that, after Fleet arrived
9 in Atlanta, he kept arguing that we didn't
10 need lawyers to defend us. The solution was
11 to go on national television and tell our
12 story.

13 MR. WOOD: Okay.

14 MR. KANE: There is a point in
15 here, and if you are going to make me tell
16 you the exact spot, I will find it for
17 you where you say.

18 MR. WOOD: We want to be fair.

19 MR. KANE: -- Fleet got into --
20 or you got a phone call from Mr. Ramsey's
21 brother Jeff.

22 MR. WOOD: What page are you on?

23 MR. KANE: I don't have the page.

24 MR. WOOD: Well, you have to --

25 MR. KANE: All right. All right.

0295

1 I am not going to ask the question.

2 MR. WOOD: I don't mind her
3 answering if you just help us.

4 THE WITNESS: Well, I mean, I
5 remember --

6 Q. (By Mr. Kane) You remember the
7 whole thing? Okay, outside of the book --

8 MR. WOOD: I want to put it
9 in --

10 MR. KANE: All right. I'll close
11 the book. I won't --

12 MR. WOOD: I do want to see what
13 you're talking about in the book.

14 THE WITNESS: There is someplace
15 where John talks about with you know
16 Fleet --

17 MR. WOOD: Jane, do you know?

18 MS. HARMER: I believe she made a
19 statement today in this interview prior about
20 this situation.

21 MR. KANE: There have been a
22 bunch of statements. I am not going to
23 quote the book.

24 MR. WOOD: But you started the
25 book and you leave it dangling about the
0296

1 book, and I want you to help me find in the
2 book what you're talking about.

3 MR. KANE: It is my question
4 though. It is my question.

5 MR. WOOD: And it's not my
6 witness.

7 MR. KANE: I am withdrawing that
8 part of the --

9 Q. (By Mr. Kane) Isn't it not true,
10 Mrs. Ramsey, that Fleet White, according to
11 John's brother, that Fleet and he got into
12 some kind of argument and you got a phone
13 call at your mother's house that Fleet was
14 on his way over?

15 MR. WOOD: Hold on. The reason
16 I am asking for the book here is you all
17 asked about that, haven't you? And I
18 thought we were going to have some new
19 information in the book that would go back
20 over that.

21 MR. KANE: It is repeated in the
22 book.

23 MR. WOOD: Then what is the new

24 information? I mean, what's the point of
25 having her restate it?

0297

1 MR. KANE: Are you saying we are
2 quitting at 5:00?

3 MR. WOOD: I know I am pretty
4 tired. I know you are not. Guys, what
5 time is it, what's Colorado time right now?

6 CHIEF BECKNER: 3:00.

7 MR. WOOD: Well, no wonder I am
8 the only one tired. I am in Georgia time.

9 MR. KANE: I live in the east.

10 MR. WOOD: You already told me
11 you can go all night. I already told you I
12 can't keep up with that.

13 CHIEF BECKNER: How much more do
14 we have?

15 MR. KANE: Lots and lots of
16 stuff.

17 MR. WOOD: Well, we might as well
18 come back.

19 CHIEF BECKNER: Do you have an
20 accurate --

21 MR. WOOD: Let's kick it off
22 tomorrow at 9:00.

23 MR. LEVIN: Your clients will
24 both be available tomorrow?

25 MR. WOOD: That was our
0298

1 agreement. We will live up to our
2 agreement.

3 MR. KANE: Okay.

4 (Whereupon, the videotaped
5 interview of PATSY RAMSEY was continued to
6 August 29, 2000.)

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1 STATE OF GEORGIA:

2 COUNTY OF FULTON:

3 I hereby certify that the foregoing
4 transcript was reported, as stated in the
5 caption, and the questions and answers
6 thereto were reduced to typewriting under my
7 direction; that the foregoing pages represent
8 a true, complete, and correct transcript of
9 the evidence given upon said hearing, and I
10 further certify that I am not of kin or
11 counsel to the parties in the case; am not
12 in the employ of counsel for any of said
13 parties; nor am I in anywise interested in
14 the result of said case.

15 .

16 .

17

18 ALEXANDER J. GALLO, CCR-B-1332

19 My commission expires on the

20 17th day of March, 2001.

21 .

22 .

23 .

24 .

25 .

0300

1 VIDEOTAPED INTERVIEW OF

2

PATSY RAMSEY

3

VOLUME II

4

5 August 29, 2000

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8 2140 The Equitable Building

100 Peachtree Street

9 Atlanta, Georgia

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12 Alexander J. Gallo, CCR-B-1332

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0301

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13 TOM WICKMAN

14 TOM TRUJILLO

15 JANE HARMER

16 .

17 Also present:

18 Ollie Gray
19 John San Agustin
20 .
21 .
22 .
23 .
24 .
25 .
0302

1 VIDEOTAPED INTERVIEW OF PATSY RAMSEY

2 Volume II

3 August 29, 2000

4 CHIEF BECKNER: Okay. Mrs.

5 Ramsey, we only have a few more things we
6 want to ask you to finish up today. One of
7 the things, I just want to give you the
8 opportunity, if there is anything that you
9 want to tell us, information that you have
10 that you didn't tell us yesterday during the
11 questioning, any other theories you may have,
12 anything like that.

13 I just want to kind of ask you
14 an open-ended -- do you have any other
15 information you expect to be able to tell us
16 today that we didn't ask you about?

17 MR. WOOD: I just can't let -- I
18 will submit that to you in writing. That is
19 such an open-ended question for her to sit
20 here and try to be sure she could actually
21 give that all to you, Chief.

22 CHIEF BECKNER: Okay.

23 MR. WOOD: That would be almost
24 like her trying to sit here inventing in her
25 own mind a whole range of questions that you

0303

1 could have asked her but didn't. I will
2 tell you, to the extent we have any
3 information that relates to the question of
4 JonBenet's death from our investigation or
5 otherwise, we will give it to you. I would
6 rather do it that way than for Patsy to try
7 to sit here today and try to give it to you
8 off the top of her head. Okay?

9 CHIEF BECKNER: Okay.

10 MR. WOOD: Is that okay with you,
11 Patsy?

12 THE WITNESS: Well, I believe we
13 have been giving, all along the way, what
14 Ollie has come up with and Ellis and John
15 Foster. I mean, as soon as we get
16 something, we send it over.

17 CHIEF BECKNER: I was trying to
18 ask you what your thoughts were specifically,
19 having that information, had you developed
20 any thoughts? I mean, obviously, you being
21 part of the family, as an example, any of
22 the names that your investigators have
23 provided to you, any of those ring a bell in
24 terms of known to the family, you had
25 interactions with that person, business

0304

1 relations with that person?

2 MR. WOOD: If we get a specific
3 name, if you want us to go pull names now
4 and let her go through them, if you want to
5 all go through them or if you have them.

6 CHIEF BECKNER: I guess I am
7 assuming that, over the last three and a
8 half years, you have been privy to names of
9 people that your investigators have
10 investigated. If that is not the case

11 A. Yes.

12 MR. WOOD: But I am not sure she
13 memorized them. We have them. I can go
14 get them.

15 THE WITNESS: Yes.

16 MR. WOOD: The problem is, for
17 you to, just to be fair, we've got names,
18 and if you want to go through each one of
19 them with her to see if --

20 THE WITNESS: That would be
21 great.

22 MR. WOOD: John can do that too.

23 CHIEF BECKNER: My thought is, if
24 you are looking at 20 names that your
25 investigators have looked at, if a name

0305

1 stands out as we had business dealings with

2 that person, I would think you would remember
3 it.

4 THE WITNESS: Well, there's a lot
5 of them.

6 MR. WOOD: That you remember?

7 THE WITNESS: Well, I can't
8 remember names because some of them I hadn't
9 known before, but a lot of information has
10 come up that has been very interesting. I
11 mean --

12 CHIEF BECKNER: Let me ask you
13 this. Do you recall seeing any of the
14 names, you don't have to tell me the name,
15 that said, ah, we know that person?

16 THE WITNESS: Well, of course
17 they looked at Bill McReynolds. We know
18 that person. They looked at Linda Hoffman
19 Pugh, the housekeeper, and some family
20 members of hers. They looked at Chris Wolf,
21 of course. You know, and then there are
22 some people that have a record, you know,
23 that are kind of not so nice people like
24 this Helgoth and -- I mean, there are lots
25 of other names like that.

0306

1 MR. WOOD: How many names, Ollie,
2 are we talking about? How many names would
3 you state right now?

4 MR. GRAY: That I would recommend
5 them look at or something?

6 MR. WOOD: Yes.

7 MR. GRAY: There are probably
8 six.

9 MR. WOOD: Other than the ones
10 that Patsy just went through?

11 MR. GRAY: Yes.

12 MR. WOOD: I am familiar with
13 names, and I don't remember them, Chief.
14 That is why I say, if you want us to get
15 the names. Have they been provided to the
16 Chief?

17 MR. GRAY: Probably all except
18 the last couple, the Westminster that I told
19 you about and that kind of stuff.

20 MR. LEVIN: I would suggest that,
21 if we are talking six or eight people, that,
22 when we finish with Mrs. Ramsey and get
23 Mr. Ramsey, perhaps you or your investigator
24 could get that list and we could talk about
25 it then.

0307

1 MR. WOOD: Okay.

2 MR. LEVIN: Just for purposes of
3 keeping things going.

4 MR. WOOD: Is that all right?

5 CHIEF BECKNER: That's fine, but
6 nothing sticks out in your mind in terms
7 of --

8 THE WITNESS: Well, the most
9 recent thing that sticks out in my mind is
10 that Ollie obtained the Hi-Tec boots that
11 belonged to Helgoth, and that was very, you
12 know, surprising to me that he came up with
13 those. And I just am real curious as to
14 whether that -- you know, I don't know how
15 much of a footprint you all have, but does
16 it match and what have you done with that.

17 CHIEF BECKNER: That is something
18 we are still looking into.
19 Was Helgoth known, when that name
20 came up, was Helgoth somebody you knew prior
21 to this investigation?

22 THE WITNESS: I don't know. I
23 don't know what his business was or -- I
24 don't know any more about him than that.

25 CHIEF BECKNER: The reason I am
0308

1 asking, one of the theories, obviously, is,
2 if this is an intruder, they had to know the
3 family pretty well, they had to know the
4 house, the layout of the house, they had to
5 know some things about the family based on
6 what was in the note, those kind of things.

7 MR. WOOD: And they could have
8 otherwise learned all of that when they were
9 there like they were in September of '97 for
10 several hours when the family was away?
11 There is a chance that everything in that

12 note in terms of the family could have been
13 gleaned from different things in the house if
14 somebody had been in there, so it is not
15 exclusive the idea that somebody had to know
16 the family, while I understand where you are
17 coming from.

18 THE WITNESS: Oh, no, I'm --

19 MR. WOOD: You've got another
20 incident in Boulder nine months later, in all
21 fairness, where someone did camp out in the
22 house.

23 CHIEF BECKNER: That hasn't been
24 proven.

25 MR. WOOD: That is what the
0309

1 parents say.

2 CHIEF BECKNER: That's what they
3 believe, yes, but that doesn't --

4 MR. WOOD: And they believe it to
5 this day, from what I'm told, concluding that
6 their daughter was a petite, small
7 14-year-old, didn't necessarily look her age.

8 THE WITNESS: And the girl who
9 was molested, this same incident, and
10 JonBenet attended the same dancing school.

11 CHIEF BECKNER: Right. We know
12 that.

13 THE WITNESS: So there could
14 be --

15 MR. WOOD: I think that is
16 probably something that we want -- one of
17 the people that you may or may not have,
18 what we understand, have not talked to, the
19 person who works there.

20 CHIEF BECKNER: At the dance
21 school?

22 MR. WOOD: Right.

23 CHIEF BECKNER: I don't know. I
24 can't answer that.

25 THE WITNESS: I mean, that could
0310

1 be --

2 MR. WOOD: If you can't answer
3 it, it is kind of hard for her to be able

4 to, in all fairness.

5 CHIEF BECKNER: In terms of
6 whether we talked to that particular person
7 you talked about. We talked to over 600
8 people.

9 THE WITNESS: But there could be
10 a situation there that I didn't know that
11 this particular person, but he, you know, saw
12 JonBenet and found out where we lived or
13 whatever.

14 MR. LEVIN: Mrs. Ramsey, I think
15 the question, and let me see if I can make
16 it very simple, that the chief was getting
17 at was Mr. Helgoth's name, was that a name
18 that was prior to the murder of your
19 daughter? I know since then you've become
20 familiar with it, but prior to the murder of
21 your daughter, was that a name you were
22 familiar with?

23 THE WITNESS: No.

24 CHIEF BECKNER: I don't think you
25 talked about Jeff Merit or Jeff Merit's wife
0311

1 yesterday. Am I remembering that correctly?

2 MR. WOOD: I don't know Jeff
3 Merit. I don't think you asked about him or
4 his wife

5 THE WITNESS: No, we didn't speak
6 of him --

7 MR. WOOD: -- or Jeff Merit by
8 name.

9 CHIEF BECKNER: When Bruce was
10 asking you yesterday about people who were
11 mentioned as possible suspects, Jeff Merrick
12 or his wife was mentioned at one time.

13 THE WITNESS: Right.

14 CHIEF BECKNER: Do you not
15 consider either Jeff or his wife no longer
16 possible suspects?

17 THE WITNESS: Well, early on we
18 provided a list, Boulder police or whomever,
19 said who could -- is there anybody that
20 could be angry with you all or you know had
21 a reason or who had access to the -- I mean

22 because we made lengthy lists of those. And
23 I believe John, you know, mentioned Mr.
24 Merrick among that list because he had been
25 let go from Access.

0312

1 And I remember very vividly that
2 the day he was going to be asked to let go,
3 I was afraid. Not unlike the postal
4 incidents that happen. I was just afraid
5 for my father and John and -- because you
6 never know what people are going to do when
7 they are asked to leave a company.
8 And subsequent to that, when he
9 was asked to leave, he made some threats to
10 John and I think maybe even to my father.
11 That -- I mean, I am paraphrasing. I don't
12 know exactly. You can ask John, but
13 something like you are going to be sorry. I
14 am going to bring this company to your
15 knees. Just really, you know, ugly.

16 Q. (By Mr. Levin) Mrs. Ramsey,
17 since June of 19

18 MR. WOOD: Let me ask you, I
19 think what you were asking her is anything,
20 have you learned anything that has caused you
21 to have less concern about potentially
22 Merrick.

23 THE WITNESS: No.

24 MR. WOOD: Right now I can tell
25 you, Chief, until you all can tell us

0313

1 somebody has been cleared, I don't think
2 anybody that has been mentioned has ever, in
3 our mind, been taken off of possibilities.

4 I mean, you all haven't, as I
5 understand, you all haven't officially
6 cleared, I am not even sure beyond Burke,
7 John Andrew and Melinda.

8 I hear rumblings back from the
9 White camp that April of '97 allegedly he
10 was cleared, but as I remember what I
11 learned about it, it looked pretty qualified.

12 THE WITNESS: All right. Because

13 I don't know --

14 MR. WOOD: We are not here to
15 clear anybody. The question for her was
16 about --

17 CHIEF BECKNER: I am asking her
18 what she believes.

19 MR. WOOD: If she's heard anything
20 that's changed her -- any other additional
21 information about Merrick other than what you
22 already had given them earlier.

23 THE WITNESS: No.

24 Q. (By Mr. Kane) Let me follow up
25 on that, Mrs. Ramsey. How were you advised
0314

1 before he was fired that he was going to be
2 fired? How did you know he was going to be
3 fired?

4 A. I don't remember. I think
5 probably John.

6 Q. John told you?

7 A. Probably. I can't think of where
8 else I would have heard it, but I am not
9 sure.

10 Q. Before he was let go, what was it
11 about him, you said you were fearful that
12 day he was going to be let go, what was it
13 about him that made you fearful that day
14 before he was let go?

15 A. I don't know. I don't know if I
16 can -- I am not sure I understand your
17 question.

18 Q. You said before he was let go,
19 you were fearful that he was going to be let
20 go.

21 THE WITNESS: No, I wasn't
22 fearful he was going to be let go. When I
23 understood that he was going to be fired
24 that day, I was frightened for my husband's
25 safety.

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1 Q. (By Mr. Kane) Because he was
2 going to be fired that day?

3 A. Yes.

4 Q. Was there anything about Jeff
5 Merrick you knew, violent propensities or

6 anything of that nature, before he was told
7 that he was no longer employed by Access
8 Graphics?

9 A. No.

10 Q. What was it that made you
11 fearful?

12 A. Well, just because of, like, I
13 gave an example of the postal workers. When
14 an employee is fired, you never know how
15 they are going to react to that.

16 Q. Okay. Were there other people
17 that had been fired by Access Graphics that
18 you had the same fear?

19 A. I didn't know. I guess I didn't
20 know many more people. I knew Jeff Merrick.

21 Q. (By Mr. Levin) Mrs. Ramsey, is
22 there anything since June of 1998, any
23 contact at all you had with Mr. and Mrs.
24 Merrick which has increased or solidified
25 your belief that they are viable suspects in
0316

1 the murder of your daughter?

2 A. I have not had any contact with
3 them.

4 MS. HARMER: Mrs. Ramsey and Mr.
5 Wood, I am going to cite a page in the
6 book, 153.

7 THE WITNESS: Okay.

8 Q. (By Ms. Harmer) You mention a
9 kid by the name of Nathan that was living
10 with the Steins. Was he living with them
11 prior to December of '96?

12 A. Yes, he was.

13 Q. And at any time did he look after
14 Burke or JonBenet?

15 A. He would, on occasion, take them
16 to school in the morning.

17 Q. Do you know anything more about
18 him, his last name?

19 A. Inouwe, Nathan Inouwe.

20 Q. Do you know how to spell that?

21 A. I-n-o-u -- maybe y-e or -e.

22 Q. Is he a white male?

23 A. He is American, but of Japanese

24 descent, I believe.

25 Q. How old is he?

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1 A. He has graduated now and is doing
2 missionary work, I think. Susan would know
3 exactly where he is, but at that time he was
4 a college junior or senior?

5 MR. LEVIN: Mr. Wood, can you
6 facilitate getting the information to us so
7 we can contact him?

8 MR. WOOD: I think we said
9 yesterday, if you all make a hit list for
10 me, so to speak, point by point what you
11 want me to do, and we will do it.

12 MS. HARMER: That is it.

13 MR. WICKMAN: Mrs. Ramsey, does
14 the name David Charles Brantley mean anything
15 to you?

16 THE WITNESS: Brantley?

17 MR. WICKMAN: Yes, B-r-a-n-t-l-e-y.

18 THE WITNESS: I don't think so,
19 no.

20 MR. WICKMAN: Ollie, can you
21 write that name down?

22 MR. GRAY: Just did.

23 MR. WICKMAN: Thanks.

24 Q. (By Mr. Wickman) I wanted to ask
25 you, since your relocation to Atlanta, have
0318

1 you, John, or Burke had any credible threats
2 since your relocation here?

3 A. We have had, I don't know if they
4 have been threats, we have had a lot of
5 weirdos come calling.

6 Q. Physically to the house?

7 A. Yes.

8 MR. WOOD: While you are all here,
9 you all might want to check out one this
10 morning that called me. Somebody called my
11 office, a female. I don't make light of it.
12 It was a pretty serious phone conversation.
13 I am not expecting you all to deal with it,
14 but you might want me to save the tape
15 because she has called here before.

16 MR. LEVIN: Have the Atlanta
17 police followed that up in the past?
18 MR. WOOD: It never has been a
19 threat made to the level that I would call
20 the police, but the last two days it has
21 gotten to the point where I may because I
22 think it may be directed toward me.
23 Q. (By Chief Beckner) Would you be
24 willing to sign releases to allow us to
25 interview Ellis Armistead and David Williams?
0319

1 MR. WOOD: I think we talked
2 about that, and I think that is something I
3 would address.

4 MR. LEVIN: I have proposed
5 written releases for both Patsy and John, and
6 when we leave this afternoon, I will leave
7 them with you and give you an opportunity to
8 look. It refers to the Colorado statute, so
9 you can have some time to look them over.
10 You can call me directly if you want to talk
11 about it.

12 MR. WOOD: Okay. Did you all
13 make a decision about whether you wanted to
14 talk with Ed Gelb, Cleve Baxter? I offered
15 them up for interviews with you, no holds
16 barred, waive the privilege.

17 CHIEF BECKNER: We may at some
18 time.

19 MR. WOOD: They talked to John
20 and Patsy. They interviewed them. So if
21 you will give me those, I will certainly --

22 MR. LEVIN: I will leave them
23 with you.

24 MR. WOOD: My concern, Bruce, and
25 obviously there are no secrets there, your
0320

1 intentions, your being the prosecution's
2 intentions, are not clear to us. Obviously,
3 as an attorney, we have to always be
4 prepared for the worst case scenario. We
5 don't think it is likely or something that
6 should happen. So there is that balancing
7 of trying to get you information from Ellis

8 and David Williams that can help with the
9 investigation but yet still maintain certain
10 information that might be important in any
11 potential defense of the case.

12 MR. LEVIN: I understand.

13 CHIEF BECKNER: Anybody have
14 anything else?

15 MR. LEVIN: I do not.

16 MR. WOOD: Although if you all
17 stay tuned to the civil cases where the
18 discovery rules are fairly liberal, that is a
19 source of tremendous information somewhere
20 down the road both ways.

21 THE WITNESS: Could I ask who is
22 David Brantley?

23 MR. WICKMAN: Not at this time,
24 but I will talk to Mr. Wood.

25 MR. WOOD: Okay. Are you all
0321

1 done with Patsy?

2 MR. LEVIN: We are. Thank you,
3 ma'am.

4 THE WITNESS: Thank you so much.

5 CHIEF BECKNER: Thank you for
6 your time.

7 (Whereupon, the videotaped
8 interview of PATSY RAMSEY was concluded.)

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1 STATE OF GEORGIA:

2 COUNTY OF FULTON:

3 I hereby certify that the foregoing

4 transcript was reported, as stated in the

5 caption, and the questions and answers

6 thereto were reduced to typewriting under my

7 direction; that the foregoing pages represent

8 a true, complete, and correct transcript of

9 the evidence given upon said hearing, and I

10 further certify that I am not of kin or

11 counsel to the parties in the case; am not

12 in the employ of counsel for any of said

13 parties; nor am I in anywise interested in

14 the result of said case.

15 .

16 .

17

18 ALEXANDER J. GALLO, CCR-B-1332

19 My commission expires on the

20 17th day of March, 2001.

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