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TRANSCRIPT

Text of John Ramsey's deposition

December 12, 2001

THE VIDEOGRAPHER: We are on the video record at 9:49.

MR. HOFFMAN: Good morning. This is the deposition of John Ramsey in the case of Robert Christian Wolf versus John Bennett Ramsey and Patricia Paugh Ramsey. I am the lead counsel for the plaintiff Chris Wolf. Would the gentlemen here identify themselves?

MR. WOOD: My name is Lin Wood. I represent the defendants John and Patsy Ramsey.

MR. RAWLS: My name is Jim Rawls. I am co-counsel for the defendants, John and Patsy Ramsey.

MS. RAMSEY: I am Patsy Ramsey.

MR. PAULK: Mahaley Paulk.

MR. SCHROEDER: Eric Schroeder.

MR. ALTMAN: Evan Altman, co-counsel with Darnay Hoffman, representing the plaintiff.

MR. WOOD: The deposition is taken pursuant to the Federal Rules of Civil Procedure. The deposition is taken pursuant to agreement of counsel. The deposition is taken pursuant to stipulation and protective order agreed to by all parties, which protective order specifically states, as we went over yesterday, the right of counsel to make sure that this deposition is not abused and that only areas that are relevant to the claims and defenses in this lawsuit are inquired of today in this deposition. Anything you want to add to that, Mr. Hoffman?

MR. HOFFMAN: No. Sounds like pretty much what we agreed yesterday was the case. And I believe yesterday you also explained what you believe the claims were, in fact, that would be relevant with respect to the deposition. So based on yesterday's statement, we will just continue the deposition.

MR. WOOD: Do you want to swear the witness, please.

JOHN RAMSEY, having been first duly sworn, was examined and testified as follows:

EXAMINATION BY-MR.HOFFMAN:

Q. Your full name, please, sir?

A. John Bennett Ramsey.

Q. Have you ever attended a deposition before?

A. Yes.

Q. Are you familiar with the deposition procedure?

A. I wouldn't say I am familiar with it. I have been at one deposition.

Q. All right. If at any time you don't understand —

MR. WOOD: He will answer questions, and he understands how to proceed with answering your questions. You do not need to counsel or advise him in that regard. Your job is to ask questions. If you would, go ahead and pose a question to the witness, please, sir.

MR. HOFFMAN: This is my deposition, Mr. Wood.

MR. WOOD: It is your deposition, but you are not here to lecture or counsel or advise my witness on what he is or is not to do. Trust me, he will answer your questions, and if he doesn't understand them, he will so indicate. Ask your first question, please.

Q. (By Mr. Hoffman) Mr. Ramsey, who is Chris Wolf?

A. Chris Wolf is your client, and he is a person who came to our attention as someone who should be looked at as a possible suspect in the murder of our daughter.

Q. Do you remember how Mr. Wolf came to your attention as a possible suspect?

A. I believe he contacted my wife's parents — no, I am sorry. His girlfriend contacted my wife's parents and said she firmly believed that he was the killer of my daughter, that he had been out all night and returned home early that morning, and that we needed to look at him.

Q. Do you know what was done with that information when your parents were — or Mrs. Ramsey's parents were given that?

A. I am sure we referred it to our attorneys through — or through our attorneys to our investigators.

Q. All right. Do you know which investigators were responsible for investigating that claim on your behalf?

A. Not for certain. I think probably they were involved, each involved at different stages.

Q. Do you know the names of the investigators that were involved?

A. I do.

Q. Could you give me their names?

A. Well, there was a group called Ellis Armistead & Associates. David Williams. John — and I can't think of his last name. Those were the principal investigators that our attorneys retained.

Q. Without revealing the substance of what you were given with respect to any reports that your investigators may have given you, do you remember if you ever saw any investigative reports concerning Chris Wolf?

A. I don't remember seeing any investigative reports regarding Chris Wolf.

Q. Do you remember whether or not you were shown investigative reports with respect to any of the other potential suspects that you may or may not have been looking at?

A. I don't recall ever seeing a report on any suspect that they might have looked at.

MR. HOFFMAN: All right. For the purpose of my next question, I would like the court reporter to please mark this as Plaintiff's Exhibit 14 for identification. And, actually, I am going to turn to the portion to which I am going to direct Mr. Ramsey to look at this.

(Plaintiff's Exhibit-14 was marked for identification.)

THE WITNESS: You want me to read this part that is highlighted?

Q. (By Mr. Hoffman) Yes. After you had an opportunity to read it to yourself, please read it out loud. A. You want me to read it out loud? I am sorry; I wasn't listening. I was reading.

Q. Yes, Mr. Ramsey.

A. "Katie Couric: You also mentioned Chris Wolf, a total stranger whose girlfriend reported that he had disappeared on Christmas night and was very agitated rather when he watched the news of the murder on TV. "John Ramsey: Uh-huh. "Katie Couric: Why do you mention him? "John Ramsey: Because he had been widely mentioned in the news, and we wanted to clarify the facts that we knew. "John Ramsey: I can tell you when, when we first started looking at it, one particular lead early on, my reaction was, 'This is it. This is the killer.' And our investigators said, 'Whoa, whoa, whoa,' he'd say, 'Don't do a Boulder police on me. Don't rush to conclusions.'"

Q. Do you remember making this statement?

A. I don't remember making the statement, but that was a number of years ago, I guess, so....

MR. HOFFMAN: In fact, just simply for the record, I believe this is the Katie Couric Today Show. It was aired on, I believe, March 24th. And I believe it was in the year 2000.

MR. WOOD: Are you talking about his statement to Katie or the statement to the investigator?

MR. HOFFMAN: The statement to Katie that —

MR. WOOD: Did you understand he was asking you if you remember making a statement to Katie as opposed to the investigator?

THE WITNESS: Yeah.

Q. (By Mr. Hoffman) Okay. Now, do you remember who it was that you were — that you made the statement, This is it, this is the killer? Do you remember who that person was, the investigator that had shown you material on it?

A. Yes.

Q. Can you name that person?

A. I don't recall his first name. Helgoth was his last name, a fellow that committed suicide on Valentine's Day, the day that Alex Hunter told the world that they were going to get the killer.

Q. Right. So you were not referring to Chris Wolf in that statement; is that correct?

A. No. That is correct.

Q. Now, I want to ask you, in the statement, there is a reference to an early lead. What kind of lead was it? Was it — you know, specifically. Since you weren't shown any files.

MR. WOOD: Do you mean how was he imparted, the information imparted to him by Helgoth?

MR. HOFFMAN: Yes. I had asked him earlier if he ever had an opportunity to review any of the investigative files on any of the murder suspects.

MR. WOOD: No, you didn't. You asked him if he had ever reviewed any investigative reports.

MR. HOFFMAN: All right. Reports.

MR. WOOD: And now you are asking him how he obtained the information about Helgoth?

MR. HOFFMAN: Uh-huh, yes. If he hadn't seen any investigative reports.

THE WITNESS: I think — I don't recall specifically whether my attorney told me about him or one of the investigators, but typically I communicated with my attorney.

Q. (By Mr. Hoffman) Were you actually shown evidence or were you just simply given a summary?

A. I have not seen any evidence that the police have.

Q. Any evidence that your investigators have?

A. I have seen a few things relating to your client. I don't know that I have seen anything relating to Helgoth.

Q. All right. Were you involved in directing the activities of these investigators that were working on your behalf?

A. I was not.

Q. Then what was, basically, your association with the private investigation of the potential suspects in the murder of JonBenet Ramsey?

A. The investigators were retained by our attorneys, and they stated to me that the principal purpose of those investigators was to prepare a defense in the case that the police might bring a charge against me. I hoped that they would also follow up on leads that came to us, but I was frequently reminded by our attorneys that their principal role was to prepare a defense should that be necessary.

Q. For a moment, I just want to direct you to the morning of December 26th. And to the degree that you can remember things today, I would like to ask you if you could just briefly summarize what happened when you got up that morning.

A. Well, I got up, was showering, getting prepared for a trip that we would be leaving on early that morning. I heard Patsy scream. I ran downstairs. She told me that JonBenet was missing, that there was a ransom note. She asked me, What should we do? I said, Call the police. Sometime during that frantic period, we checked on Burke. He appeared to be asleep to us. A uniformed officer arrives reasonably quickly, and I focussed all the energy I could focus on getting my daughter back from that point on.

Q. When the police officer arrived, do you remember the name of the police officer?

A. I think it was French was the first one there, Officer French.

Q. Did you have an opportunity to observe what Officer French did at that point when he arrived? Did he speak to you?

A. He spoke to me. I told him my daughter had been kidnapped. He said, Do you think she might have just run away? And I said, For heaven's sake, she is only six years old; no, I don't. He asked

us all to, Patsy and I, to stay in the sunroom, which is a small room off our living room. So I didn't see all that he did beyond that.

Q. You say that he asked you to stay in the sunroom. Did you remain in the sunroom the whole morning?

A. We did not. Other people arrived. The police arrived. They asked to use our cell phones because theirs were dead. They asked us to do a number of things that required us to leave that room.

Q. Did Officer French give you any explanation as to why he wanted you just to remain in the sunroom?

A. No.

Q. Did anybody ask you to go back to the sunroom and remain there?

A. No.

Q. Did any other law enforcement official ask you to remain in any other part of the house?

A. No.

Q. Do you remember, in a general way, where you were in the morning from the time the police arrived and you left the sunroom? Could you just sort of walk me through what was going on?

A. I was in the house. That is probably the best I could tell you.

Q. Did you ever have occasion prior to, say, 1:00 in the afternoon to go down to the basement?

A. Yes.

Q. How many times?

A. Twice.

Q. Prior to 1:00?

A. I don't know what time it was. I wasn't paying attention.

Q. Prior to the time that I believe it was Linda Arndt had asked people to begin looking around the house?

A. Linda Arndt asked me to look around the house, yes.

Q. Did she ask anybody else to do it?

A. I don't remember her specific instruction, no.

Q. Prior to Linda Arndt asking you to look around the house, how many times did you go to the basement? **A.** Once.

Q. Do you remember at what time in the morning you went to the basement?

A. I do not.

Q. Do you remember what you saw in the basement when you went down there?

A. I saw a partially opened window with broken glass and a suitcase beneath the window.

Q. When you would — did you see anything else there?

A. Not that looked out of the ordinary.

Q. May I ask why you went to the basement at that time?

A. I was trying to determine how someone could have gotten into our house.

Q. Did anyone ask you to go to the basement at that time?

A. No.

Q. Do you know if anybody saw you go to the basement at that time?

A. I have no idea.

Q. When you saw that the basement was in the condition that it was in, as you have just described it, and you came back upstairs, did you inform anybody of what you found in the basement?

A. I don't recall specifically if I did or not. I have a vague recollection of telling Linda Arndt that I found an open window with broken glass, but that I perhaps had broken that glass myself months earlier.

Q. Do you think you might have mentioned that to any other law enforcement officer beside Linda Arndt?

A. Not that I recall.

Q. When Linda Arndt asked you to go down to the basement, I think that was sometime in the early afternoon —

A. I don't remember the time. I really don't.

Q. When she asked you to go down to the basement, could you explain why you chose going to the basement since you had already been there earlier?

A. She told me to go through the house and look for anything — go through the house thoroughly, as I recall, and look for anything that seems out of place. And so my intent was to do it thoroughly.

Q. Did you ask Fleet White to join you?

A. I think I did, as I recall.

Q. Do you remember exactly the sequence of events when you went down to the basement the second time?

A. Uh-huh (affirmative).

Q. Can you tell me where you looked?

A. I went back into the train room, showed Fleet the broken window, explained to him that I might have broken it myself months ago. I showed him the suitcase that I saw under the window, which I felt was very out of place. We looked for any large pieces of broken glass. And then I got up and went to the cellar room, opened the door, and found JonBenet.

Q. Do you remember why you decided to go to the cellar door at that particular time?

A. It was the next door outside of the train room. Other than that, no, it was a methodical search, in my mind.

Q. Was there a reason that you hadn't looked at that door the first time you went down to the basement?

A. There is no external exit from that room, so I was — the first time I went to the basement, I was trying to figure out how someone could possibly have gotten into our home.

Q. Do you remember whether or not Fleet White said anything to you while you were down in the basement showing him the broken window and the suitcase?

A. I don't remember that he said anything.

Q. Okay. Were you the first one to go to the cellar door?

A. I don't know.

Q. When you opened the cellar door, can you describe, to the best of your recollection today, what it was that you saw?

A. I saw a white blanket, and I knew immediately I found JonBenet.

Q. Had you turned the light on or —

A. I don't remember turning the light on.

Q. When you found the white blanket, what did you do?

A. I took the tape off of her mouth, I tried to untie the cord that was wrapped around her arms, and I kissed her and talked to her.

Q. Did you do anything then after that?

A. I realized that she wasn't just asleep, that this was not good. And I carried her upstairs.

Q. Do you know what, if anything, Fleet White was doing at that time?

A. I have no idea what he was doing. I wasn't aware that he was around me.

Q. So you wouldn't have known whether or not he had stepped into the cellar area where her body was?

A. No. I don't — I — well, I don't remember him stepping into the cellar area, no.

Q. Do you remember asking him to go upstairs and get assistance or help?

A. I did not. I did not ask him that.

Q. During the time — I am going to direct your attention to the time that is earlier than the time you found JonBenet's body, and that is the time when the police were in the house, between the time Officer French first arrived and the time Linda Arndt asked you to make a more thorough search of the house. Were you questioned by the police?

A. Yes, I think I was.

Q. All right. Do you remember making statements to the police?

A. I remember responding to a number of questions they had.

Q. Do you remember if you were asked whether or not the house was secured when you went to bed the night before?

A. No, I don't remember that they asked me that question.

Q. Do you remember ever telling any law enforcement officer that the house had been secured before you went to bed that night?

A. I remember telling, I believe it was Linda Arndt, that I thought all the doors were locked, and I didn't understand how someone could have gotten in. Of course, I learned later that one of the doors was found wide open.

Q. Did you know whether or not the security alarm was on that night?

A. It was not on.

Q. Did you tell Linda Arndt or any other police officer that the security alarm was off —

A. I don't —

Q. — the night before?

A. No. I don't believe I did.

Q. When you were — when you spoke to the police, did you offer them any theories as to why you thought JonBenet was missing?

A. I responded to a number of questions they had.

Q. Do you remember some of those questions?

A. Oh, they asked: Was anyone angry with you at work? Was anyone around you acting peculiar recently in the last few days? Anyone you could think of that would do such a thing?

Q. And do you remember what you answered?

A. Oh, not completely. I know that in terms of people that were angry with me at work, I mentioned Jeff Merrick, who we had terminated due to performance. And he was extremely angry, to the point of making threats in the past six months prior to that. Patsy made me aware of Linda Hoffman-Pugh's strange behavior just prior to, but you need to ask Patsy about that because that is not firsthand information.

Q. Anyone else?

A. I don't believe so.

Q. Do you remember what, if any, other questions you were asked by any of the law enforcement people that were present?

A. Well, they asked if we had any recent pictures of JonBenet. Gosh, that is the only one I can remember.

Q. Were you asked at any time by law enforcement during this period what had transpired the night before in your home?

A. During that period?

Q. Uh-huh (affirmative).

A. I don't recall that they asked that.

Q. Can you remember what occurred on December 25th, say, from the morning on?

A. Generally, I can.

Q. Could you give me just a general summary, to the best of your knowledge?

A. I remember the kids bounding into our room that morning excited to open their presents. Our normal tradition is that I go downstairs, turn on the Christmas tree lights. I brought a bicycle out of the garage that I had as a surprise for Patsy. The kids came down. We opened presents. JonBenet wanted me to take movies, but my battery was dead. We had breakfast, Christmas breakfast.

Q. Do you remember what was served at that breakfast?

A. Not — no, I don't. Probably pancakes.

Q. Was that one a family favorite?

A. Yes.

Q. Who —

MR. WOOD: Wait. You asked him a question, and he was trying to answer. Why don't you let him finish his answer.

MR. HOFFMAN: All right. Sorry.

THE WITNESS: I enjoyed making pancakes with kids, and JonBenet enjoyed decorating them. So, yes, it was kind of a special treat.

Q. (By Mr. Hoffman) And after you finished breakfast, do you remember what you were doing?

A. At some point, I went out to the airport to pre-pack some gifts in the airplane, check it out, get it ready for an early morning departure. I remember kids being in and out of the house when I was there, neighborhood kids. We were going to go to the Whites' that evening for a dinner. I remember JonBenet asking me to help her ride her bike around the corn- — around the block, her new bike that she had gotten for Christmas. That is generally what I remember that day.

Q. Do you remember what happened in the evening, what you were doing in the evening?

A. Well, we went to the Whites' house where they had family and relatives, friends, I guess. We were perhaps the only friends there for Christmas dinner.

Q. Do you remember anything else about that Christmas dinner at Fleet White's?

A. Nothing notable. It was a family dinner.

Q. What, if anything, did you do after Fleet White's dinner?

A. We left. Patsy wanted to drop two gifts off at the Walkers' and the Stines', which we did on the way home. We pulled in the driveway into the garage. And JonBenet was asleep in the back of the car. I carried her upstairs and put her to bed.

Q. Is that the last time you saw JonBenet alive?

A. Yes, it was.

Q. All right. Do you know if Patsy joined you in the bedroom when you put her to — put JonBenet to bed?

A. I don't recall that she was in the bedroom when I was in the bedroom.

Q. Do you remember what JonBenet was doing that evening when you were over at Fleet White's?

A. She was playing with Daphne upstairs. She and Daphne had both received a little bead-making machine. She and I and Fleet and Daphne sat on the floor and made necklace beads.

Q. Do you remember anything else?

A. That is the highlight of my memory.

Q. Do you have any memory of what she was doing after you left Fleet White's?

A. She was asleep.

Q. How soon after you left Fleet White did she go to sleep?

A. I don't know. Sometime between the time she got in the car and when we arrived home.

Q. Do you remember whether she woke up at any time between the time you saw her asleep in the car and the time you put her to bed?

A. She did not.

Q. At that point, after you put her to bed, what, if anything, did you do?

A. I went downstairs to get Burke in bed. He was putting together a little plastic toy that he had gotten for Christmas. I helped him finish it so he could get off to bed. And we did that, and then I went to bed myself.

Q. When you say you went to bed yourself, do you remember exactly the sequence by which you prepared for going to bed that night?

A. I think I took my clothes off, brushed my teeth, put my pajamas on, and crawled into bed. That's —

Q. Did you do anything else?

A. Not that I remember.

Q. Did you use anything to help yourself go to sleep?

A. I took a melatonin tablet.

Q. Do you know the amount of melatonin you took?

A. No. It was an over-the-counter tablet.

Q. Was it a single tablet or half a tablet or two tablets?

A. I think it was a single tablet, as I recall.

Q. Do you remember the brand?

A. No.

Q. Do you know or remember whether or not you read anything before going to sleep?

A. I read for a few minutes, as I recall, before I turned the light out.

Q. Do you remember at any point Patsy joining you in bed that night?

A. Patsy was in bed before I went to bed.

Q. Do you remember what Patsy was wearing when she got into bed or was in bed?

A. I don't remember specifically, no.

Q. All right. Did you wake up at all during the night?

A. I did not.

Q. Was this routine pretty much the normal routine when you went to bed at night when you were at home? **MR. WOOD:** To take off his clothes, brush his teeth —

Q. (By Mr. Hoffman) Was anything different than that?

MR. WOOD — put on his pajamas and go to bed?

MR. HOFFMAN: Yes.

Q. (By Mr. Hoffman) Anything different than that?

A. Pretty standard routine.

Q. Pretty standard routine? And —

A. Except I usually didn't take a melatonin tablet every night.

Q. Why were you taking the melatonin that night?

A. I wanted to be sure I slept well because we were going to get up early, and I was going to fly to Minneapolis and then on to Michigan, and I wanted to be fresh.

Q. Do you know if Mrs. Ramsey was taking any medication to help her sleep?

A. Not to my knowledge.

Q. Any melatonin?

A. No, I don't believe so.

Q. You mentioned that you were going to fly to — where was it?

A. Minneapolis and then on to Charlevoix, Michigan.

Q. You have a pilot's license, I presume?

A. Yes, I do.

Q. Would you tell me what sort of pilot's license you have?

A. I have a commercial license, I have a flight instructor license for airplanes, for instrument flying. I have a multi-engine rating, and I have an instrument rating.

Q. What sort of planes does that allow you to fly?

A. Anything below 12,500 pounds gross weight.

Q. Does that include twin engines?

A. Yes.

Q. Does it include any kind of a jet?

A. Most jets are over 12,500 pounds that I know of.

Q. May I ask you where you learned to fly?

A. My dad taught me.

Q. Did you ever have occasion to fly when you were in the military?

A. No, I did not, other than in flying clubs.

Q. Was that the normal means by which you would travel; you would fly yourself, or did you take commercial airlines?

MR. WOOD: Travel in?

Q. (By Mr. Hoffman) Travel around the country whenever you would travel.

A. If I was flying for business, I normally would take commercial airlines. If I was flying personally with my family, we normally flew ourselves.

Q. You say that — and I understand that you were in the Navy; is that correct?

A. Yes.

Q. All right. When you were in the Navy, would you describe, if you remember, pretty much what area you were responsible for as a serviceman?

A. Well, I was a Civil Engineer Corps officer. I was stationed in the Philippines for two years. I was the civil engineer for the Naval supply depot in the Philippines. I was transferred to Atlanta where I was the base engineer for the Naval Air Station in Atlanta.

Q. Would you describe what you were doing as an engineer?

A. Contract management. We ran all the base utilities, maintenance and repair, road construction, long-term planning, site planning.

Q. Were you actually involved in any hands-on engineering projects?

A. I had a staff that did that. I was in charge of the staff.

Q. So were you ever involved in any of the actual construction?

A. Did I help pound nails? No.

Q. Or do anything like that, any sort of manual labor work.

A. In the military?

Q. Yes, in the military.

A. I did not.

Q. When you were not in the military, did you do that?

A. I enjoy remodeling and doing work with my hands, yes.

Q. Did you do any remodeling in your home in Boulder?

A. We did quite a bit of remodeling. I did not do any of the work there, as I recall.

Q. Did you have occasion to do remodeling in any of your other homes?

A. We have remodeled every home we have owned.

Q. Have you personally done any remodeling in any of these homes?

A. Yes.

Q. When you were in the Navy, you went through basic training, naturally?

A. I went through officer candidate school in Newport, Rhode Island.

Q. And would you just describe briefly what your basic training was like?

A. It was physical training, it was navigation, celestial navigation, seamanship, rules of the road relative to ship movement, and, generally, familiarization with military procedures and the military system.

Q. All right. You say that one of the areas that you were instructed in was seamanship?

A. Navigation and piloting. You were being prepared to captain a ship.

Q. Did any of your basic training involve — and I don't know if they still do this — learning various nautical knots?

A. No.

Q. Do you sail at all?

A. I used to.

Q. Did you pilot your own sailboat or did you —

A. Yes.

Q. — have someone —

A. Yes.

Q. — do it for you?

A. No.

Q. Did you receive any training in sailing?

A. No.

Q. Are you familiar with the various knots involved in sailing?

A. I am really not. I should be, but I am not.

Q. All right. So how would you generally moor your craft?

A. I would tie it up on a cleat.

Q. Was there any sort of knot that you used that you could identify that has a technical term?

A. I don't know the technical term for it.

Q. Have you had occasion to be able to look at the knot that was tied around the so-called paintbrush garotte?

A. I have not.

Q. Is there any reason why you haven't?

A. It is very painful for me, Mr. Hoffman.

Q. I understand that. But with your nautical training, do you think that you could in any way be able to identify the sort of knot?

A. No.

Q. Okay. Do you know whether or not any — if your private investigators hired anyone to look at the way in which that knot was made and to give a report on it?

A. Not to my knowledge.

Q. Do you know if any of your investigators have been involved in trying to look at forensic evidence? A. What is "forensic evidence"?

Q. Any of the physical evidence that might have been at the scene that you might have had occasion to have.

A. Well, I think any evidence that was at the scene was in the possession of the police. I don't know that we had any physical evidence that —

Q. Would the ransom note be considered physical evidence, in your mind?

A. Absolutely.

Q. Do you know whether or not your investigators had occasion to have anyone who was professional in this area examine the ransom note?

A. I believe they did.

Q. Do you know — well, first of all, were you ever given a copy of the ransom note?

A. Patsy handed it to me that morning, yes.

Q. Do you know what happened to the ransom note after Patsy handed it to you?

A. I gave it to Officer French when he arrived.

Q. Did you give the ransom note to any of the friends that you had invited to come over?

A. I did not.

Q. Do you know if the ransom note was passed around to other police officers? Did you have occasion to observe that?

A. I don't — I don't know.

Q. Do you know what happened to the ransom note after you gave it to Officer French?

A. Not for certain. I think they took it and made copies of it.

Q. Do you remember the next time you saw a ransom note?

A. I think Linda Arndt or someone gave me a Xerox copy of it that morning as we were waiting.

Q. Do you know why she gave you a Xerox copy of it?

A. No.

Q. Did you ask for a Xerox copy of it?

A. No.

Q. You say you had an opportunity to read the ransom note when it was initially discovered by Patsy — A. Yes.

Q. — is that correct? Would you tell me how much time you spent reading it?

A. Not specifically. It was — I spread it out on the floor and tried to read it as quickly as possible.

Q. Do you remember when that — was it in the morning that Linda Arndt gave you a copy of the ransom note?

A. It was prior to finding JonBenet. I don't remember specifically what time.

Q. Do you know how she was able to make a copy for you?

A. I do not.

Q. Once she gave you a copy of the ransom note, did you at any point in the morning read it again?

A. Yes.

Q. Did you read it more than once?

A. Yes.

Q. Do you remember how many times you may have read it?

A. No.

Q. Would you say a dozen times?

A. I don't remember. I mean, I was trying to figure out, to the best of my ability, who in the world had my daughter.

Q. And were you looking at the ransom note for that purpose?

A. Yes.

Q. When you were looking at the ransom note, was there anything in the language of the ransom note that struck you as peculiar?

A. The whole thing was peculiar. We were addressed as "Mr. and Mrs. Ramsey," and then they switched to "John" personally. They asked for twenty dollar bills and hundred dollar bills, as I recall. The amount was a very odd amount. The way the note was signed was very odd. The cruelty that they threatened was bizarre. It was a very sick mind that wrote that note.

Q. Were there any phrases in that ransom note that you thought were peculiar?

A. I don't remember at that time that I thought that, but certainly later, we focused in on some phrases that seemed very peculiar.

Q. When you say "we focused in on some phrases" that were peculiar, would you identify the "we"?

A. Talking corporately in terms of everyone that was looking at the note.

Q. Would you tell me what phrases you were focusing on as peculiar?

A. Oh, I think the "grow a brain" phrase was one that looked odd. "You are not the only fat cat in this town, John." Those are the two that I recall now.

Q. "Use your good common sense, John"; do you remember that phrase?

A. Your good southern common sense, or something like that.

Q. Did those phrases seem peculiar to you?

A. On reflection they did. I don't remember how they struck me that morning.

Q. Had you ever heard any of those phrases used in relation to you before?

A. In relation to me?

Q. Uh-huh (affirmative).

A. No.

Q. Had you heard anybody that you knew ever use those as common phrases in their speech?

A. Yes.

Q. Would you identify them?

A. Priscilla White used the term "fat cat" in my presence.

Q. Any other phrases that you can remember somebody using?

A. No.

Q. Did anybody in your family ever use any of those phrases?

A. No.

Q. The phrase "common sense" or "good southern common sense," have you ever heard anybody use that before?

MR. WOOD: Are you asking has he ever heard anybody use the term "common sense"?

MR. HOFFMAN: No.

MR. WOOD: Why don't you give him the precise phrase from the ransom note so that we don't have any misunderstandings about what you are asking, Mr. Hoffman.

MR. HOFFMAN: I will go back and ask him that. I will get the ransom note in a bit. I just want to see what he remembers. **MR. WOOD:** Darnay, he is telling you what he remembers in response to your question, but when you ask him, Have you ever heard anybody use the phrase "common sense" or "good common" — I want to make — I want to know precisely what you are asking him.

MR. HOFFMAN: All right. Fine.

MR. WOOD: He is entitled to do that, and that is your obligation in terms of asking a proper question. **MR. HOFFMAN:** Are you finished?

MR. WOOD: He will be glad to look at the note if you want him to.

MR. HOFFMAN: Thank you. May I continue, Mr. Wood?

MR. WOOD: Absolutely.

MR. HOFFMAN: Thank you.

Q. (By Mr. Hoffman) Mr. Ramsey, so you are certain that you don't remember anybody in your family using any of the phrases in the ransom note?

A. I am certain I don't remember ever hearing anyone in my family using any of those phrases.

Q. Now, just briefly, do you know how your children were disciplined if they did something that was against a family rule or any wishes of their parents in your family?

A. Yes.

Q. Would you tell me how they were disciplined.

A. I disciplined my children by raising my voice.

Q. Do you know how your wife disciplined them?

A. I think in a similar manner.

Q. Did you personally ever have occasion to spank any of your children?

A. I did not.

Q. Do you have a philosophy with respect to corporal punishment in child-raising?

A. Yes.

Q. Can you tell me what that is?

A. I don't believe it is appropriate to strike a child.

Q. Do you know whether or not your wife ever had an occasion to strike any of the children?

A. I have never seen her spank any of our children.

Q. With respect to corporal punishment, do you know if she has any philosophy that she has expressed to you?

A. I have only seen it demonstrated. We have never talked about philosophy of corporal punishment.

Q. Have you ever discussed how the children should be disciplined?

A. No.

Q. No time during the marriage?

A. Well, at no time have we ever discussed how the children should be disciplined? I am sure we have.

Q. Do you remember any time?

MR. WOOD: All of his children to the present date?

Q. (By Mr. Hoffman) The two children that you had with Patricia Ramsey.

A. You know, I don't. They were goodkids. I don't remember ever talking about discipline. It didn't seem to be necessary.

MR. HOFFMAN: Could I take a break for just about five minutes at this point? I want to start going into different areas.

THE VIDEOGRAPHER: We are off the video record at 10:35.

(A recess was taken.)

THE VIDEOGRAPHER: We are on the video record at 10:53.

MR. HOFFMAN: Thank you. (By Mr. Hoffman) Mr. Ramsey, I forgot to ask you a couple questions before I asked for a break, and they regard any personal observations with respect to your daughter JonBenet. Do you know if she liked to draw on her hand? Did you ever personally see that?

A. Not that I recall.

Q. Do you remember whether or not she had drawn anything on her hand that night?

A. I don't remember seeing anything on her hand.

Q. Were you away a great deal in the year prior to her death on business and whatever?

MR. WOOD: "Away a great deal...on business or whatever?"

MR. HOFFMAN: Yes.

MR. WOOD: Why don't you clear that question up. It is sloppy.

Q. (By Mr. Hoffman) Did you ever —

MR. HOFFMAN: Mr. Wood —

MR. WOOD: I object to the form of the question. The question is vague and ambiguous and sloppy.

MR. HOFFMAN: I object to the characterization. No, that is not a proper objection. "Sloppy" is not an objection to evidence.

MR. WOOD: It strikes me as a sloppy question. I have asked you to rephrase it. And so if you want to, please do. If you don't, leave it on the table.

MR. HOFFMAN: All right.

MR. WOOD: Let's go.

Q. (By Mr. Hoffman) All right. Mr. Ramsey, how much time would you say you were at home in the year prior to her death, JonBenet Ramsey's death?

A. Well, I was normally gone Monday through Friday from 8:00 in the morning until 5:00 or 6:00 at night every day. I traveled occasionally. I don't remember specifically that year. I tried to make my trips either one-day trips or one or two nights out. Typically, they were to California, Boston. Twice a year I probably went to Europe to visit our offices there.

Q. So would it be fair to say you didn't do that much travelling away from home? Is that correct?

A. I don't remember. I really don't. Certainly, more than I would have liked, I am sure, but I ran the company. I had to be there more often than not.

Q. When Mrs. Ramsey was diagnosed with cancer, do you know what her treatment consisted of?

A. Her treatment — yes, I do.

Q. Could you tell me what you do know about her treatment? (Whereupon, a discussion ensued and a recess was taken.)

THE VIDEOGRAPHER: We are on the video record at 1:27.

MR. HOFFMAN: Would the reporter please read back the last question that I asked Mr. Ramsey? (The record was read by the reporter, as follows: "Question: Could you tell me what you do know about her treatment?")

MR. HOFFMAN: Mr. Ramsey, before you answer that question, I am withdrawing that question. Thank you very much.

Q. (By Mr. Hoffman) Mr. Ramsey, I am going to ask you to look at page 145 of "the Death of Innocence." And I am going to just simply ask you to look at the highlighted area at the very top. And after you have read it, I would like you to have an opportunity to just read it out loud.

A. Just the highlighted part?

Q. Yes, please, Mr. Ramsey.

A. "Douglas described the killer as someone with extreme anger towards John Ramsey, trying to hurt him in the most devastating manner possible."

Q. Thank you very much. Now, Mr. Ramsey, I am also going to —

MR. HOFFMAN: First of all, I am going to ask the reporter to please mark this document Plaintiff's Exhibit 15 for identification. Mr. Wood, I am going to show this to you. I am interested in Mr. Ramsey reading — looking at the highlighted parts of that first on the second page.

(Discussion ensued off the record.)

(Plaintiff's Exhibit-15 was marked for identification.)

Q. (By Mr. Hoffman) All right. Have you had a chance to read it, Mr. Ramsey?

A. Yeah.

Q. First I am going to ask you if you recognize this as a press release dated July 23rd, 1997. Do you recognize this?

A. Do I recognize this as —

Q. As the language, not the article, but the actual language in this, do you recognize it at all?

A. You know, I really don't.

Q. Okay.

A. I mean, it quite possibly came from us, but I don't remember it or recognize it.

Q. I am going to ask you just to look at the second page and the highlighted area. Just simply look at the different elements here of this profile. Is this profile familiar to you?

A. Generally. I mean, I think these were post-behavior characteristics that one might expect in the killer.

Q. Were these characteristics that came from Mr. Douglas in this profile?

A. I don't remember. It is possible, but I don't remember.

Q. Okay. Because I just want you to examine it in conjunction with the statement that you had in your book that — I believe the statement is that, "Douglas described the killer as someone with extreme anger towards John Ramsey, trying to hurt him in the most devastating manner possible." And I am assuming that, correct — Mr. Ramsey, do you — Did you put this statement in the book because you subscribe to that as true?

A. I can't imagine anybody, anyone that I have made angry enough to murder a child. I took that at — the opinion of someone who understands the criminal mind better than I do, but I am not convinced that is correct.

Q. All right. What I would like you to do is just simply look at the elements on the second page there. And I would like to ask you if, for instance, in the first element, I believe it is, "Jon Benet's killer may have been suffering from some stress in the weeks and months preceding the crime." Do you see that element —

A. Uh-huh (affirmative).

Q. — in that profile? I am going to ask you, with respect to Patsy, do you feel that Patsy was under any kind of unusual stress during the Christmas holidays, your wife Mrs. Ramsey?

A. No.

Q. Did, at any point during the holidays, you observe her as working too hard?

A. No.

Q. Do you feel that Mrs. Ramsey took too much responsibility on herself, helping herself and other people?

A. Well, she is a very giving person, but that is her nature. So I don't feel she took too much on, no.

Q. All right. So you don't believe that she was under any unusual stress during that period?

A. Absolutely not.

Q. Okay. The second element here is "A triggering event, such as a job crisis or crisis in a personal relationship, may have caused this individual to vent anger, perhaps at a female close to him"— Or to her, though it doesn't say "her" here. — "and perhaps at me personally." The question I have — and I am very sorry to ask you this, and I don't mean any disrespect — was there any stress in your personal relationship with Mrs. Ramsey that you would have observed at this time?

A. No.

Q. Were you having any marital problems?

A. Absolutely not.

Q. None. Okay. Now, with respect to two elements down, "He possibly has increased his consumption of alcohol or drugs," do you — did you have occasion to observe Mrs. Ramsey drink at any point during this period?

A. During what period?

Q. The Christmas holidays.

A. Well, we had a church party at our house at one point. We were at the Whites' at one point. Patsy is not a heavy drinker. I don't recall an image of her having a drink. She might have had a glass of wine, but I don't —

Q. Did you ever have occasion to see Patsy, what you would call, inebriated at any point in your marriage? **A.** Not that I recall.

Q. Okay. Do you know if Mrs. Ramsey was taking medication at that time during the Christmas holidays?

A. Do I know if she was?

Q. Yes.

A. Not to my knowledge.

Q. Now, the next element is "He may have even turned to religion." Was it your observation that Patsy was a particularly religious person?

A. We both were.

Q. Did there come a time during Mrs. Ramsey's cancer that she expressed to you that she had experienced an extremely intense spiritual or religious event in that —

A. We had a healing service that was conducted by our priest from St. John's. He prayed an Episcopal prayer that asked God to heal her body. Patsy returned to NIH within a week and took a CAT scan, and the cancer was gone. And we believe that, that our prayers were answered, yes.

Q. Do you or Patsy believe in the Holy Spirit?

A. Yes, I do.

Q. Do you believe that the Holy Spirit is an agent for healing by God?

A. I believe the Holy Spirit is part of the Trinity of God. And I don't know that I understand the Holy Spirit's role in healing, no. I don't know that one way or other.

Q. Are you familiar with Pentecostal religious beliefs that the true purpose of Christianity and Jesus' purpose was a healing ministry, and that the Holy Spirit was involved in that healing ministry?

A. I am not familiar with that.

Q. Also, are you familiar with the religious concept of what is known as "being in right relation to God"?

A. I don't know of that as a concept. I have heard that phrase.

Q. I was just wondering if you understood what that phrase meant to you.

A. Do I understand the phrase "being in a right relationship with God"?

Q. Yes. "One being in right relation to God."

A. Well, I would — that would not be how I would describe my relationship with God.

Q. All right. I just wanted to know that.

A. Uh-huh (affirmative).

Q. The next statement: "He may be rigid, nervous and preoccupied in casual conversation." How would you describe your observations of Patsy — of Mrs. Ramsey's — excuse me — Mrs. Ramsey's conversational, you know, attitude? Do you find her to be rigid or nervous or preoccupied in conversation?

A. You mean in general?

Q. In general.

A. No.

Q. During the Christmas holidays, leading up to the death of your daughter, did you find her to be in any way rigid, nervous, or preoccupied —

A. No.

Q. — in conversations?

A. No.

Q. Well, the next one I think speaks for itself. "He may have tried to appear very cooperative with the authorities." Have you tried, to the best of your knowledge, to cooperate with the authorities?

A. Well, I think we detailed that pretty accurately. We were very willing to cooperate with them, given that their intentions were to be trusted.

Q. "He may have quickly constructed an alibi for his whereabouts the night JonBenet was killed." That brings me to the issue of the next area I want to go into, which is the area of the ransom note, which I am going to show you at page 407, which I showed Mrs. Ramsey yesterday, in your book with respect to the ransom note. Would you read that aloud? I had Mrs. Ramsey do it yesterday too.

A. Number 4. "The ransom note. Considered earlier and throughout the book, the note was written by the killer and remains an extremely important clue. An adequate amount of handwriting samples from the killer should conclusively tie him to the long and rambling note."

Q. Do you still believe that statement to be true?

A. That is my opinion, yes.

Q. Yes. In your opinion?

A. Yes.

Q. May I ask you if any of your investigators made any attempt to examine or prepare — did any of your investigators prepare handwriting reports with respect to your handwriting and Mrs. Ramsey's handwriting? **A.** I never saw any reports. I don't know what they prepared.

Q. Do you know if reports have been prepared?

A. I don't know that for a fact.

MR. WOOD: For the record, I do think we indicated in response to requests for production that there are written reports that were in the possession of Hal Haddon under a belief on his part that they are grand jury materials that he is not allowed to release even to me, present counsel for the

Ramseys. So I don't know that John knows that, but I do want to make the record clear that you know that.

MR. HOFFMAN: Also, just to make the record clear, I don't know what effect, if any, the July 5th ruling by Judge — the Denver federal judge, Wiley Daniel, with respect to third-party testimony and the fact that the grand jury secrecy rule with respect to that which was declared unconstitutional. To the extent that that would be the statement of the party — meaning whoever the expert was, his report is, in effect, statements, whether or not that that now would be covered under the grand jury secrecy act. And so for the purposes of this record, I would indicate that that might not be available to counsel.

MR. WOOD: I have asked Hal Haddon since that ruling to produce those for me, and he declined.

MR. HOFFMAN: Okay. Thank you.

(By Mr. Hoffman) Mr. Ramsey, what I am going to do now is I am going to first have the reporter mark this Plaintiff's Exhibit 16 for identification. We'll do that.

MR. HOFFMAN: Mr. Wood, I will show you this, and please show it to your client.

(Plaintiff's Exhibit-16 was marked for identification.)

Q. (By Mr. Hoffman) Mr. Ramsey, I am going to ask you to look at the document that has been marked Plaintiff's Exhibit 16 for identification, and I am going to ask you if you recognize this document.

A. Yes, I believe I do.

Q. Could you identify it, please?

A. Well, it appears to be a copy of the ransom note that we found in our home.

Q. Does it look substantially like the ransom note that you saw that morning?

A. Yes, I think so.

Q. Okay. Now, Mr. Ramsey, I am going to ask you to, once again, look at it. And I am going to ask you, in looking at it, whether or not you see any similarity between your wife's handwriting and the handwriting in the ransom note; you personally.

A. Absolutely not.

Q. None at all?

A. No.

Q. Not even a little bit?

A. Not even a little bit.

Q. Now, Mr. Ramsey —

A. Patsy writes very neatly. She is a feminine writer.

Q. Right.

A. There are misspellings in the note. She graduated at the top of her class. She doesn't misspell words like "business" and "possession."

Q. Do you think the ransom note writer was trying to disguise their identity?

A. I have been told that that was the intent, but there are parts of it that — where that is broken down. I don't know which parts, but —

Q. Do you think that maybe some of the misspelling may have been an attempt by whoever was writing this note to disguise their identity?

A. I don't think so, because I think they tried to be very articulate, to the best of their ability, and misspellings were because they didn't know how to spell those words.

Q. With respect to the sloppiness of the handwriting, do you think it is possible that the handwriting — that the person who wrote this handwriting was trying to make their handwriting look sloppier than normal?

A. I don't know. It is very sloppy handwriting. I would agree with that.

Q. Now, Mr. Ramsey, do you know whether or — were you ever told that Mrs. Ramsey could not be eliminated from any of the handwriting investigation being done by the Colorado Bureau of Investigation? Did anybody ever tell you that?

A. I was told that it was virtually certain that she did not write the note, but that there were some similarities which exist in all of our handwriting because we have all been taught the same, and that is how we communicate is with the written language in English. But that because of these few similarities, she could not be absolutely eliminated, but it was highly improbable that she wrote the note. And that, in fact, there were more dissimilarities in her writing than a number of other people that had been looked at.

Q. Right. Do you know if your handwriting was examined by the law enforcement?

A. As far as I know, it was.

Q. Do you know whether or not you were eliminated as the author of the note?

A. I was told that, on a scale of 1 to 5, Patsy was placed at a 4.5 in terms of probability. In other words, a very low probability. Mine was a 5.

Q. Just to go back to the one point that you made, it was your understanding that the reason Mrs. Ramsey could not be eliminated was because of what is, I think called, style book similarities. We all go to school, as you say; we are taught to make our letters look the same way. Is that the reason?

MR. WOOD: Let me object to the form of the question only because you have used what I think is meant to be some form of a technical term, "style book similarities."

MR. HOFFMAN: Yes.

MR. WOOD: I don't think that was a term Mr. Ramsey used. So to the extent you misstated his testimony, I object to the form. If you would understand it, John, feel free to answer it.

THE WITNESS: Well, I don't know what that means. I told you what I was told. And I was told that by our attorneys. I was told that by — I heard the police make that statement. I heard the district attorney make that statement, that it is highly improbable that Patsy wrote this note based on their testing and our testing.

Q. (By Mr. Hoffman) Do you know if she was the only one that law enforcement could not completely eliminate as the author of —

A. No. In fact, I was told that your client had fewer dissimilarities than Patsy had with the note.

Q. Without revealing an attorney/client privilege, do you know who told you that? Was it a law enforcement source, or was it your private investigators? **A.** I don't recall. I don't recall.

MR. WOOD: I do know —

THE WITNESS: I was told that there were other people that were tested that were much more interesting than Patsy in terms of a comparison.

Q. (By Mr. Hoffman) Now, how do you know that? **A.** I was told that. I don't recall by whom. It is general knowledge that I have in my head.

MR. WOOD: Plus I want to point out, and I have not shared with Mr. Ramsey Alex Hunter's testimony on that very point, which I think you were aware of —

MR. HOFFMAN: Yes.

MR. WOOD: — who has stated there were a number of people who had not been eliminated that were under suspicion.

MR. HOFFMAN: I just want to know how Mr. Ramsey, if he remembers how he knows that, with respect to that.

Q. (By Mr. Hoffman) Now, Mr. Ramsey, I am going to ask you to do something that I did yesterday, at least on a few pages here, and that is I am going to ask you to look at Plaintiff's Exhibit No. 1 that was marked for identification yesterday, and I would like you to look at that document.

A. Okay.

Q. I am going to ask you if you recognize, without naming anybody, any of the figures in that particular document?

A. I think I recognize two.

Q. Okay. Now I am going to ask you to look at the handwriting beneath the document, and I am going to ask you if you recognize that handwriting.

A. I do not.

Q. Could it be your wife's handwriting?

A. I don't recognize it. It doesn't look like Patsy's writing. It is sloppy. It is irregular. I would not look at that and say that is Patsy's handwriting.

Q. Thank you. Now I am going to hand to you Plaintiff's Exhibit No. 2 that was marked for identification yesterday, and I am going to ask you to please look at that. Now I am going to ask you if you can identify, without naming the individuals in those photographs, any of them.

A. Yes.

Q. Now I am going to ask you to look at the handwriting, and tell me if you can recognize the handwriting.

A. I do not.

Q. Could that be your wife's handwriting?

A. I doubt it very seriously.

Q. Tell me why you don't think it is your wife's handwriting.

A. It doesn't look like her handwriting. It is sloppy. It is — it just doesn't look like her handwriting.

Q. Now I am going to ask you to look at Plaintiff's Exhibit 11, marked for identification, and all I am going to ask you to do is look at this document and tell me if you have ever seen it before.

A. Not that I recall.

Q. So would it be fair to say that today is the first time you ever have seen that document?

A. I think so. I don't remember seeing it. I don't remember seeing it. Let me put it that way.

Q. Okay. Thank you very much. Now, Mr. Ramsey, do you know — have you ever heard the name Cina Wong?

A. I have heard that name in association with you, yes.

Q. Do you know who Cina Wong is?

A. I have no idea.

Q. Have you heard the name David Liebman?

A. It was on that form right there.

Q. Had you ever heard the name or seen the name before this?

A. Not that I recall.

Q. Are you aware those names appear in your book?

A. It is very possible.

Q. So you weren't the person that provided the names in the book, in the manuscript; is that correct?

A. I don't remember. It is possible. I found that my brain cells have depleted a lot during the last five years.

Q. Have you ever heard the name Howard Rile?

A. Yes.

Q. Would you tell me who Howard Rile is?

A. He is either a handwriting expert or an expert linguistic examiner. I don't recall which.

Q. Do you recall the context in which you heard his name?

A. I think he was someone that our attorneys consulted to examine a number of documents that we have received.

Q. Do you know if he examined Mrs. Ramsey's handwriting?

A. I believe that he did, yes.

Q. Do you know if he prepared a written report?

A. I don't know.

MR. WOOD: Again —

THE WITNESS: Isn't he the one that started the book?

MR. WOOD: No, that is someone else.

THE WITNESS: Okay.

MR. WOOD: Again, we go back, and we have provided you as his counsel information that Mr. Rile and Mr. Cunningham, we are told, did prepare written reports, but they were submitted to the grand jury and they are, again, in the possession of Hal Haddon, and the question of releasing them from Mr. Haddon, at least, is something that he has not done voluntarily yet. Whether he did that in response to a request from you, I don't know. But there are written reports from Mr. Rile and Mr. Cunningham about Mrs. Ramsey.

Q. (By Mr. Hoffman) Had you ever heard of the name Floyd Cunningham, Mr. Ramsey?

A. Yes.

MR. WOOD: Lloyd.

MR. HOFFMAN: I am sorry. Is it Floyd?

MR. WOOD: Lloyd.

MR. HOFFMAN: Oh, Lloyd. All right. I am sorry. I don't know why I thought Floyd.

Q. (By Mr. Hoffman) Lloyd Cunningham, have you ever heard that name?

A. Yes.

Q. Would you tell me in what context you heard that name?

A. I think he was someone that was used by our attorneys and investigators to look at handwriting exemplars.

Q. Do you know anything else?

A. That he is at the top of his field. That is what I remember.

Q. Do you know if Mr. Cunningham prepared a written handwriting report?

A. I don't know that for a fact.

MR. WOOD: Again, same observation —

MR. HOFFMAN: Absolutely.

MR. WOOD: — for the benefit of you and the benefit of the record.

MR. HOFFMAN: Yes.

Q. (By Mr. Hoffman) I want to make sure that what I am about to say is accurate, so I have to do it in summation, and Mr. Wood will absolutely correct me if I am wrong in characterizing anything that I have said.

MR. WOOD: It sounds like an invitation.

MR. HOFFMAN: It is, Mr. Wood, in this particular instance.

Q. (By Mr. Hoffman) I want to make sure I am correct. You have not personally seen the handwriting report, if there was one, by Mr. Rile; is that correct?

MR. WOOD: Hang on a second. Let me confer. I want to make sure we are not touching into an area that might go to attorney-client privilege —

MR. HOFFMAN: Okay.

MR. WOOD: — because that report was prepared by former counsel for Mr. Ramsey, or at their request for Ramsey purposes.

MR. HOFFMAN: Well, I can remove the offending language as to prepared it — prepared for him. I don't know who prepared it for him.

Q. (By Mr. Hoffman) I am not asking that. That this handwriting report by Mr. Rile was prepared for the Ramseys, irrespective of who prepared it. I am not trying to identify who prepared it, but that it was prepared by some person for you.

A. I know of no report that was prepared for us that I saw.

Q. And when you say report, I am more interested in if you had an opportunity to see any report involving handwriting of either Mrs. Ramsey or yourself by any expert that you or your agents and people that worked for you hired. Did you have an opportunity to see any report?

A. I don't recall seeing any report.

Q. Do you remember whether or not you had an opportunity to see any other handwriting reports by, say, law enforcement?

A. I don't recall seeing any reports from law enforcement, no.

Q. Then are you saying that you are relying upon the opinion or statements of people that have seen those reports as the basis for your belief that Mrs. Ramsey is not the ransom note writer?

MR. WOOD: Hold on one second. I don't know how he is going to differentiate counsel's discussions. Do you want to omit counsel?

MR. HOFFMAN: You mean our discussions?

MR. WOOD: Well, you say that you are relying — are you saying that you are relying upon the opinion or statements of people that have seen those reports as the basis for your belief that Mrs. Ramsey is not the ransom note writer? Do you understand what he is asking you, John?

THE WITNESS: Yes.

MR. HOFFMAN: Well, to put it more —

MR. WOOD: I am going to let him answer.

MR. HOFFMAN: Oh, okay.

MR. WOOD: Let's go ahead and just let him answer.

THE WITNESS: No, I do not base my opinion on the reports that I have heard from others. I base my opinion on that I know my wife. I would stake my life on the fact that she did not murder her child, she did not fake all of this nonsense, and she did not write this bizarre note. That is what I stake my belief on, Mr. Hoffman.

Q. (By Mr. Hoffman) So it is not based on anything empirical, such as —

A. The empirical information supports that belief totally.

Q. I am just wanting to determine whether you are familiar with the empirical information that supports it.

A. Yes.

Q. I am trying to distinguish between your belief in your wife, which is understandable, and a belief that comes from actually having looked at forensic evidence that you personally have had an opportunity to view.

MR. WOOD: Let me just — again, I am going to object to the form of that question because I think — at one point you are talking about determining whether he is familiar with the information, and then you turn it around and make it limited to reports that he has personally had an opportunity to view. I mean, you are omitting the fact that his counsel, and present company included, may have fully apprised him of the nature of the variety of expert reports in summary fashion verbally.

MR. HOFFMAN: Yes.

MR. WOOD: That would go into attorney-client privilege.

MR. HOFFMAN: Right. Which I am not trying to go into.

MR. WOOD: But you can't omit the fact they may have received that information. I don't think it would be fair for the record to —

MR. HOFFMAN: No.

MR. WOOD: I don't want the record to appear that Mr. Ramsey is unaware of what Mr. Rile, Cunningham, and, obviously, the information from the Boulder authorities that we know from Mr. Smit and others in terms of — and Mr. Hunter now, and Chief Beckner, what that — those conclusions, even though he hasn't seen the formal report. Am I making sense here?

MR. HOFFMAN: Absolutely.

MR. WOOD: I just want to make sure the record is not — doesn't mislead one to think that Mr. Ramsey, because he may have heard it through counsel, is unaware of it. That is my point.

THE WITNESS: And I have answered the questions that I understood were, have I physically seen and read a report.

Q. (By Mr. Hoffman) Right. So I am now going to ask you one additional question, which may be a bit of a repetition, but I hope it will clarify it. And you may have already answered it. In light of the fact that you have admitted that you have not physically seen the handwriting reports themselves, but may be relying on summaries from the people around you, why are you so certain that Mrs. Ramsey is not the ransom note writer?

A. Because I know my wife. I know how much she loved Jon Benet. I know how much she valued life. She valued every day that she lived, and lived every day to its fullest as if it were a gift from God.

Q. Are you aware that there are handwriting experts which are experts on behalf of Chris Wolf that have rendered opinions —

MR. HOFFMAN: Do you want to stop there?

MR. WOOD: I just want to make sure he knows that I want to make an objection.

MR. HOFFMAN: Okay. Okay.

MR. WOOD: Why don't you start again.

MR. HOFFMAN: All right. Just simply, I just want to know what he knows or doesn't know. I am not asking him to do anything other than yes or no to this.

(By Mr. Hoffman) Are you aware that there are handwriting experts that are working on behalf of Chris Wolf who have concluded that Patsy Ramsey is, as one of them said, without doubt the ransom note writer?

MR. WOOD: I am going to object to that question and — on several bases. Number one, there has been no finding of qualification of any individual submitted to date by the plaintiff as a handwriting, quote/unquote, expert, number one. To the contrary, at least three or four of the individuals that are presently being relied upon, at least we believe, by the plaintiff, have been specifically rejected as legitimate handwriting experts by the Boulder District Attorney's office and the Boulder Police Department. Third, you are representing, Mr. Hoffman, that one of these individuals is making a statement without doubt Patsy Ramsey wrote the ransom note, and I think that that is an unfair statement on your part because we have, as counsel for the defendants, been seeking for several months, at least the last two months, to obtain Rule 26 reports from these individuals that you represent to be experts, so that we, according to law, could then depose them, test their qualifications, test their opinions, against cross-examination, including cross-examination of standard and fundamental handwriting practices and procedures. So far, for whatever reason, we have not been afforded those reports, we have not been afforded the opportunity to examine those experts to determine what, if any, opinion they may hold and what, if any, credibility that opinion is worth receiving. And I think it is fundamentally unfair to ask Mr. Ramsey a question that presupposes at least one of those expert's opinions and ask him if he is aware of it.

MR. HOFFMAN: Just all I want to know is if he is aware.

MR. WOOD: The point is, I think it is fundamentally unfair to ask him to do that. Beyond that point, I think it is clearly a question that does not raise a reasonable chance of discovering admissible evidence because Mr. Ramsey's knowledge of that does not go to any issue of admissibility; whether he knows about something that one of your alleged experts says, I don't see how that is relevant in terms of reasonably calculated to lead to the discovery of admissible evidence. But as long as you will stipulate for me that we have not received the Rule 26 reports and have not yet had the opportunity to cross-examine those experts, and then, obviously, we have not reached the questions about Dalbert and other cases —

MR. HOFFMAN: Absolutely.

MR. WOOD: — about whether the court would allow those individuals to testify.

MR. HOFFMAN: Absolutely.

MR. WOOD: If you will stipulate that I am accurate in those representations, then I am going to let him answer the question. Is that fair?

MR. HOFFMAN: There is only one representation that I won't stipulate to, and that is two of the handwriting experts, Larry Ziegler and Gideon Epstein, for which you have, at least, there preliminary reports, one of which has that statement, "without doubt Patsy Ramsey is the ransom note writer." That you have those statements, that they were given to you, and that those two experts are not only highly qualified, but have been admitted, one of which was admitted by Judge Carnes in a case that she sat on several years ago. So to the degree that your representation is that the handwriting experts are, in fact, not experts, I would take — I would disagree with at least that characterization with respect to Mr. Gideon Epstein and Larry Ziegler. And that is the only thing I want to correct within it, but I will stipulate to everything else that you have said with respect — that you haven't received the federal Rule 26 reports, or anything else. That is absolutely correct.

MR. WOOD: Well, I have not and I will not, and I don't believe that I am allowed to characterize an individual as an expert. I think that is a decision that would ultimately be determined by Judge Carnes in this case. And whatever may have happened to Mr. Ziegler in another case has no bearing whatsoever on what his position will be in this case.

MR. HOFFMAN: All right.

MR. WOOD: But I don't want this record to be kind of one-sided, Darnay, on this issue of Gideon Epstein and Larry Ziegler because you have asked me about what is in their affidavits. I don't have those in front of me.

MR. HOFFMAN: They are not affidavits. They are letters.

MR. WOOD: Well, that is what I — it is my recollection there was a letter to you from each of these individuals.

MR. HOFFMAN: Right.

MR. WOOD: I can't recall sitting here today, because my brain cells are failing me as I age also, exactly what those letters said. But I do know this — and I want this to be clear on the record. I know that you submitted affidavits from these two individuals, Epstein and Ziegler.

MR. HOFFMAN: I never —

MR. WOOD: I am sorry. Submitted letters —

MR. HOFFMAN: Yes.

MR. WOOD: — as part of a supplemental response to mandatory disclosures.

MR. HOFFMAN: Right.

MR. WOOD: And I know for a fact that those letters to you, submitted by you, indicated that there were some similarities between Patsy's handwriting and the note, copy of the note they looked at. And they stated unequivocally that they believed that they could reach a conclusion if they were allowed to see other handwriting examples from Mrs. Ramsey from that time period. Am I right so far?

MR. HOFFMAN: Yes.

MR. WOOD: And I do know that I have a number of public statements made by you, both on the internet and on television, wherein you made almost the identical representations that Mr. Ziegler and Mr. Epstein would, in fact, testify conclusively that Patsy Ramsey wrote the note. And I know as a matter of undisputed fact that you made those representations about the conclusions of Ziegler and Epstein at a time when Ziegler and Epstein had not been given any additional handwriting exemplars which they had earlier stated they had to have in order to reach the conclusions that you attributed to them. Those, I believe, are clearly undisputed facts that can be shown. And those facts alone, before I even get to an expert's report or the ability to cross-examine that expert, say to me that Mr. Ziegler and Mr. Epstein, if you have accurately stated their conclusions publicly at the time you did state them, have some very, very serious credibility problems. That is my response to Ziegler and Epstein for the record.

MR. HOFFMAN: I, just for the record, I think that that was sort of an unnecessarily long response; but irrespective of that, I would just simply like to state that the more recent statements by Mr. Ziegler and Mr. Gideon Epstein reflect the fact that they were able to actually look at the police exemplars that were given by Mr. Ramsey and Mrs. Ramsey and which were provided by you subject to a discovery request, and that those most recent observations are based on that. And to that degree, those observations are more complete.

MR. WOOD: Well, let's leave it here.

MR. HOFFMAN: I will withdraw this question if it is a problem.

MR. WOOD: No, I am going to let him answer whether he is aware of that.

MR. HOFFMAN: I just want to —

MR. WOOD: He probably is now after listening to us. The point is, simply this: We look forward to receiving the reports, and we look extremely forward to the opportunity to cross-examine Mr. Ziegler, Mr. Epstein, and any other individual who is identified by you as a potential expert.

MR. HOFFMAN: All right.

Q. (By Mr. Hoffman) So, Mr. Ramsey, could you answer?

MR. HOFFMAN: But maybe I am going to need a read-back from the question.

Q. (By Mr. Hoffman) And, Mr. Ramsey, if you can answer it, please do, to the best of your ability. (The record was read by the reporter, as follows: "Question: Are you aware that there are handwriting experts that are working on behalf of Chris Wolf who have concluded that Patsy Ramsey is, as one of them said, without doubt the ransom note writer?")

Q. (By Mr. Hoffman) That is a yes or no.

MR. WOOD: Or answer any way you feel appropriate.

THE WITNESS: I wouldn't be qualified to say that they are handwriting experts, particularly if they reach that conclusion.

Q. (By Mr. Hoffman) All right.

A. They are wrong. And they made probably a serious career limiting decision if that, in fact, is their statement, because that is something that neither the CBI, the FBI, the Secret Service, nor the top experts in this country have ever said. In fact, quite the contrary.

Q. How do you know that, Mr. Ramsey, that they —

A. I have heard statements from the police, I have heard statements from the district attorney, I have heard the results of what we consider and most people would consider the top handwriting experts and linguistic experts in the country, all of which have said, highly improbable that Patsy wrote the note.

Q. Yet you have never actually seen any of these reports?

A. I have never read any of the reports. They have never physically been given to me.

Q. That is all I want to know. In light of that, I think, then, we are just going to move on, and I am going to ask you to look at a document that I am going to have marked as Plaintiff's Exhibit 17.

MR. HOFFMAN: Okay. Would you please do that?

THE WITNESS: And might I ask a question?

Q. (By Mr. Hoffman) Would you like to —

A. No. I would like to ask you a question. Was this used by your experts?

Q. That was one of the exhibits that was attached to an early handwriting report, and one of the reasons that we are, in fact, here asking, we have made an initial request in what is known as a notice to — a request for admission, and there seemed to be some question as to whether or not

what I had attached as an exhibit was sufficiently clear for there to be, you know, an accurate representation of yes or no. So I thought it would be easier if I just brought in clearer copies and just asked you and Mrs. Ramsey to determine whether or not these are, in fact, samples of her handwriting. Clearly, nobody wants to be drawing conclusions based on handwriting samples which are, in fact, not hers. It seems that Mrs. Ramsey doesn't remember this as being hers.

A. She said she doesn't recognize it, nor do I.

Q. (By Mr. Hoffman) Nor do you. Okay. That's all —

MR. WOOD: And fairly, Darnay, let's be clear that we are talking about Plaintiff's Exhibit No. 2 and Plaintiff's Exhibit No. 1. And to the extent that it is also letters from those might be in Plaintiff's Exhibits 11, and I think also 10, as well as Plaintiff's Exhibit No. 9, the record should accurately reflect that each and every one of your experts, including Epstein and Ziegler, have, in fact, stated conclusions to some extent relying in part on each and every one of those exhibits except for Exhibits 10 and 11, which are Cina Wong, David Liebman's exhibit. So all of your experts have relied on that to form their statements made in their reports to date, including just the recent letters we received —

MR. HOFFMAN: Right.

MR. WOOD: — that you sent us a few months ago from Epstein and Ziegler; they did rely on those documents, and they didn't even know that it wasn't Patsy's handwriting.

MR. HOFFMAN: Well, that hasn't been established because the argument can always be that there is always a reason why Mr. and Mrs. Ramsey might have a motive to lie. I am not saying that they are, but the fact is, there might be a reason why it is convenient for them not to be able to recognize it.

THE WITNESS: I think Patsy was very clear that she did identify handwriting that she recognized as hers.

MR. HOFFMAN: And, quite frankly, she may very well have been telling the truth.

THE WITNESS: Quite frankly, she was telling the truth, Mr. Hoffman.

MR. WOOD: And what might be interesting is to know what efforts were made by any of your so-called experts to actually authenticate those documents as Patsy Ramsey's handwriting before they were willing to go out and publicly stake their reputations that she is the author of the note based on handwriting exemplars that they didn't even have the slightest clue were written by her. So those are —

MR. HOFFMAN: Not necessarily they didn't have the slightest clue. Don't mischaracterize.

MR. WOOD: Well, when you raise questions about whether my clients might have a motive to lie, I am going to respond by saying that I think these people that you claim to be experts might have a motive to lie, and that motive is to get publicity and other things. We won't clutter the record up today. But let me tell you something, my clients have clearly identified the documents that you attached as exhibits. When the writing was Patsy Ramseys, nobody ran from it. The problem is, your people are relying on documents that either are not Patsy's or documents that they never bothered clearly to find out whether they were Patsy's before they went out publicly and accused Patsy Ramsey of writing a note to support the accusation that Patsy Ramsey killed her daughter. That is pretty flimsy, in my opinion, and I think that your experts will have a lot to answer for when we are finally given their report and allowed to cross-examine them, Darnay.

MR. HOFFMAN: Absolutely. I will say one thing in my defense and in their defense.

MR. WOOD: What?

MR. HOFFMAN: If, in fact, we were concerned that there was something bogus about their examination, I think the last thing we would want to do is establish at a deposition record by the testimony of both Mr. and Mrs. Ramsey that this is, in fact, not their handwriting. I think we can let that go by the board.

MR. WOOD: Well, with all due respect, with all due respect, you should have had reasonable notice to be concerned about whether there was something bogus about the alleged reports of Cina Wong and David Liebman and Mr. Stacey — or Lacey, I am sorry, and I think Tom Miller, when you were informed by Michael Kane of the Boulder District Attorney's office that those experts were not following recognized handwriting methodology, that they were not even attempting to discuss dissimilarities, but were only hinging their alleged conclusions on a few similarities which are common to almost all handwritings, and that there were serious questions in the Boulder District Attorney's minds also on their credibility because of their efforts to gain publicity for themselves regarding those reports. That information was provided to you, Mr. Hoffman, in writing from Michael Kane. And I don't think you are going to state that Michael Kane was necessarily trying to do John or Patsy Ramsey any favors in his role as a grand jury specialist for the Boulder D.A. But once he told you that and put that in writing, I believe that you should have been on clear notice that there were legitimate and serious concerns about the bogusness of these people's reports and conclusions, and those are the individuals, Mr. Hoffman, not Mr. Epstein and Mr. Ziegler, who are now Johnny-come-latelys to this lawsuit, those were the individuals who you relied upon when you filed this complaint for Chris Wolf and submitted your mandatory disclosures. So I think there are very serious questions about their legitimacy, not just those raised by me. I haven't had the time yet and opportunity to cross-examine them, which I say I look forward to. But they were carefully studied by the Boulder District Attorney's offices, and they were soundly and wholeheartedly rejected as credible experts on the issue of handwriting. You knew that before you used them to file this lawsuit, yet you filed it anyway, I

would say without further inquiry into their legitimacy. That is a problem and an issue, and I think the record ought to reflect it, and I think I stated it accurately.

MR. HOFFMAN: I have to — now, naturally, since you made a record, I am going to have to respond to what may be either mischaracterizations or just simply things that you are not aware of. To begin with, the letter by Michael Kane did not indicate what about the methodology with the exception of dissimilarity was suspect.

MR. WOOD: I can get the record, and we can put it into the record here. Why don't we do that. Let the letter speak for itself. I have got a copy of the letter.

MR. HOFFMAN: Well, if you would like to take a break and do that, we can —

MR. WOOD: We don't have to take a break, but I can have someone find that letter.

MR. HOFFMAN: That letter, fine. We will put that into the record. That is the first thing, from what I remember, since you are speaking from memory, also.

MR. WOOD: I have a pretty good memory on that one. It doesn't always fail me.

MR. HOFFMAN: Second point is that, with respect to the similarities, we do not know who Mr. Kane had actually submitted those reports to and who he was relying upon for the questions about the legitimacy of the reports. He did not indicate in his letter who it was that he had consulted. But, more importantly, I will say one thing, that, with respect to disguised handwriting, finding dissimilarities is less useful since the person clearly is trying to create consciously dissimilarities in the handwriting. And to the degree that the handwriting is disguised, there is, to some degree, dissimilarity to be expected and to continually belabor the point that disguised handwriting has dissimilarities is really not useful in a discussion of dissimilarities with respect to being able to put, add, or eliminate people from handwriting. So I never thought that Mr. Kane's one methodological discussion was a particularly valid one. Now, with respect to the district attorney's office that experts would be seeking publicity, I know that at one time they certainly did consult with a Donald Foster, who I believe was thought to be seeking publicity at one point, but that did not prevent them from at least consulting with him at least at some time. I know that Barry Scheck, who is a former professor of mine and was brought in as a DNA expert, I won't say he is a publicity hound, but he certainly is not media-averse. They brought him in, and they relied upon him. Also, I know that periodically the district attorney's office would trot out an expert. I believe there was somebody from Canada who was not an expert, or whatever, so I don't think the district attorney was averse to using media-seeking experts. And I think Michael Kane's characterization of Cina Wong and David Liebman as media experts disqualifying them inherently because of that was, in fact, anything other than just simply hypocritical on his part. Now, as far as Mr. Kane is concerned, I don't think that, from the statements that I have heard from the Ramseys, that they particularly trust, A, his judgment, B, his motivation. I may be incorrect with respect to that. I, in turn, do not trust either

his motivation or his competence. But I will point out that these handwriting reports were given to Alex Hunter's office. In the four years that they have had the reports or anything else, they not once made an attempt to contact either myself or any of my experts to talk even in a collect telephone call. There was never any acknowledgment of receiving it, and that is despite the fact that the district attorney's office, and I believe the police department, made public appeals to individuals to please come forward, that they would listen to any sort of reasonable clue, if it came over the internet, if it came from telephone calls, or whatever, and here were handwriting reports that I had solicited, some of which I actually had to use my own money to prepare, and they were completely ignored. They weren't even acknowledged by anybody in the district attorney's office, and yet they spent an inordinate amount of money trying to track down something that was known in the press as a Santa Bear, for instance. That sort of thing — Yes, Mr. Ramsey?

THE WITNESS: Well, I have got a band concert to go to tonight. Could I get my questions asked, and then you guys could put stuff on the record?

MR. HOFFMAN: The only reason I am responding, and I am very sorry, is that I have to respond to your counsel's colloquy here, and I have to make a record. I am very sorry for that. Mr. Wood, and I am sure will take this — this is my first hearing that you have a band concert. I am very sorry. And I will try to make this — I will try to make it —

MR. WOOD: I think he is trying to say, maybe, let's don't go back and forth until 7:00 or 8:00 tonight.

THE WITNESS: Yeah.

MR. HOFFMAN: You made a record with respect to and representation for a record with respect to my experts, and I am not going to allow my silence to act as some sort of admission that you, in fact, were correct. I categorically deny that my experts are unqualified, any of them, that any of them acted out of any malice. In fact, it was my experience that when Cina Wong, when I contacted her initially — each expert was contacted to look at the report of another expert to see whether or not there was a problem in their methodology. And as a result of looking at the methodology, they reached the same conclusions. I did not ask them to reach a conclusion. I basically wanted to make sure that if, in fact, there was going to be a case made in civil court against Mr. and Mrs. Ramsey, that there was, in fact, a sufficient basis for it. I was doing my best to investigate the facts of the case before making the allegations. The only allegation that I ever really made is that, based on the handwriting reports by people that I trust to be experts, that their conclusion that Mrs. Ramsey is the ransom note writer was the basis not only for any allegations that I may have made personally in public with respect to Mrs. Ramsey, but also forms the basis by which I filed the — not only the action against Alex Hunter in 1997, but also the action on behalf of Chris Wolf and Linda Hoffman-Pugh. So I have tried to do a due diligence and certainly avoid any problems with Rule 11. I am under a duty as an officer of the court to

investigate the case and the facts. And the only reason, basically, we are here today is because I have yet to see handwriting reports from any source other than my own that, in fact, clear Mrs. Ramsey. I would love to see those reports. I don't know why I have never been offered a report. The question I have for Mr. Wood is, at the time that Mr. Wood was releasing your polygraph reports and had a very attentive national media, why did he not come forward with written handwriting reports that could clear Mrs. Ramsey? I think that that would have been a spectacular and an extremely important opportunity in order to clear your wife from any suspicion of being the ransom note writer. And, yet, there has never been, despite all the money that Mr. and Mrs. Ramsey have spent, any attempt to release a written report at any time to the media similar to the written report that was released in the polygraph, and I never have been able to understand it. It is like the dog that should have barked in the night that hasn't barked in the night. My question has always been, why haven't the Ramseys released a handwriting report to shut me up, to just simply stop all the noise about the fact that there are handwriting experts that believe that Mrs. Ramsey wrote the ransom note? Why haven't, Mr. Wood, your clients been willing to produce for public consumption a handwriting report that simply, adequately, and for all time clears Mrs. Ramsey?

MR. WOOD: Darnay, out of respect for John, who does have a band concert, I am not going to engage in trying to go back through and respond to all of that colloquy.

MR. HOFFMAN: Okay.

MR. WOOD: Suffice it to say, because you have referenced two individuals, clearly, Barry Scheck has never sought publicity about the Ramsey case. He has never discussed it publicly. He has refused to do so. Don Foster was not rejected by the Boulder District Attorney's office because he sought publicity. Don Foster was rejected because he concluded, after being hired by Steve Thomas, that Patsy Ramsey was the author of the note, and they thereafter found out that he had, prior to being hired by the Boulder District Attorney's office, written a three-page letter to Patsy Ramsey stating unequivocally that he would stake his reputation on her innocence that she was not the author of the note.

So they discovered that Don Foster was, as we say in the business, a liar for hire. There are a lot of liars for hire in our business. You and I can debate, after I have been presented with your experts' reports and the opportunity to depose them, whether they have any legitimacy or whether they too are liars for hire or for publicity. We will resolve that another day. Suffice it to say here that we are not going to react to your comments about handwriting experts until we get your experts, which we are entitled to get, and then I want you to know this: You will receive handwriting expert reports from the Ramseys. Okay? So the time for that will come. It hasn't been time yet, but that will happen at the appropriate time. But, first, we are entitled to get your reports and cross-examine your experts. Once we have done that, you will get your reports that you so desperately want. And then I am going to hold you to that; that once you get those reports, since you don't believe the four people that Alex Hunter described as top of the line that

said out there in Boulder she didn't write it, since you don't believe them, I will hold you to your word. Once we give the reports to you, I am going to ask you to, quote/unquote, as you say, "shut up," your words, not mine, then dismiss your lawsuit. Okay? So let's go on and let Mr. Ramsey answer questions.

Q. (By Mr. Hoffman) All right. Mr. Ramsey, what time do you need to be out of here. I am not going to hold it against you. Seriously, I would like to — because I will do this according to that.

THE WITNESS: What time is the band concert?

MS. RAMSEY: 7:00.

THE WITNESS: 7:00, okay.

MS. RAMSEY: He is not in a band concert.

THE WITNESS: No, my son is.

MR. ALTMAN: I understand that.

Q. (By Mr. Hoffman) Okay. What time would you like to be able to leave here to be able to conveniently get there?

A. If we left at 5:00, we will be in good shape.

Q. What time do we have now?

MR. WOOD: It is 2:30. We have got plenty of time.

MR. HOFFMAN: We are not going more than an hour, Mr. Ramsey, at all, and maybe even less than that.

THE WITNESS: Okay.

MR. HOFFMAN: Okay.

MR. WOOD: But that's not an invitation for him and I to go for another two and a half hours and talking.

MR. ALTMAN: Once again, if I could say something, if we can stick to what we have been here for, ask questions, answer questions, I think we will be fine.

MR. WOOD: I think that is appropriate, but I think Darnay knows as well, that this deposition, as the Ramseys have done before, they don't claim confidentiality, they have nothing to hide, and I want the record to be clear that this idea that Mr. Hoffman is asking questions that seem to contain damaging statements of experts about Mrs. Ramsey, I think that invites the record to be very clear that there are serious questions about whether these individuals are, as I say in the

industry, we call them liars for hire. And so I think that both sides of that issue have to be explored on the record when he makes their conclusions part of his question. That is all.

MR. ALTMAN: I think the question was, is it, in fact — do you have knowledge of it, not so much do you agree with it.

MR. WOOD: That is the way of putting out what we believe to be potentially a very bogus conclusion accusing Patsy Ramsey of writing the note because he wants that to then be part of a public record that is either watched on television or read by someone. And when you put that kind of information out there, the record, in order to be accurate and complete, has got to contain information that I think clearly demonstrates that there are, at a minimum, serious credibility issues with these experts, if there is not already sufficient evidence in the record to show that they are, quote/unquote, liars for hire or bogus excerpts. I have offered to resolve at least part of this, and I will do so. If I have my office locate Mr. Kane's letter to Mr. Hoffman, we will attach it to the record. It will speak for itself. That is all.

MR. HOFFMAN: Mr. Wood, I just want to say one other thing with respect to that. You may have noticed that I have not asked Mr. Ramsey for personal information or Mrs. Ramsey. I haven't asked for their address. I haven't asked for social security numbers. I haven't asked for anything that would in any way hinder your ability to have to hold this back to at least redact those elements of it, because I am not interested in creating a record that will keep you from being able to make this public if you choose to do so at any time that you choose to do so. I just simply want to go — I have had an opportunity to see a lot of the tapes and transcripts of Mr. Ramsey and Mrs. Ramsey with the police interviews and whatever, and I am not interested in taking them over the same ground. I could have easily — Mrs. Ramsey, I believe, made a statement to the media yesterday that she was surprised at how short the deposition was, that there didn't seem to be any "Where is the meat to the Whopper," but a lot of that was already provided to me by material from discovery. So consequently, I am not trying to create any kind of record. I am just trying to get answers to questions that I still have. I am required to do that. **MR. WOOD:** Let's move forward. You ask questions. They have answered every one that you have asked so far, and they will continue to do so.

MR. HOFFMAN: Okay. All right.

Q. (By Mr. Hoffman) Mr. Ramsey, I am going to show you a document that I would like to have the court reporter mark as Plaintiff's Exhibit 17, marked for identification.

(Plaintiff's Exhibit-17 was marked for identification.)

MR. WOOD: Is there a part of this you want him to look at?

MR. HOFFMAN: I want him to look at the headline, because, basically, I know this is a news story. I am going to ask him if he can — if he has ever seen this news story before.

THE WITNESS: No, I have not.

Q. (By Mr. Hoffman) Are you familiar with Charlie Brennan —

A. Yes.

Q. — as a news reporter? Do you have any opinion with respect to his ability as a journalist to accurately report the news? Any personal knowledge.

A. I know of one instance in the beginning where he reported incorrect information.

Q. I am going to ask you whether or not the headline in this story is substantially correct, knowing that these are not your words. Did you, in fact, have investigators tail possible suspects?

A. I did not have investigators tail possible suspects.

Q. Do you know if anyone working on your behalf had suspects tailed by investigators?

A. I believe that our investigators observed the behavior of certain people the day that that ad appeared. I don't know for how long. I don't know what they did. But I am aware of that.

Q. I would like to ask you, then, very simply, is this headline substantially correct or false as a statement of fact, in your opinion?

A. Is it substantially —

Q. — correct as a statement of fact in your opinion, the headline?

A. Well, the word I have difficulty with is "tail." I don't know that they tailed anyone. I think they observed outside their homes. So it is generally correct, to my knowledge.

Q. Okay. I am going to now ask you to look at something I am going to have the court reporter mark as Plaintiff's Exhibit 18 for identification.

(Plaintiff's Exhibit-18 was marked for identification.)

Q. (By Mr. Hoffman) There are a series of documents here. I just would like you to look at them all at one time briefly, and I will ask you about each one. All right. With respect to the first document, I would like you to review the headline, and I am going to ask you whether or not that headline is substantially correct when it states that "Parents' book will name suspects, publisher says."

A. I think it is substantially incorrect.

Q. In what respect?

A. Our book did not name suspects. It addressed people that were already being discussed in books, in the media, who had been on television and whom, had we not addressed, would have looked foolish. There are a number of people that we are interested in that we did not name in our book because they were not out in the public and known to the public.

Q. Do you know if at this time — the story is dated February 22. I believe it is — the year your book came out was 2000. It is copywritten 2000. Around this time, you were doing a media tour, what is commonly known as a media tour for the book?

A. We agreed to do a few interviews, yes.

Q. Interviews, right. Were you aware that your publisher was reported as having made these statements, that the Ramseys' book will name suspects? At the time.

MR. WOOD: You may answer that. Reported, yes. But in fairness to Mr. Zettersten, I don't believe that that is what he said. If you look at the quote, that may be the headline that somebody decided to give it, but if you will look at the quotes, I don't think Ralph Zettersten said that before. In fact, he said very precisely, "It is people who have been mentioned before, Zettersten said. There will be a couple of others, but not by name."

THE WITNESS: And that is correct.

MR. WOOD: That is his quote. So, I mean, we are not responsible for what some writer decided to put in a headline for whatever reason. But you would answer the question, if you were familiar with this article or other articles that have claimed that that is what Mr. Zettersten was doing.

MR. HOFFMAN: Actually, I am going to withdraw my question, and I am going to ask a different question.

Q. (By Mr. Hoffman) Were you aware at the time this article was published that there were stories with this sort of headline circulating, that the Ramseys were naming suspects?

A. Was I aware — I was aware post that being out there. I wasn't aware that that was going to be said or that —

Q. But afterward.

A. But that was interpreted as the matter.

Q. Did you make any attempt to object to any of the media with respect to this characterization? Did you make any attempt to correct that impression?

A. What we found in dealing with the media is that it is a massive brute. I don't know how I would begin to correct that kind of thing. The book was an attempt to correct as many of the myths that we knew about.

Q. Mr. Ramsey, I quite agree with the characterization as the media as a massive brute. However, did you at any time ever say in public that one of your intentions in your litigation was to change the way in which the press reported the news in a case like yours.

MR. WOOD: You can answer that. If you want to see the statement. Darnay, I think you are obligated —

MR. HOFFMAN: No, I am just saying in terms of that effect —

THE WITNESS: I will tell you what my feeling is, and I have said this a number of times, that we need a law in this country that prevents the police from talking to the media about evidence in an ongoing case. We have bypassed the constitutional provisions that have been put in place to protect people's rights when the police could disclose evidence to the media for entertainment. It is a law in England. If some of the things that the media had done in this country and that the police had done in Boulder had been done in England, they would be in jail. It is a simple law. I think we need that in our society. So, yes, I would love to see that kind of a change because I think our system is too quick to convict based on hearsay that is broadcast on the media. And that is unfair to any citizen.

Q. (By Mr. Hoffman) I don't know if you are familiar with J. Edgar Hoover, who was the former head of the FBI, or whether or not you are aware that J. Edgar Hoover used to tell his agents that if you cannot solve a case, if you are having a hard time solving the case, give it to the press because people are more likely to come forward and talk to a reporter than they are to a law enforcement agent, and that that might be the reason why some law enforcement agents, in fact, have this policy of giving information to the media. I just wanted to know if you were aware of that. **A.** Well, I am talking —

MR. WOOD: Do you have any source for that statement from J. Edgar Hoover? I mean, you know, Darnay —

MR. HOFFMAN: I don't have it, but I can produce it. I am just looking for a response here.

MR. WOOD: We could say J. Edgar Hoover could speak for himself, but, you know, you are putting in —

MR. HOFFMAN: Or herself, whatever the case may be.

MR. WOOD: Himself or herself.

MR. HOFFMAN: He is not somebody that I would, like, quote as a libertarian or a humanitarian, or an ACLU, whatever.

MR. WOOD: I will let Mr. Ramsey answer, but we are getting far afield, I am afraid. But go ahead.

THE WITNESS: I can tell you from my opinion some of the best investigative work has been done by journalists in this case. But that is different than disclosing evidence or opinions on evidence to the media prior to a trial.

Q. (By Mr. Hoffman) Now, you said —

A. That is what I am talking about, evidence. I am not talking about the fact that someone was murdered or accosted or raped and it was in this location and this is the description of the person we are looking for. I am talking about — you know, we know for a fact that there was a deliberate and thought-out effort on the behalf of the police at the direction of the FBI to publicly assassinate our character and discredit us and bring massive pressure on Patsy and I in hopes that one of us would confess or break and turn the other one in. That is bypassing all of the rights that have been established in our constitution to protect every citizen, and that is wrong.

Q. Okay. That brings me to my next question, which is, would you just express briefly your opinions of tabloid magazines, such as Globe, The Enquirer, The Examiner, the Star?

A. I have said before, and I still believe, they are a cancer in our society.

Q. Which brings me to the next question which I asked Mrs. Ramsey yesterday, and I am going to ask you. Did you at any time agree to give an interview with The Enquirer, this cancer on society?

A. Yes.

Q. May I ask you why you agreed to do that?

A. It was part of a settlement agreement on behalf of some suits that we had filed against these people. And I cannot disclose per the agreement any more than that. And we were willing to confront our most ridiculous accusers.

Q. I just want to ask you to —

MR. HOFFMAN: I am going to ask the court reporter to mark this as Plaintiff's Exhibit 19. And I will show that to Mr. Ramsey.

(Plaintiff's Exhibit-19 was marked for identification.)

Q. (By Mr. Hoffman) Mr. Ramsey, I am going to ask you if the document I just have shown you, which is marked Plaintiff's Exhibit 19 for identification, is substantially correct in its reporting with respect to its headline?

A. No, it is not.

Q. In what respects is it incorrect?

A. We did not turn to the work of a psychic. A picture was forwarded to us that was done by a Dorothy Allison, who I believe is a psychic, by someone. I think she had done it on a television program. We forwarded it to our investigators as a matter of procedure. We did that with everything we got in the mail. And we got a lot of stuff. And I believe they chose to put it on their website to stir up activity. And they did receive a number of leads and calls based on that.

Q. Were those leads and calls useful to your investigation?

A. I don't know.

Q. Now, I am going to show you — unfortunately, for some reason, I ran out without making a second copy, so I am going to ask the reporter to mark this as Plaintiff's Exhibit 20 for identification, and then I will just show it to you after he has marked it.

(Plaintiff's Exhibit-20 was marked for identification.)

THE WITNESS: Okay.

Q. (By Mr. Hoffman) Mr. Ramsey, I am going to ask you if you can identify what appears in that document.

A. I can identify most of the pictures of JonBenet. Some of them — or one of them is very fuzzy. I just assume that is the picture that was on the website.

Q. Do you know if that is, in fact, a picture of your website that you are looking at?

A. I don't know that for a fact, no. I have not seen this image.

Q. Do you know if the image of the man at the lower part of it —

A. Uh-huh (affirmative).

Q. — do you know if that image ever appeared on your website?

A. This is the first I have seen it. I don't usually look at that website.

Q. Do you know if the man in question in that photo was, in fact, a suspect, to your personal knowledge?

A. I don't know.

Q. Was that man meant to be Chris Wolf?

A. Not to my knowledge.

MR. WOOD: Just so the record is clear, that is the drawing of the psychic that you were earlier referring to.

MR. HOFFMAN: Is it? I don't know.

THE WITNESS: Oh, yeah.

MR. HOFFMAN: I was asking Mr. Ramsey what he did or didn't know.

MR. WOOD: Just so the record is not confused here, Mr. Ramsey indicated to you that the psychic's drawing was sent to the Ramseys, that it was reviewed by the Ramsey investigators, and that the investigators put it up on the website. And I think he said their website. This website was utilized by the Ramsey investigators.

MR. HOFFMAN: I just asked Mr. Ramsey if he could identify it, if he had he ever seen those pictures, and whatever else. That is all I want to know.

THE WITNESS: That is a different question than I was asked. Had I ever seen this drawing? Yes, I have.

Q. (By Mr. Hoffman) You have. Oh, I see. Okay. Do you know in what context it was?

A. It appears to be, from the best I can tell from the copy, the drawing that was sent to us that was made by Dorothy Allison.

Q. Had you ever seen a picture of Chris Wolf?

A. Yes.

Q. In your opinion, does Chris Wolf look anything like the picture there?

A. I wouldn't draw that conclusion, no.

Q. Okay. Now, I have one last question. Just simply, it is a point that involves something I just wanted to be clear about. And I am going to let you read this. It is — and the reason I am not reading it out loud is that it is part of the Boulder police interview, which has been marked confidential. I don't want to have something read into the record that would in any way mean we would suddenly have to mark this confidential, if for some reason we don't want to have today's deposition marked confidential. So for the purposes of this question, I am just going to ask you to read to yourself the highlighted portions. And in fact, I am not going to even attach this as an exhibit. I am just going to simply — just as a recollection, to reflect, refreshed. If you would look at that, I am just going to ask you one question with respect to it.

MR. HOFFMAN: And, Mr. Lin, it is at the very end; it regards the, I think, the butler door, whatever it is. **MR. WOOD:** Let me say this to you.

MR. HOFFMAN: Yes.

MR. WOOD: This is a couple of pages from, it looks like, Patsy Ramsey's April '97 interview —

MR. HOFFMAN: Yes, on the front, I put that on the cover.

MR. WOOD: — six-hour interview. I don't have any problems; you can read it, you can put it into the record.

MR. HOFFMAN: I would just prefer —

MR. WOOD: We don't have any — I don't have any problems with that being made part of the record officially. Put it out there. We would like to see the whole police investigative file be made public so people would know the truth about this case.

MR. HOFFMAN: I would prefer, since this has been stamped "confidential" —

MR. WOOD: I am the one that stamped it confidential in other litigation several months ago, if not last year, for reasons different than the issue of confidentiality in this case. I am waiving any claim for confidentiality. Put that into the record. I have no problems with you doing so.

MR. HOFFMAN: Well, I am not —

MR. WOOD: You could put the whole April 1997 transcript of both of their interviews into the record. I have no problems with you doing so.

MR. HOFFMAN: I am not going to do that.

MR. WOOD: I have no problems with it.

MR. HOFFMAN: All right. Thank you very much.

MR. WOOD: Let the truth come out.

MR. HOFFMAN: I agree with you.

Q. (By Mr. Hoffman) This question involves the — do you know where the butler kitchen was in your house?

A. Well, yes. I know what we called the butler kitchen.

Q. Butler kitchen. Do you remember opening the door to the butler kitchen at any time in the morning while you were looking through the house for Jon Benet?

A. No.

Q. And so is it that you have no memory of it or that you just didn't do it?

A. I did not open it.

Q. So it wasn't opened by you?

A. No.

MR. HOFFMAN: Thank you very much. This is going to conclude my deposition testimony of Mr. Ramsey. And I want to thank Mr. Ramsey for being here. I want to thank Mrs. Ramsey, once again, for her deposition yesterday and for being here today, and thank counsel.

MR. WOOD: All right. Just so the record is clear, we have a number of hours under the Federal Rules of Civil Procedure remaining in which you have the right to examine Mr. Ramsey and to ask him any question factually otherwise that is proper and relevant to the claims and defenses in the lawsuit. And do you acknowledge that there are a number of hours remaining?

MR. HOFFMAN: Yes. Absolutely.

MR. WOOD: He answered every question today?

MR. HOFFMAN: Yes, he has.

MR. ALTMAN: I think with the exception of what we had spoken about regarding the financial issues which we may take up later.

MR. WOOD: We are not going to take that up on the record, as that is something that would require a court ruling.

MR. HOFFMAN: Every question that was put to Mr. Ramsey that was a matter of record today, that we agreed on was a matter of record, was, in fact, answered by Mr. Ramsey.

MR. WOOD: And as you indicated, you have reviewed his April '97, June 1998, and April 2000 police interviews —

MR. HOFFMAN: That is correct.

MR. WOOD: — and I think you will say, with respect to Mr. Ramsey, Mr. Hoffman, the same as you said with respect to Mrs. Ramsey yesterday, he answered every question for the police; didn't he?

MR. HOFFMAN: That I can't make a subjective statement about simply because I don't know what it was the police were trying to elicit in the way of answers, so I can't say that. **MR.**

WOOD: You can't say that he gave him the answers they wanted?

MR. HOFFMAN: No, I just don't know. It's really probably improper for me to characterize their testimony. I mean — and I don't think anybody will want a testimonial from me, from the Ramsey family anyway.

MR. WOOD: Yeah, but the point is —

MR. HOFFMAN: But I did receive those.

MR. WOOD: — you have that massive what amounts to about 70 hours of their interviews with police; they voluntarily gave them. My question is, all of that material having been forwarded to you earlier by the Ramseys, along with a number of other documents, are you sure you have no other questions of Mr. Ramsey, because if you do, I want you to ask them today.

MR. HOFFMAN: No. I understand. In fact, one of the reasons why — and I want to characterize this properly. One of the reasons why these depositions are shorter than they might have been is because I am not asking either Mr. or Mrs. Ramsey to go over testimony that they have already given by the police. The police certainly have spent a great deal of time with the Ramseys, and, quite frankly, even though there may be areas that I might have personal curiosity about, I feel it would be inappropriate for me to ask them, and so that is why these depositions aren't going the full day. It is not because I feel that the Ramseys don't have anything to offer. It is just simply that I think that they offered a great deal of information when they were, in fact, interviewed, and I just chose not to cover most of it. And that is all.

MR. WOOD: But you acknowledge that any question you have, curiosity or otherwise, that you believe to be relevant and properly framed in this case, you have the opportunity to ask them now.

MR. HOFFMAN: There — I have had the opportunity to ask Mr. Ramsey questions today. And with the stipulated exception that we have, which does not affect my answer here, I felt that Mr. Ramsey made the best effort that he could to answer those questions fully.

MR. WOOD: Let me briefly cover a couple of matters with you, Mr. Ramsey, by way of direct or reflect discovery.

EXAMINATION BY-MR.WOOD:

Q. Let me hand you what has been marked for purposes of identification as Plaintiff's Exhibit 16 to this deposition, and I think it has been represented to you and acknowledged by you, it appears to be — we don't know how much generations away from the original, but a copy of the ransom note found in your home on December 26, 1996. You have looked at that earlier today?

A. Uh-huh (affirmative).

Q. At the time earlier in your testimony with Mr. Hoffman, I think you made reference to one of the peculiarities of the ransom note being that you were first discussed or addressed formally and then later in the note informally. Do you remember —

A. Yes.

Q. — telling Mr. Hoffman about that? And I think you made the reference that you were addressed "Mr. and Mrs. Ramsey." Do you recall telling him that?

A. Yes.

Q. Did you have the ransom note in front of you at the time you were giving that information to Mr. Hoffman?

A. No. I had forgotten that it was only addressed to me. But what it was what — what I noticed was that it was a formal address, and yet they fell into a familiar form later on.

MR. WOOD: That is all I wanted to clarify.

MR. HOFFMAN: Yes.

MR. WOOD: And now let me mark this as Defendant's Exhibit No. 1.

(Defendant's Exhibit-1 was marked for identification.)

MR. WOOD: Do you want to take a look at this real quick?

MR. HOFFMAN: Yes, please. Thank you very much. May I make one observation about this before you read it into the record?

MR. WOOD: Sure.

MR. HOFFMAN: I would like the record to reflect that I made this document available on the internet at the time that Cina Wong, and there is a document which seems to be almost identical, that David Liebman received this. I would just like the record to reflect I made no attempt to keep this hidden from the public.

MR. WOOD: And there has been no representation that you did make any such attempt.

MR. HOFFMAN: I am sorry? No. I want the record to reflect that —

MR. WOOD: But I appreciate the stipulation.

MR. HOFFMAN: — that I made that available through the internet.

MR. WOOD: The stipulation was that you recognize the document, and it is actually the very material that you placed on the internet.

MR. HOFFMAN: That is correct.

MR. WOOD: And it was, in fact, and is, in fact, a true and correct statement of the letter that was sent to Cina Wong by Michael Kaneon behalf of Alex Hunter, the —

MR. HOFFMAN: Correct.

MR. WOOD: — the Boulder district attorney.

MR. HOFFMAN: Uh-huh (affirmative).

MR. WOOD: January 20, 1999.

MR. HOFFMAN: Yes.

MR. WOOD: And also a true and correct verbatim statement of the letter sent by Mr. Kane on that date, January 20, 1999, to Mr. David Liebman; am I right?

MR. HOFFMAN: That is correct.

MR. WOOD: All right. So that the record is clear, in those letters which predate the filing of this lawsuit, Mr. Kane stated to Ms. Wong and Mr. Liebman in identical language that he was informing them that their request to testify before the Boulder County grand jury in the JonBenet Ramsey murder investigation was denied, and the statement was, "We have determined that your proposed testimony would not serve the interest of justice, which is the controlling standard by which to judge your request." And I continue to quote: "The primary reason that we have reached this decision is that we believe that the methodology which you have used in reaching your conclusions does not meet the standards employed by the vast majority of forensic questioned document examiners in this country." I continue to quote: "Most significant is your complete failure to account for or even reference any unexplained dissimilarities between the questioned and known samples. You are willing to conclude with 100 percent certainty that a writing was authored by a particular person based on some threshold level of similarities without any mention that there may be 10, 100, or 10,000 unexplainable dissimilarities between the known and unknown writings. I know of no reputable forensic document examiner who will not agree that unexplainable dissimilarities between a person's natural writing and questioned handwriting will preclude a positive identification. "In fact, where the degree of unexplained dissimilarity is high, it may result in an elimination, in spite of the existence of a number of points of similarity." And then I go down to state: "In addition to your technical deficiencies," I quote, "there are other reasons for our decision. I would note that you have engaged in a campaign of promoting your opinion in a manner that would surely open your credibility to doubt on cross-examination in a judicial proceeding. "As an experienced trial attorney, I believe that an expert witness who has attempted to insinuate herself," or himself, "into a particular criminal investigation through a public media campaign would appear less than objective and professional to a jury." Now, I make that statement because I misspoke earlier when I made a statement about a letter sent by Michael Kane to you. In fact, the letters were sent by Michael Kane directly to Cina Wong and to David Liebman in January of 1999. You received copies of those letters before this lawsuit was filed. You published those letters on the internet, and I simply make this record because I now

note there can be no dispute about what Michael Kane said about your alleged experts, and your knowledge.

MR. HOFFMAN: About how they became available to the public.

MR. WOOD: There is no — I don't think there is any dispute about what Michael Kane has said about their methodology and their credibility. That is why this is important to be put into the record, since you have referred to them earlier today. And I do that not only to clarify the record but also to point out that this is another one of the reasons that we filed what is now correctly identified by me as the 15th defense, going on. I earlier said the 13th defense. That instead of bringing this legal action out of a concern for some real injury to reputation, Plaintiff Wolf and his counsel bring this lawsuit as a publicity stunt. They have thus joined legions of persons who have tried to make personal profit from the brutal murder of defendants' child. Neither plaintiff Wolf nor his counsel possesses any admissible evidence that any defendant murdered JonBenet Ramsey. That is verbatim the 15th defense. There was some question in the litigation raised earlier in the deposition about whether that had been made in the pleadings. It is a defense to this case asserted in the 15th defense in our answer. With those clarifications to the record, I have nothing further.

MR. HOFFMAN: I would just only like to point out one thing with respect to Mr. Kane's objection. The operative word there is "unexplained dissimilarities." And the fact is that Mr. Liebman and Ms. Wong felt that these dissimilarities were explained by the fact that the person in question, in their opinion, was trying to disguise their handwriting. And in disguising your handwriting, occasionally, you are going to create dissimilarities which are not unexplained. They are dissimilarities, but they are not unexplained dissimilarities. And that is the point I would like to make with that. And thank you.

MR. WOOD: I appreciate your statements about what they say. We look forward to that and the opportunity, as I am sure you would tell us to ourselves, cross-examine Mr. Wong, Mr. Liebman, Mr. Lacey, Mr. Miller, if he is going to be involved, as well as Mr. Epstein and Mr. Ziegler. We look forward to that day —

MR. HOFFMAN: Thank you very much.

MR. WOOD: — when we can present them the questions and get the answers from them. Thank you.

MR. HOFFMAN: All right. Thank you. Again, Mr. and Mrs. Ramsey, thank you for being here today.

THE WITNESS: We have had our differences, but we are all children of God, and I respect you for that.

MR. HOFFMAN: Thank you very much.

THE VIDEOGRAPHER: We are off the video record at 3:03.

(A recess ensued.)

MR. WOOD: Just before we complete the record, I wanted to state that, on behalf of the Ramseys, and in this instance particularly John Ramsey, that we do not claim any confidentiality as to this deposition. The Ramseys agree that this deposition of John Ramsey, just like the deposition of Patsy Ramsey, can be presented publicly with no claim of confidentiality, unlike every other witness and party in the case to date. Every other witness, including Steve Thomas, including, in part, Mr. Wolf, and the other witnesses so far, Alex Hunter, Mark Beckner, Carey Weinheimer, have all claimed a measure of, if not entire, confidentiality. The Ramseys want the whole truth in this case out, and they are willing for the public to see their depositions in its entirety. So we make no claim to confidentiality.

MR. HOFFMAN: And with respect to any claim of confidentiality that has been made in Chris Wolf's case, it has been a limited level of confidentiality; and we, of course, invite the Ramseys, to whatever extent they feel appropriate, to release any or all part of the unredacted portion of Mr. Wolf's deposition.

MR. WOOD: I appreciate that. On behalf of the Ramseys, we would ask you to do the same thing they are doing, that is, let the entire truth come out about Chris Wolf and not prevent the public from knowing all aspects of his life, including those that you have chosen selectively to deem confidential. I would like for Mr. Wolf's deposition in its entirety to be made public, not just theselected portions. I think the truth — that is why I haven't let it out, because I don't want — I want the whole truth out, not just parts of it. Let it all come out.

(Whereupon, the deposition was concluded.).

December 20, 2001