## John Ramsey's deposition from Oct. 20, 1998

The following is the transcript of John Ramsey's Oct. 20, 1998, video-taped deposition as part of Boulder photographer Stephen Miles' defamation lawsuit against Ramsey and the National Enquirer.

Present were attorneys for John Ramsey, the National Enquirer and Miles' attorney, Lee Hill, who conducted the interview.

The interview was conducted while a Boulder County grand jury investigated the murder of JonBenet Ramsey. Out of respect for the grand jury process, and because Ramsey could be called to testify, questions directly related to the murder had to wait until after Ramsey's testimony before the grand jury.

Hill said his intentions at the time of the deposition were to build a rapport with Ramsey and subtly develop leads that could be used during a second interview. The second interview never came; a federal judge dismissed Miles' lawsuit after not finding sufficent proof against the Enquirer.

As Ramsey answered questions, more than a half dozen reporters and camera crews, including a Globe reporter, waited outside his Denver attorney's office hoping to catch a comment or a photo.

Although Ramsey testified for nearly a full day, he successfully avoided the media.

Page 1

1 IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF COLORADO

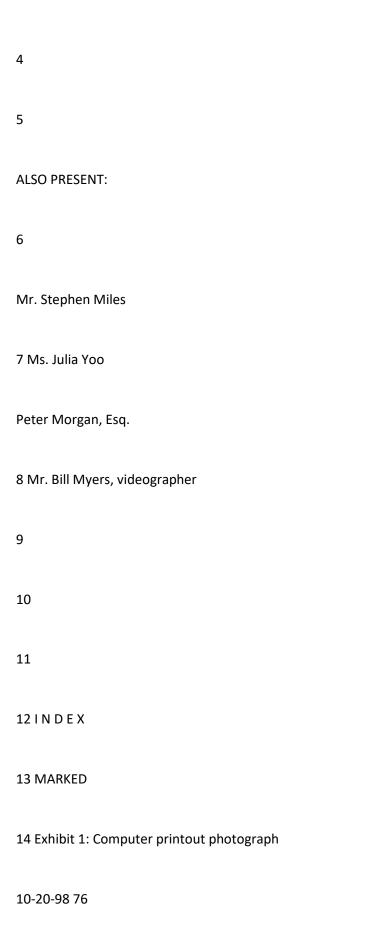
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Civil Action No. 98-WY-528-CB

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4 STEPHEN MILES, )
) VIDEO
5 Plaintiff, )
vs. ) DEPOSITION OF
6)
JOHN RAMSEY, NATIONAL ENQUIRER, ) JOHN RAMSEY
7 INC., JOHN SOUTH, DAVID WRIGHT, )
and JOHN DOES NOS. 1 - 20, )
8)
Defendants.)
9
10
PURSUANT TO NOTICE, the video deposition of
11 JOHN RAMSEY was taken by the Plaintiff at the offices of
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White & Steele, P.C., 1225 - 17th Street, Denver, 12 Colorado, beginning at 9:36 a.m. on Tuesday, October 20, 1998, pursuant to the Federal Rules of Civil Procedure, 13 before JOHN J. SPERA, Certified Shorthand Reporter and Notary Public for the State of Colorado. 14 15 APPEARANCES: 16 W. LEE HILL, Attorney at Law, P. O. Box 21181, Boulder, Colorado 80308, appearing for the Plaintiff 17 JOHN P. CRAVER, Attorney at Law, WHITE & STEELE, P.C., 18 1225 - 17th Street, Ste. 2800, Denver, Colorado 80202, appearing for John Ramsey 19

20 GORDON, Exeter Building, 1050 Walnut Street, Ste. 501,
Boulder, Colorado 80302, appearing for John Ramsey
21
BRYAN MORGAN, Attorney at Law, HADDON, MORGAN & FOREMAN,
22 P.C., 150 East Tenth Avenue, Denver, Colorado 80203,
appearing for John Ramsey
23
24
25
Page 2
1 APPEARANCES CONTINUED:
2 MATTHEW J. HERRINGTON, Attorney at Law, WILLIAMS &
CONNOLLY, 725 Twelfth Street, N.W., Washington, D.C.
3 20005, appearing for the National Enquirer



15 Exhibit 2: Computer printout photograph
10-20-98 76
16 Exhibit 3: National Enquirer article,
10-21-98, two pages 76
17 Exhibit 4: National Enquirer article,
one page 76
18
19
20
21 Marked questions: 32, 57
22
23
24

## 1 P R O C E E D I N G S

2 MR. MYERS: We're going on the record

3 approximately 9:36. Today is October 20, 1998. We're

4 here for the video testimony of John Ramsey in the matter

5 of Stephen Miles, plaintiff, versus John Ramsey, National

6 Enquirer, et al., defendants. Case number 98 Wyoming --

7 I'm sorry, WY-528-CB, in the United States District Court

8 for the District of Colorado.

9 Will counsel please introduce themselves?

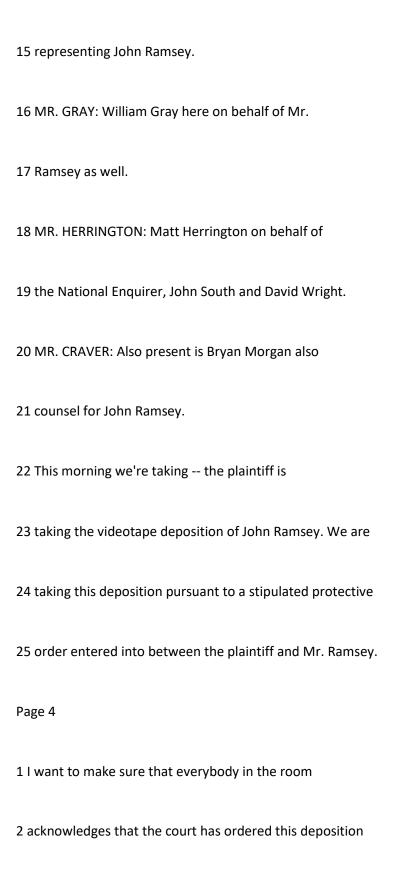
10 MR. HILL: Good morning. I'm Lee Hill

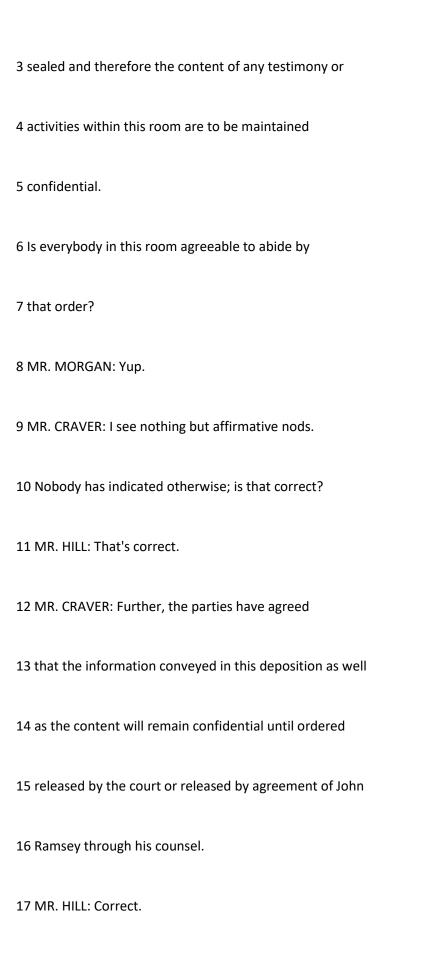
11 representing plaintiff, Stephen Miles. I'm here with

12 associates Julia Yoo, Peter Morgan and my client, Stephen

13 Miles.

14 MR. CRAVER: Good morning. John P. Craver

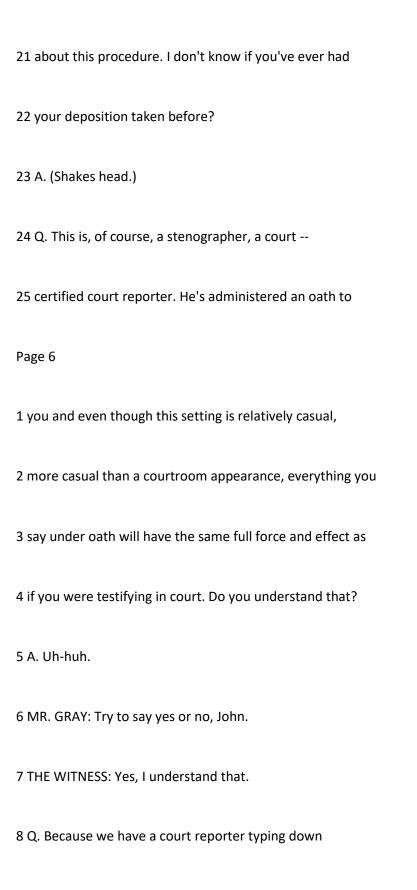




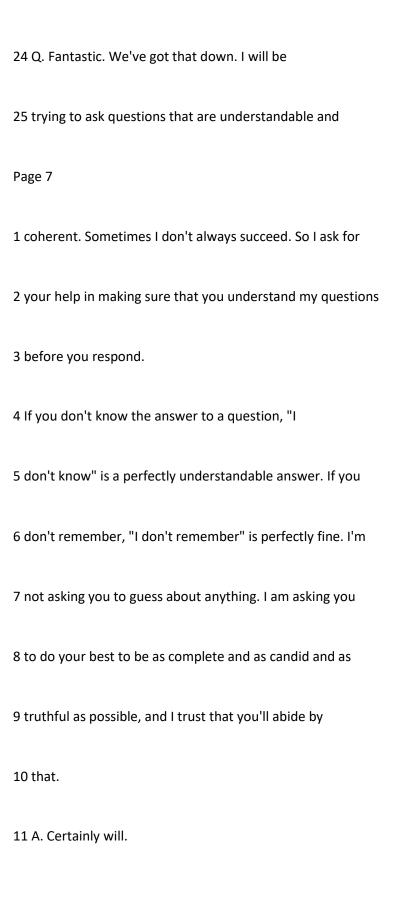
18 MR. CRAVER: And it is also agreed that these
19 proceedings will not be commercially marketed without the
20 agreement of John Ramsey.
21 MR. HILL: Correct.
22 MR. CRAVER: Everybody in the room understands
23 that agreement?
24 MR. MILES: Yes.
25 MR. CRAVER: Within the parameters of those
Page 5
1 agreements, I'll allow you to proceed, Mr. Hill.
2 MR. HILL: Thank you.
3 JOHN RAMSEY
4 was called for video deposition and after having been
5 first duly sworn, testified as follows:

## **6 EXAMINATION** 7 BY MR. HILL: 8 Q. Good morning, Mr. Ramsey. 9 A. Good morning. 10 Q. As I introduced myself earlier, my name is Lee 11 Hill. I wanted to started initially and with all respect 12 by expressing my personal sympathy and my client's 13 sympathy and everyone who works on my team for your tragic 14 loss. 15 A. Thank you very much. 16 Q. I'll do my best not to touch upon sensitive -- I 17 mean, I realize all of this is sensitive, but I'll do my 18 best to make it as easy and painless as possible. 19 A. Thank you.

20 Q. I'm going to begin with a couple of explanations

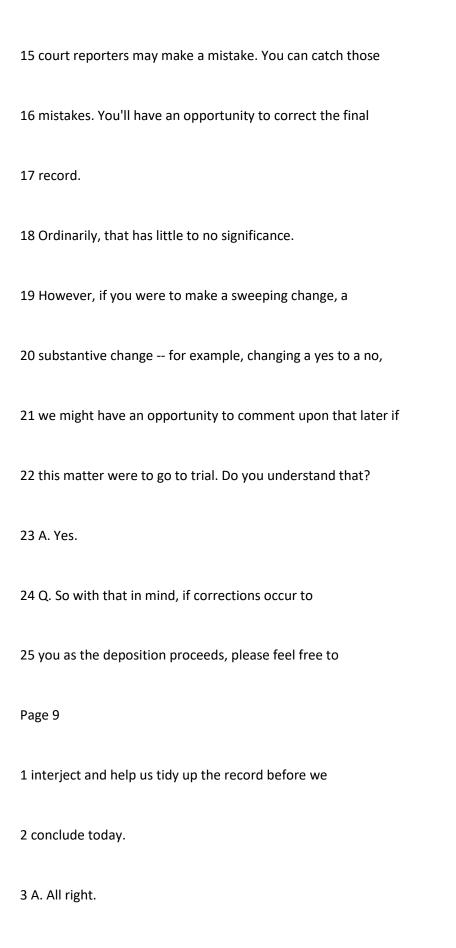


9 essentially every phonetic sound that we make, it's real
10 important for us to deviate a little bit from standard
11 conversational practice. If I say uh-huh, unt-un, it
12 results in a garbled record. The same for you.
13 A. Okay.
14 Q. A couple of things are real critical, but real
15 easy to adjust to. Basically, we must let everyone
16 complete their sentences before someone else begins to
17 speak. That's because we don't have stereo court
18 reporting going on here.
19 A. Okay.
20 Q. Also, we need to respond with audible words.
21 A. Uh-huh.
22 Q. Do you understand?
23 A. I understand.

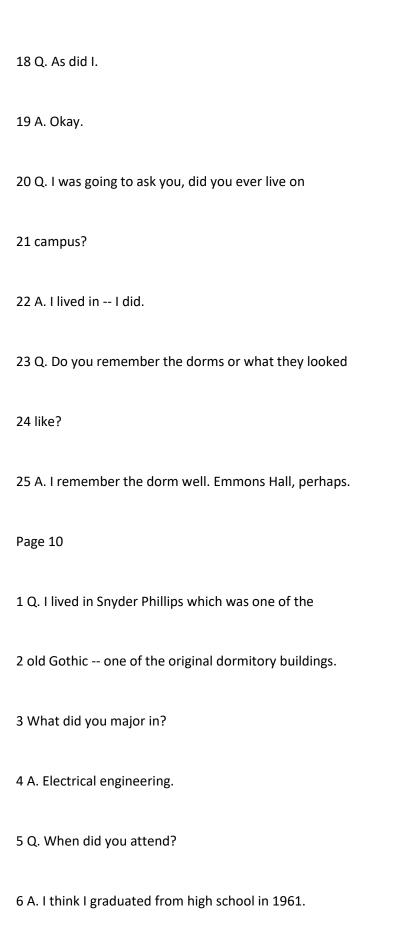


12 Q. As I mentioned earlier, if at any point during 13 the deposition you need to take a break, please just let 14 us know and we'll accommodate you, no problem. 15 A. Okay. 16 Q. I need to ask you a couple of other questions 17 that might sound awkward, but it's my attempt to insure 18 that we're getting your best testimony today. 19 I don't know, for example, whether you might be 20 under the influence of any medication or alcohol or 21 anything else? 22 A. No alcohol certainly, but I've been under 23 doctor's care for almost two years now and take Prozac. 24 Q. Yes, sir. That doesn't affect your ability to 25 recall though, does it? Maybe slightly?

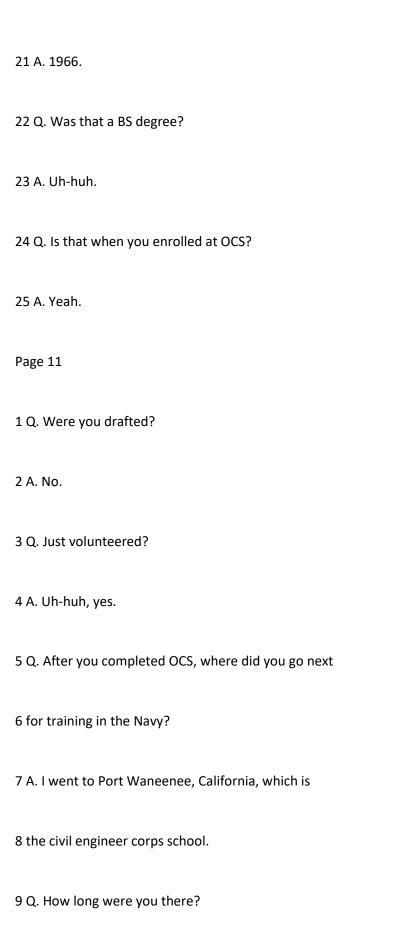
1 A. It seems like.
2 Q. Can't remember whether it affects it or not?
3 I'm not going to be
4 A. I don't know whether it's that or just the
5 trauma we've been through, but
6 Q. Yes, sir. I understand. We'll just deal with
7 that the best we can.
8 Are you comfortable right now?
9 A. Uh-huh, yes.
10 Q. As we go through the questions, eventually
11 you'll have an opportunity to review the written
12 transcript of what we've said here today and at that time
13 you'll have the opportunity to make corrections.
14 Sometimes, as infallible as they generally are,



4 MR. HILL: Does anyone need to take a break at
5 this point?
6 MR. CRAVER: You're the only one talking.
7 Q. Do you have any questions about this process so
8 far?
9 A. No.
10 Q. Very briefly, I was going to ask you some
11 biographical questions. I understand that you're from
12 Michigan originally?
13 A. Originally from Nebraska. I was born in
14 Nebraska, left there at the end of the 6th grade, moved to
15 Michigan.
16 Q. And you attended Michigan State University?
17 A. Yes.



7 So I started that fall and then went through 1966 and then
8 went on for graduate studies which were interrupted by
9 Navy service.
10 Q. It saddens me to confess that I also share naval
11 service experience with you. What type of work did you do
12 with the Navy?
13 A. I was in the civil engineer corps and went
14 through OCS, officer candidate school.
15 Q. At Newport?
16 A. At Newport.
17 Q. Were you in NROTC?
18 A. No.
19 Q. So you graduated Michigan State with a
20 undergraduate degree in what year?

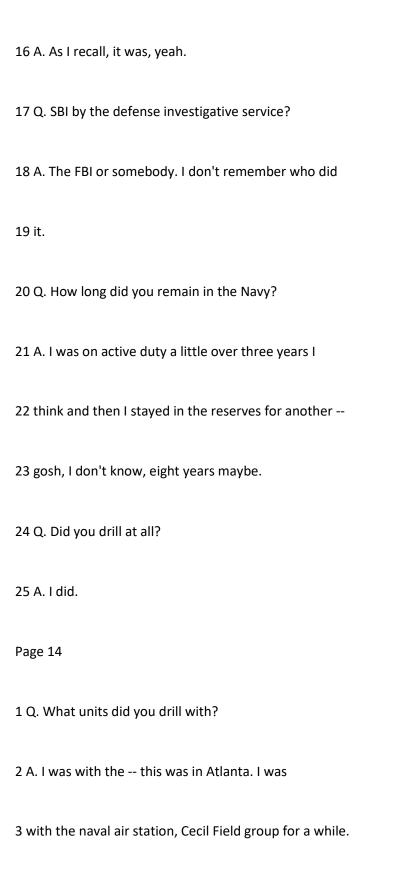


1	10 A. A couple months. I don't remember the duration,
1	11 but it was 10 weeks maybe.
1	12 Q. What was your next stop in the Navy?
1	13 A. Then I was assigned to the Philippines, Subic
1	14 Bay.
1	15 Q. What unit were you in?
1	16 A. I was with the public works center.
1	17 Q. Were you an ensign at that time?
1	18 A. Yes.
1	19 Q. What type of work did you do with the public
2	20 works center?
2	21 A. I was a facilities engineer and I had
2	22 responsibility for the naval supply depot facilities, as I
2	23 recall, most of the time I was there.

24 Q. Do you remember your commanding officer at that
25 time?
Page 12
1 A. When I got there, I believe it was Captain
2 Laland.
3 Q. Can we spell that for the court reporter's
4 convenience?
5 A. I'd be taking a guess. I think it was
6 L-a-l-a-n-d. I think.
7 Q. Thanks. How was he as a CO?
8 A. A gentleman.
9 Q. You're lucky. I was an aviation intelligence
10 officer, so I went through ASCS in Pensacola and ended up
11 in the 14th Squadron out of Miramar and deployed on
12 America, did an Indian Ocean cruise via the Med.

13 Did you ever deploy? Were you ever at sea?
14 A. No, I wasn't.
15 Q. That's the only way to be in the Navy. How long
16 were you at Subic?
17 A. It was approximately two years. I don't
18 remember exactly.
19 Q. During that time, did you ever get to come back
20 home or was it an uninterrupted stay?
21 A. It was uninterrupted.
22 Q. During that time, were you able to travel at all
23 through the rest of the
24 A. We traveled a bit, yeah, on R&R.
25 Q. Do you remember what countries you visited

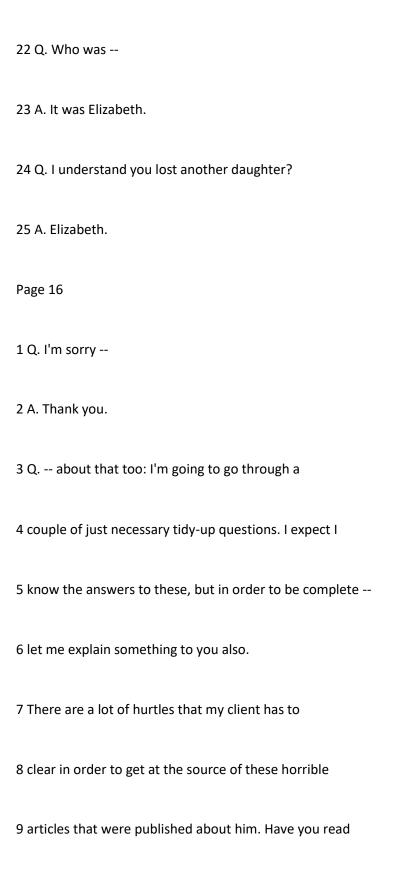
1 during that time?	
2 A. We visited Japan, Hong Kong, Taiwan, Thailand.	
3 I think that was it.	
4 Q. Were you required to maintain a security	
5 clearance?	
6 A. Yes.	
7 Q. What level of security clearance did you have?	
8 A. Top secret.	
9 Q. Was it compartmented also or a standard gen-cert	
10 top secret clearance, if you remember?	
11 A. I don't remember.	
12 Q. If you don't remember, it was probably gen-cert?	
13 A. Yeah.	
14 Q. And that was a result of was it a special	
15 background investigation, do you know?	



4 And then I was with the officer in charge of construction
5 for gosh, I don't remember the southeast or I
6 forget the unit name. It was a civil engineer corps unit.
7 Q. This is the one-weekend-a-month situation?
8 A. Right.
9 Q. Did you ever do the two weeks active duty
10 stints?
11 A. Uh-huh.
12 Q. Do you remember places?
13 A. Cecil Field in Florida several times. That's
14 the only one I remember.
15 Q. Throughout your reserve duty, did you maintain
16 your same security clearance?
17 A. I believe so.
18 Q. Have you ever had a current clearance revoked?

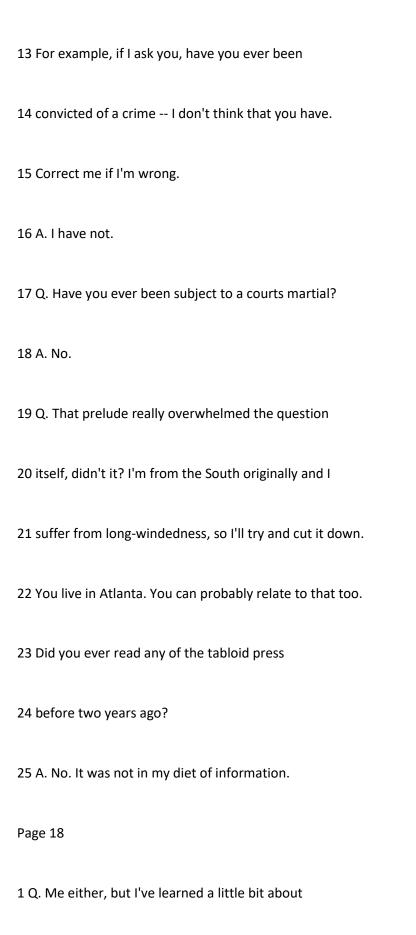
19 A. Not that I know of.
20 Q. Leaping ahead, from the termination of your
21 naval career to date, at any time during that period have
22 you received and maintained a government security
23 clearance?
24 A. No.
25 Q. In connection with your work with Access
Page 15
1 Graphics, did you receive any clearance?
2 A. No.
3 Q. Were you ever briefed or debriefed by any
4 federal agency with respect to security issues?
5 A. I don't recall.
6 Q. Needless to say, if you weren't maintaining a

7 clearance, no clearance was ever taken away from you
8 during that period, correct?
9 A. Not that I know of,
10 Q. Your departure from the Navy, do you recall what
11 rank you were at the time?
12 A. I left active duty I think as lieutenant.
13 Q. Your discharge was honorable?
14 A. Yes.
15 Q. Anything else eventful occur during your naval
16 service?
17 A. My first child was born.
18 Q. Congratulations. When were you first married?
19 A. 1966.
20 Q. When was your first child born?
21 A. 1969.



10 those articles at all?
11 A. (Shakes head.)
12 Q. I brought copies with me to show you. I should
13 clarify too that you shook your head negatively?
14 A. No, I have not read the articles.
15 Q. While we have a visual record, we also have to
16 take care of our typed record here. I brought you a
17 couple of those articles to show you and, with your
18 attorneys permission, I'll let you look over those during
19 our first break.
20 You may be informed though that my client has
21 been the unwitting recipient of attention from the
22 national tabloid press. I'm informed that you have been
23 too?
24 A. I understand how that feels.

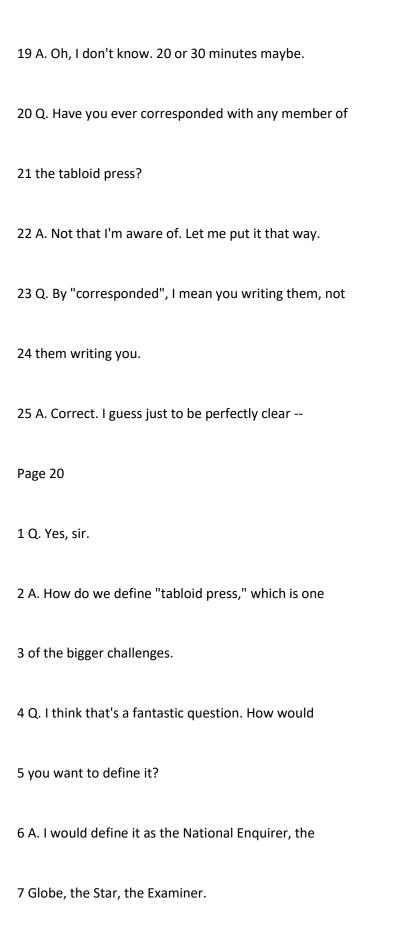
25 Q. I expected that you would, and also I'd like to
Page 17
1 express our empathy for you in that record.
2 A. Thanks.
3 Q. So we anticipate quite a bit of issues and
4 haggling regarding journalism shield laws, for example.
5 And it is our task to cover every bit of ground we can in
6 order to make it plain to the court ultimately I'm kind
7 of revealing my strategies.
8 MR. HERRINGTON: I'm getting this all down.
9 Q. So that we can take shots at that and try and
10 find out where these stories came from. So I'm going to
11 ask you questions that seem obvious or stupid. Please
12 don't take offense.



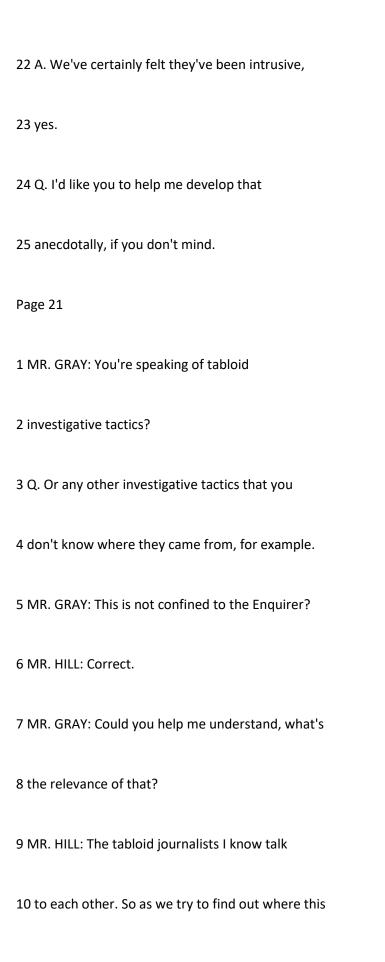
2 them since then. I trust you've probably learned a little
3 about them since then too?
4 A. Regretfully I have, yes.
5 Q. We'll talk more about that in a little while,
6 but I'll like to invite you to start thinking about it
7 because I want to learn from you, if I can, what you've
8 learned about their tactics and the approaches that they
9 take.
10 Going through this preliminary material, I trust
11 that you've been impacted by the articles that have been
12 published?
13 A. Well, they've been very hurtful certainly, the
14 ones we're aware of.
15 Q. Exacerbating a tragic situation, correct?

16 A. Yes.
17 Q. Have you ever had occasion to speak with any of
18 the people who are directly involved with the tabloid
19 press?
20 A. The only time I've knowingly talked to someone
21 that I know of was this fellow Jeffrey Shapiro.
22 Q. When did you speak with him?
23 A. He called our house this past summer.
24 Q. What tabloid does he work for?
25 A. He said he worked for the Globe.
Page 19
1 Q. Had you ever met him before?
2 A. No.
3 Q. How many times did he call you?
A A Lonly remember that one time. That's the only

5 time I remember.
6 Q. He actually called you at home?
7 A. Yeah.
8 Q. Did you enter into a conversation with him?
9 A. Uh-huh.
10 Q. That would be yes?
11 A. Yes.
12 Q. Do you remember the substance of that
13 conversation?
14 A. He called and said he was moved to call, that he
15 felt badly for what he had done and that he felt I was
16 innocent and he wanted me to know that. And I said thank
17 you.
18 Q. Do you recall how long the conversation lasted?

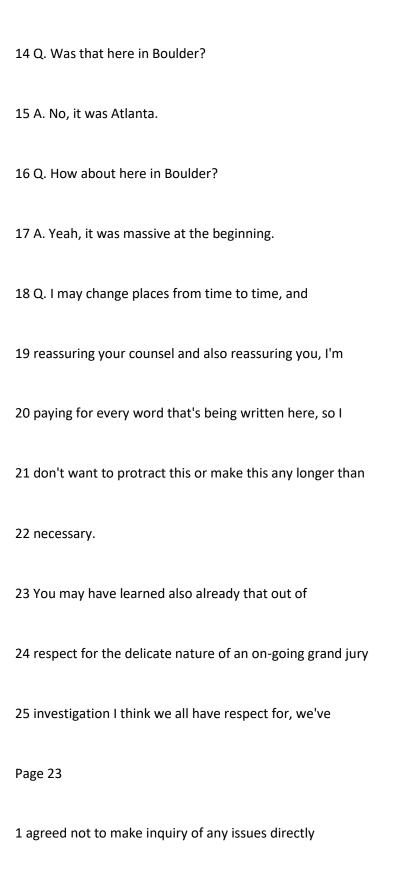


8 Q. Shall we throw any television programs into that	
9 mix?	
10 A. I think it would be very easy to do, but	
11 Q. Let's include everybody, why don't we, and then	
12 we can separate what we agree to describe as the	
13 main-stream press. Is that fair?	
14 A. Sure.	
15 Q. What is there, Hard Copy, American Journal,	
16 Inside Edition?	
17 A. I would never we've been chased by them and	
18 pursued, but never knowingly made ourselves available to	
19 them.	
20 Q. Have you been the victim of any intrusive	
21 investigative tactics, to your knowledge?	



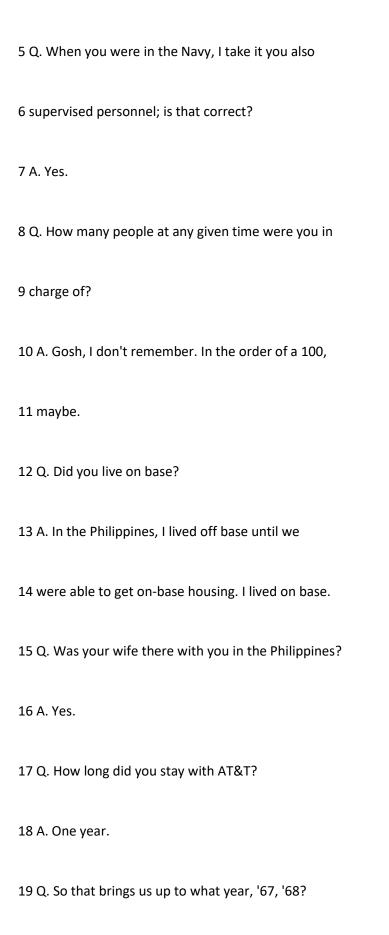
- 11 material derived from, I'd like to find out everyone who
- 12 had access to information regarding Mr. Ramsey's matter.
- 13 MR. GRAY: This is going to be a very long
- 14 deposition if you want to ask about every contact he's
- 15 ever had with harassing investigative techniques that
- 16 don't even involve parties to this litigation, Mr. Hill.
- 17 I'm just trying to understand what we can
- 18 anticipate for future questioning along this route or if
- 19 this is a relatively narrow area of your inquiry?
- 20 MR. HILL: It's just a developing area of my
- 21 inquiry and I'm sure it will go faster if we don't quarrel
- 22 too much.
- 23 MR. GRAY: I'm not trying to quarrel. I'm
- 24 wondering what the relevance is of questions about parties

25 that aren't involved in this litigation?
Page 22
1 MR. HILL: If I'm not mistaken, irrelevance is
2 an appropriate trial objection, but in this context, I
3 need to restrict my questions to what's reasonably
4 calculated to lead to the discovery of admissible
5 evidence.
6 MR. GRAY: And that's really what I'm asking.
7 What is it that we're looking at? Go ahead, John.
8 MR. CRAVER: Is there a question?
9 Q. I'm just looking for intrusive investigative
10 or
11 A. We've had people parked outside of our home for
12 hours with binoculars and cameras. We've had people come
13 to our door with cameras.



2 associated with the homicide investigation.
3 A. Yes.
4 Q. Although reserving an opportunity to come back
5 to ask questions about that if it seems necessary at a
6 later time after you may be called to testify before the
7 grand jury.
8 So I say all of that by way of explaining that,
9 you know, I expect this can go fairly quickly and
10 seamlessly, although we may not conclude today. We may
11 have the opportunity to declare a conclusion or resume
12 later at a time and place that's convenient for you.
13 I wanted to continue developing my understanding
14 of your career progression following your departure from
15 active duty. What did you do after you got out of the
16 Navy?

17 A. I went back and finished graduate school at 18 Michigan State, a master's degree in business. That took 19 about a year, I think, 15 months. Went to work for AT&T. 20 Q. Where? 21 A. In -- I was hired in Chicago, but I went to work 22 in Columbus, Ohio. 23 Q. What type of work were you doing for them? 24 A. I was in an initial management development 25 program that they had for new college hires. Page 24 1 Q. You were on the career path? 2 A. I was -- they start you out in a supervisory 3 role. I supervised a -- what was it called -- a test 4 board. I forget the name of the test board.



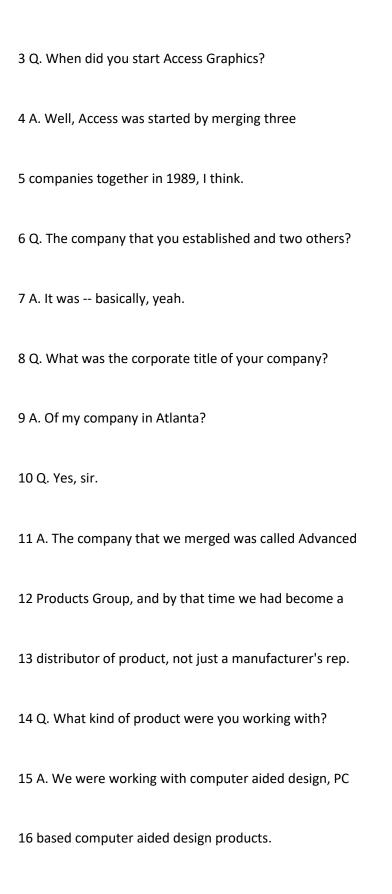
20 A. No, it would have been early '70s. I don't
21 remember the exact year.
22 Q. And from AT&T, where did you go?
23 A. I went to work for a company called BCS
24 Associates.
25 Q. What does BCS stand for?
Page 25
1 A. They were a manufacturer's representative for
2 electronic equipment in the Southeast. I was a salesman
3 for them.
4 Q. How long did you work for them?
5 A. Two years maybe, three years.
6 Q. Did you leave AT&T on favorable terms?
7 A. As far as I know.

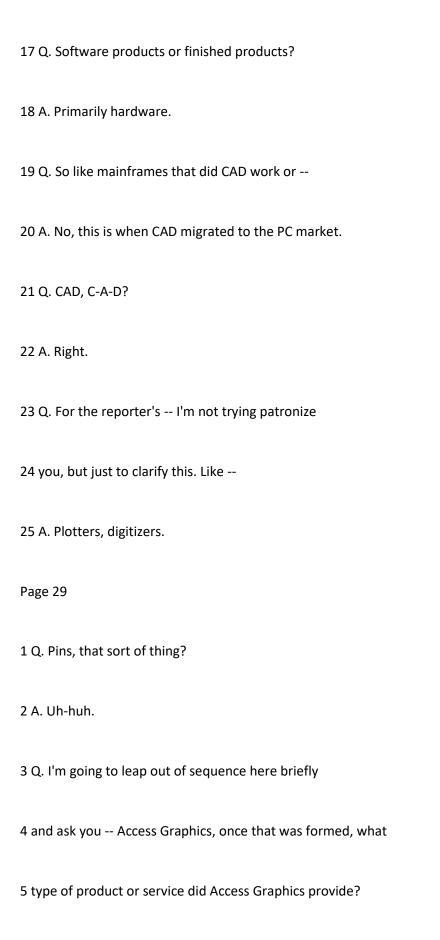
8 Q. You weren't fired from AT&T?
9 A. Well, the program was a let's try it for a
10 year, then make a decision whether or not this is going to
11 work or not. And we both concluded it wasn't.
12 Q. So it was a mutual decision or was it
13 A. Well, it was AT&T had the right to decide,
14 and they did decide that I wasn't a good fit for their
15 management, top management rank.
16 Q. Do you know what they based that decision on or
17 what
18 A. I think I wasn't as aggressive or as strong a
19 personality as they felt they needed to see in a big
20 organization.
21 Q. You weren't enough of a jerk?
22 A. Didn't have enough of an impact.

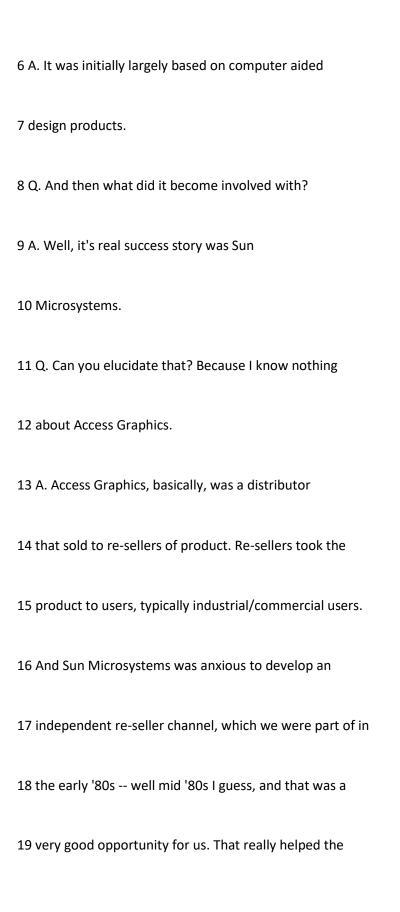
23 Q. Did you hear my question?
24 A. Yeah.
25 Q. Is that what it boils down to?
Page 26
1 A. I think it yeah, they were looking for people
2 that would come in and challenge the system and make
3 waves.
4 Q. Was BCS better for you then?
5 A. Yeah, yes.
6 Q. Where did you go after BCS?
7 A. I went to work for a company called Vidar,
8 V-i-d-a-r.
9 Q. What did they do?
10 A. They made process monitoring systems.

11 Q. Your transition of out BCS, can you tell me
12 about that?
13 A. I had represented Vidar in my sales position,
14 had accepted a job, a new job with a company and then
15 Vidar approached me and said, gee, if you're going to
16 leave, we'd like you to come work for us.
17 So at the last minute, I decided to turn down
18 the original position I left for and took a job with
19 Vidar.
20 Q. Where were they located?
21 A. Vidar?
22 Q. Yes, sir.
23 A. Mountain View, California.
24 Q. Did you relocate?
25 A. I was based in Atlanta.

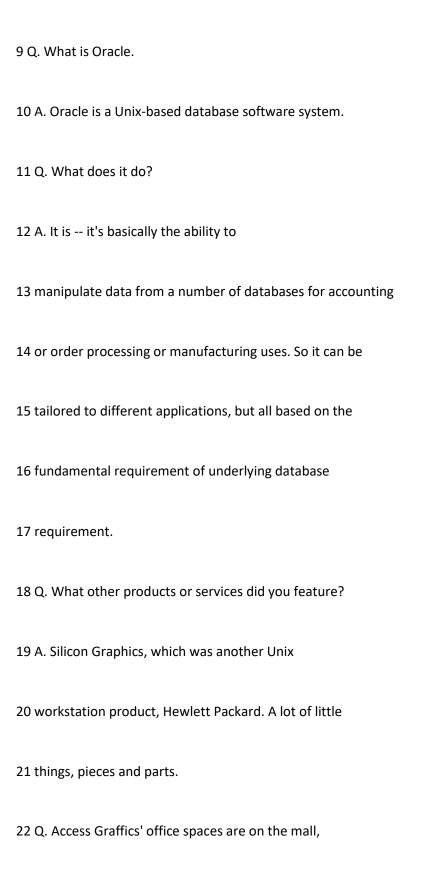
14 housing and so forth.
15 So I proposed to them that I represent them as a
16 manufacturer's representative in the Southeast as an
17 independent and
18 Q. That was the nature of your next transition, you
19 became an independent contractor still working with Vidar?
20 A. Correct.
21 Q. And you were based out of Atlanta?
22 A. Right.
23 Q. How long did you maintain that position?
24 A. Well, that basically allowed me to start my own
25 little business, which was a manufacturer's rep company,
Page 28
1 Vidar being the heart of it, and that continued for
2 well, really until we started Access Graphics.

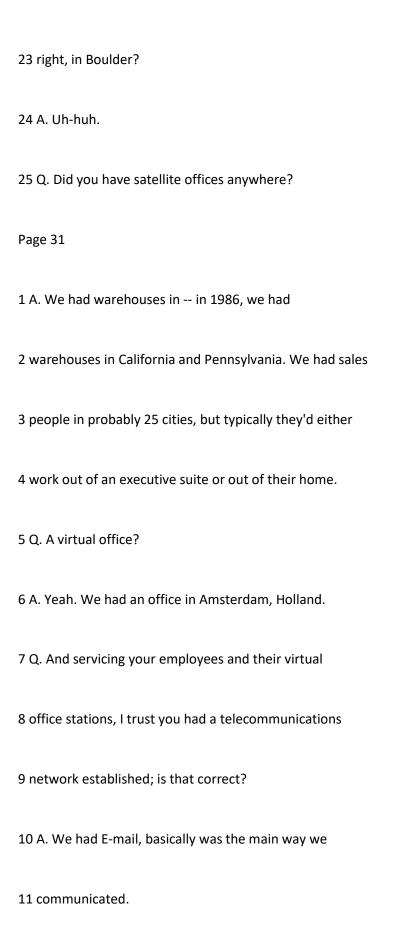


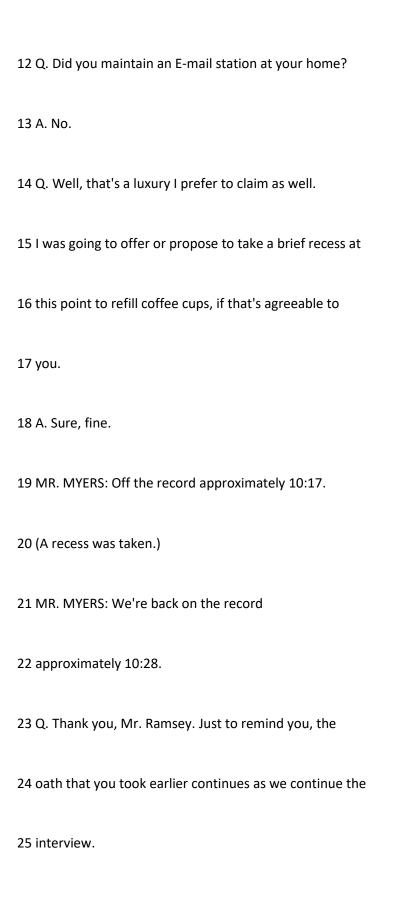




20 company grow.
21 Q. At that point, were you selling mainframes or
22 A. We were selling Unix workstations.
23 Q. Were you still selling drafting hardware?
24 A. Uh-huh.
25 Q. Were you involved in software development?
Page 30
1 A. No. Not development, no.
2 Q. Is that the way business continued at Access
3 Graphics through 1996?
4 A. Basically, by adding product lines, but Sun was
5 the bulk of our business.
6 Q. You qualified it as "basically". What were
7 other ancillary product lines or service lines offered?
8 A. Oracle database software.

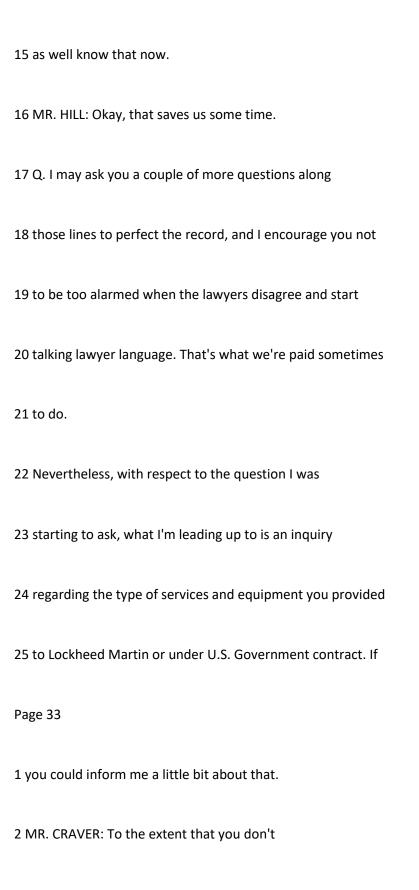






13 MR. CRAVER: Correct. You won't be allowed to

14 ask into his assets or his family's assets and you might

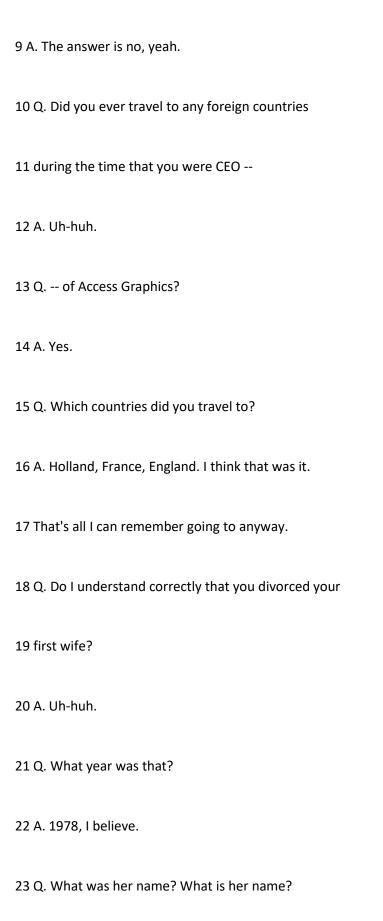


- 3 violate any secrecy or contractual agreements which your
  4 company may have with Lockheed Martin, I'll permit you to
  5 answer. You're the only one that would know about those
  6 agreements, John.
- 7 A. We provided Sun workstations to Lockheed under a8 contract that was negotiated between Sun, Lockheed and9 ourselves. We provided Unix help-desk services to
- 10 Lockheed. That's really all I remember that we ever did
  11 with Lockheed.
- 12 Q. Did you have any type of non-disclosure
- 13 agreements or secrecy agreements with Lockheed Martin or
- 14 any other recipient or client of your services?
- 15 A. Quite often we would have non-disclosure
- 16 agreements relating to new products that were disclosed to
- 17 us before they were released. Those kind of things.

18 Q. But no standard, blanket sort of secret
19 briefings?
20 A. (Shakes head.)
21 Q. You're shaking your head negatively?
22 A. No, not that I remember ever
23 Q. As I asked earlier, no briefings by the U.S.
24 Government at any time?
25 A. No.
Page 34
1 Q. Regarding government classification or secrecy
2 issues?
3 A. No.
4 Q. So your spaces on the mall, for example, were
5 not hardened against electronic surveillance or otherwise

6 secured with respect to classification concerns?
7 A. No.
8 Q. Nor was your home?
9 A. That's correct.
10 Q. You were CEO of Access Graphics?
11 A. Yes.
12 Q. Did you enjoy any protective services from
13 Lockheed Martin's security?
14 A. No.
15 Q. Did you have a security network in place at
16 Access Graphics?
17 A. No.
18 Q. Did you ever receive any type of or were you
19 ever invited to participate in any type of corporate
20 security briefings by Lockheed Martin's security?

21 A. No, I don't believe so.
22 Q. Did you know anyone at Lockheed Martin's
23 security?
24 A. I don't think so. No.
25 Q. When you say you don't think so, is there
Page 35
1 someone
2 A. I knew a lot of people at Lockheed, but I don't
3 know that anyone was associated directly with their
4 security group, if they have I don't even know if they
5 have a security group. I assume they do, but
6 Q. You don't know whether they do or not?
7 A. (Shakes head.)
8 Q. The answer is no?



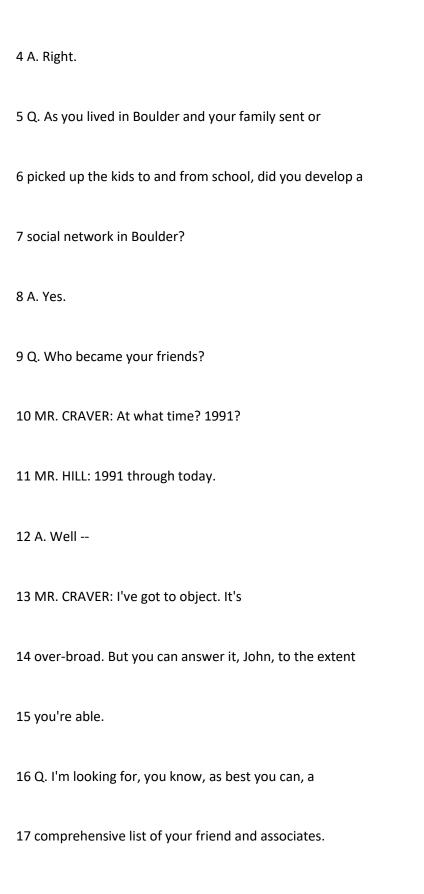
24 A. Lucinda.
25 Q. When did you remarry?
Page 36
1 A. In November, 1980.
2 Q. And that was?
3 A. Patricia.
4 Q. Where did the ceremony occur?
5 A. The marriage was in Atlanta.
6 Q. I'll refer to her as Mrs. Ramsey, if that's all
7 right?
8 A. Uh-huh.
9 Q. Mrs. Ramsey was with you in each of your
10 stations during your professional development?
11 A. Yeah, starting in 1980.

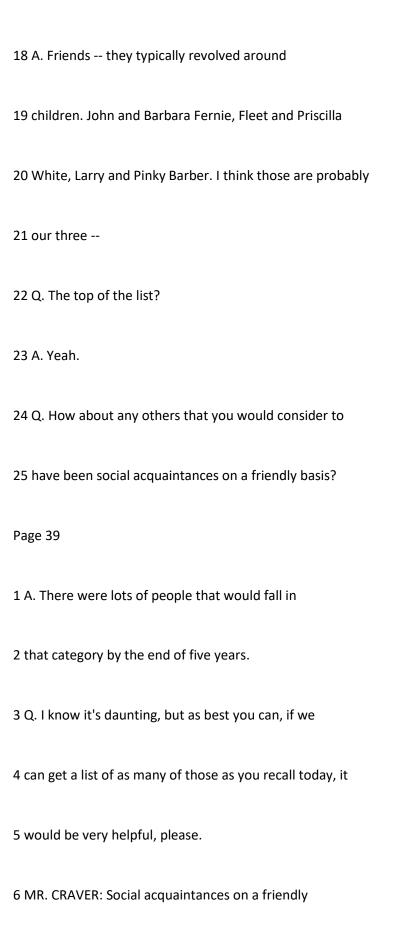
13 A. Yes, with the exception of a period of time that
14 I commuted from Atlanta to Boulder before we moved.
15 Q. When was that?
16 A. Gosh, it would have been 1989/1990 kind of time
17 frame.
18 Q. How did you decide to come to Boulder?
19 A. When my son told his teacher that his mother
20 lived in Atlanta and his dad lives in Colorado, we decided
21 that wasn't a good idea. So we decided to go ahead and
22 move the family.
23 Q. How did you decide to bring your business to
24 Boulder?
25 A. Access Graphics was formed by putting three

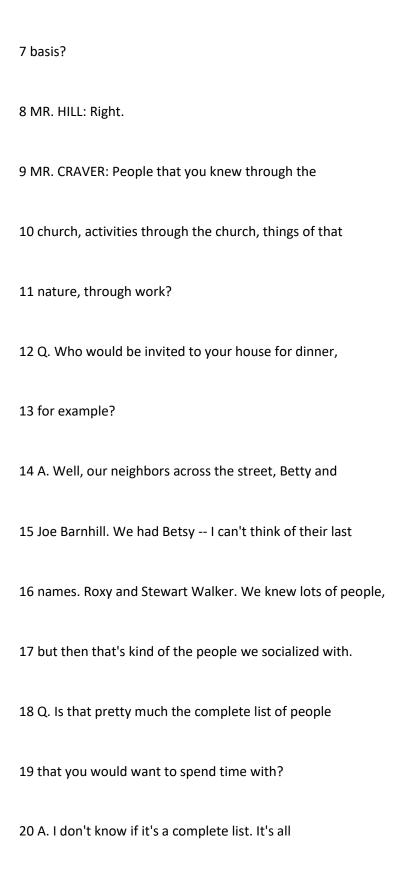
12 Q. In 1980?

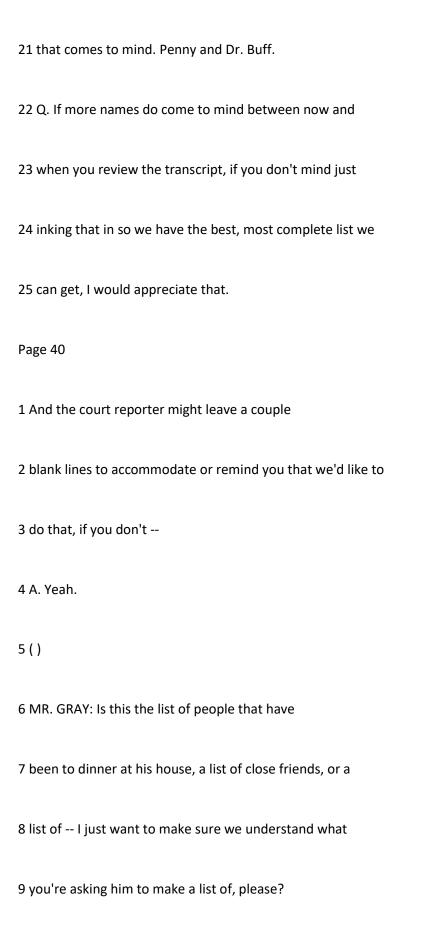
1 small companies together, one of which was based in
2 Boulder.
3 Q. Which company was that?
4 A. CAD Distributors was the name of that company,
5 and it was larger than the other two, so it became kind of
6 the de facto headquarters.
7 Q. So when did you completely relocate your entire
8 family here in Boulder?
9 A. I think it was 1991, middle of 1991.
10 Q. Did you know anyone else who lived here in
11 Boulder before you moved here, apart from your immediate
12 business associates?
13 A. I knew Mel Phillips, who
14 Q. Is that Mel?

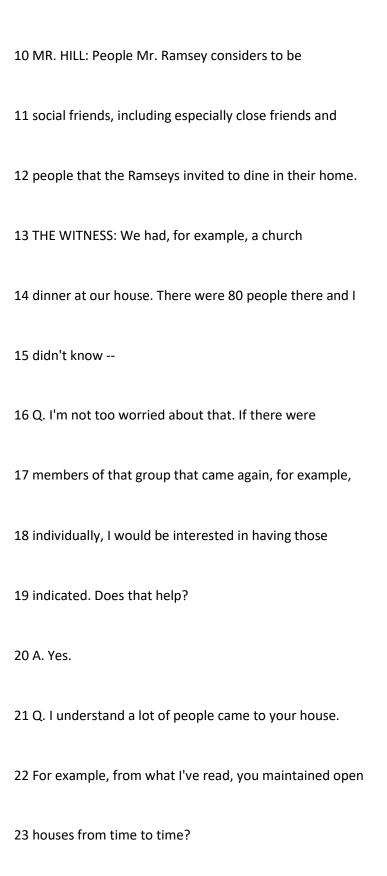
15 A. Mel Phillips, who lived in Atlanta and moved to
16 Boulder.
17 Q. What does Mel do?
18 A. He's an attorney. I think that was the only
19 person that I learned that lived in Boulder that I had
20 known before.
21 Q. Mr. Phillips was married to Judith Phillips at
22 the time; is that correct?
23 A. Yeah.
24 Q. Did you also know Judith Phillips?
25 A. Uh-huh.
Page 38
1 Q. Before you moved here?
2 A. Yes.
3 Q. You were acquainted with her too?

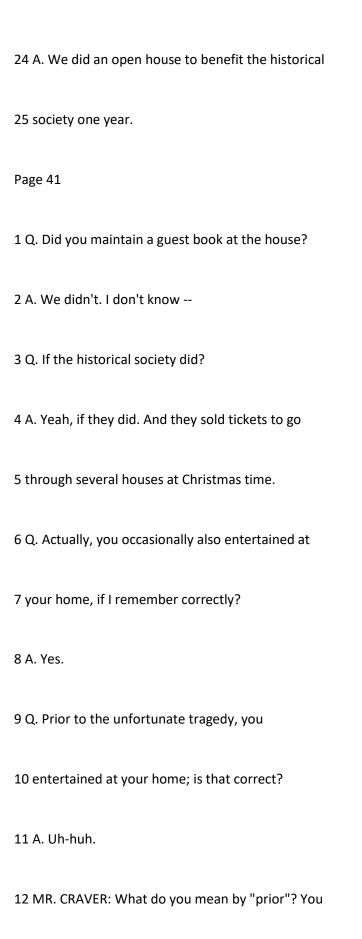








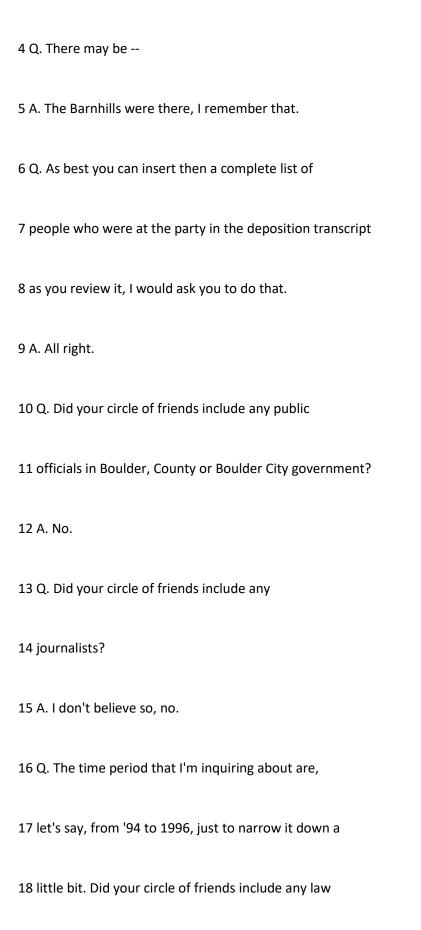




13 mean during the years prior?
14 MR. HILL: During the month prior.
15 MR. CRAVER: Okay.
16 A. Yes.
17 Q. I have information that you hosed a party on
18 December 23; is that correct?
19 A. That's correct.
20 Q. Who did you invite to that party?
21 A. They were a group of friends and their children.
22 Certainly some of the people I've mentioned were there.
23 Priscilla White's parents were there. Some guests they
24 had, who we didn't know, were there. There might have
25 been others. That's all I can remember.

1 Q. Did you send out invitations?
2 A. No.
3 Q. Or
4 A. I don't think so. They were probably I don't
5 know for a fact, but I believe Patsy called and invited
6 people.
7 Q. So she would know who was invited?
8 A. Perhaps.
9 Q. I don't know, for example, if there was
10 designated seating?
11 A. It wasn't a dinner. It was just a
12 family/children's get-together.
13 Q. Were gifts exchanged?
14 A. Patsy had little gifts for each of the children
15 and at least some of the adults, just token gifts.





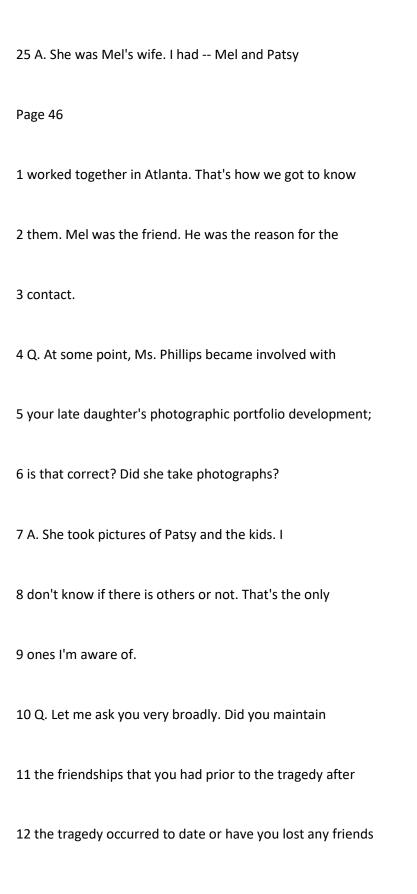
19 enforcement officers?
20 A. No.
21 Q. Any lawyers?
22 A. Not our close circle of friends, no, that I can
23 recall. I don't think any lawyers.
24 Q. What's the first tier where a lawyer turns up?
25 A. Well, we knew people Noel Phillips was a
Page 44
1 lawyer, became a lawyer. That's the only one I can think
2 of that I knew.
3 Q. Were your friends the same as your wife's
4 friends?
5 A. Yeah, basically.
6 Q. Completely?

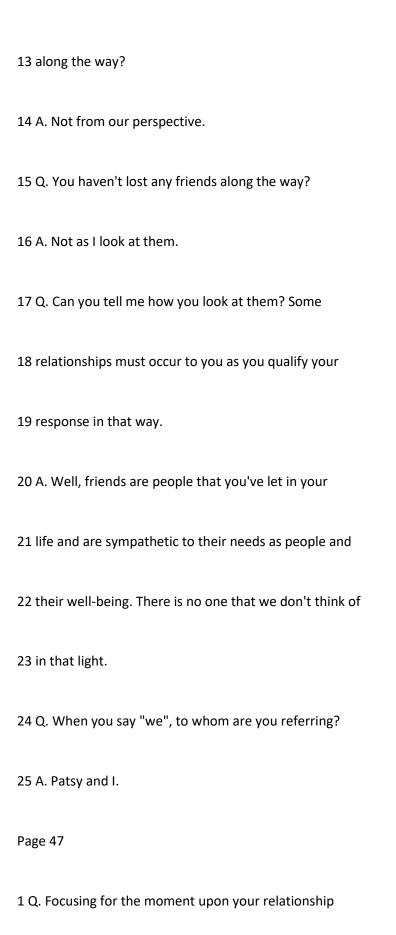
- 7 A. Well, within the people that we socialized with,
- 8 yeah. Pretty much, it was couples and family activity.
- 9 Q. Did either of you enjoy any degree of separate
- 10 social environment or milieu?
- 11 A. I mean, I had business entertaining that we
- 12 would do from time to time, which Patsy -- I never drug
- 13 her along, not particularly, that I can remember.
- 14 Q. Some couples, you know, share every friend in
- 15 common and others will have, you know, separate friends
- 16 interested in different things. I wouldn't expect you to
- 17 be a member of a sewing circle, for example. I don't know
- 18 if your wife was either.
- 19 What I'm asking is if -- I realize you don't
- 20 know who she would consider -- well, I'm asking you, do
- 21 you know whom she would consider to be in her close circle

22 of friends?
23 A. I think it would be the people we socialized
24 with as couples, Pinky Barber, Barbara Fernie, Priscilla
25 White, Roxy Walker.
Page 45
1 Q. Judith Phillips, would you consider her to be a
2 close friend?
3 A. No.
4 Q. I'm not asking currently, but previously.
5 A. No.
6 Q. If I'm not mistaken, she's made representations
7 in interviews that she was a close friend of the family's,
8 is that incorrect, or do you disagree with that?
9 A. Well, I think that's

10 MR. CRAVER: Let me ask -- I object to the form 11 of the question. I think you're asking two questions in a 12 row. Can you just state one or the other? 13 MR. HILL: Sure. 14 Q. If she's made statements to the press that she 15 was a close friend of the family's, do you differ with 16 that? 17 A. I never considered her a close personal friend. 18 Q. Do you know if your wife considered her to be a 19 close personal friend? 20 A. I don't know for sure, but I would suspect not. 21 Q. What type of friend was she? How would you 22 characterize her friendship? 23 MR. CRAVER: At what time?

24 Q. During the two years preceding the tragedy.

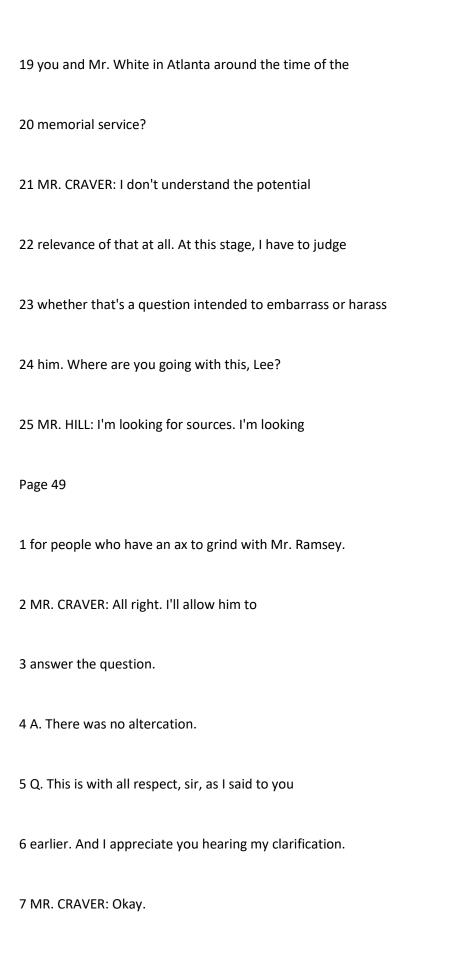




2 with Mr. and Mrs. White, is it your testimony that your
3 relationship continues on the same level of friendship as
4 it did prior?
5 A. No, we haven't talked to them probably for a
6 year and a half.
7 Q. Why not?
8 A. You'd have to ask them. I don't know.
9 Q. Why haven't you called them, for example?
10 A. I have.
11 Q. And what was the nature of the exchange?
12 A. I didn't get a response.
13 Q. They refused to talk to you since 18 months ago.
14 What was the precipitating moment you recognize that they
15 no longer were going to talk to you?

16 A. Well, we were pretty much in isolation for a
17 long time just because we were devastated. Some people, I
18 think around any tragedy, have difficulty being there. So
19 we never really and we weren't particularly open to
20 wanting to socialize for a long time. So I can't say
21 there is any, you know, time.
22 Q. What was the last time you had direct contact,
23 person-to-person, with the White family?
24 A. I think it was when I was in our priest office,
25 Fleet White came in and spent a few minutes. That was
Page 48
1 I don't know, I don't even remember when it was. It was
2 quite a while ago.
3 Q. Was that here in Boulder?
4 A. Yes.

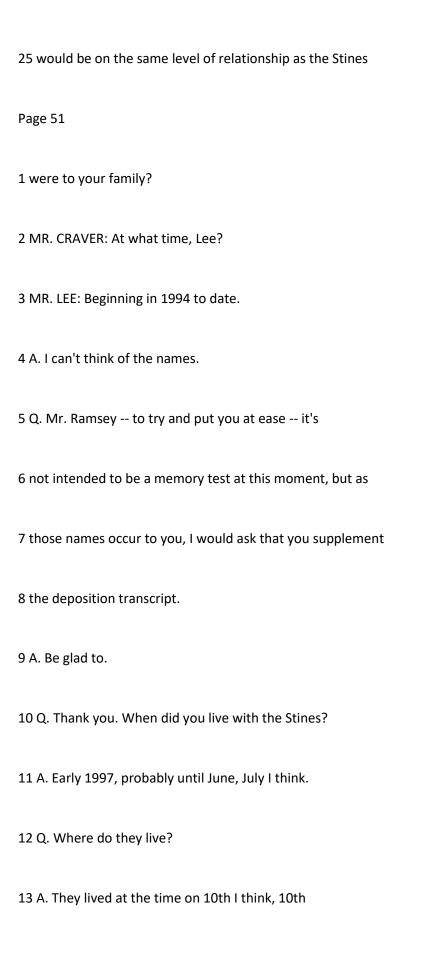
5 Q. When was the last time you had any contact with
6 Mrs. White?
7 A. Probably at might have been at the memorial
8 service for JonBenet here in Boulder, which I think was
9 when we came back, but I don't remember the time sequence.
10 Q. Was that before or after the Atlanta, Georgia
11 service?
12 A. I don't remember. I don't remember. It was in
13 the same time period.
14 Q. Did they attend the Atlanta memorial service?
15 A. Yes. Well, they were in Atlanta. I don't
16 remember much about the Atlanta memorial service, who was
17 there. As far as I know, they were there.
18 Q. Is it true that there was an altercation between

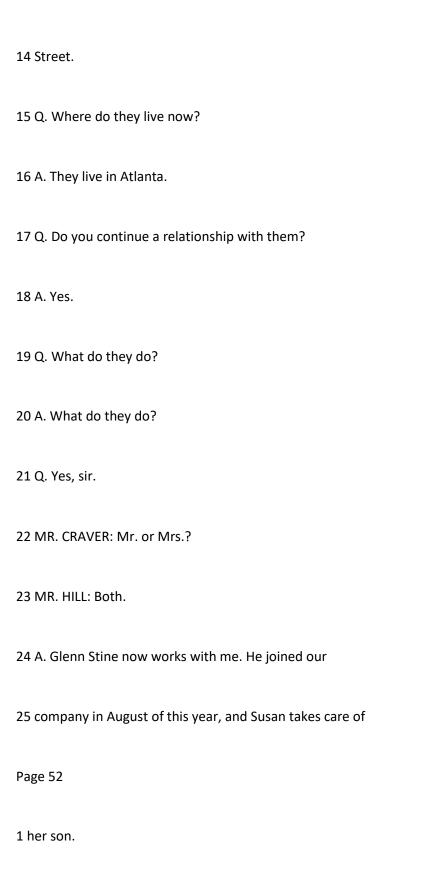


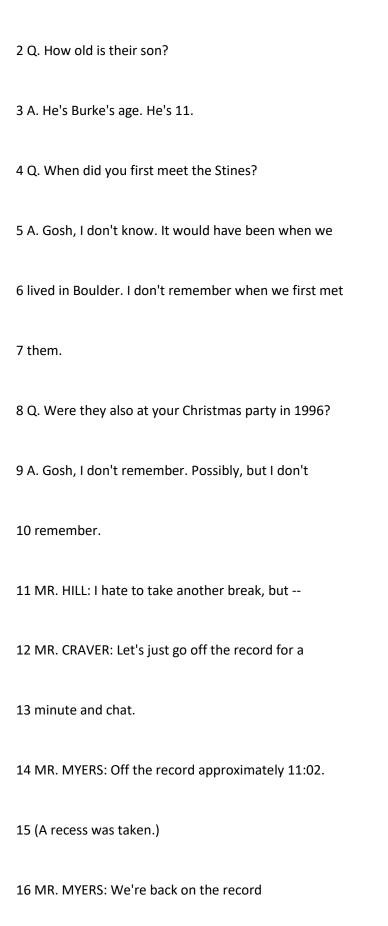
8 Q. We had been informed that there was some sort of 9 dispute or disagreement, that police were called. Is that 10 all hog-wash? 11 A. To my knowledge, yeah. I am not aware of any of 12 that. 13 Q. Also, I think much has been made about the 14 Whites traveling to Atlanta on the company plane that was 15 made available, but not traveling back on the company 16 plane. And I'm wondering if you could better inform me 17 about that? 18 A. I don't think Fleet was on the plane going out 19 to Atlanta. I don't remember if Priscilla was or not. I 20 remember that Fleet was not. That, I know for sure. 21 Q. He came down some other way to Atlanta?

22 A. Right.
23 Q. So it's your testimony that there was no heated
24 disagreement between you and the White family during that
25 time span?
Page 50
1 A. That's correct.
2 Q. Concerning Ms. Phillips, it's my perception that
3 there has been, in her view, a degradation of the warmth
4 and social relationship that she claims to have enjoyed
5 with your family post-tragedy. Can you tell me about
6 that?
7 A. Well, I think we've really limited ourselves to
8 the amount of social contact we have with anybody. It's
9 very difficult.
10 Q. Sure.

<u>:</u>	11 A. And we certainly haven't talked to or heard
<u>:</u>	12 from, to my knowledge, Judith, Judy.
2	13 Q. Do you have anyone running interference for you
1	14 with respect to social contacts or attempts? Anyone
2	15 taking calls or screening calls?
2	16 A. Not we did for a while, only because we lived
<u>.</u>	17 with some people.
ź	18 Q. Who were those people?
<u>.</u>	19 A. Susan and Glenn Stine.
2	20 Q. Should I add them to your list of close friends?
2	21 A. They were not close friends, believe it or not.
2	22 They were friends, but we didn't socialize a lot with
2	23 them.
2	24 Q. Can you help me complete a list of people who







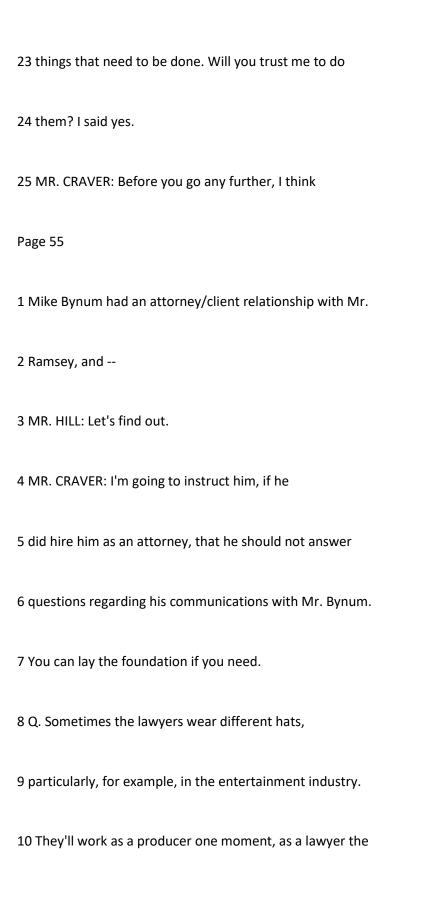
17 approximately 11:14.
18 Q. Mr. Ramsey, I'm going to hand these to your
19 lawyers. These are photocopies of the Enquirer articles.
20 I won't ask you any questions about them now, but over the
21 lunch break, if you have a chance to read them over and
22 get a sense of where we're coming from, it will be
23 informative.
24 I also caution you that, of course, as is their
25 consistent theme, it contains information sensitive to
Page 53
1 your family's interests and adverse to your family's
2 interests in my view, and I apologize for confronting you
3 with that and providing it for your reference with respect
4 to our claims.

5 A. Okay. 6 Q. Following the tragedy, I'm informed from 7 material I've read in the main-stream press that you 8 assembled a group of people to assist you and your family 9 dealing with the challenges that arose related to the 10 tragedy; is that correct? 11 A. Are you referring to attorneys or --12 Q. They're included, but I was going to ask you for 13 information regarding everyone that you assembled, 14 everyone who came together to assist you and your family. 15 MR. CRAVER: I need to object to the form of the 16 question. I think that -- my form is that that was a 17 compound question, but I'm not sure what you mean by 18 "assembled". People he hired? People he -- you know, can

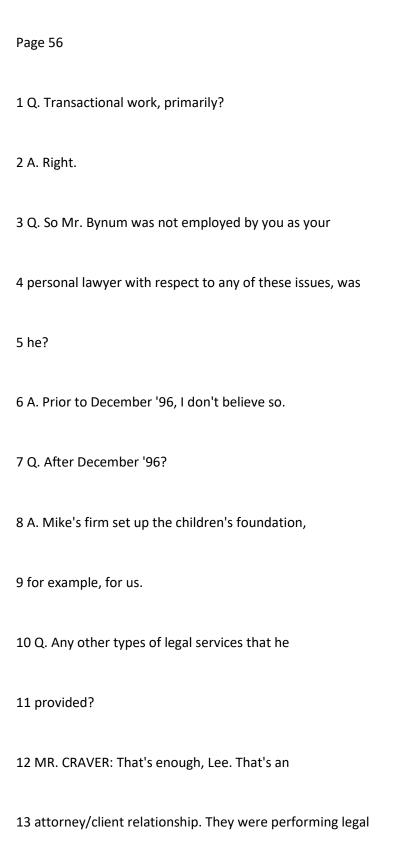
19 you find another term because that has different

20 connotations.
21 Q. I'm interested very much in finding out everyone
22 who was hired to assist you in meeting these challenges,
23 these various challenges. I'm referring to all the
24 challenges. I mean, even something as mundane as making
25 airline reservations following the tragedy. Everyone
Page 54
1 hired to assist you.
2 A. Well, my friend, Mike Bynum, basically asked me,
3 would you trust me to do some things that I feel need to
4 be done for your family? And I said yes.
5 Q. When did he ask that?
6 A. That was probably on the 26th or 27th.

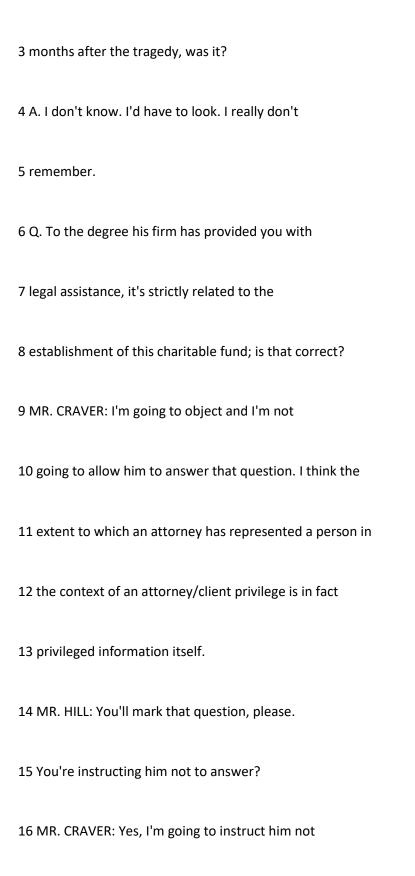
8 A. I had known him for two or three years, I guess.
9 Q. Was he a professional associate or a social
10 friend?
11 A. He was I guess more of a professional associate.
12 Q. Also something of a friend as well?
13 A. Sure.
14 Q. What strata would he belong in? Would he be
15 roughly in the same category as the Stines?
16 A. Uh-huh.
17 Q. Yes?
18 A. Yes.
19 Q. Specifically, he offered to arrange for
20 everything that was necessary, in his words, or words to
21 that effect; is that correct?
22 A. He, as I recall, said, I think there is some

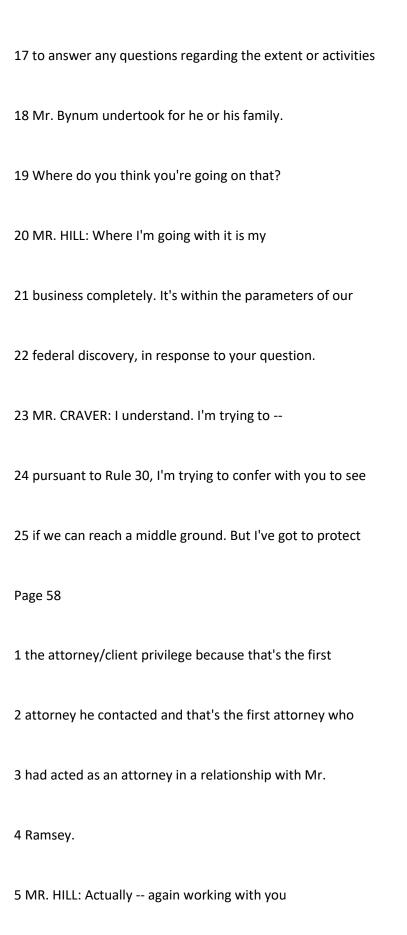


11 next.
12 When we refer to the attorney/client privilege,
13 it's a very strong privilege, but actually fairly narrow
14 in terms of its applicability. And so we should explore
15 that because I don't want to ask you anything that you
16 shouldn't be talking to me about.
17 On the other hand, if it doesn't fall into that
18 category, we should talk about it to facilitate the
19 resolution of, you know, open questions that we have.
20 Did you hire Mr. Bynum to represent you as a
21 lawyer?
22 A. He might have his firm might have been doing
23 work for Access Graphics.
24 Q. But that would have been commercial work?
25 A. Correct.



14 work, setting up a foundation. So I think we'll assert
15 the privilege as to any communication between he and Mr.
16 Bynum as of that date.
17 Q. Was Mr. Bynum involved in establishing the
18 foundation?
19 A. He was involved, yes, as I recall.
20 Q. When did you actually cut a check to his firm
21 to establish the foundation?
22 A. We have paid some monies to them, yeah.
23 Q. When did those payments take place?
24 A. I don't know. I'd have to look.
25 Q. Will you do that?
Page 57
1 A. Uh-huh.
2 Q. And let us know. It wasn't within the first two





6 here for a moment -- it's not clear to me whether he was

7 working as an attorney or a friend, and that's really what

8 I'm trying to determine.

9 What I'm looking for, so you know -- I'm not

10 trying to blind-side you or your lawyers. I'm looking for

11 public relations personnel, spokespersons designated, that

12 sort of thing. People who would have contact on your

13 behalf with members of the media, for example.

14 MR. CRAVER: He can answer those questions. I'm

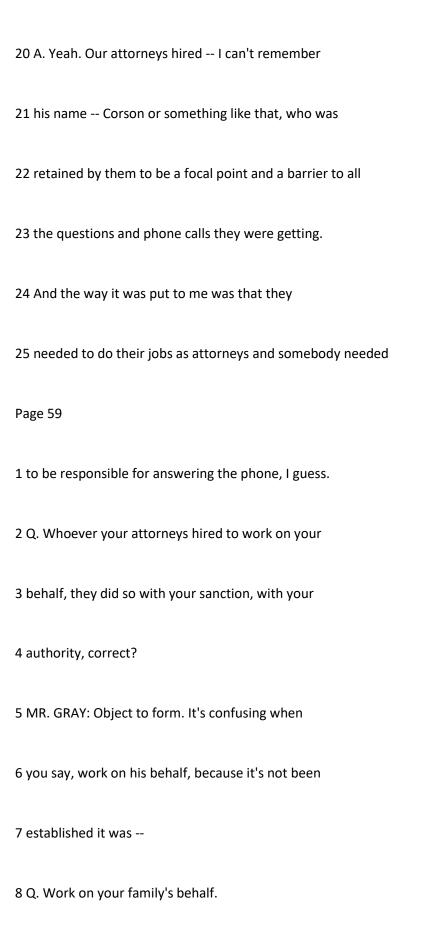
15 not going to let him answer questions as to the extent of

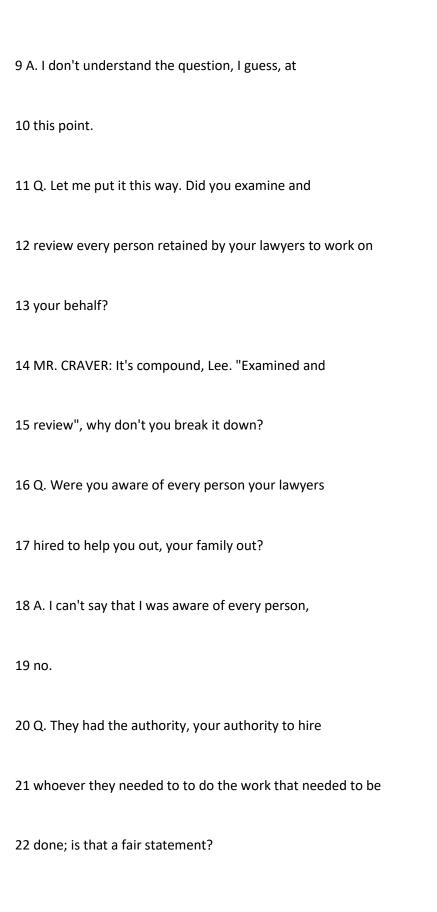
16 what Mr. Bynum was doing for him.

17 MR. HILL: Right.

18 MR. CRAVER: You're so instructed.

19 Q. Do you have a sense of what I'm looking for?



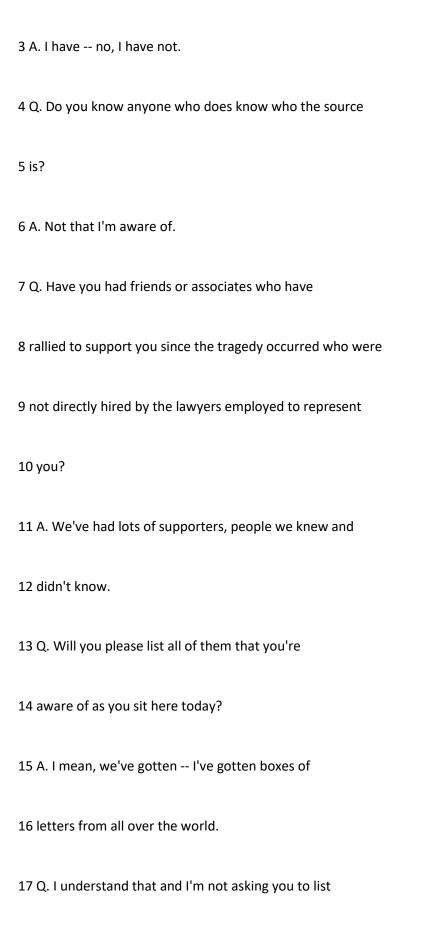


23 A. We were on
24 MR. CRAVER: You know, Lee, I've got to ask you
25 to re-state these questions. When you ask whether they
Page 60
1 had the authority, you're invading the attorney/client
2 relationship. You're actually asking him what the nature
3 of the agreements were between he and his counsel.
4 Can you perhaps ask the question, do you know of
5 an independent source, you know, who they hired, because I
6 can't let you ask him about his communication with his
7 lawyers.
8 Q. Do you know
9 A. I'm not sure I understand.
10 Q. Do you know who they hired? Do you know
11 everyone they hired?

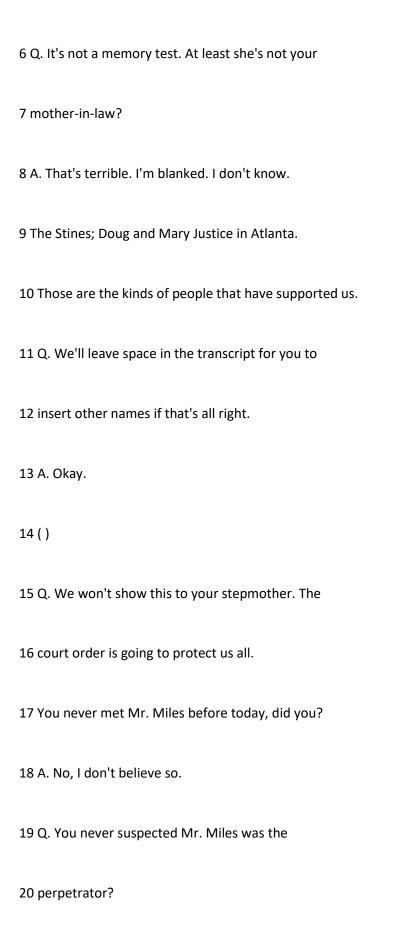
12 A. I suspect not. 13 Q. Do you know some of the people that were hired? 14 A. I'm aware of some of the people, yeah. I know 15 some of the people. 16 Q. Can you tell who the ones are that you know 17 about? 18 MR. MORGAN: This is Bryan Morgan speaking. The 19 question was, tell us what you know or the persons you 20 know that we hired. If that information came through us, 21 then I'm going to instruct my client not to answer that 22 question. That is in the privilege. 23 MR. HILL: Not from your firm, Mr. Morgan, but 24 from any other firm's or professional relationships he may 25 have --

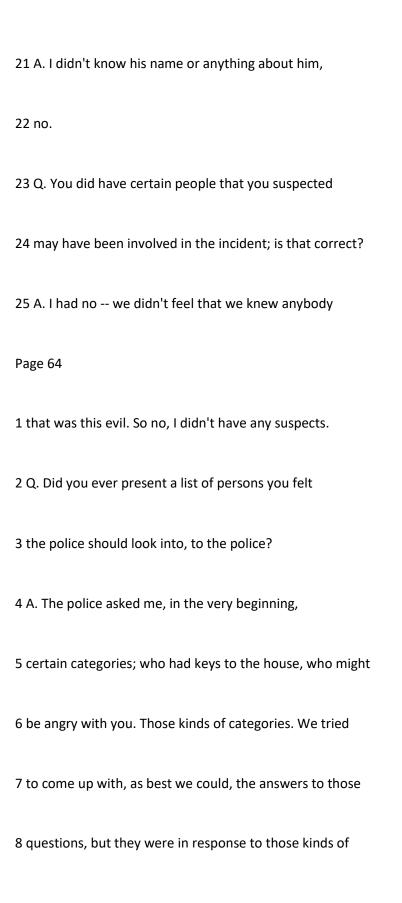
1 A. I don't think we employed anybody that wasn't
2 Q. Did someone, working on your behalf
3 MR. CRAVER: He didn't finish his answer.
4 MR. HILL: I'm sorry.
5 A that was not through the work that Bryan
6 Morgan was doing.
7 Q. When did you hire Mr. Morgan's firm?
8 A. I was introduced to Bryan by Mike Bynum shortly
9 after the murder. I don't remember. The 27th, the 28th,
10 something like that.
11 Q. And you hired him?
12 A. I didn't do anything at that time other than
13 I mean, I was crushed. Mike introduced me to him.
14 Q. Do you know where the Enquirer actually, this

15 kind of lacks foundation because you haven't read the
16 articles, according to your testimony. Let me put it this
17 way.
18 Have you learned who the source is that's
19 referenced in the Enquirer articles?
20 MR. CRAVER: I'll instruct the witness only to
21 testify to the knowledge he may have other than what he
22 gained from his attorneys.
23 A. I did not know of the article. I did not know
24 of Mr. Miles and the controversy until I learned that I
25 was being sued.
Page 62
1 Q. Since that time, have you learned who the source

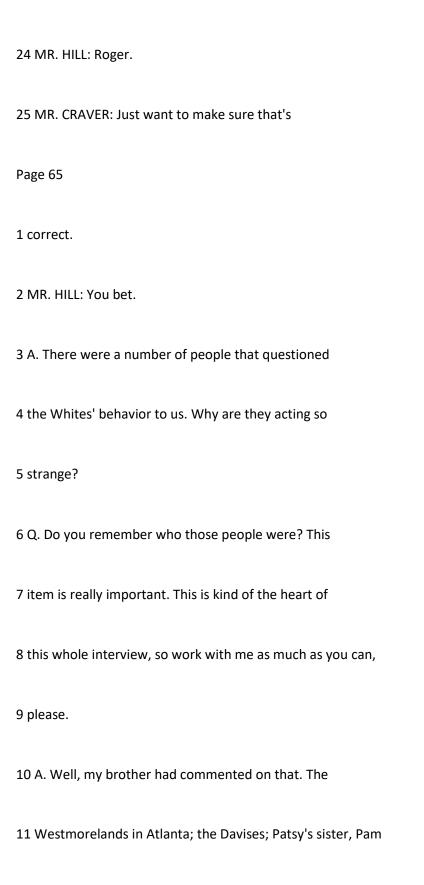


1	18 every letter you've got, but I am interested in learning
1	19 the people who have counseled with you, who have met with
2	20 you, have spoken about this matter with you, your friends,
2	21 associates, well-wishers, volunteers so-to-speak, who have
2	22 offered you direct support following the tragedy who were
2	23 not employed by lawyers.
2	24 A. Well, Rol Hoverstock, our priest; my brother.
2	25 Q. What is his name?
F	Page 63
1	L A. Jeff. My stepmother.
2	2 Q. Her name, please?
3	3 A. Irene.
4	1 Q. Ramsey?
5	5 A. She was re-married and her

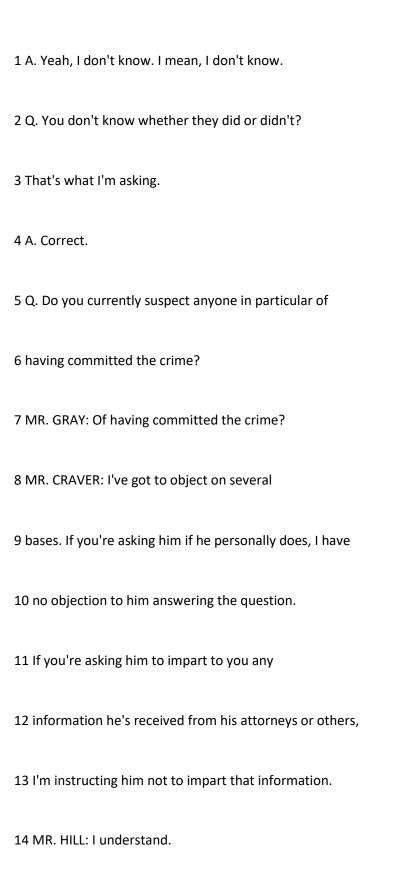


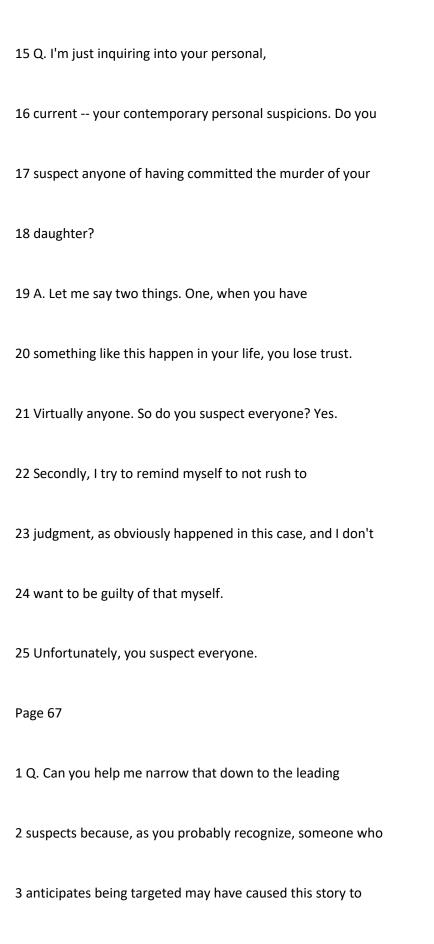


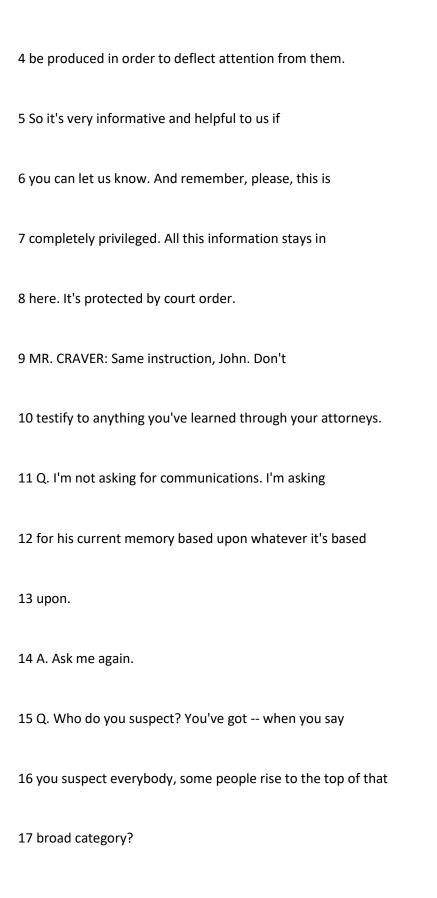
9 category questions.
10 Q. Did any of your friends, supporters, volunteers,
11 people other than your lawyers or people employed by your
12 lawyers, ever offer to you suggestions of people they
13 thought may be suspicious with respect to the murder?
14 A. We have had people both we knew and didn't know,
15 yeah.
16 Q. Among the people you knew, who has offered you
17 names or descriptions of people they thought were worth
18 looking into?
19 MR. CRAVER: People he knew outside the
20 attorneys?
21 MR. HILL: Roger.
22 MR. CRAVER: And the people he's retained,
23 correct?

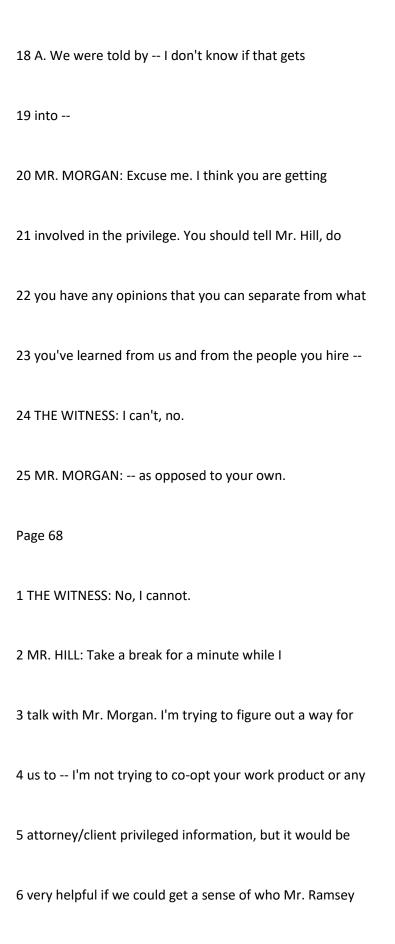


12 Paugh; the Stines.
13 Q. So far the Stines are the only ones who live in
14 Boulder; is that right?
15 A. Yeah, so far on that list.
16 Q. Who lived in Boulder?
17 A. Right.
18 Q. Anyone else in Boulder?
19 A. Not that I recall.
20 Q. Did the Walkers ever make any suggestions to
21 you?
22 A. Not now I mean, not that I remember.
23 Q. Is it possible that they may have made
24 suggestions to your wife that you're unaware of?
25 MR. CRAVER: Don't speculate.



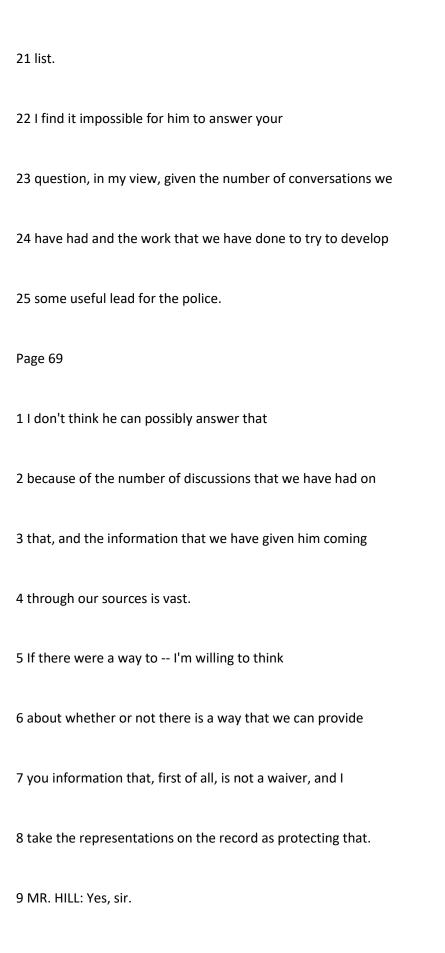






7 believes, based upon anything he may have learned -- and I 8 will not get into -- I will not attempt to interrogate 9 regarding the basis of those opinions. 10 MR. MORGAN: Let me make a statement with the 11 understanding that this is not a waiver of that privilege. 12 MR. HILL: Sure. 13 MR. MORGAN: We have spent a lot of time and 14 effort and energy trying to develop leads that we thought 15 were useful. A lot of junk comes in over the transom, and 16 it's junk. 17 There is stuff that, in our view, was not junk. 18 When it was appropriate, when we thought that Mr. Ramsey 19 would have information bearing on that, we have discussed

20 that with him. That has been literally at the top of his



- 10 MR. MORGAN: But our experience has been that
- 11 anytime anything like that is said, then it is immediately
- 12 leaked and it appears in the tabloids with the worst
- 13 possible spin on it. And we are extremely leery of that.
- 14 And I will say on the record that that has been
- 15 our experience with the Boulder Police Department as well.
- 16 Therefore, we have been burned more than once on this
- 17 subject and it's not so much a question of the trust of
- 18 people in this room as it is to me others.
- 19 So I need to think about that. If there is a
- 20 way that we can deal with it, I willing to think about it,
- 21 but I sure can't commit to it. And I rest on John's
- 22 statement that, with my background, that the number of
- 23 discussions we have had on this subject are just virtually

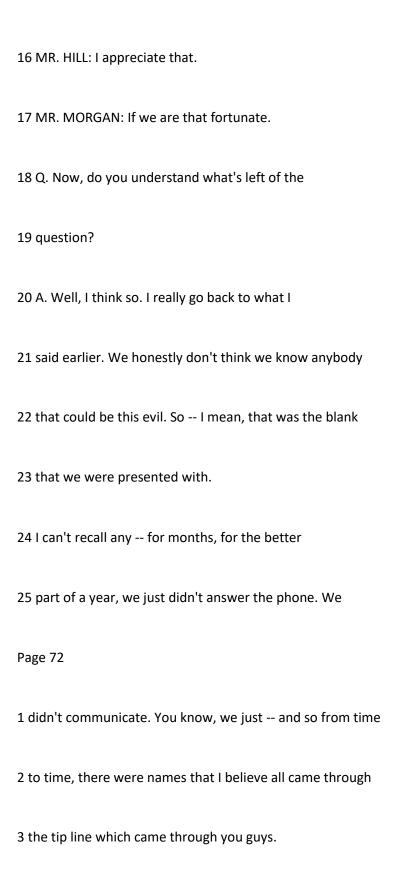
24 countless and I find it impossible to believe that he can 25 answer that question without getting into things that we Page 70 1 have told him. And I leave it at that. 2 MR. HILL: I appreciate your help. 3 MR. MORGAN: I'll do what I can, but I commit to 4 nothing. 5 THE WITNESS: Thank you, senator. 6 MR. MORGAN: I want to be real clear about that. 7 MR. HILL: With that said, while we're still on 8 the record, acknowledging, you know, our information that 9 there is a tabloid reporter lurking downstairs -- I don't 10 want to sound paranoid or spooky about this, but can you 11 all check to make sure we're not being -- that we're not 12 broadcasting right now?

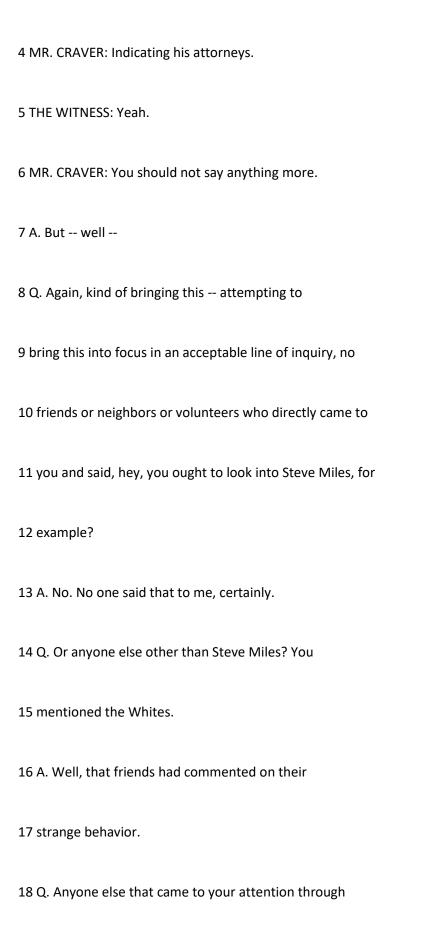
13 Do you know who cleans your office spaces or who 14 has access to this space? I mean, because I don't want to 15 be nailed for this. I'm not going to let any of this out. 16 I give you my personal word as well as assurance that I 17 respect and abide by the court's orders, and the people 18 who work for me and my client do too. He's burned in the 19 sale way. He's burned in the sale way. 20 MR. CRAVER: I did not search the room for 21 mikes. 22 MR. HILL: I don't want you all to think that 23 I'm --24 MR. CRAVER: I trust that we can proceed with

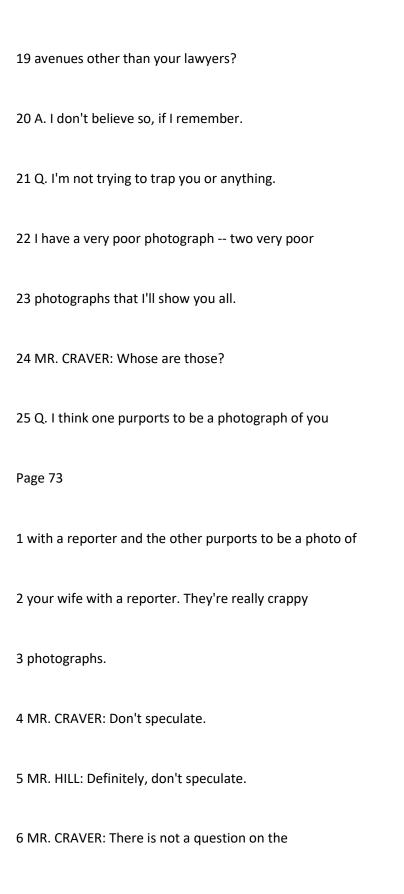
25 our confidentiality agreement. I'll let you ask this

1 question. I'll let you ask him if he has any knowledge of 2 suspects from sources other than his attorneys. And if he 3 answers that question no, then the questioning stops 4 there. 5 MR. HILL: But, Mr. Morgan, I trust you'll 6 continue to work with us to try and develop as much 7 information as may be useful to us as we search for our --8 MR. MORGAN: Our job is, with the -- without the 9 power of the state, without police search warrants, 10 without the right to pick up people and interrogate, 11 without all of those things, to try to find the person who 12 did this. 13 If that results in information that might be 14 useful in terms of pointing towards the source, then we

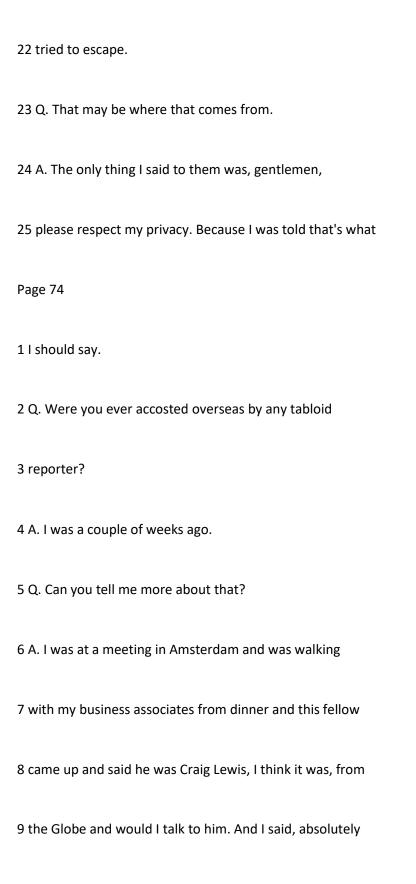
15 will consider it.



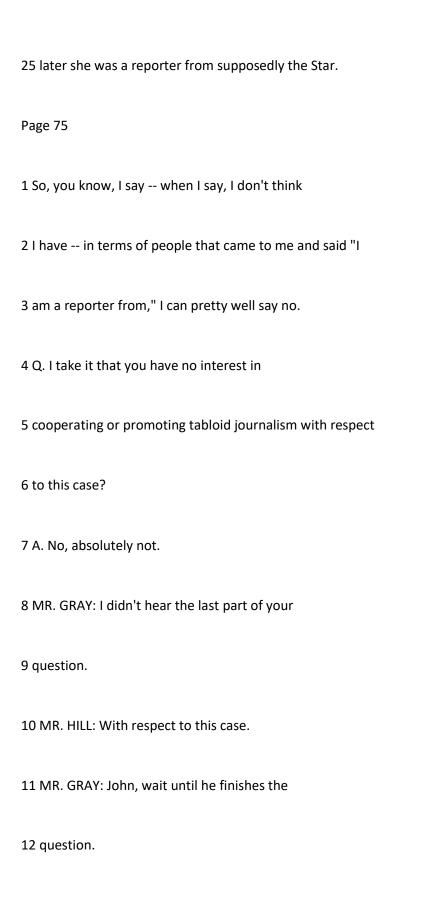




7 table. Wait for a question. 8 Q. I'm just going to ask you if you have seen 9 either of these photographs before? 10 A. No, I haven't. 11 Q. If you recognized any of the people depicted in 12 the photographs? 13 A. No, other than, that appears to be me. 14 Q. You don't remember -- you can barely see this 15 man's face. I believe he's a Globe employee. I'm 16 informed that he's a Globe employee. I'm not trying to 17 impeach you or anything else technical. I'm just offering 18 this to ask if you recall having any communications with 19 any other tabloid reporters besides Jeff Shapiro? 20 A. I was accosted by the Globe when I got off the 21 airplane once in Denver, and they took pictures of me as I

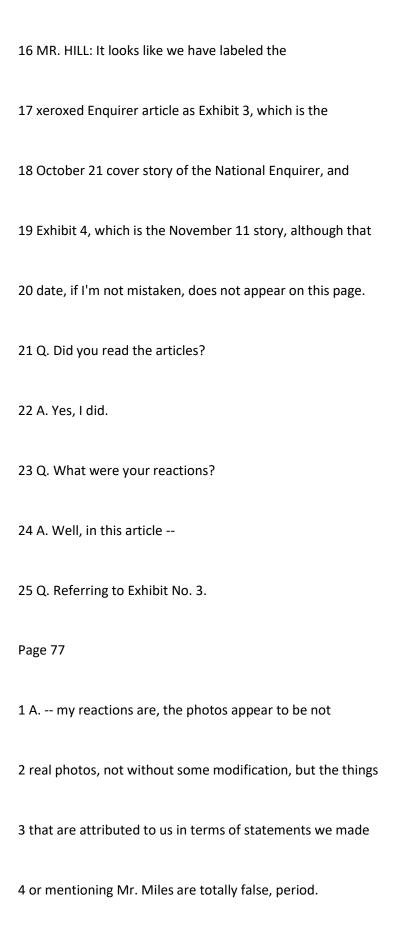


10 not, and walked on. 11 Q. Any other contacts? 12 A. I mean, not that I remember. We had people 13 that -- there was a lady once from the Enquirer -- I 14 shouldn't say that. I don't know where she was from. We 15 were told later she was a tabloid reporter who was 16 painting a picture in front of our house. They said she 17 was just an artist, and Patsy liked art and liked to 18 paint, and they talked. But she represented herself as a 19 tourist. We were told later she was a tabloid reporter. 20 Q. Was this in Boulder? 21 A. No, this was in Charlevoix, Michigan. Another 22 time, one came to my mother-in-law's home, said she was a 23 representative of Princess Diana and wanted to bring 24 flowers on behalf of the British people. And we learned



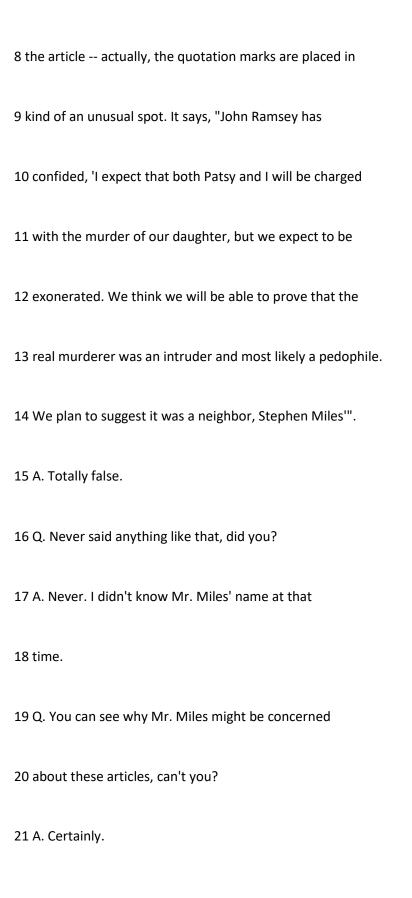


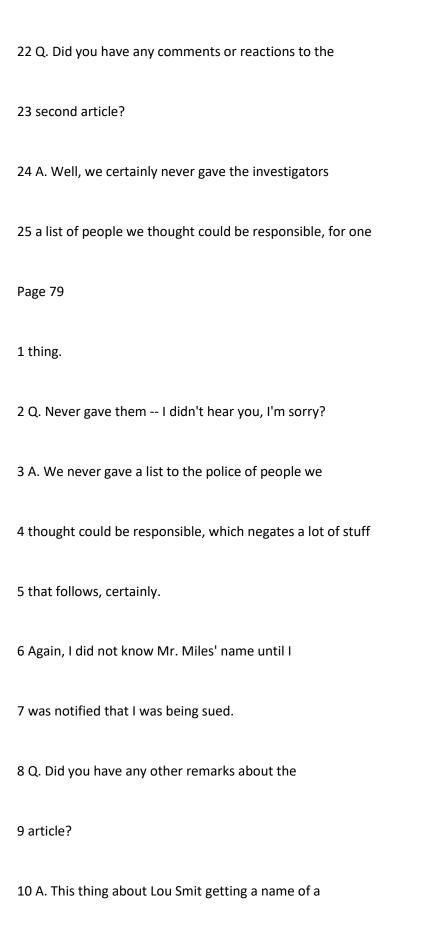
2 Q. Good afternoon, Mr. Ramsey. Thank you for the
3 break and I remind you that you're still under oath from
4 this morning as we continue with the interview.
5 A. Yes.
6 Q. Did you have a chance to look at these?
7 A. I did.
8 Q. I'm referring to let me take care of some
9 administrative work.
10 MR. HILL: Earlier I referred to two computer
11 printouts of poor photographs downloaded from the Internet
12 which I'd like to attach as Exhibits 1 and 2. It doesn't
13 matter what order.
14 (Exhibits 1 through 4 were marked for
15 identification.)



- 5 Q. It's your testimony that you never planned to
- 6 claim that the real killer was Stephen Miles; is that
- 7 correct?
- 8 A. That's absolutely correct. I didn't know Mr.
- 9 Miles' name. I don't believe we ever met. And the first
- 10 time I knew his name was when I was advised that I was
- 11 being sued.
- 12 Q. Is it your testimony that you never discussed a
- 13 plan to name a neighbor as the real killer?
- 14 MR. CRAVER: Wait a second. I'm going to object
- 15 to the form of your question. When you say "discussed",
- 16 you can't ask him about discussions he's had with his
- 17 counsel. Who are you suggesting he discussed it with?
- 18 MR. HILL: I bet I probably can ask him about

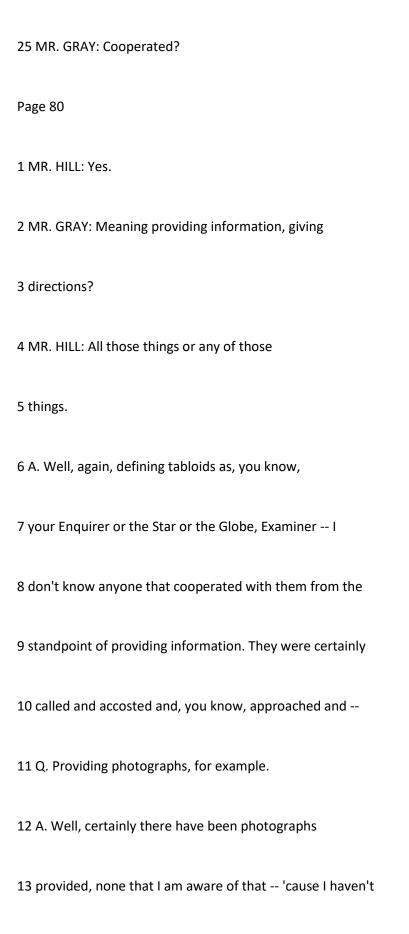
19 any discussions in which he identified plans to name a
20 neighbor as a real killer.
21 A. Well, I can tell you that's I did not.
22 MR. HILL: Thanks. I'm not trying to undercut
23 your objection, but
24 MR. CRAVER: My objection stands. Just so that
25 you note that objection before his answer over my
Page 78
1 objection.
2 MR. HILL: I appreciate it.
3 A. Our objective always has been to find the
4 killer.
5 Q. Yes, sir.
6 A. And that's
7 Q. A quote is attributed to you and I'll read from

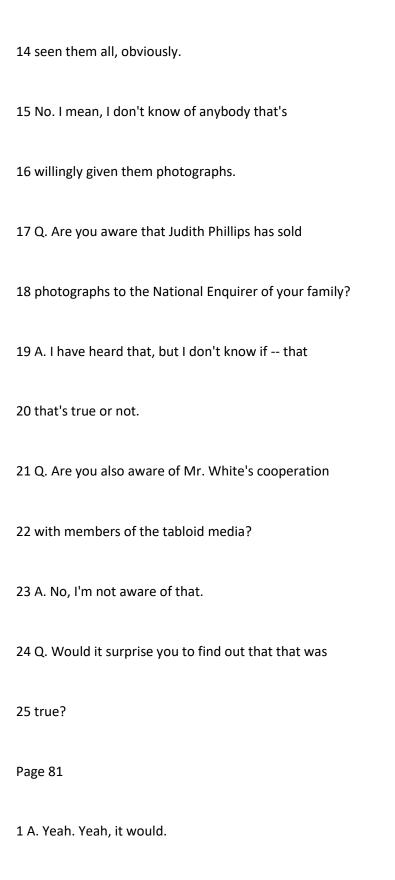




11 54-year-old neighbor from us, I don't know who that would 12 be. That doesn't appear to be accurate. 13 Q. How long did you know the Phillips -- have you 14 known the Phillips? 15 MR. CRAVER: When you say "Phillips", are you 16 referring to them as a couple? 17 MR. HILL: Yes. 18 A. Well, Patsy worked with Mel when she was 19 working, which was in the early '80s, and so I guess we've 20 known them since then. '82 maybe or something like that. 21 Q. How many of your friends or close acquaintances 22 on the level of Judith Phillips and above do you know to 23 have cooperated with tabloid journalists including

24 television and print?





2 Q. What were the circumstances under which you met
3 the Stine family?
4 A. I think it was probably through school. Doug
5 and Burke were the same age, same class, same grade, and
6 that's probably where we met.
7 Q. Since the tragedy, you've stayed in other
8 families' homes other than your former home on 15th
9 Street; is that correct?
10 A. Uh-huh.
11 Q. Whose homes have you stayed in?
12 A. We stayed in Jay Elowsky's home for a period of
13 time. We've stayed in the Stines'. Both of those were
14 for extended periods. We've stayed at people's houses,
15 you know, a day or the two at a time.
16 O. Who would that include?

17 A. Well, the Westmorelands in Atlanta for a few
18 days; my brother's house; my parents-in-law's home.
19 Q. Where is that?
20 A. It's in Atlanta.
21 Q. Anyone else?
22 A. We stayed at Byron Chrisman's condominium at
23 Snowmass not Snowmass, Streamboat for a few days. We
24 were trying to escape the media. That's all I can
25 remember.
Page 82
1 Q. You mentioned Jay Elowsky and I think it's the
2 first time you've mentioned his name today. Where does he
3 fall in your spectrum of social contacts?
4 A. Jay certainly was a friend. He was a friend

5 that we didn't necessarily socialize with, but I certainly 6 considered him a friend. I helped him with his business a 7 bit. I tried to. 8 Q. When you say you helped him, was that in the 9 status of an investor or partner? 10 A. Investor, yeah. Needless to say, he was a good 11 friend, but we didn't socialize with him. 12 Q. Was that at Pasta Jay's or some other business? 13 A. Uh-huh, Pasta Jay's, yeah. 14 Q. Do you still have an interest in it? 15 MR. CRAVER: There again, you're going into his 16 financial interests. Can you tell me any reason you need 17 to know that? 18 MR. HILL: Yeah, lots of reasons actually. 19 MR. CRAVER: I'll let him answer that limited

20 question, but I'm not going to let him go into how m	uch
21 MR. HILL: I'm not trying to go into	
22 A. Yes, at the moment, I do.	
23 Q. Just in that enterprise or other enterprises?	
24 A. No, just that one.	
25 Q. Did you happen to watch Larry King Live last	
Page 83	
1 night?	
2 A. (Shakes head.)	
3 Q. Are you aware that Ms. Paugh appeared?	
4 A. I was aware that somebody told me she was	
5 going to, but I haven't watched television. We took	
6 television out of our house in March.	
7 Q. Probably a good idea.	

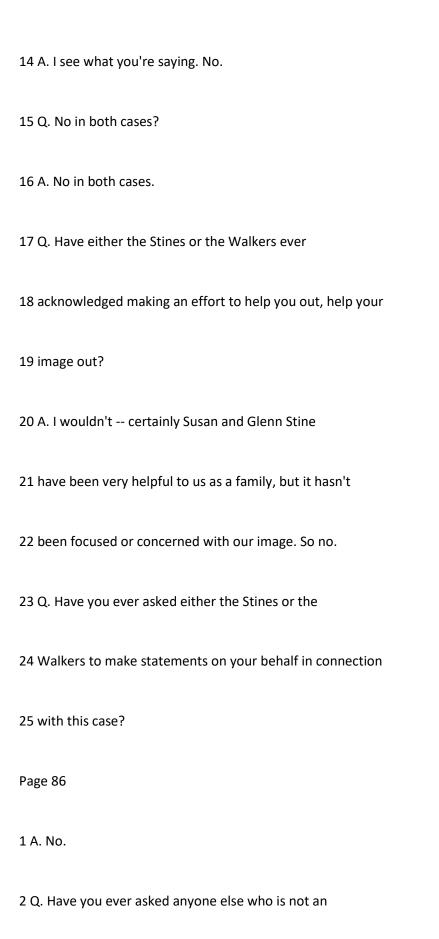
8 I'm told that Pam Paugh, your sister-in-law,
9 expressed that she believed someone close to you was
10 responsible for providing material to the Enquirer that
11 resulted in the stories about Stephen Miles. I was
12 wondering if you knew anything about that?
13 A. No, I don't.
14 Q. Have you had any discussions with Ms. Paugh
15 about this case, referring to the Miles case?
16 A. No.
17 Q. Have you discussed the Miles case with anyone
18 other than your lawyers?
19 A. I probably mentioned them to my brother and the
20 Stines that I was being sued, but that's probably the
21 extent of it.
22 Q. Do you recall the occasion when you discussed

23 this case with the Stines, when and where that occurred?
24 A. No. It wouldn't have been a discussion of the
25 case. It would just have been a comment.
Page 84
1 Q. Since you did become aware of my client, Stephen
2 Miles, have you has anyone, other than your lawyers,
3 approached you to discuss Stephen Miles or his background?
4 A. No.
5 Q. You're acquainted with Ms. Walker, Roxanne
6 Walker?
7 A. Uh-huh.
8 Q. Have you ever stayed at her house?
9 A. No.
10 Q. Has your wife ever stayed with Ms. Walker?

11 A. Not that I'm aware of. 12 Q. Have you ever stored belongs or an automobile at 13 Ms. Walker's house? 14 A. She borrowed a car of ours for a while, yeah. 15 Q. Are you aware of where Ms. Walker lives with 16 respect to my client? 17 A. Well, she lives -- I've only learned this in the 18 last few months. She I believe lives across from Judith 19 Phillips, and I believe you live next door, is what I've 20 been told. But that's recent knowledge. 21 Q. Do you know where the Stines lived when they 22 were still in Boulder relative to my client's house? 23 A. Well, more or less. I mean, I know where the 24 Stines lived and I know where the Walkers live, so yeah.

25 Q. It's your testimony that you've entered into no

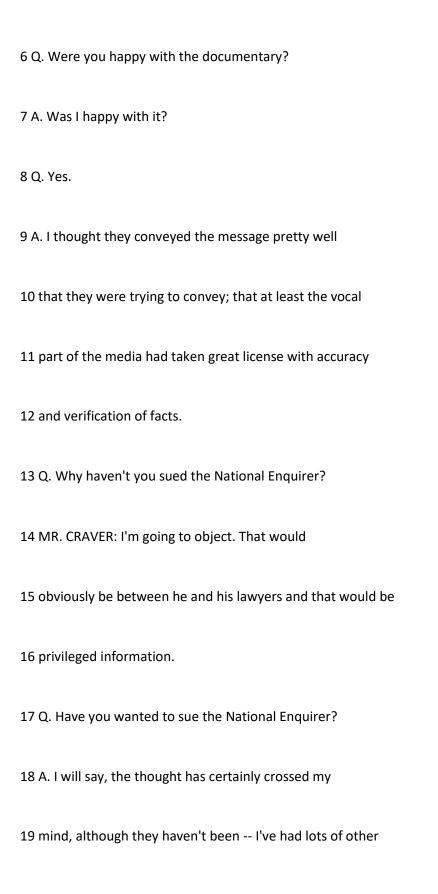
13 Enquirer trying to help you out?

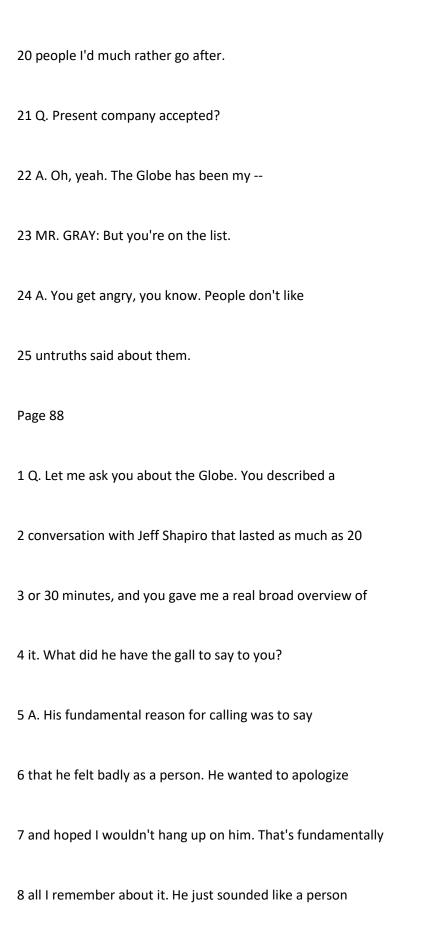


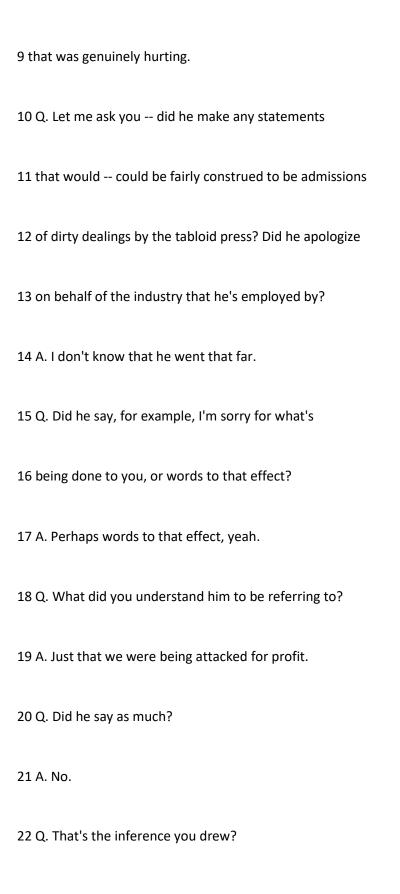
3 attorney working for you or an employee of an attorney 4 working for you to make statements on your behalf? 5 A. No. 6 Q. How did you decide to participate in the 7 documentary film produced by Mr. Glick and Mr. Tracey? 8 A. Well, our interest in this was to somehow make 9 something good come out of it that was significant. One 10 of the real sicknesses I think we have in this country is 11 our media system and its unaccountability and inaccuracy. 12 So this appeared to be a venue that would 13 highlight that based on what's going on in our case. We 14 were going to participate, try to make a difference. That 15 was the only reason.

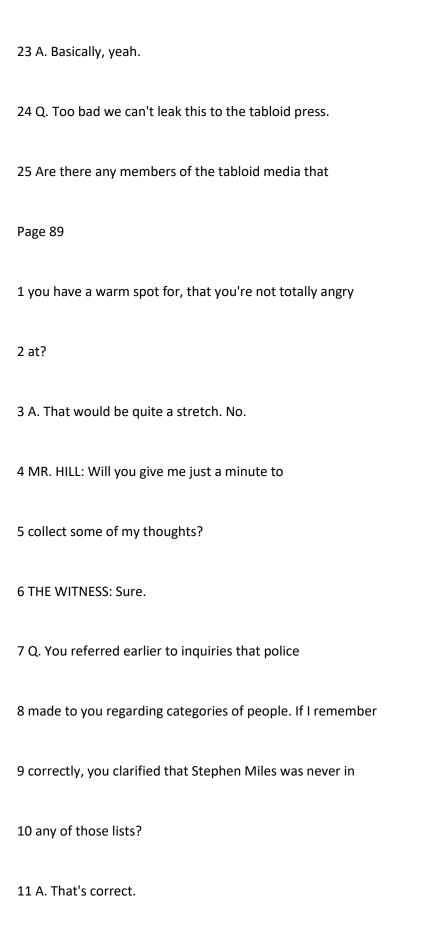
16 Q. Did you make the initial approach to the

17 producers or did they approach you initially?
18 A. They approached us, I'm sure. It wouldn't have
19 crossed our mind.
20 Q. Did you participate in any of the editorial
21 decisions related to the documentary?
22 A. No. That was right up-front.
23 Q. They maintained creative control?
24 A. Precisely, yeah.
25 Q. Did the Stines participate to any degree in the
Page 87
1 production of the documentary?
2 A. Susan was interviewed.
3 Q. Any other degree of participation?
4 A. Not, other than being with us when we were
5 interviewed, to my knowledge.







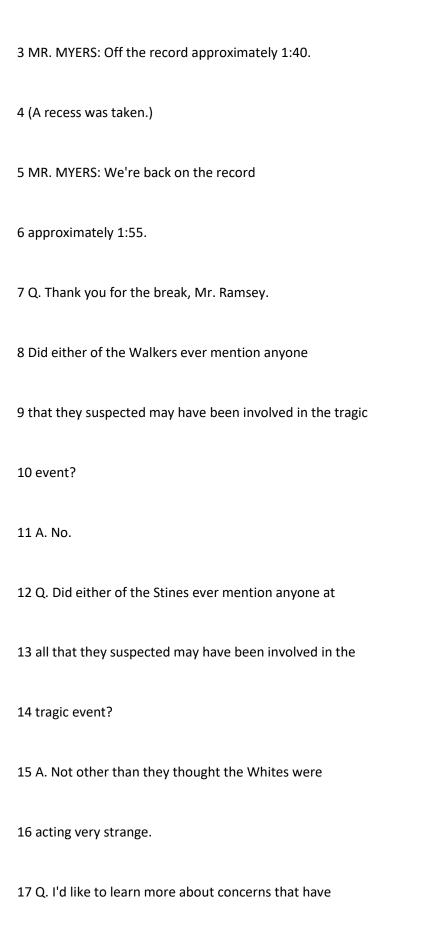


12 Q. Has anyone -- did the police, for example, ever 13 bring up or introduce Stephen Miles in discussions with 14 you? 15 A. No. 16 Q. Who was on -- who did you indicate to the police 17 as belonging to the several categories that they outlined 18 for you? 19 A. I can't accurately remember. I mean, the 20 categories were, who had keys to the house, who might be 21 angry with you? Those kinds of questions. And there were 22 unfortunately a lot of people who had keys to our house, 23 contractors, plumbers, cleaning ladies, neighbors. But I 24 couldn't give you a complete list from memory.

25 Q. As you sit here today, are you aware of any

1 circumstances that may have given rise to the information
2 apparently delivered to the National Enquirer that may
3 have been misconstrued by the person delivering that
4 information to the National Enquirer, any discussions that
5 may have been overheard by someone potentially that could
6 have developed into this, say the third person to hear it
7 down the line?
8 A. Discussions from me?
9 Q. That occurred around you.
10 A. No. I've said it before, but I did not know
11 Mr. Miles' name.
12 Q. Any discussions about anyone near Mr. Miles or
13 in that neighborhood?
14 A. No.

15 Q. Any discussion where someone who knew
16 Mr. Miles even recognizing that you don't know
17 didn't know Mr. Miles, could someone have overheard you
18 talking about someone else and mistaken your remarks to
19 apply to Mr. Miles?
20 MR. CRAVER: I've got to object to the form of
21 that question?
22 A. I don't believe so.
23 MR. HILL: Inartfully posed, my question.
24 MR. CRAVER: I think he's answered it anyway.
25 MR. HILL: I'm going to ask you if I can take a
Page 91
1 five-minute break.
2 THE WITNESS: Sure.



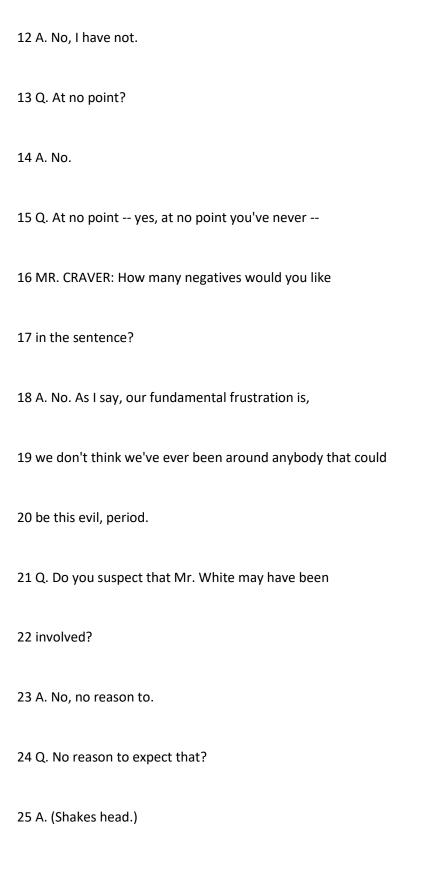
18 been expressed to you about the Whites because, if I
19 remember correctly, you indicated that your brother, the
20 Westmorelands, the Stines, Ms. Paugh is that the
21 correct way to pronounce her name?
22 A. Yeah.
23 Q expressed concerns about the Whites. What
24 were the nature of their concerns? What exactly are they
25 concerned about?
25 concerned about? Page 92
Page 92
Page 92  1 A. Just that their behavior was very odd.
Page 92  1 A. Just that their behavior was very odd.  2 Q. What behavior were they referring to?

6 A. Uh-huh.
7 Q. Physically assaulted a receptionist?
8 A. I don't think he assaulted her. You know, he
9 was vice president of the university and probably not
10 accustomed to have people just walking off the street into
11 his office.
12 Q. You mean t-h-r-o-u-g-h, through the
13 receptionist?
14 A. Right.
15 Q. Not t-h-r-e-w the receptionist?
16 A. Correct, yeah.
17 Q. Of course, I read letters, correspondence that
18 have been published by the Whites that appear to be very
19 critical of the district attorney's office investigation
20 of the circumstances surrounding the death of the your

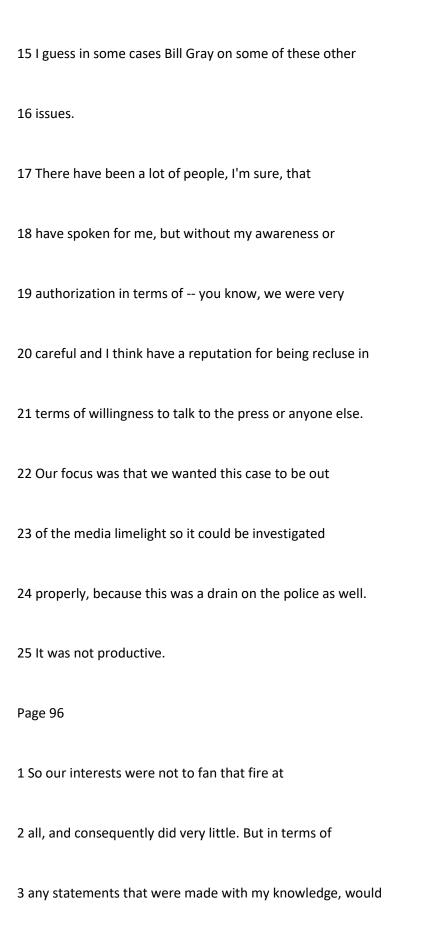
21 daughter. Is that also included in the odd behavior?
22 A. Probably, yeah.
23 Q. Anything else that the Whites have done to your
24 family that have impressed you or the people that you
25 listed as being suspicious of the Whites as being odd or
Page 93
1 suspicious?
2 A. No. I think just a lot of very, very strong
3 emotions that could have just as well been from the
4 trauma.
5 Q. Whose emotions are you referring to now?
6 A. Primarily Fleet's, Fleet White.
7 Q. What emotions has he expressed that fall into
8 this category that you're describing now?

9 A. Well, the only ones I've observed would have
10 been just a very strong, fearful reaction to the media.
11 Q. Do you perceive Mr. White to be angry at you at
12 all?
13 A. No, not since I've talked to him last. No, not
14 at all.
15 Q. At any point post-tragedy, has he expressed
16 anger towards you or vented anger at you or your family?
17 A. No, not to me.
18 Q. Did Mr. White ever discuss with you anyone that
19 he suspected may have been involved?
20 A. No.
21 Q. Have you ever indicated to anyone your suspicion
22 that a photographer may be involved in the death of your
23 daughter?

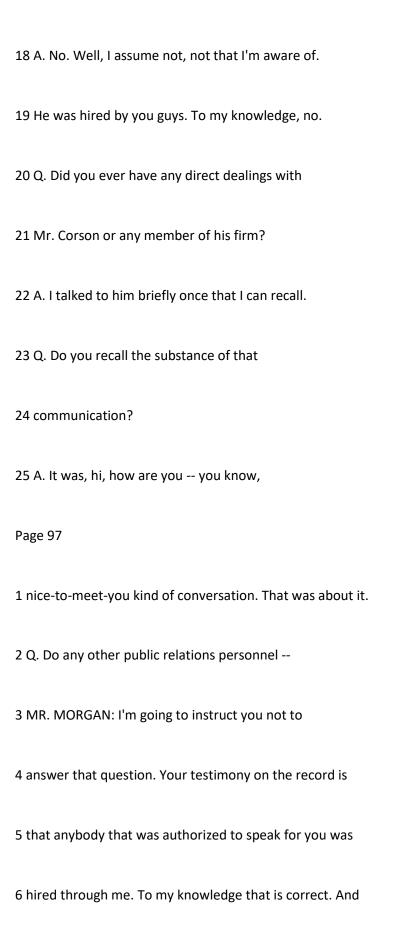
24 A. I'm sorry, say that again.
25 Q. Have you ever expressed
Page 94
1 A. Have I ever expressed that?
2 Q. To anyone, suspicion that a photographer may
3 have been involved.
4 MR. GRAY: Excluding communications with your
5 lawyers, of course.
6 A. No.
7 Q. And you already know it encompasses the
8 caveat that Mr. Gray interjected?
9 A. Right.
10 Q. Have you ever suspected that a photographer was
11 involved in the death of your daughter?

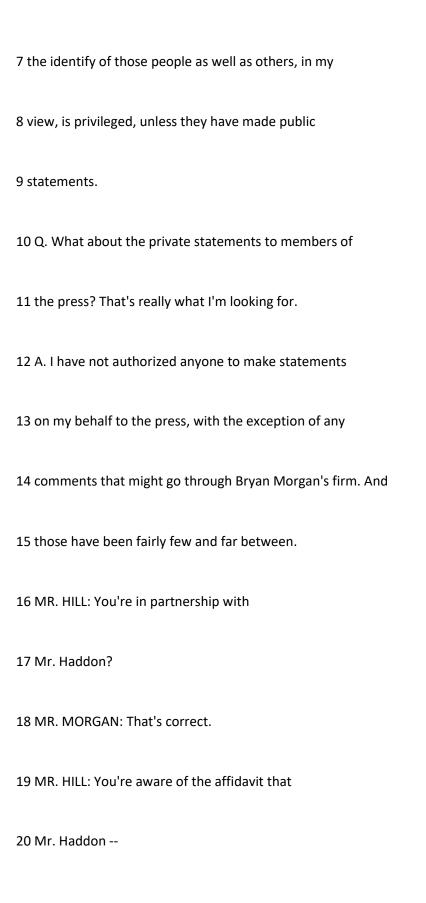


- 1 Q. Again, I'm not trying to encroach upon valid
- 2 assertion of the attorney/client privilege. What I am
- 3 seeking to do is determine how many people -- you know,
- 4 the identities of the persons who have been involved in
- 5 public relations activities, public relations research on
- 6 your behalf, anyone who may have been in a position to be
- 7 aware of strategy discussions concerning your family's
- 8 interests.
- 9 I'm not looking for communications between you
- 10 and any of these employees, just the identities. I
- 11 believe you mentioned Mr. Corson?
- 12 A. Well, the only people -- the only person almost
- 13 that I -- or people, I guess, that I have ever authorized
- 14 or relied upon to speak for me have been Bryan Morgan and

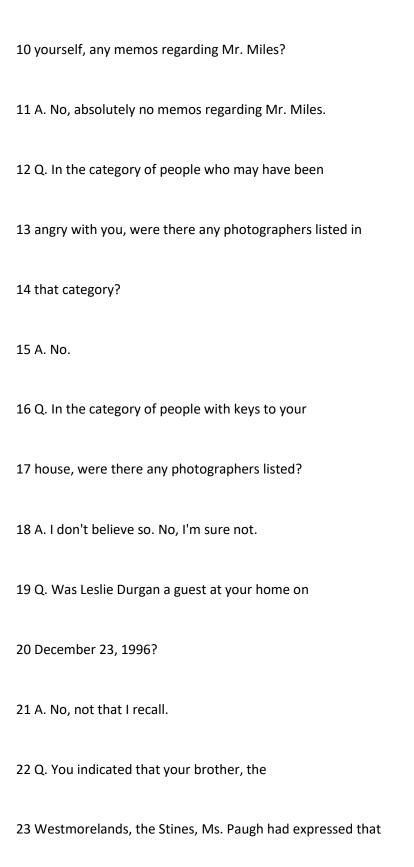


- 4 have come only through Bryan.
  5 Q. When Mr. Bynum gave statements to television
  6 reporters, was that with or without your approval?
  7 A. It was with my awareness. He told me he was
- 8 going to do it. And I said, well, that's -- I never saw
- 9 that program, so I don't even know what he said.
- 10 Q. And that was in his capacity as a friend of
- 11 yours, not as your lawyer?
- 12 A. Correct. I guess -- I mean, I didn't see the
- 13 program, so I don't know.
- 14 Q. Okay.
- 15 A. It's tough for us to watch that stuff, frankly.
- 16 Q. Sure, absolutely. Does Mr. Corson still work
- 17 for you?



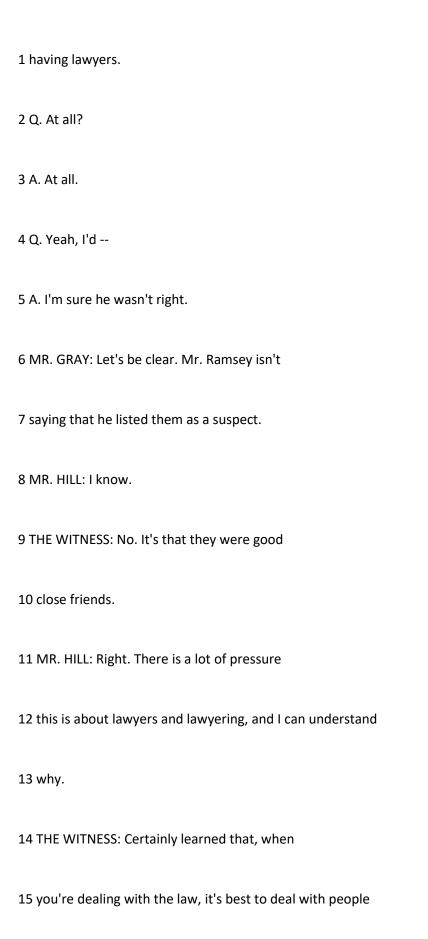


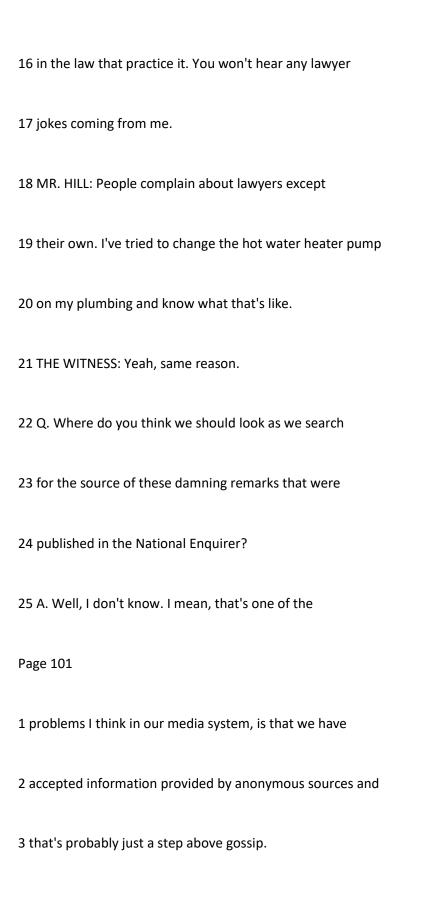
21 MR. MORGAN: Yes, I am.
22 Q. We've left certain spaces in the deposition
23 transcript for you to supplement if you remember other
24 people or other names. Did you have an opportunity to
25 review any documents to refresh your memory in connection
Page 98
1 with this deposition today?
2 A. No.
3 Q. Do you have any notes or documents that relate
4 to this case or issues associated with this case?
5 A. Yes.
6 Q. What type of notes and documents do you have?
7 A. I think they're virtually all correspondence
8 with Bryan or someone in his firm.
9 Q. Any other documents, any journals, any notes to



24 they were suspicious of the Whites. Who else did they
25 indicate that they may be suspicious of?
Page 99
1 A. No one that I recall, and they were suspicious
2 only because of very strange behavior.
3 Q. Have you ever made a complete list of the
4 strange behavior?
5 A Have I?
6 Q. Yes.
7 A. No.
8 Q. Can you supplement it so I have
9 MR. CRAVER: He means, have you told him all the
10 strange behavior that you can recall at this time?
11 A. Yeah. In general, it was just very strong
12 anguish and anger and apprehensiveness and very strong

13 emotions about certain things that should and shouldn't 14 be. 15 Q. Like what? 16 A. Such as, we should do the CNN interview that we 17 did. That was done entirely because of Fleet White's 18 angry and -- or emotional insistence that we do so. 19 Q. He pressured you to do the CNN interview? 20 A. He was very strongly promoting it, yes. 21 Q. Did that seem perplexing to you? 22 A. Well, the stated reason was that we were getting 23 crucified in the press. We ought to let people see who we 24 were. Certainly, probably the last thing we wanted to do 25 was -- parents of a child be destroyed. Very much against

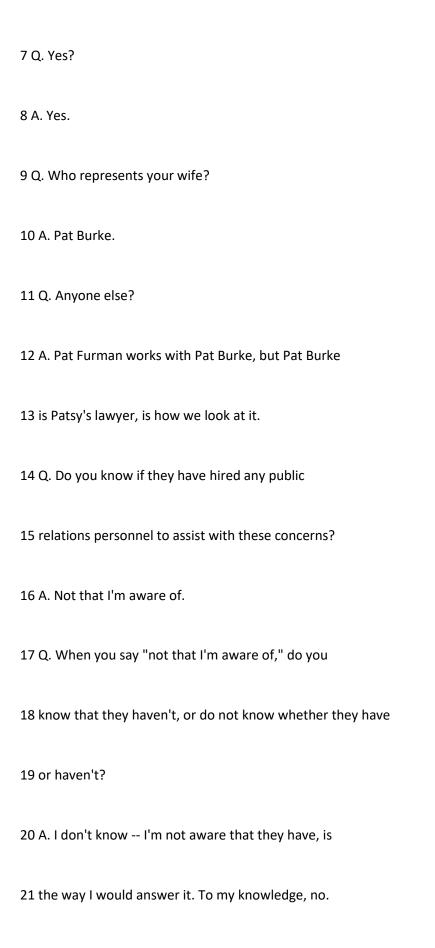


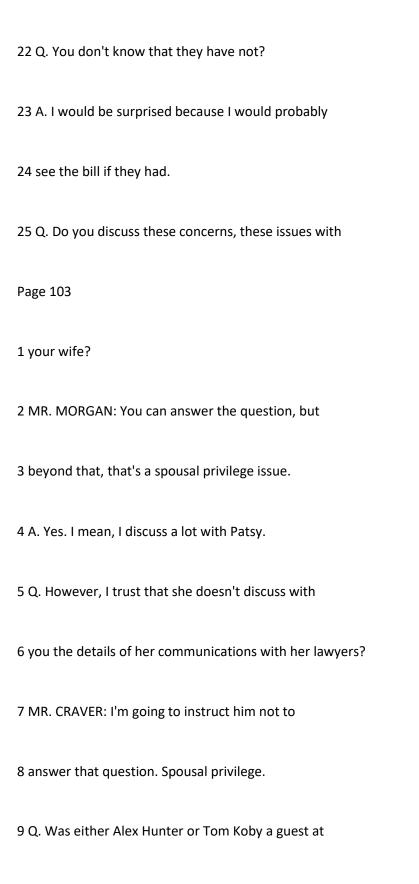


4 I think it's a fundamental problem with the 5 entire media system. I mean, that's one of the problems I 6 think we have in our system. So I don't know. That's --7 because so much of that is how all media reports these 8 days, it seems to me. 9 Q. Speaking of the media, you made reference to 10 Fleet White's strong fearful reaction to the media. Did 11 he make those expressions after he encouraged you to 12 appear on CNN or before? 13 A. Well, after, I guess is the -- in terms of the 14 instance I can think of. 15 Q. How did those reactions -- how did those strong 16 beliefs manifest? Was he yelling about it? What was he 17 trying to get you to do?

18 A. Well, at the time that I was with Rol

19 Hoverstock, out minister, he came into the office and had 20 a note from a reporter that said, I think, did you or John 21 go down the basement first? I need to know which is true. 22 Fleet was just beside himself. My reaction was, 23 you can't let that get under your skin. It certainly 24 appeared to be very troublesome to him. He was very 25 anxious about it, didn't know what to do. He seemed very Page 102 1 genuinely afraid of what might be said about him in the 2 media, is my impression. 3 Q. You've done a great job of telling me who all is 4 authorized to make statements on your behalf. Patsy has 5 her own group of lawyers, doesn't she? 6 A. (Nods head.)





10 your December 23rd party? 11 A. No. I didn't know either of those fellows 12 either. 13 Q. I didn't think you did. Rumors fly. I guess 14 you're aware of that more than anybody, probably. And 15 nothing offers better rumor control than going directly to 16 the source. And I really appreciate your availability 17 today and also your forthright demeanor with me. 18 I'd like to be able to eliminate potential 19 sources of this defamation of my client with respect to 20 your wife and her defense team. However, my efforts to do 21 that have been frustrated. We requested an affidavit 22 similar to the one that Mr. Morgan's office provided us. 23 It was from Mr. Burke and Mr. Furman. And they decided 24 not to do that for us.

25 I spoke with them recently -- with Mr. Furman

Page 104

1 recently about possibly locating a convenient time and

2 place to interview your wife, as we have interviewed you

3 today, in our search for the source, and regrettably that

4 exchange broke down into something of a shouting match.

5 So I really am determined not to make this any

6 worse than it has to be. But as you can appreciate, it's

7 very essential that we do everything we can to find and

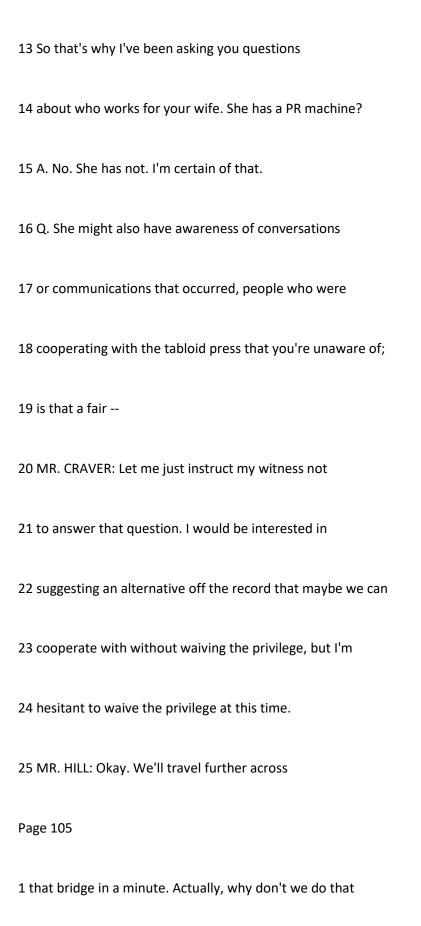
8 pinpoint the source of this information.

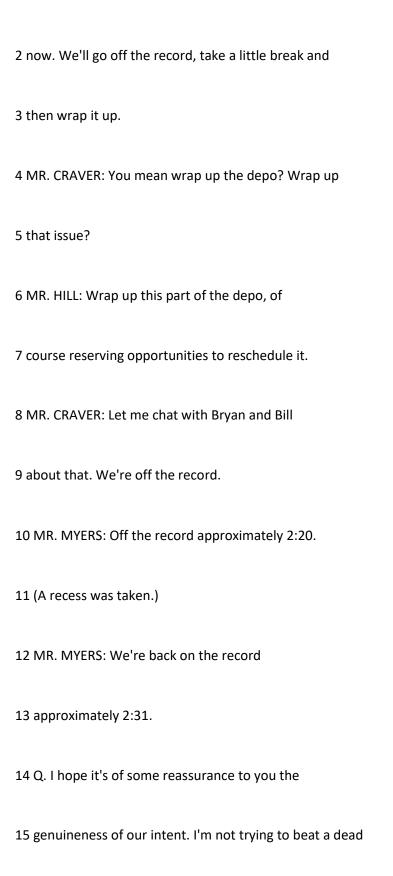
9 We may be in a better place to try and stop this

10 kind of abuse than you are because of the relative

11 circumstances, the contrasts. There are similarities, but

12 there are also contrasts. We have other opportunities.

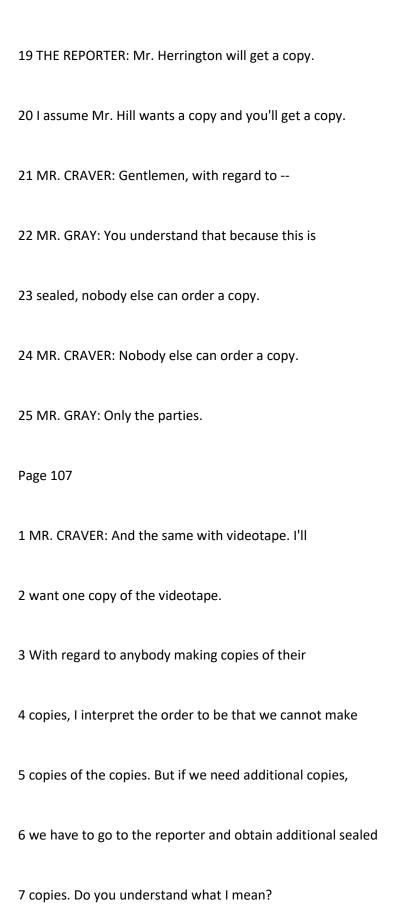




16 horse with a dead stick here.
17 A. You've been very courteous.
18 Q. Thank you, and I appreciate your candor and
19 courtesy. I'll ask you again if there is anything else I
20 should ask of you that will help me to narrow our field of
21 investigation so that we can locate the
22 MR. CRAVER: I can't allow him to answer that
23 question, whether you should ask him anything else
24 you're the lawyer. You know the elements of your case.
25 MR. HILL: It's not a trick question. I'm just
Page 106
1 asking Mr. Ramsey if he has any suggestions of any source.
2 MR. CRAVER: Why don't you ask him the question,
3 whether he has any information himself as to the identity
4 of the source.

5 MR. HILL: Let's take that question. 6 THE WITNESS: No, I do not. 7 MR. HILL: Under the terms of the stipulated 8 protective order, you know, I don't have any further 9 questions at this time. 10 MR. CRAVER: Obviously, we reserve the rights to 11 object to a later deposition on all bases with -- but at 12 least we moved the case forward, moved the ball forward a 13 little bit. 14 MR. HILL: I don't know if you have any 15 questions? 16 MR. HERRINGTON: I don't have anything today. 17 MR. CRAVER: We'll handle signature, please.

18 I want to know who gets and who orders copies.



8 MR. HILL: I just interpret the order as being

9 prohibitive of distribution of any images or any

10 recordings based upon the deposition.

11 MR. CRAVER: Or any content of the deposition.

12 MR. HILL: Absolutely.

13 MR. CRAVER: I would appreciate it, if anybody

14 makes a copy and intends to provide it to a non-lawyer,

15 that they bring it to our attention.

16 MR. HILL: We're not going to do that.

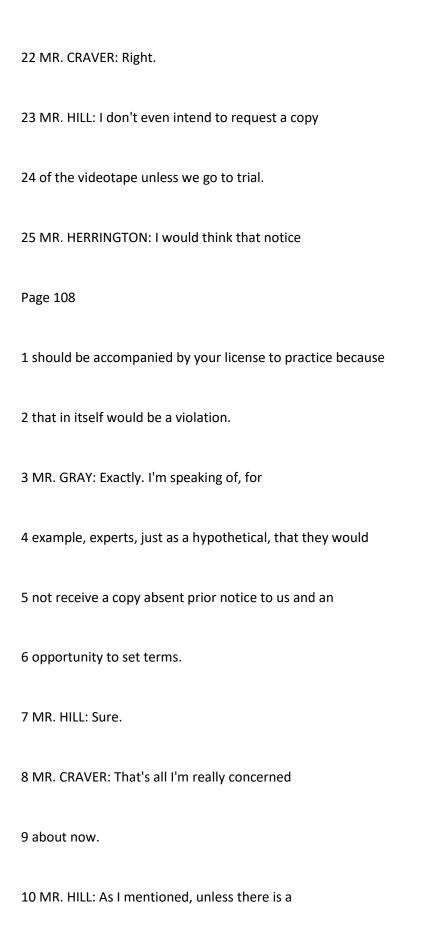
17 MR. GRAY: I think we also want to have an

18 agreement that in furtherance of the court order, if there

19 is to be a copy provided to someone who is not party to

20 this protective order, that the other parties are entitled

21 to prior notice of that and opportunity to object.



11 need for it, unless we, you know, are preparing for tria
12 I don't I'm not even going to order a copy of it.
13 MR. CRAVER: Thank you.
14 MR. MYERS: Off the record approximately 2:35,
15 tape 2 of 2.
16 (The deposition concluded at 2:35 p.m.)
17
18
19
20
21
22
23

Page 109
1 CERTIFICATE OF WITNESS
2
STATE OF)
3 ) ss.
COUNTY OF)
4
5
I, JOHN RAMSEY, a witness in the above
6 deposition, do hereby acknowledge that I have read the
foregoing transcript of my testimony, and state under oath
7 that it, together with any attached amendment to the
deposition, constitutes my sworn testimony.

I ( ) have ( ) have not made
9 corrections on the attached amendment to the deposition
form.
10
11
12
JOHN RAMSEY
13
14
15 SUBSCRIBED AND SWORN to before me this
day of
16
My commission expires

19 Notary Public, State of
Street Address
20 City and State
21
22
23
24
25
Page 110
1 CERTIFICATE OF DEPOSITION OFFICER
2 STATE OF COLORADO )
)
3 COUNTY OF DENVER )

I, JOHN J. SPERA, a Certified Court Reporter

5 and Notary Public within and for the State of Colorado,

commissioned to administer oaths, do hereby certify that

6 previous to the commencement of the examination, the

witness was duly sworn by me to testify the truth in

7 relation to matters in controversy between the said

parties; that the said deposition was taken in stenotypy

8 by me at the time and place aforesaid and was thereafter

reduced to typewritten form by me; and that the foregoing

9 is a true and correct transcript of my stenotype notes

thereof.

10

That I am not an attorney nor counsel nor in

11 any way connected with any attorney or counsel for any of
the parties to said action nor otherwise interested in
12 the outcome of this action.
13 IN WITNESS WHEREOF I have affixed my signature
and seal this day of , 1998.
14
My Commission expires March 10, 2002.
15
16
17 JOHN J. SPERA
Certified Shorthand Reporter
18 Notary Public, State of Colorado
1874 South Pontiac Way

19 Denver, Colorado 80224

February 6, 2000