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1 IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA

2 ATLANTA DIVISION

3 ROBERT CHRISTIAN WOLF,  
Plaintiff,

4 CIVIL ACTION FILE

vs.

5 NO. 00-CIV-1187(JEC)

JOHN BENNETT RAMSEY and  
6 PATRICIA PAUGH RAMSEY,  
Defendants.

7 ~~~~~

8 VIDEOTAPED DEPOSITION OF

9 JOHN BENNETT RAMSEY

10 December 12, 2001

9:49 a.m.

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500 The Candler Building

12 127 Peachtree Street, N.E.

Atlanta, Georgia

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14 Alexander J. Gallo, CCR-B-1332, CRR

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1 APPEARANCES OF COUNSEL

2 On behalf of the Plaintiff:

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16 On behalf of the Defendants:  
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25 -and-  
0003

1 L. LIN WOOD, Esq.  
2 MAHALEY C. PAULK, Esq.  
3 L. Lin Wood, P.C.  
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7 (404) 522-1713  
8 .

9 Also Present:  
10 Patricia Paugh Ramsey  
11 Michael McElroy, Videographer

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1 Deposition of John Bennett Ramsey  
2 December 12, 2001  
3 THE VIDEOGRAPHER: We are on the  
4 video record at 9:49.  
5 MR. HOFFMAN: Good morning. This is  
6 the deposition of John Ramsey in the case of

7 Robert Christian Wolf versus John Bennett Ramsey  
8 and Patricia Paugh Ramsey.

9 I am the lead counsel for the  
10 plaintiff Chris Wolf.

11 Would the gentlemen here identify  
12 themselves?

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

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

18 MS. RAMSEY: I am Patsy Ramsey.

19 MR. PAULK: Mahaley Paulk.

20 MR. SCHROEDER: Eric Schroeder.

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

23 MR. WOOD: The deposition is taken  
24 pursuant to the Federal Rules of Civil Procedure.  
25 The deposition is taken pursuant to agreement of  
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1 counsel.

2 The deposition is taken pursuant to a  
3 stipulation and protective order agreed to by all  
4 parties, which protective order specifically  
5 states, as we went over yesterday, the right of  
6 counsel to make sure that this deposition is not  
7 abused and that only areas that are relevant to  
8 the claims and defenses in this lawsuit are  
9 inquired of today in this deposition.

10 Anything you want to add to that,  
11 Mr. Hoffman?

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

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

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

23 EXAMINATION

24 BY-MR.HOFFMAN:

25 Q. Your full name, please, sir?

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1 A. John Bennett Ramsey.

2 Q. Have you ever attended a deposition  
3 before?

4 A. Yes.

5 Q. Are you familiar with the deposition  
6 procedure?

7 A. I wouldn't say I am familiar with it.

8 I have been at one deposition.

9 Q. All right. If at any time you don't  
10 understand --

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

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

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

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

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

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

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

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

18 A. I am sure we referred it to our  
19 attorneys through -- or through our attorneys to  
20 our investigators.

21 Q. All right. Do you know which  
22 investigators were responsible for investigating

23 that claim on your behalf?

24 A. Not for certain. I think probably

25 they were involved, each involved at different

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1 stages.

2 Q. Do you know the names of the

3 investigators that were involved?

4 A. I do.

5 Q. Could you give me their names?

6 A. Well, there was a group called Ellis

7 Armistead & Associates. David Williams. John --

8 and I can't think of his last name. Those were

9 the principal investigators that our attorneys

10 retained.

11 Q. Without revealing the substance of

12 what you were given with respect to any reports

13 that your investigators may have given you, do

14 you remember if you ever saw any investigative

15 reports concerning Chris Wolf?

16 A. I don't remember seeing any

17 investigative reports regarding Chris Wolf.

18 Q. Do you remember whether or not you

19 were shown investigative reports with respect to

20 any of the other potential suspects that you may

21 or may not have been looking at?

22 A. I don't recall ever seeing a report

23 on any suspect that they might have looked at.

24 MR. HOFFMAN: All right. For the

25 purpose of my next question, I would like the

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1 court reporter to please mark this as Plaintiff's

2 Exhibit 14 for identification. And, actually, I

3 am going to turn to the portion to which I am

4 going to direct Mr. Ramsey to look at this.

5 (Plaintiff's Exhibit-14 was marked for

6 identification.)

7 THE WITNESS: You want me to read

8 this part that is highlighted?

9 Q. (By Mr. Hoffman) Yes. After you

10 had an opportunity to read it to yourself, please

11 read it out loud.

12 A. You want me to read it out loud? I

13 am sorry; I wasn't listening. I was reading.

14 Q. Yes, Mr. Ramsey.

15 A. "Katie Couric: You also mentioned

16 Chris Wolf, a total stranger whose girlfriend

17 reported that he had disappeared on Christmas

18 night and was very agitated rather when he  
19 watched the news of the murder on TV.  
20 "John Ramsey: Uh-huh.  
21 "Katie Couric: Why do you mention  
22 him?  
23 "John Ramsey: Because he had been  
24 widely mentioned in the news, and we wanted to  
25 clarify the facts that we knew.

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1 "John Ramsey: I can tell you when,  
2 when we first startled looking at it, one  
3 particular lead early on, my reaction was, 'This  
4 is it. This is the killer.' And our  
5 investigators said, 'Whoa, whoa, whoa,' he'd say,  
6 'Don't do a Boulder police on me. Don't rush to  
7 conclusions.'"

8 Q. Do you remember making this statement?

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

12 MR. HOFFMAN: In fact, just simply  
13 for the record, I believe this is the Katie  
14 Couric Today Show. It was aired on, I believe,  
15 March 24th. And I believe it was in the year  
16 2000.

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

20 MR. HOFFMAN: The statement to Katie  
21 that --

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

25 THE WITNESS: Yeah.

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

6 A. Yes.

7 Q. Can you name that person?

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

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

15 A. No. That is correct.

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

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

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

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

5 MR. HOFFMAN: All right. Reports.

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

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

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

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

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

19 Q. Any evidence that your investigators  
20 have?

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

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

2 A. I was not.

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

7 A. The investigators were retained by our

8 attorneys, and they stated to me that the  
9 principal purpose of those investigators was to  
10 prepare a defense in the case that the police  
11 might bring a charge against me.

12 I hoped that they would also follow  
13 up on leads that came to us, but I was  
14 frequently reminded by our attorneys that their  
15 principal role was to prepare a defense should  
16 that be necessary.

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

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

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

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

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

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

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

2 Q. You say that he asked you to stay in

3 the sunroom. Did you remain in the sunroom the  
4 whole morning?

5 A. We did not. Other people arrived.

6 The police arrived. They asked to use our cell  
7 phones because theirs were dead. They asked us  
8 to do a number of things that required us to  
9 leave that room.

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

13 A. No.

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

16 A. No.

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

20 A. No.

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

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

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

6 A. Yes.

7 Q. How many times?

8 A. Twice.

9 Q. Prior to 1:00?

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

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

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

17 Q. Did she ask anybody else to do it?

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

20 Q. Prior to Linda Arndt asking you to  
21 look around the house, how many times did you go  
22 to the basement?

23 A. Once.

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

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1 A. I do not.

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

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

6 Q. When you would -- did you see  
7 anything else there?

8 A. Not that looked out of the ordinary.

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

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

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

15 A. No.

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

18 A. I have no idea.

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

23 A. I don't recall specifically if I did  
24 or not. I have a vague recollection of telling  
25 Linda Arndt that I found an open window with

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1 broken glass, but that I perhaps had broken that  
2 glass myself months earlier.

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

6 A. Not that I recall.

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

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

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

16 A. She told me to go through the house  
17 and look for anything -- go through the house  
18 thoroughly, as I recall, and look for anything

19 that seems out of place. And so my intent was  
20 to do it thoroughly.

21 Q. Did you ask Fleet White to join you?

22 A. I think I did, as I recall.

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

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1 A. Uh-huh (affirmative).

2 Q. Can you tell me where you looked?

3 A. I went back into the train room,  
4 showed Fleet the broken window, explained to him  
5 that I might have broken it myself months ago.  
6 I showed him the suitcase that I saw under the  
7 window, which I felt was very out of place.

8 We looked for any large pieces of  
9 broken glass. And then I got up and went to  
10 the cellar room, opened the door, and found  
11 JonBenet.

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

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

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

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

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

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

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

7 A. I don't know.

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

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

13 Q. Had you turned the light on or --

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

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

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

20 Q. Did you do anything then after that?

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

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

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

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

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

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

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

11 Q. During the time -- I am going to  
12 direct your attention to the time that is earlier  
13 than the time you found JonBenet's body, and that  
14 is the time when the police were in the house,  
15 between the time Officer French first arrived and  
16 the time Linda Arndt asked you to make a more  
17 thorough search of the house.

18 Were you questioned by the police?

19 A. Yes, I think I was.

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

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

24 Q. Do you remember if you were asked  
25 whether or not the house was secured when you

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1 went to bed the night before?

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

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

7 A. I remember telling, I believe it was  
8 Linda Arndt, that I thought all the doors were

9 locked, and I didn't understand how someone could  
10 have gotten in. Of course, I learned later that  
11 one of the doors was found wide open.

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

14 A. It was not on.

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

17 A. I don't --

18 Q. -- the night before?

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

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

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

25 Q. Do you remember some of those

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1 questions?

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

6 Q. And do you remember what you answered?

7 A. Oh, not completely. I know that in  
8 terms of people that were angry with me at work,  
9 I mentioned Jeff Merrick, who we had terminated  
10 due to performance. And he was extremely angry,  
11 to the point of making threats in the past six  
12 months prior to that.

13 Patsy made me aware of Linda  
14 Hoffman-Pugh's strange behavior just prior to, but  
15 you need to ask Patsy about that because that is  
16 not firsthand information.

17 Q. Anyone else?

18 A. I don't believe so.

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

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

25 Q. Were you asked at any time by law

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1 enforcement during this period what had transpired  
2 the night before in your home?

3 A. During that period?

4 Q. Uh-huh (affirmative).

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

6 Q. Can you remember what occurred on

7 December 25th, say, from the morning on?

8 A. Generally, I can.

9 Q. Could you give me just a general

10 summary, to the best of your knowledge?

11 A. I remember the kids bounding into our

12 room that morning excited to open their presents.

13 Our normal tradition is that I go downstairs,

14 turn on the Christmas tree lights. I brought a

15 bicycle out of the garage that I had as a

16 surprise for Patsy.

17 The kids came down. We opened

18 presents. JonBenet wanted me to take movies, but

19 my battery was dead. We had breakfast, Christmas

20 breakfast.

21 Q. Do you remember what was served at

22 that breakfast?

23 A. Not -- no, I don't. Probably

24 pancakes.

25 Q. Was that one a family favorite?

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1 A. Yes.

2 Q. Who --

3 MR. WOOD: Wait. You asked him a

4 question, and he was trying to answer. Why don't

5 you let him finish his answer.

6 MR. HOFFMAN: All right. Sorry.

7 THE WITNESS: I enjoyed making

8 pancakes with kids, and JonBenet enjoyed

9 decorating them. So, yes, it was kind of a

10 special treat.

11 Q. (By Mr. Hoffman) And after you

12 finished breakfast, do you remember what you were

13 doing?

14 A. At some point, I went out to the

15 airport to pre-pack some gifts in the airplane,

16 check it out, get it ready for an early morning

17 departure. I remember kids being in and out of

18 the house when I was there, neighborhood kids.

19 We were going to go to the Whites'

20 that evening for a dinner. I remember JonBenet

21 asking me to help her ride her bike around the

22 corn- -- around the block, her new bike that she

23 had gotten for Christmas.

24 That is generally what I remember that

25 day.

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

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

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

9 A. Nothing notable. It was a family  
10 dinner.

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

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

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

22 A. Yes, it was.

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

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

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

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

10 Q. Do you remember anything else?

11 A. That is the highlight of my memory.

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

14 A. She was asleep.

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

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

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

23 A. She did not.

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

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

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

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

12 Q. Did you do anything else?

13 A. Not that I remember.

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

16 A. I took a melatonin tablet.

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

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

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

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

25 Q. Do you remember the brand?

0029

1 A. No.

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

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

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

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

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

12 A. I don't remember specifically, no.

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

15 A. I did not.

16 Q. Was this routine pretty much the  
17 normal routine when you went to bed at night when  
18 you were at home?

19 MR. WOOD: To take off his clothes,  
20 brush his teeth --

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

23 MR. WOOD -- put on his pajamas and  
24 go to bed?

25 MR. HOFFMAN: Yes.

0030

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

3 A. Pretty standard routine.

4 Q. Pretty standard routine? And --

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

7 Q. Why were you taking the melatonin that  
8 night?

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

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

15 A. Not to my knowledge.

16 Q. Any melatonin?

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

18 Q. You mentioned that you were going to  
19 fly to -- where was it?

20 A. Minneapolis and then on to Charlevoix,  
21 Michigan.

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

23 A. Yes, I do.

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

0031

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

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

7 A. Anything below 12,500 pounds gross  
8 weight.

9 Q. Does that include twin engines?

10 A. Yes.

11 Q. Does it include any kind of a jet?

12 A. Most jets are over 12,500 pounds that

13 I know of.

14 Q. May I ask you where you learned to

15 fly?

16 A. My dad taught me.

17 Q. Did you ever have occasion to fly

18 when you were in the military?

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

20 clubs.

21 Q. Was that the normal means by which

22 you would travel; you would fly yourself, or did

23 you take commercial airlines?

24 MR. WOOD: Travel in?

25 Q. (By Mr. Hoffman) Travel around the

0032

1 country whenever you would travel.

2 A. If I was flying for business, I

3 normally would take commercial airlines. If I

4 was flying personally with my family, we normally

5 flew ourselves.

6 Q. You say that -- and I understand that

7 you were in the Navy; is that correct?

8 A. Yes.

9 Q. All right. When you were in the

10 Navy, would you describe, if you remember, pretty

11 much what area you were responsible for as a

12 serviceman?

13 A. Well, I was a Civil Engineer Corps

14 officer. I was stationed in the Philippines for

15 two years. I was the civil engineer for the

16 Naval supply depot in the Philippines. I was

17 transferred to Atlanta where I was the base

18 engineer for the Naval Air Station in Atlanta.

19 Q. Would you describe what you were doing

20 as an engineer?

21 A. Contract management. We ran all the

22 base utilities, maintenance and repair, road

23 construction, long-term planning, site planning.

24 Q. Were you actually involved in any

25 hands-on engineering projects?

0033

1 A. I had a staff that did that. I was

2 in charge of the staff.

3 Q. So were you ever involved in any of

4 the actual construction?

5 A. Did I help pound nails? No.

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

8 A. In the military?

9 Q. Yes, in the military.

10 A. I did not.

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

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

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

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

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

21 A. We have remodeled every home we have  
22 owned.

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

25 A. Yes.

0034

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

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

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

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

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

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

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

19 A. No.

20 Q. Do you sail at all?

21 A. I used to.

22 Q. Did you pilot your own sailboat or  
23 did you --

24 A. Yes.

25 Q. -- have someone --

0035

- 1 A. Yes.
- 2 Q. -- do it for you?
- 3 A. No.
- 4 Q. Did you receive any training in
- 5 sailing?
- 6 A. No.
- 7 Q. Are you familiar with the various
- 8 knots involved in sailing?
- 9 A. I am really not. I should be, but I
- 10 am not.
- 11 Q. All right. So how would you
- 12 generally moor your craft?
- 13 A. I would tie it up on a cleat.
- 14 Q. Was there any sort of knot that you
- 15 used that you could identify that has a technical
- 16 term?
- 17 A. I don't know the technical term for
- 18 it.
- 19 Q. Have you had occasion to be able to
- 20 look at the knot that was tied around the
- 21 so-called paintbrush garotte?
- 22 A. I have not.
- 23 Q. Is there any reason why you haven't?
- 24 A. It is very painful for me,
- 25 Mr. Hoffman.

0036

- 1 Q. I understand that. But with your
- 2 nautical training, do you think that you could in
- 3 any way be able to identify the sort of knot?
- 4 A. No.
- 5 Q. Okay. Do you know whether or not
- 6 any -- if your private investigators hired anyone
- 7 to look at the way in which that knot was made
- 8 and to give a report on it?
- 9 A. Not to my knowledge.
- 10 Q. Do you know if any of your
- 11 investigators have been involved in trying to look
- 12 at forensic evidence?
- 13 A. What is "forensic evidence"?
- 14 Q. Any of the physical evidence that
- 15 might have been at the scene that you might have
- 16 had occasion to have.
- 17 A. Well, I think any evidence that was
- 18 at the scene was in the possession of the police.
- 19 I don't know that we had any physical evidence
- 20 that --

21 Q. Would the ransom note be considered

22 physical evidence, in your mind?

23 A. Absolutely.

24 Q. Do you know whether or not your

25 investigators had occasion to have anyone who was

0037

1 professional in this area examine the ransom note?

2 A. I believe they did.

3 Q. Do you know -- well, first of all,

4 were you ever given a copy of the ransom note?

5 A. Patsy handed it to me that morning,

6 yes.

7 Q. Do you know what happened to the

8 ransom note after Patsy handed it to you?

9 A. I gave it to Officer French when he

10 arrived.

11 Q. Did you give the ransom note to any

12 of the friends that you had invited to come over?

13 A. I did not.

14 Q. Do you know if the ransom note was

15 passed around to other police officers? Did you

16 have occasion to observe that?

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

18 Q. Do you know what happened to the

19 ransom note after you gave it to Officer French?

20 A. Not for certain. I think they took

21 it and made copies of it.

22 Q. Do you remember the next time you saw

23 a ransom note?

24 A. I think Linda Arndt or someone gave

25 me a Xerox copy of it that morning as we were

0038

1 waiting.

2 Q. Do you know why she gave you a Xerox

3 copy of it?

4 A. No.

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

6 A. No.

7 Q. You say you had an opportunity to

8 read the ransom note when it was initially

9 discovered by Patsy --

10 A. Yes.

11 Q. -- is that correct?

12 Would you tell me how much time you

13 spent reading it?

14 A. Not specifically. It was -- I spread

15 it out on the floor and tried to read it as

16 quickly as possible.

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

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

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

24 A. I do not.

25 Q. Once she gave you a copy of the  
0039

1 ransom note, did you at any point in the morning  
2 read it again?

3 A. Yes.

4 Q. Did you read it more than once?

5 A. Yes.

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

8 A. No.

9 Q. Would you say a dozen times?

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

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

15 A. Yes.

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

19 A. The whole thing was peculiar. We  
20 were addressed as "Mr. and Mrs. Ramsey," and then  
21 they switched to "John" personally.

22 They asked for twenty dollar bills and  
23 hundred dollar bills, as I recall. The amount  
24 was a very odd amount.

25 The way the note was signed was very  
0040

1 odd.

2 The cruelty that they threatened was  
3 bizarre. It was a very sick mind that wrote  
4 that note.

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

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

10 Q. When you say "we focused in on some

11 phrases" that were peculiar, would you identify  
12 the "we"?

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

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

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

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

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

25 Q. Did those phrases seem peculiar to  
0041

1 you?

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

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

6 A. In relation to me?

7 Q. Uh-huh (affirmative).

8 A. No.

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

11 A. Yes.

12 Q. Would you identify them?

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

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

17 A. No.

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

20 A. No.

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

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

0042

1 MR. HOFFMAN: No.

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

6 MR. HOFFMAN: I will go back and ask  
7 him that. I will get the ransom note in a bit.  
8 I just want to see what he remembers.  
9 MR. WOOD: Darnay, he is telling you  
10 what he remembers in response to your question,  
11 but when you ask him, Have you ever heard anybody  
12 use the phrase "common sense" or "good common" --  
13 I want to make -- I want to know precisely what  
14 you are asking him.  
15 MR. HOFFMAN: All right. Fine.  
16 MR. WOOD: He is entitled to do  
17 that, and that is your obligation in terms of  
18 asking a proper question.  
19 MR. HOFFMAN: Are you finished?  
20 MR. WOOD: He will be glad to look  
21 at the note if you want him to.  
22 MR. HOFFMAN: Thank you. May I  
23 continue, Mr. Wood?  
24 MR. WOOD: Absolutely.  
25 MR. HOFFMAN: Thank you.

0043

1 Q. (By Mr. Hoffman) Mr. Ramsey, so you  
2 are certain that you don't remember anybody in  
3 your family using any of the phrases in the  
4 ransom note?  
5 A. I am certain I don't remember ever  
6 hearing anyone in my family using any of those  
7 phrases.  
8 Q. Now, just briefly, do you know how  
9 your children were disciplined if they did  
10 something that was against a family rule or any  
11 wishes of their parents in your family?  
12 A. Yes.  
13 Q. Would you tell me how they were  
14 disciplined.  
15 A. I disciplined my children by raising  
16 my voice.  
17 Q. Do you know how your wife disciplined  
18 them?  
19 A. I think in a similar manner.  
20 Q. Did you personally ever have occasion  
21 to spank any of your children?  
22 A. I did not.  
23 Q. Do you have a philosophy with respect  
24 to corporal punishment in child-raising?  
25 A. Yes.

0044

1 Q. Can you tell me what that is?

2 A. I don't believe it is appropriate to

3 strike a child.

4 Q. Do you know whether or not your wife

5 ever had an occasion to strike any of the

6 children?

7 A. I have never seen her spank any of

8 our children.

9 Q. With respect to corporal punishment,

10 do you know if she has any philosophy that she

11 has expressed to you?

12 A. I have only seen it demonstrated. We

13 have never talked about philosophy of corporal

14 punishment.

15 Q. Have you ever discussed how the

16 children should be disciplined?

17 A. No.

18 Q. No time during the marriage?

19 A. Well, at no time have we ever

20 discussed how the children should be disciplined?

21 I am sure we have.

22 Q. Do you remember any time?

23 MR. WOOD: All of his children to

24 the present date?

25 Q. (By Mr. Hoffman) The two children

0045

1 that you had with Patricia Ramsey.

2 A. You know, I don't. They were good

3 kids. I don't remember ever talking about

4 discipline. It didn't seem to be necessary.

5 MR. HOFFMAN: Could I take a break

6 for just about five minutes at this point? I

7 want to start going into different areas.

8 THE VIDEOGRAPHER: We are off the

9 video record at 10:35.

10 (A recess was taken.)

11 THE VIDEOGRAPHER: We are on the

12 video record at 10:53.

13 MR. HOFFMAN: Thank you.

14 Q. (By Mr. Hoffman) Mr. Ramsey, I

15 forgot to ask you a couple questions before I

16 asked for a break, and they regard any personal

17 observations with respect to your daughter

18 JonBenet.

19 Do you know if she liked to draw on

20 her hand? Did you ever personally see that?

21 A. Not that I recall.

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

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

0046

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

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

5 MR. HOFFMAN: Yes.

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

8 Q. (By Mr. Hoffman) Did you ever --

9 MR. HOFFMAN: Mr. Wood --

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

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

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

21 MR. HOFFMAN: All right.

22 MR. WOOD: Let's go.

23 Q. (By Mr. Hoffman) All right.

24 Mr. Ramsey, how much time would you say you were  
25 at home in the year prior to her death, JonBenet

0047

1 Ramsey's death?

2 A. Well, I was normally gone Monday  
3 through Friday from 8:00 in the morning until  
4 5:00 or 6:00 at night every day. I traveled  
5 occasionally. I don't remember specifically that  
6 year. I tried to make my trips either one-day  
7 trips or one or two nights out. Typically, they  
8 were to California, Boston. Twice a year I  
9 probably went to Europe to visit our offices  
10 there.

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

14 A. I don't remember. I really don't.

15 Certainly, more than I would have liked, I am  
16 sure, but I ran the company. I had to be there

17 more often than not.

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

21 A. Her treatment -- yes, I do.

22 Q. Could you tell me what you do know  
23 about her treatment?

24 (Whereupon, a discussion ensued and a  
25 recess was taken.)

0048

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

3 MR. HOFFMAN: Would the reporter  
4 please read back the last question that I asked  
5 Mr. Ramsey?

6 (The record was read by the reporter,  
7 as follows:

8 "Question: Could you tell me what  
9 you do know about her treatment?")

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

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

20 A. Just the highlighted part?

21 Q. Yes, please, Mr. Ramsey.

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

0049

1 Q. Thank you very much.

2 Now, Mr. Ramsey, I am also going  
3 to --

4 MR. HOFFMAN: First of all, I am  
5 going to ask the reporter to please mark this  
6 document Plaintiff's Exhibit 15 for identification.

7 Mr. Wood, I am going to show this to  
8 you.

9 I am interested in Mr. Ramsey reading  
10 -- looking at the highlighted parts of that first  
11 on the second page.

12 (Discussion ensued off the record.)

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

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

17 A. Yeah.

18 Q. First I am going to ask you if you  
19 recognize this as a press release dated July  
20 23rd, 1997. Do you recognize this?

21 A. Do I recognize this as --

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

25 A. You know, I really don't.

0050

1 Q. Okay.

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

4 Q. I am going to ask you just to look  
5 at the second page and the highlighted area.

6 Just simply look at the different  
7 elements here of this profile.

8 Is this profile familiar to you?

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

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

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

16 Q. Okay. Because I just want you to  
17 examine it in conjunction with the statement that  
18 you had in your book that -- I believe the  
19 statement is that, "Douglas described the killer  
20 as someone with extreme anger towards John Ramsey,  
21 trying to hurt him in the most devastating manner  
22 possible."

23 And I am assuming that, correct --

24 Mr. Ramsey, do you --

25 Did you put this statement in the

0051

1 book because you subscribe to that as true?

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

7 Q. All right. What I would like you to  
8 do is just simply look at the elements on the  
9 second page there. And I would like to ask you  
10 if, for instance, in the first element, I believe  
11 it is, "JonBenet's killer may have been suffering  
12 from some stress in the weeks and months  
13 preceding the crime."

14 Do you see that element --

15 A. Uh-huh (affirmative).

16 Q. -- in that profile?

17 I am going to ask you, with respect  
18 to Patsy, do you feel that Patsy was under any  
19 kind of unusual stress during the Christmas  
20 holidays, your wife Mrs. Ramsey?

21 A. No.

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

24 A. No.

25 Q. Do you feel that Mrs. Ramsey took too  
0052

1 much responsibility on herself, helping herself  
2 and other people?

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

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

9 A. Absolutely not.

10 Q. Okay. The second element here is "A  
11 triggering event, such as a job crisis or crisis  
12 in a personal relationship, may have caused this  
13 individual to vent anger, perhaps at a female  
14 close to him"--

15 Or to her, though it doesn't say

16 "her" here.

17 -- "and perhaps at me personally."

18 The question I have -- and I am very  
19 sorry to ask you this, and I don't mean any  
20 disrespect -- was there any stress in your  
21 personal relationship with Mrs. Ramsey that you  
22 would have observed at this time?

23 A. No.

24 Q. Were you having any marital problems?

25 A. Absolutely not.

0053

1 Q. None. Okay. Now, with respect to

2 two elements down, "He possibly has increased his  
3 consumption of alcohol or drugs," do you -- did  
4 you have occasion to observe Mrs. Ramsey drink at  
5 any point during this period?

6 A. During what period?

7 Q. The Christmas holidays.

8 A. Well, we had a church party at our  
9 house at one point. We were at the Whites' at  
10 one point.

11 Patsy is not a heavy drinker. I  
12 don't recall an image of her having a drink.  
13 She might have had a glass of wine, but I  
14 don't --

15 Q. Did you ever have occasion to see  
16 Patsy, what you would call, inebriated at any  
17 point in your marriage?

18 A. Not that I recall.

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

22 A. Do I know if she was?

23 Q. Yes.

24 A. Not to my knowledge.

25 Q. Now, the next element is "He may have  
0054

1 even turned to religion." Was it your  
2 observation that Patsy was a particularly  
3 religious person?

4 A. We both were.

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

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

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

18 A. Yes, I do.

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

21 A. I believe the Holy Spirit is part of  
22 the Trinity of God. And I don't know that I

23 understand the Holy Spirit's role in healing, no.

24 I don't know that one way or other.

25 Q. Are you familiar with Pentecostal

0055

1 religious beliefs that the true purpose of

2 Christianity and Jesus' purpose was a healing

3 ministry, and that the Holy Spirit was involved

4 in that healing ministry?

5 A. I am not familiar with that.

6 Q. Also, are you familiar with the

7 religious concept of what is known as "being in

8 right relation to God"?

9 A. I don't know of that as a concept.

10 I have heard that phrase.

11 Q. I was just wondering if you understood

12 what that phrase meant to you.

13 A. Do I understand the phrase "being in

14 a right relationship with God"?

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

16 God."

17 A. Well, I would -- that would not be

18 how I would describe my relationship with God.

19 Q. All right. I just wanted to know

20 that.

21 A. Uh-huh (affirmative).

22 Q. The next statement: "He may be

23 rigid, nervous and preoccupied in casual

24 conversation."

25 How would you describe your

0056

1 observations of Patsy -- of Mrs. Ramsey's --

2 excuse me -- Mrs. Ramsey's conversational, you

3 know, attitude? Do you find her to be rigid or

4 nervous or preoccupied in conversation?

5 A. You mean in general?

6 Q. In general.

7 A. No.

8 Q. During the Christmas holidays, leading

9 up to the death of your daughter, did you find

10 her to be in any way rigid, nervous, or

11 preoccupied --

12 A. No.

13 Q. -- in conversations?

14 A. No.

15 Q. Well, the next one I think speaks for

16 itself. "He may have tried to appear very

17 cooperative with the authorities."

18 Have you tried, to the best of your  
19 knowledge, to cooperate with the authorities?  
20 A. Well, I think we detailed that pretty  
21 accurately. We were very willing to cooperate  
22 with them, given that their intentions were to be  
23 trusted.  
24 Q. "He may have quickly constructed an  
25 alibi for his whereabouts the night JonBenet was  
0057

1 killed."  
2 That brings me to the issue of the  
3 next area I want to go into, which is the area  
4 of the ransom note, which I am going to show you  
5 at page 407, which I showed Mrs. Ramsey  
6 yesterday, in your book with respect to the  
7 ransom note.

8 Would you read that aloud? I had  
9 Mrs. Ramsey do it yesterday too.  
10 A. Number 4. "The ransom note.  
11 Considered earlier and throughout the book, the  
12 note was written by the killer and remains an  
13 extremely important clue. An adequate amount of  
14 handwriting samples from the killer should  
15 conclusively tie him to the long and rambling  
16 note."

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

19 A. That is my opinion, yes.

20 Q. Yes. In your opinion?

21 A. Yes.

22 Q. May I ask you if any of your  
23 investigators made any attempt to examine or  
24 prepare -- did any of your investigators prepare  
25 handwriting reports with respect to your  
0058

1 handwriting and Mrs. Ramsey's handwriting?

2 A. I never saw any reports. I don't  
3 know what they prepared.

4 Q. Do you know if reports have been  
5 prepared?

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

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

13 to me, present counsel for the Ramseys.  
14 So I don't know that John knows that,  
15 but I do want to make the record clear that you  
16 know that.

17 MR. HOFFMAN: Also, just to make the  
18 record clear, I don't know what effect, if any,  
19 the July 5th ruling by Judge -- the Denver  
20 federal judge, Wiley Daniel, with respect to  
21 third-party testimony and the fact that the grand  
22 jury secrecy rule with respect to that which was  
23 declared unconstitutional. To the extent that  
24 that would be the statement of the party --  
25 meaning whoever the expert was, his report is, in  
0059

1 effect, statements, whether or not that that now  
2 would be covered under the grand jury secrecy  
3 act.

4 And so for the purposes of this  
5 record, I would indicate that that might not be  
6 available to counsel.

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

10 MR. HOFFMAN: Okay. Thank you.

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

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

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

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

24 A. Yes, I believe I do.

25 Q. Could you identify it, please?

0060

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

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

5 A. Yes, I think so.

6 Q. Okay. Now, Mr. Ramsey, I am going  
7 to ask you to, once again, look at it. And I

8 am going to ask you, in looking at it, whether  
9 or not you see any similarity between your wife's  
10 handwriting and the handwriting in the ransom  
11 note; you personally.

12 A. Absolutely not.

13 Q. None at all?

14 A. No.

15 Q. Not even a little bit?

16 A. Not even a little bit.

17 Q. Now, Mr. Ramsey --

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

20 Q. Right.

21 A. There are misspellings in the note.

22 She graduated at the top of her class. She  
23 doesn't misspell words like "business" and  
24 "possession."

25 Q. Do you think the ransom note writer  
0061

1 was trying to disguise their identity?

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

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

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

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

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

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

25 A. I was told that it was virtually  
0062

1 certain that she did not write the note, but that  
2 there were some similarities which exist in all

3 of our handwriting because we have all been  
4 taught the same, and that is how we communicate  
5 is with the written language in English. But  
6 that because of these few similarities, she could  
7 not be absolutely eliminated, but it was highly  
8 improbable that she wrote the note. And that, in  
9 fact, there were more dissimilarities in her  
10 writing than a number of other people that had  
11 been looked at.

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

14 A. As far as I know, it was.

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

17 A. I was told that, on a scale of 1 to  
18 5, Patsy was placed at a 4.5 in terms of  
19 probability. In other words, a very low  
20 probability. Mine was a 5.

21 Q. Just to go back to the one point  
22 that you made, it was your understanding that the  
23 reason Mrs. Ramsey could not be eliminated was  
24 because of what is, I think called, style book  
25 similarities. We all go to school, as you say; we  
0063

1 are taught to make our letters look the same way.

2 Is that the reason?

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

7 MR. HOFFMAN: Yes.

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

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

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

23 A. No. In fact, I was told that your

24 client had fewer dissimilarities than Patsy had  
25 with the note.

0064

1 Q. Without revealing an attorney/client  
2 privilege, do you know who told you that? Was  
3 it a law enforcement source, or was it your  
4 private investigators?

5 A. I don't recall. I don't recall.

6 MR. WOOD: I do know --

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

11 Q. (By Mr. Hoffman) Now, how do you  
12 know that?

13 A. I was told that. I don't recall by  
14 whom. It is general knowledge that I have in my  
15 head.

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

20 MR. HOFFMAN: Yes.

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

24 MR. HOFFMAN: I just want to know  
25 how Mr. Ramsey, if he remembers how he knows

0065

1 that, with respect to that.

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

9 A. Okay.

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

13 A. I think I recognize two.

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

18 A. I do not.

19 Q. Could it be your wife's handwriting?

20 A. I don't recognize it. It doesn't

21 look like Patsy's writing. It is sloppy. It is

22 irregular. I would not look at that and say

23 that is Patsy's handwriting.

24 Q. Thank you. Now I am going to hand

25 to you Plaintiff's Exhibit No. 2 that was marked  
0066

1 for identification yesterday, and I am going to

2 ask you to please look at that.

3 Now I am going to ask you if you can

4 identify, without naming the individuals in those

5 photographs, any of them.

6 A. Yes.

7 Q. Now I am going to ask you to look at

8 the handwriting, and tell me if you can recognize

9 the handwriting.

10 A. I do not.

11 Q. Could that be your wife's handwriting?

12 A. I doubt it very seriously.

13 Q. Tell me why you don't think it is

14 your wife's handwriting.

15 A. It doesn't look like her handwriting.

16 It is sloppy. It is -- it just doesn't look

17 like her handwriting.

18 Q. Now I am going to ask you to look at

19 Plaintiff's Exhibit 11, marked for identification,

20 and all I am going to ask you to do is look at

21 this document and tell me if you have ever seen

22 it before.

23 A. Not that I recall.

24 Q. So would it be fair to say that

25 today is the first time you ever have seen that

0067

1 document?

2 A. I think so. I don't remember seeing

3 it. I don't remember seeing it. Let me put it

4 that way.

5 Q. Okay. Thank you very much.

6 Now, Mr. Ramsey, do you know -- have

7 you ever heard the name Cina Wong?

8 A. I have heard that name in association

9 with you, yes.

10 Q. Do you know who Cina Wong is?

11 A. I have no idea.

12 Q. Have you heard the name David Liebman?

13 A. It was on that form right there.

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

16 A. Not that I recall.

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

19 A. It is very possible.

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

23 A. I don't remember. It is possible.

24 I found that my brain cells have depleted a lot  
25 during the last five years.

0068

1 Q. Have you ever heard the name Howard  
2 Rile?

3 A. Yes.

4 Q. Would you tell me who Howard Rile is?

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

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

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

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

15 A. I believe that he did, yes.

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

18 A. I don't know.

19 MR. WOOD: Again --

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

22 MR. WOOD: No, that is someone else.

23 THE WITNESS: Okay.

24 MR. WOOD: Again, we go back, and we  
25 have provided you as his counsel information that

0069

1 Mr. Rile and Mr. Cunningham, we are told, did  
2 prepare written reports, but they were submitted  
3 to the grand jury and they are, again, in the  
4 possession of Hal Haddon, and the question of  
5 releasing them from Mr. Haddon, at least, is  
6 something that he has not done voluntarily yet.  
7 Whether he did that in response to a request from  
8 you, I don't know. But there are written reports

9 from Mr. Rile and Mr. Cunningham about Mrs.  
10 Ramsey.

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

13 A. Yes.

14 MR. WOOD: Lloyd.

15 MR. HOFFMAN: I am sorry. Is it

16 Floyd?

17 MR. WOOD: Lloyd.

18 MR. HOFFMAN: Oh, Lloyd. All right.

19 I am sorry. I don't know why I thought Floyd.

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

22 A. Yes.

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

25 A. I think he was someone that was used  
0070

1 by our attorneys and investigators to look at  
2 handwriting exemplars.

3 Q. Do you know anything else?

4 A. That he is at the top of his field.

5 That is what I remember.

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

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

9 MR. WOOD: Again, same observation --

10 MR. HOFFMAN: Absolutely.

11 MR. WOOD: -- for the benefit of you

12 and the benefit of the record.

13 MR. HOFFMAN: Yes.

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

19 MR. WOOD: It sounds like an  
20 invitation.

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

23 Q. (By Mr. Hoffman) I want to make  
24 sure I am correct.

25 You have not personally seen the  
0071

1 handwriting report, if there was one, by  
2 Mr. Rile; is that correct?

3 MR. WOOD: Hang on a second. Let me

4 confer. I want to make sure we are not touching  
5 into an area that might go to attorney-client  
6 privilege --

7 MR. HOFFMAN: Okay.

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

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

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

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

22 Q. And when you say report, I am more  
23 interested in if you had an opportunity to see  
24 any report involving handwriting of either Mrs.  
25 Ramsey or yourself by any expert that you or your  
0072

1 agents and people that worked for you hired. Did  
2 you have an opportunity to see any report?

3 A. I don't recall seeing any report.

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

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

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

14 MR. WOOD: Hold on one second.

15 I don't know how he is going to  
16 differentiate counsel's discussions. Do you want  
17 to omit counsel?

18 MR. HOFFMAN: You mean our  
19 discussions?

20 MR. WOOD: Well, you say that you  
21 are relying -- are you saying that you are  
22 relying upon the opinion or statements of people  
23 that have seen those reports as the basis for  
24 your belief that Mrs. Ramsey is not the ransom

25 note writer?

0073

1 Do you understand what he is asking

2 you, John?

3 THE WITNESS: Yes.

4 MR. HOFFMAN: Well, to put it

5 more --

6 MR. WOOD: I am going to let him

7 answer.

8 MR. HOFFMAN: Oh, okay.

9 MR. WOOD: Let's go ahead and just

10 let him answer.

11 THE WITNESS: No, I do not base my

12 opinion on the reports that I have heard from

13 others. I base my opinion on that I know my

14 wife. I would stake my life on the fact that she

15 did not murder her child, she did not fake all

16 of this nonsense, and she did not write this

17 bizarre note. That is what I stake my belief on,

18 Mr. Hoffman.

19 Q. (By Mr. Hoffman) So it is not based

20 on anything empirical, such as --

21 A. The empirical information supports that

22 belief totally.

23 Q. I am just wanting to determine whether

24 you are familiar with the empirical information

25 that supports it.

0074

1 A. Yes.

2 Q. I am trying to distinguish between

3 your belief in your wife, which is understandable,

4 and a belief that comes from actually having

5 looked at forensic evidence that you personally

6 have had an opportunity to view.

7 MR. WOOD: Let me just -- again, I

8 am going to object to the form of that question

9 because I think -- at one point you are talking

10 about determining whether he is familiar with the

11 information, and then you turn it around and make

12 it limited to reports that he has personally had

13 an opportunity to view.

14 I mean, you are omitting the fact

15 that his counsel, and present company included,

16 may have fully apprised him of the nature of the

17 variety of expert reports in summary fashion

18 verbally.

19 MR. HOFFMAN: Yes.

20 MR. WOOD: That would go into  
21 attorney-client privilege.  
22 MR. HOFFMAN: Right. Which I am not  
23 trying to go into.  
24 MR. WOOD: But you can't omit the  
25 fact they may have received that information. I  
0075

1 don't think it would be fair for the record  
2 to --  
3 MR. HOFFMAN: No.  
4 MR. WOOD: I don't want the record  
5 to appear that Mr. Ramsey is unaware of what  
6 Mr. Rile, Cunningham, and, obviously, the  
7 information from the Boulder authorities that we  
8 know from Mr. Smit and others in terms of -- and  
9 Mr. Hunter now, and Chief Beckner, what that --  
10 those conclusions, even though he hasn't seen the  
11 formal report.

12 Am I making sense here?

13 MR. HOFFMAN: Absolutely.

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

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

22 Q. (By Mr. Hoffman) Right. So I am  
23 now going to ask you one additional question,  
24 which may be a bit of a repetition, but I hope  
25 it will clarify it. And you may have already  
0076

1 answered it.  
2 In light of the fact that you have  
3 admitted that you have not physically seen the  
4 handwriting reports themselves, but may be relying  
5 on summaries from the people around you, why are  
6 you so certain that Mrs. Ramsey is not the ransom  
7 note writer?

8 A. Because I know my wife. I know how  
9 much she loved JonBenet. I know how much she  
10 valued life. She valued every day that she  
11 lived, and lived every day to its fullest as if  
12 it were a gift from God.

13 Q. Are you aware that there are  
14 handwriting experts which are experts on behalf of

15 Chris Wolf that have rendered opinions --

16 MR. HOFFMAN: Do you want to stop

17 there?

18 MR. WOOD: I just want to make sure

19 he knows that I want to make an objection.

20 MR. HOFFMAN: Okay. Okay.

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

22 MR. HOFFMAN: All right. Just

23 simply, I just want to know what he knows or

24 doesn't know. I am not asking him to do

25 anything other than yes or no to this.

0077

1 Q. (By Mr. Hoffman) Are you aware that

2 there are handwriting experts that are working on

3 behalf of Chris Wolf who have concluded that

4 Patsy Ramsey is, as one of them said, without

5 doubt the ransom note writer?

6 MR. WOOD: I am going to object to

7 that question and -- on several bases.

8 Number one, there has been no finding

9 of qualification of any individual submitted to

10 date by the plaintiff as a handwriting,

11 quote/unquote, expert, number one.

12 To the contrary, at least three or

13 four of the individuals that are presently being

14 relied upon, at least we believe, by the

15 plaintiff, have been specifically rejected as

16 legitimate handwriting experts by the Boulder

17 District Attorney's office and the Boulder Police

18 Department.

19 Third, you are representing,

20 Mr. Hoffman, that one of these individuals is

21 making a statement without doubt Patsy Ramsey

22 wrote the ransom note, and I think that that is

23 an unfair statement on your part because we have,

24 as counsel for the defendants, been seeking for

25 several months, at least the last two months, to

0078

1 obtain Rule 26 reports from these individuals that

2 you represent to be experts, so that we,

3 according to law, could then depose them, test

4 their qualifications, test their opinions, against

5 cross-examination, including cross-examination of

6 standard and fundamental handwriting practices and

7 procedures.

8 So far, for whatever reason, we have

9 not been afforded those reports, we have not been

10 afforded the opportunity to examine those experts  
11 to determine what, if any, opinion they may hold  
12 and what, if any, credibility that opinion is  
13 worth receiving.

14 And I think it is fundamentally unfair  
15 to ask Mr. Ramsey a question that presupposes at  
16 least one of those expert's opinions and ask him  
17 if he is aware of it.

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

20 MR. WOOD: The point is, I think it  
21 is fundamentally unfair to ask him to do that.  
22 Beyond that point, I think it is  
23 clearly a question that does not raise a  
24 reasonable chance of discovering admissible  
25 evidence because Mr. Ramsey's knowledge of that  
0079

1 does not go to any issue of admissibility;  
2 whether he knows about something that one of your  
3 alleged experts says, I don't see how that is  
4 relevant in terms of reasonably calculated to lead  
5 to the discovery of admissible evidence.

6 But as long as you will stipulate for  
7 me that we have not received the Rule 26 reports  
8 and have not yet had the opportunity to  
9 cross-examine those experts, and then, obviously,  
10 we have not reached the questions about Dalbert  
11 and other cases --

12 MR. HOFFMAN: Absolutely.

13 MR. WOOD: -- about whether the court  
14 would allow those individuals to testify.

15 MR. HOFFMAN: Absolutely.

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

20 MR. HOFFMAN: There is only one  
21 representation that I won't stipulate to, and that  
22 is two of the handwriting experts, Larry Ziegler  
23 and Gideon Epstein, for which you have, at least,  
24 there preliminary reports, one of which has that  
25 statement, "without doubt Patsy Ramsey is the  
0080

1 ransom note writer." That you have those  
2 statements, that they were given to you, and that  
3 those two experts are not only highly qualified,  
4 but have been admitted, one of which was admitted

5 by Judge Carnes in a case that she sat on  
6 several years ago.  
7 So to the degree that your  
8 representation is that the handwriting experts  
9 are, in fact, not experts, I would take -- I  
10 would disagree with at least that characterization  
11 with respect to Mr. Gideon Epstein and Larry  
12 Ziegler.

13 And that is the only thing I want to  
14 correct within it, but I will stipulate to  
15 everything else that you have said with respect  
16 -- that you haven't received the federal Rule 26  
17 reports, or anything else. That is absolutely  
18 correct.

19 MR. WOOD: Well, I have not and I  
20 will not, and I don't believe that I am allowed  
21 to characterize an individual as an expert. I  
22 think that is a decision that would ultimately be  
23 determined by Judge Carnes in this case. And  
24 whatever may have happened to Mr. Ziegler in  
25 another case has no bearing whatsoever on what  
0081

1 his position will be in this case.

2 MR. HOFFMAN: All right.

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

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

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

13 MR. HOFFMAN: Right.

14 MR. WOOD: I can't recall sitting  
15 here today, because my brain cells are failing me  
16 as I age also, exactly what those letters said.

17 But I do know this -- and I want  
18 this to be clear on the record. I know that  
19 you submitted affidavits from these two  
20 individuals, Epstein and Ziegler.

21 MR. HOFFMAN: I never --

22 MR. WOOD: I am sorry. Submitted  
23 letters --

24 MR. HOFFMAN: Yes.

25 MR. WOOD: -- as part of a

0082

1 supplemental response to mandatory disclosures.  
2 MR. HOFFMAN: Right.  
3 MR. WOOD: And I know for a fact  
4 that those letters to you, submitted by you,  
5 indicated that there were some similarities  
6 between Patsy's handwriting and the note, copy of  
7 the note they looked at. And they stated  
8 unequivocally that they believed that they could  
9 reach a conclusion if they were allowed to see  
10 other handwriting examples from Mrs. Ramsey from  
11 that time period.

12 Am I right so far?

13 MR. HOFFMAN: Yes.

14 MR. WOOD: And I do know that I have  
15 a number of public statements made by you, both  
16 on the internet and on television, wherein you  
17 made almost the identical representations that  
18 Mr. Ziegler and Mr. Epstein would, in fact,  
19 testify conclusively that Patsy Ramsey wrote the  
20 note.

21 And I know as a matter of undisputed  
22 fact that you made those representations about the  
23 conclusions of Ziegler and Epstein at a time when  
24 Ziegler and Epstein had not been given any  
25 additional handwriting exemplars which they had  
0083

1 earlier stated they had to have in order to reach  
2 the conclusions that you attributed do them.  
3 Those, I believe, are clearly  
4 undisputed facts that can be shown. And those  
5 facts alone, before I even get to an expert's  
6 report or the ability to cross-examine that  
7 expert, say to me that Mr. Ziegler and  
8 Mr. Epstein, if you have accurately stated their  
9 conclusions publicly at the time you did state  
10 them, have some very, very serious credibility  
11 problems.

12 That is my response to Ziegler and  
13 Epstein for the record.

14 MR. HOFFMAN: I, just for the record,  
15 I think that that was sort of an unnecessarily  
16 long response; but irrespective of that, I would  
17 just simply like to state that the more recent  
18 statements by Mr. Ziegler and Mr. Gideon Epstein  
19 reflect the fact that they were able to actually  
20 look at the police exemplars that were given by

21 Mr. Ramsey and Mrs. Ramsey and which were  
22 provided by you subject to a discovery request,  
23 and that those most recent observations are based  
24 on that.

25 And to that degree, those observations  
0084

1 are more complete.

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

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

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

7 MR. HOFFMAN: I just want to --

8 MR. WOOD: He probably is now after  
9 listening to us.

10 The point is, simply this: We look  
11 forward to receiving the reports, and we look  
12 extremely forward to the opportunity to  
13 cross-examine Mr. Ziegler, Mr. Epstein, and any  
14 other individual who is identified by you as a  
15 potential expert.

16 MR. HOFFMAN: All right.

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

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

21 Q. (By Mr. Hoffman) And, Mr. Ramsey, if  
22 you can answer it, please do, to the best of  
23 your ability.

24 (The record was read by the reporter,  
25 as follows:

0085

1 "Question: Are you aware that there  
2 are handwriting experts that are working on behalf  
3 of Chris Wolf who have concluded that Patsy  
4 Ramsey is, as one of them said, without doubt the  
5 ransom note writer?")

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

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

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

13 Q. (By Mr. Hoffman) All right.

14 A. They are wrong. And they made  
15 probably a serious career limiting decision if

16 that, in fact, is their statement, because that  
17 is something that neither the CBI, the FBI, the  
18 Secret Service, nor the top experts in this  
19 country have ever said. In fact, quite the  
20 contrary.

21 Q. How do you know that, Mr. Ramsey,  
22 that they --

23 A. I have heard statements from the  
24 police, I have heard statements from the district  
25 attorney, I have heard the results of what we  
0086

1 consider and most people would consider the top  
2 handwriting experts and linguistic experts in the  
3 country, all of which have said, highly improbable  
4 that Patsy wrote the note.

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

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

9 Q. That is all I want to know.

10 In light of that, I think, then, we  
11 are just going to move on, and I am going to  
12 ask you to look at a document that I am going  
13 to have marked as Plaintiff's Exhibit 17.

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

16 THE WITNESS: And might I ask a  
17 question?

18 Q. (By Mr. Hoffman) Would you like  
19 to --

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

22 Q. That was one of the exhibits that was  
23 attached to an early handwriting report, and one  
24 of the reasons that we are, in fact, here asking,  
25 we have made an initial request in what is known  
0087

1 as a notice to -- a request for admission, and  
2 there seemed to be some question as to whether or  
3 not what I had attached as an exhibit was  
4 sufficiently clear for there to be, you know, an  
5 accurate representation of yes or no.

6 So I thought it would be easier if I  
7 just brought in clearer copies and just asked you  
8 and Mrs. Ramsey to determine whether or not these  
9 are, in fact, samples of her handwriting.

10 Clearly, nobody wants to be drawing conclusions

11 based on handwriting samples which are, in fact,  
12 not hers.

13 It seems that Mrs. Ramsey doesn't  
14 remember this as being hers.

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

17 Q. (By Mr. Hoffman) Nor do you. Okay.

18 That's all --

19 MR. WOOD: And fairly, Darnay, let's  
20 be clear that we are talking about Plaintiff's  
21 Exhibit No. 2 and Plaintiff's Exhibit No. 1. And  
22 to the extent that it is also letters from those  
23 might be in Plaintiff's Exhibits 11, and I think  
24 also 10, as well as Plaintiff's Exhibit No. 9,  
25 the record should accurately reflect that each and  
0088

1 every one of your experts, including Epstein and  
2 Ziegler, have, in fact, stated conclusions to some  
3 extent relying in part on each and every one of  
4 those exhibits except for Exhibits 10 and 11,  
5 which are Cina Wong, David Liebman's exhibit.  
6 So all of your experts have relied on  
7 that to form their statements made in their  
8 reports to date, including just the recent letters  
9 we received --

10 MR. HOFFMAN: Right.

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

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

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

25 MR. HOFFMAN: And, quite frankly, she  
0089

1 may very well have been telling the truth.

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

4 MR. WOOD: And what might be  
5 interesting is to know what efforts were made by

6 any of your so-called experts to actually  
7 authenticate those documents as Patsy Ramsey's  
8 handwriting before they were willing to go out  
9 and publicly stake their reputations that she is  
10 the author of the note based on handwriting  
11 exemplars that they didn't even have the slightest  
12 clue were written by her.

13 So those are --

14 MR. HOFFMAN: Not necessarily they  
15 didn't have the slightest crew. Don't  
16 mischaracterize.

17 MR. WOOD: Well, when you raise  
18 questions about whether my clients might have a  
19 motive to lie, I am going to respond by saying  
20 that I think these people that you claim to be  
21 experts might have a motive to lie, and that  
22 motive is to get publicity and other things. We  
23 won't clutter the record up today.

24 But let me tell you something, my  
25 clients have clearly identified the documents that  
0090

1 you attached as exhibits. When the writing was  
2 Patsy Ramseys, nobody ran from it. The problem  
3 is, your people are relying on documents that  
4 either are not Patsy's or documents that they  
5 never bothered clearly to find out whether they  
6 were Patsy's before they went out publicly and  
7 accused Patsy Ramsey of writing a note to support  
8 the accusation that Patsy Ramsey killed her  
9 daughter. That is pretty flimsy, in my opinion,  
10 and I think that your experts will have a lot to  
11 answer for when we are finally given their report  
12 and allowed to cross-examine them, Darnay.

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

15 MR. WOOD: What?

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

24 MR. WOOD: Well, with all due  
25 respect, with all due respect, you should have  
0091

1 had reasonable notice to be concerned about  
2 whether there was something bogus about the  
3 alleged reports of Cina Wong and David Liebman  
4 and Mr. Stacey -- or Lacey, I am sorry, and I  
5 think Tom Miller, when you were informed by  
6 Michael Kane of the Boulder District Attorney's  
7 office that those experts were not following  
8 recognized handwriting methodology, that they were  
9 not even attempting to discuss dissimilarities,  
10 but were only hinging their alleged conclusions on  
11 a few similarities which are common to almost all  
12 handwritings, and that there were serious  
13 questions in the Boulder District Attorney's minds  
14 also on their credibility because of their efforts  
15 to gain publicity for themselves regarding those  
16 reports.

17 That information was provided to you,  
18 Mr. Hoffman, in writing from Michael Kane. And I  
19 don't think you are going to state that Michael  
20 Kane was necessarily trying to do John or Patsy  
21 Ramsey any favors in his role as a grand jury  
22 specialist for the Boulder D.A.  
23 But once he told you that and put  
24 that in writing, I believe that you should have  
25 been on clear notice that there were legitimate  
0092

1 and serious concerns about the bogusness of these  
2 people's reports and conclusions, and those are  
3 the individuals, Mr. Hoffman, not Mr. Epstein and  
4 Mr. Ziegler, who are now Johnny-come-latelys to  
5 this lawsuit, those were the individuals who you  
6 relied upon when you filed this complaint for  
7 Chris Wolf and submitted your mandatory  
8 disclosures.

9 So I think there are very serious  
10 questions about their legitimacy, not just those  
11 raised by me. I haven't had the time yet and  
12 opportunity to cross-examine them, which I say I  
13 look forward to. But they were carefully studied  
14 by the Boulder District Attorney's offices, and  
15 they were soundly and wholeheartedly rejected as  
16 credible experts on the issue of handwriting.  
17 You knew that before you used them to  
18 file this lawsuit, yet you filed it anyway, I  
19 would say without further inquiry into their  
20 legitimacy. That is a problem and an issue, and I  
21 think the record ought to reflect it, and I think

22 I stated it accurately.

23 MR. HOFFMAN: I have to -- now,  
24 naturally, since you made a record, I am going to  
25 have to respond to what may be either  
0093

1 mischaracterizations or just simply things that  
2 you are not aware of.  
3 To begin with, the letter by Michael  
4 Kane did not indicate what about the methodology  
5 with the exception of dissimilarity was suspect.  
6 MR. WOOD: I can get the record, and  
7 we can put it into the record here. Why don't  
8 we do that.  
9 Let the letter speak for itself. I  
10 have got a copy of the letter.

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

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

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

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

21 MR. HOFFMAN: Second point is that,  
22 with respect to the similarities, we do not know  
23 who Mr. Kane had actually submitted those reports  
24 to and who he was relying upon for the questions  
25 about the legitimacy of the reports. He did not  
0094

1 indicate in his letter who it was that he had  
2 consulted.  
3 But, more importantly, I will say one  
4 thing, that, with respect to disguised  
5 handwriting, finding dissimilarities is less useful  
6 since the person clearly is trying to create  
7 consciously dissimilarities in the handwriting.  
8 And to the degree that the handwriting is  
9 disguised, there is, to some degree, dissimilarity  
10 to be expected and to continually belabor the  
11 point that disguised handwriting has  
12 dissimilarities is really not useful in a  
13 discussion of dissimilarities with respect to  
14 being able to put, add, or eliminate people from  
15 handwriting.  
16 So I never thought that Mr. Kane's

17 one methodological discussion was a particularly  
18 valid one.

19 Now, with respect to the district  
20 attorney's office that experts would be seeking  
21 publicity, I know that at one time they certainly  
22 did consult with a Donald Foster, who I believe  
23 was thought to be seeking publicity at one point,  
24 but that did not prevent them from at least  
25 consulting with him at least at some time.

0095

1 I know that Barry Scheck, who is a  
2 former professor of mine and was brought in as a  
3 DNA expert, I won't say he is a publicity hound,  
4 but he certainly is not media-averse. They  
5 brought him in, and they relied upon him.  
6 Also, I know that periodically the  
7 district attorney's office would trot out an  
8 expert. I believe there was somebody from Canada  
9 who was not an expert, or whatever, so I don't  
10 think the district attorney was averse to using  
11 media-seeking experts. And I think Michael Kane's  
12 characterization of Cina Wong and David Liebman as  
13 media experts disqualifying them inherently because  
14 of that was, in fact, anything other than just  
15 simply hypocritical on his part.

16 Now, as far as Mr. Kane is concerned,  
17 I don't think that, from the statements that I  
18 have heard from the Ramseys, that they  
19 particularly trust, A, his judgment, B, his  
20 motivation. I may be incorrect with respect to  
21 that. I, in turn, do not trust either his  
22 motivation or his competence.

23 But I will point out that these  
24 handwriting reports were given to Alex Hunter's  
25 office. In the four years that they have had

0096

1 the reports or anything else, they not once made  
2 an attempt to contact either myself or any of my  
3 experts to talk even in a collect telephone call.  
4 There was never any acknowledgment of receiving  
5 it, and that is despite the fact that the  
6 district attorney's office, and I believe the  
7 police department, made public appeals to  
8 individuals to please come forward, that they  
9 would listen to any sort of reasonable clue, if  
10 it came over the internet, if it came from  
11 telephone calls, or whatever, and here were

12 handwriting reports that I had solicited, some of  
13 which I actually had to use my own money to  
14 prepare, and they were completely ignored. They  
15 weren't even acknowledged by anybody in the  
16 district attorney's office, and yet they spent an  
17 inordinate amount of money trying to track down  
18 something that was known in the press as a Santa  
19 Bear, for instance. That sort of thing --

20 Yes, Mr. Ramsey?

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

25 MR. HOFFMAN: The only reason I am  
0097

1 responding, and I am very sorry, is that I have  
2 to respond to your counsel's colloquy here, and I  
3 have to make a record. I am very sorry for  
4 that.

5 Mr. Wood, and I am sure will take  
6 this -- this is my first hearing that you have a  
7 band concert. I am very sorry. And I will try  
8 to make this -- I will try to make it --

9 MR. WOOD: I think he is trying to  
10 say, maybe, let's don't go back and forth until  
11 7:00 or 8:00 tonight.

12 THE WITNESS: Yeah.

13 MR. HOFFMAN: You made a record with  
14 respect to and representation for a record with  
15 respect to my experts, and I am not going to  
16 allow my silence to act as some sort of admission  
17 that you, in fact, were correct.

18 I categorically deny that my experts  
19 are unqualified, any of them, that any of them  
20 acted out of any malice. In fact, it was my  
21 experience that when Cina Wong, when I contacted  
22 her initially -- each expert was contacted to  
23 look at the report of another expert to see  
24 whether or not there was a problem in their  
25 methodology.

0098

1 And as a result of looking at the  
2 methodology, they reached the same conclusions. I  
3 did not ask them to reach a conclusion. I  
4 basically wanted to make sure that if, in fact,  
5 there was going to be a case made in civil court  
6 against Mr. and Mrs. Ramsey, that there was, in

7 fact, a sufficient basis for it. I was doing my  
8 best to investigate the facts of the case before  
9 making the allegations.  
10 The only allegation that I ever really  
11 made is that, based on the handwriting reports by  
12 people that I trust to be experts, that their  
13 conclusion that Mrs. Ramsey is the ransom note  
14 writer was the basis not only for any allegations  
15 that I may have made personally in public with  
16 respect to Mrs. Ramsey, but also forms the basis  
17 by which I filed the -- not only the action  
18 against Alex Hunter in 1997, but also the action  
19 on behalf of Chris Wolf and Linda Hoffman-Pugh.  
20 So I have tried to do a due  
21 diligence and certainly avoid any problems with  
22 Rule 11. I am under a duty as an officer of  
23 the court to investigate the case and the facts.  
24 And the only reason, basically, we are here today  
25 is because I have yet to see handwriting reports  
0099

1 from any source other than my own that, in fact,  
2 clear Mrs. Ramsey.  
3 I would love to see those reports.  
4 I don't know why I have never been offered a  
5 report. The question I have for Mr. Wood is, at  
6 the time that Mr. Wood was releasing your  
7 polygraph reports and had a very attentive  
8 national media, why did he not come forward with  
9 written handwriting reports that could clear Mrs.  
10 Ramsey? I think that that would have been a  
11 spectacular and an extremely important opportunity  
12 in order to clear your wife from any suspicion of  
13 being the ransom note writer.  
14 And, yet, there has never been,  
15 despite all the money that Mr. and Mrs. Ramsey  
16 have spent, any attempt to release a written  
17 report at any time to the media similar to the  
18 written report that was released in the polygraph,  
19 and I never have been able to understand it. It  
20 is like the dog that should have barked in the  
21 night that hasn't barked in the night. My  
22 question has always been, why haven't the Ramseys  
23 released a handwriting report to shut me up, to  
24 just simply stop all the noise about the fact  
25 that there are handwriting experts that believe  
0100

1 that Mrs. Ramsey wrote the ransom note? Why

2 haven't, Mr. Wood, your clients been willing to  
3 produce for public consumption a handwriting  
4 report that simply, adequately, and for all time  
5 clears Mrs. Ramsey?

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

10 MR. HOFFMAN: Okay.

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

0101

1 So they discovered that Don Foster  
2 was, as we say in the business, a liar for hire.  
3 There are a lot of liars for hire in our  
4 business. You and I can debate, after I have  
5 been presented with your experts' reports and the  
6 opportunity to depose them, whether they have any  
7 legitimacy or whether they too are liars for hire  
8 or for publicity. We will resolve that another  
9 day.

10 Suffice it to say here that we are  
11 not going to react to your comments about  
12 handwriting experts until we get your experts,  
13 which we are entitled to get, and then I want  
14 you to know this: You will receive handwriting  
15 expert reports from the Ramseys. Okay? So the  
16 time for that will come. It hasn't been time  
17 yet, but that will happen at the appropriate  
18 time.

19 But, first, we are entitled to get  
20 your reports and cross-examine your experts. Once  
21 we have done that, you will get your reports that  
22 you so desperately want. And then I am going to

23 hold you to that; that once you get those  
24 reports, since you don't believe the four people  
25 that Alex Hunter described as top of the line  
0102

1 that said out there in Boulder she didn't write  
2 it, since you don't believe them, I will hold you  
3 to your word.

4 Once we give the reports to you, I  
5 am going to ask you to, quote/unquote, as you  
6 say, "shut up," your words, not mine, then  
7 dismiss your lawsuit. Okay? So let's go on and  
8 let Mr. Ramsey answer questions.

9 Q. (By Mr. Hoffman) All right.

10 Mr. Ramsey, what time do you need to be out of  
11 here. I am not going to hold it against you.

12 Seriously, I would like to -- because I will do  
13 this according to that.

14 THE WITNESS: What time is the band  
15 concert?

16 MS. RAMSEY: 7:00.

17 THE WITNESS: 7:00, okay.

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

20 THE WITNESS: No, my son is.

21 MR. ALTMAN: I understand that.

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

25 A. If we left at 5:00, we will be in  
0103

1 good shape.

2 Q. What time do we have now?

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

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

8 THE WITNESS: Okay.

9 MR. HOFFMAN: Okay.

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

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

17 MR. WOOD: I think that is

18 appropriate, but I think Darnay knows as well,  
19 that this deposition, as the Ramseys have done  
20 before, they don't claim confidentiality, they  
21 have nothing to hide, and I want the record to  
22 be clear that this idea that Mr. Hoffman is  
23 asking questions that seem to contain damaging  
24 statements of experts about Mrs. Ramsey, I think  
25 that invites the record to be very clear that  
0104

1 there are serious questions about whether these  
2 individuals are, as I say in the industry, we  
3 call them liars for hire. And so I think that  
4 both sides of that issue have to be explored on  
5 the record when he makes their conclusions part  
6 of his question. That is all.

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

10 MR. WOOD: That is the way of  
11 putting out what we believe to be potentially a  
12 very bogus conclusion accusing Patsy Ramsey of  
13 writing the note because he wants that to then be  
14 part of a public record that is either watched on  
15 television or read by someone.  
16 And when you put that kind of  
17 information out there, the record, in order to be  
18 accurate and complete, has got to contain  
19 information that I think clearly demonstrates that  
20 there are, at a minimum, serious credibility  
21 issues with these experts, if there is not  
22 already sufficient evidence in the record to show  
23 that they are, quote/unquote, liars for hire or  
24 bogus excerpts.

25 I have offered to resolve at least  
0105

1 part of this, and I will do so. If I have my  
2 office locate Mr. Kane's letter to Mr. Hoffman,  
3 we will attach it to the record. It will speak  
4 for itself. That is all.

5 MR. HOFFMAN: Mr. Wood, I just want  
6 to say one other thing with respect to that.  
7 You may have noticed that I have not asked  
8 Mr. Ramsey for personal information or  
9 Mrs. Ramsey. I haven't asked for their address.  
10 I haven't asked for social security numbers. I  
11 haven't asked for anything that would in any way  
12 hinder your ability to have to hold this back to

13 at least redact those elements of it, because I  
14 am not interested in creating a record that will  
15 keep you from being able to make this public if  
16 you choose to do so at any time that you choose  
17 to do so.

18 I just simply want to go -- I have  
19 had an opportunity to see a lot of the tapes and  
20 transcripts of Mr. Ramsey and Mrs. Ramsey with  
21 the police interviews and whatever, and I am not  
22 interested in taking them over the same ground.  
23 I could have easily -- Mrs. Ramsey, I believe,  
24 made a statement to the media yesterday that she  
25 was surprised at how short the deposition was,  
0106

1 that there didn't seem to be any "Where is the  
2 meat to the Whopper," but a lot of that was  
3 already provided to me by material from discovery.  
4 So consequently, I am not trying to  
5 create any kind of record. I am just trying to  
6 get answers to questions that I still have. I  
7 am required to do that.

8 MR. WOOD: Let's move forward. You  
9 ask questions. They have answered every one that  
10 you have asked so far, and they will continue to  
11 do so.

12 MR. HOFFMAN: Okay. All right.

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

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

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

25 THE WITNESS: No, I have not.  
0107

1 Q. (By Mr. Hoffman) Are you familiar  
2 with Charlie Brennan --

3 A. Yes.

4 Q. -- as a news reporter?

5 Do you have any opinion with respect  
6 to his ability as a journalist to accurately  
7 report the news? Any personal knowledge.

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

10 Q. I am going to ask you whether or not  
11 the headline in this story is substantially  
12 correct, knowing that these are not your words.

13 Did you, in fact, have investigators  
14 tail possible suspects?

15 A. I did not have investigators tail  
16 possible suspects.

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

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

24 Q. I would like to ask you, then, very  
25 simply, is this headline substantially correct or  
0108

1 false as a statement of fact, in your opinion?

2 A. Is it substantially --

3 Q. -- correct as a statement of fact in  
4 your opinion, the headline?

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

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

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

15 Q. (By Mr. Hoffman) There are a series  
16 of documents here. I just would like you to  
17 look at them all at one time briefly, and I will  
18 ask you about each one.

19 All right. With respect to the first  
20 document, I would like you to review the  
21 headline, and I am going to ask you whether or  
22 not that headline is substantially correct when it  
23 states that "Parents' book will name suspects,  
24 publisher says."

25 A. I think it is substantially incorrect.  
0109

1 Q. In what respect?

2 A. Our book did not name suspects. It

3 addressed people that were already being discussed  
4 in books, in the media, who had been on  
5 television and whom, had we not addressed, would  
6 have looked foolish.

7 There are a number of people that we  
8 are interested in that we did not name in our  
9 book because they were not out in the public and  
10 known to the public.

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

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

19 Q. Interviews, right.

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

23 MR. WOOD: You may answer that.

24 Reported, yes. But in fairness to  
25 Mr. Zettersten, I don't believe that that is what  
0110

1 he said. If you look at the quote, that may be  
2 the headline that somebody decided to give it,  
3 but if you will look at the quotes, I don't  
4 think Ralph Zettersten said that before.

5 In fact, he said very precisely, "It  
6 is people who have been mentioned before,  
7 Zettersten said. There will be a couple of  
8 others, but not by name."

9 THE WITNESS: And that is correct.

10 MR. WOOD: That is his quote. So, I  
11 mean, we are not responsible for what some writer  
12 decided to put in a headline for whatever reason.

13 But you would answer the question, if  
14 you were familiar with this article or other  
15 articles that have claimed that that is what  
16 Mr. Zettersten was doing.

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

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

24 suspects?

25 A. Was I aware -- I was aware post that

0111

1 being out there. I wasn't aware that that was

2 going to be said or that --

3 Q. But afterward.

4 A. But that was interpreted as the

5 matter.

6 Q. Did you make any attempt to object to

7 any of the media with respect to this

8 characterization? Did you make any attempt to

9 correct that impression?

10 A. What we found in dealing with the

11 media is that it is a massive brute. I don't

12 know how I would begin to correct that kind of

13 thing. The book was an attempt to correct as

14 many of the myths that we knew about.

15 Q. Mr. Ramsey, I quite agree with the

16 characterization as the media as a massive brute.

17 However, did you at any time ever say

18 in public that one of your intentions in your

19 litigation was to change the way in which the

20 press reported the news in a case like yours.

21 MR. WOOD: You can answer that. If

22 you want to see the statement. Darnay, I think

23 you are obligated --

24 MR. HOFFMAN: No, I am just saying

25 in terms of that effect --

0112

1 THE WITNESS: I will tell you what

2 my feeling is, and I have said this a number of

3 times, that we need a law in this country that

4 prevents the police from talking to the media

5 about evidence in an ongoing case.

6 We have bypassed the constitutional

7 provisions that have been put in place to protect

8 people's rights when the police could disclose

9 evidence to the media for entertainment.

10 It is a law in England. If some of

11 the things that the media had done in this

12 country and that the police had done in Boulder

13 had been done in England, they would be in jail.

14 It is a simple law. I think we need that in

15 our society.

16 So, yes, I would love to see that

17 kind of a change because I think our system is

18 too quick to convict based on hearsay that is

19 broadcast on the media. And that is unfair to  
20 any citizen.

21 Q. (By Mr. Hoffman) I don't know if  
22 you are familiar with J. Edgar Hoover, who was  
23 the former head of the FBI, or whether or not  
24 you are aware that J. Edgar Hoover used to tell  
25 his agents that if you cannot solve a case, if  
0113

1 you are having a hard time solving the case, give  
2 it to the press because people are more likely to  
3 come forward and talk to a reporter than they are  
4 to a law enforcement agent, and that that might  
5 be the reason why some law enforcement agents, in  
6 fact, have this policy of giving information to  
7 the media. I just wanted to know if you were  
8 aware of that.

9 A. Well, I am talking --

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

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

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

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

21 MR. WOOD: Himself or herself.

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

25 MR. WOOD: I will let Mr. Ramsey  
0114

1 answer, but we are getting far afield, I am  
2 afraid. But go ahead.

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

8 Q. (By Mr. Hoffman) Now, you said --

9 A. That is what I am talking about,  
10 evidence. I am not talking about the fact that  
11 someone was murdered or accosted or raped and it  
12 was in this location and this is the description  
13 of the person we are looking for.

14 I am talking about -- you know, we  
15 know for a fact that there was a deliberate and  
16 thought-out effort on the behalf of the police at  
17 the direction of the FBI to publicly assassinate  
18 our character and discredit us and bring massive  
19 pressure on Patsy and I in hopes that one of us  
20 would confess or break and turn the other one in.  
21 That is bypassing all of the rights  
22 that have been established in our constitution to  
23 protect every citizen, and that is wrong.  
24 Q. Okay. That brings me to my next  
25 question, which is, would you just express briefly  
0115

1 your opinions of tabloid magazines, such as Globe,  
2 The Enquirer, The Examiner, the Star?  
3 A. I have said before, and I still  
4 believe, they are a cancer in our society.  
5 Q. Which brings me to the next question  
6 which I asked Mrs. Ramsey yesterday, and I am  
7 going to ask you. Did you at any time agree to  
8 give an interview with The Enquirer, this cancer  
9 on society?  
10 A. Yes.

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

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

18 Q. I just want to ask you to --

19 MR. HOFFMAN: I am going to ask the  
20 court reporter to mark this as Plaintiff's Exhibit  
21 19. And I will show that to Mr. Ramsey.  
22 (Plaintiff's Exhibit-19 was marked for  
23 identification.)

24 Q. (By Mr. Hoffman) Mr. Ramsey, I am  
25 going to ask you if the document I just have  
0116

1 shown you, which is marked Plaintiff's Exhibit 19  
2 for identification, is substantially correct in  
3 its reporting with respect to its headline?

4 A. No, it is not.

5 Q. In what respects is it incorrect?

6 A. We did not turn to the work of a  
7 psychic. A picture was forwarded to us that was  
8 done by a Dorothy Allison, who I believe is a

9 psychic, by someone. I think she had done it on  
10 a television program. We forwarded it to our  
11 investigators as a matter of procedure. We did  
12 that with everything we got in the mail. And we  
13 got a lot of stuff.

14 And I believe they chose to put it  
15 on their website to stir up activity. And they  
16 did receive a number of leads and calls based on  
17 that.

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

20 A. I don't know.

21 Q. Now, I am going to show you --  
22 unfortunately, for some reason, I ran out without  
23 making a second copy, so I am going to ask the  
24 reporter to mark this as Plaintiff's Exhibit 20  
25 for identification, and then I will just show it  
0117

1 to you after he has marked it.

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

4 THE WITNESS: Okay.

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

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

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

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

16 Q. Do you know if the image of the man  
17 at the lower part of it --

18 A. Uh-huh (affirmative).

19 Q. -- do you know if that image ever  
20 appeared on your website?

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

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

0118

1 A. I don't know.

2 Q. Was that man meant to be Chris Wolf?

3 A. Not to my knowledge.

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

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

8 THE WITNESS: Oh, yeah.

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

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

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

23 THE WITNESS: That is a different  
24 question than I was asked.

25 Had I ever seen this drawing? Yes,  
0119

1 I have.

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

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

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

9 A. Yes.

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

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

13 Q. Okay. Now, I have one last question.

14 Just simply, it is a point that involves  
15 something I just wanted to be clear about. And  
16 I am going to let you read this. It is -- and  
17 the reason I am not reading it out loud is that  
18 it is part of the Boulder police interview, which  
19 has been marked confidential. I don't want to  
20 have something read into the record that would in  
21 any way mean we would suddenly have to mark this  
22 confidential, if for some reason we don't want to  
23 have today's deposition marked confidential.

24 So for the purposes of this question,

25 I am just going to ask you to read to yourself

0120

1 the highlighted portions.

2 And in fact, I am not going to even

3 attach this as an exhibit. I am just going to

4 simply -- just as a recollection, to reflect,

5 refreshed. If you would look at that, I am just

6 going to ask you one question with respect to it.

7 MR. HOFFMAN: And, Mr. Lin, it is at

8 the very end; it regards the, I think, the butler

9 door, whatever it is.

10 MR. WOOD: Let me say this to you.

11 MR. HOFFMAN: Yes.

12 MR. WOOD: This is a couple of pages

13 from, it looks like, Patsy Ramsey's April '97

14 interview --

15 MR. HOFFMAN: Yes, on the front, I

16 put that on the cover.

17 MR. WOOD: -- six-hour interview.

18 I don't have any problems; you can

19 read it, you can put it into the record.

20 MR. HOFFMAN: I would just prefer --

21 MR. WOOD: We don't have any -- I

22 don't have any problems with that being made part

23 of the record officially. Put it out there. We

24 would like to see the whole police investigative

25 file be made public so people would know the

0121

1 truth about this case.

2 MR. HOFFMAN: I would prefer, since

3 this has been stamped "confidential" --

4 MR. WOOD: I am the one that stamped

5 it confidential in other litigation several months

6 ago, if not last year, for reasons different than

7 the issue of confidentiality in this case. I am

8 waiving any claim for confidentiality. Put that

9 into the record. I have no problems with you

10 doing so.

11 MR. HOFFMAN: Well, I am not --

12 MR. WOOD: You could put the whole

13 April 1997 transcript of both of their interviews

14 into the record. I have no problems with you

15 doing so.

16 MR. HOFFMAN: I am not going to do

17 that.

18 MR. WOOD: I have no problems with

19 it.

20 MR. HOFFMAN: All right. Thank you

21 very much.

22 MR. WOOD: Let the truth come out.

23 MR. HOFFMAN: I agree with you.

24 Q. (By Mr. Hoffman) This question

25 involves the -- do you know where the butler

0122

1 kitchen was in your house?

2 A. Well, yes. I know what we called

3 the butler kitchen.

4 Q. Butler kitchen. Do you remember

5 opening the door to the butler kitchen at any

6 time in the morning while you were looking

7 through the house for JonBenet?

8 A. No.

9 Q. And so is it that you have no memory

10 of it or that you just didn't do it?

11 A. I did not open it.

12 Q. So it wasn't opened by you?

13 A. No.

14 MR. HOFFMAN: Thank you very much.

15 This is going to conclude my

16 deposition testimony of Mr. Ramsey. And I want

17 to thank Mr. Ramsey for being here. I want to

18 thank Mrs. Ramsey, once again, for her deposition

19 yesterday and for being here today, and thank

20 counsel.

21 MR. WOOD: All right. Just so the

22 record is clear, we have a number of hours under

23 the Federal Rules of Civil Procedure remaining in

24 which you have the right to examine Mr. Ramsey

25 and to ask him any question factually otherwise

0123

1 that is proper and relevant to the claims and

2 defenses in the lawsuit. And do you acknowledge

3 that there are a number of hours remaining?

4 MR. HOFFMAN: Yes. Absolutely.

5 MR. WOOD: He answered every question

6 today?

7 MR. HOFFMAN: Yes, he has.

8 MR. ALTMAN: I think with the

9 exception of what we had spoken about regarding

10 the financial issues which we may take up later.

11 MR. WOOD: We are not going to take

12 that up on the record, as that is something that

13 would require a court ruling.

14 MR. HOFFMAN: Every question that was

15 put to Mr. Ramsey that was a matter of record  
16 today, that we agreed on was a matter of record,  
17 was, in fact, answered by Mr. Ramsey.

18 MR. WOOD: And as you indicated, you  
19 have reviewed his April '97, June 1998, and April  
20 2000 police interviews --

21 MR. HOFFMAN: That is correct.

22 MR. WOOD: -- and I think you will  
23 say, with respect to Mr. Ramsey, Mr. Hoffman, the  
24 same as you said with respect to Mrs. Ramsey  
25 yesterday, he answered every question for the  
0124

1 police; didn't he?

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

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

8 MR. HOFFMAN: No, I just don't know.

9 It's really probably improper for me to  
10 characterize their testimony. I mean -- and I  
11 don't think anybody will want a testimonial from  
12 me, from the Ramsey family anyway.

13 MR. WOOD: Yeah, but the point is --

14 MR. HOFFMAN: But I did receive  
15 those.

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

25 MR. HOFFMAN: No. I understand. In  
0125

1 fact, one of the reasons why -- and I want to  
2 characterize this properly.

3 One of the reasons why these  
4 depositions are shorter than they might have been  
5 is because I am not asking either Mr. or  
6 Mrs. Ramsey to go over testimony that they have  
7 already given by the police.

8 The police certainly have spent a  
9 great deal of time with the Ramseys, and, quite

10 frankly, even though there may be areas that I  
11 might have personal curiosity about, I feel it  
12 would be inappropriate for me to ask them, and so  
13 that is why these depositions aren't going the  
14 full day.

15 It is not because I feel that the  
16 Ramseys don't have anything to offer. It is just  
17 simply that I think that they offered a great  
18 deal of information when they were, in fact,  
19 interviewed, and I just chose not to cover most  
20 of it. And that is all.

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

0126

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

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

10 EXAMINATION

11 BY-MR.WOOD:

12 Q. Let me hand you what has been marked  
13 for purposes of identification as Plaintiff's  
14 Exhibit 16 to this deposition, and I think it has  
15 been represented to you and acknowledged by you,  
16 it appears to be -- we don't know how much  
17 generations away from the original, but a copy of  
18 the ransom note found in your home on December  
19 26, 1996. You have looked at that earlier today?

20 A. Uh-huh (affirmative).

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

0127

1 Do you remember --

2 A. Yes.

3 Q. -- telling Mr. Hoffman about that?

4 And I think you made the reference

5 that you were addressed "Mr. and Mrs. Ramsey."

6 Do you recall telling him that?

7 A. Yes.

8 Q. Did you have the ransom note in front

9 of you at the time you were giving that

10 information to Mr. Hoffman?

11 A. No. I had forgotten that it was

12 only addressed to me. But what it was what --

13 what I noticed was that it was a formal address,

14 and yet they fell into a familiar form later on.

15 MR. WOOD: That is all I wanted to

16 clarify.

17 MR. HOFFMAN: Yes.

18 MR. WOOD: And now let me mark this

19 as Defendant's Exhibit No. 1.

20 (Defendant's Exhibit-1 was marked for

21 identification.)

22 MR. WOOD: Do you want to take a

23 look at this real quick?

24 MR. HOFFMAN: Yes, please. Thank you

25 very much.

0128

1 May I make one observation about this

2 before you read it into the record?

3 MR. WOOD: Sure.

4 MR. HOFFMAN: I would like the record

5 to reflect that I made this document available on

6 the internet at the time that Cina Wong, and

7 there is a document which seems to be almost

8 identical, that David Liebman received this. I

9 would just like the record to reflect I made no

10 attempt to keep this hidden from the public.

11 MR. WOOD: And there has been no

12 representation that you did make any such attempt.

13 MR. HOFFMAN: I am sorry? No. I

14 want the record to reflect that --

15 MR. WOOD: But I appreciate the

16 stipulation.

17 MR. HOFFMAN: -- that I made that

18 available through the internet.

19 MR. WOOD: The stipulation was that

20 you recognize the document, and it is actually

21 the very material that you placed on the

22 internet.

23 MR. HOFFMAN: That is correct.

24 MR. WOOD: And it was, in fact, and

25 is, in fact, a true and correct statement of the

0129

1 letter that was sent to Cina Wong by Michael Kane  
2 on behalf of Alex Hunter, the --  
3 MR. HOFFMAN: Correct.  
4 MR. WOOD: -- the Boulder district  
5 attorney.  
6 MR. HOFFMAN: Uh-huh (affirmative).  
7 MR. WOOD: January 20, 1999.  
8 MR. HOFFMAN: Yes.  
9 MR. WOOD: And also a true and  
10 correct verbatim statement of the letter sent by  
11 Mr. Kane on that date, January 20, 1999, to  
12 Mr. David Liebman; am I right?  
13 MR. HOFFMAN: That is correct.  
14 MR. WOOD: All right. So that the  
15 record is clear, in those letters which predate  
16 the filing of this lawsuit, Mr. Kane stated to  
17 Ms. Wong and Mr. Liebman in identical language  
18 that he was informing them that their request to  
19 testify before the Boulder County grand jury in  
20 the JonBenet Ramsey murder investigation was  
21 denied, and the statement was, "We have determined  
22 that your proposed testimony would not serve the  
23 interest of justice, which is the controlling  
24 standard by which to judge your request."  
25 And I continue to quote: "The

0130

1 primary reason that we have reached this decision  
2 is that we believe that the methodology which you  
3 have used in reaching your conclusions does not  
4 meet the standards employed by the vast majority  
5 of forensic questioned document examiners in this  
6 country."  
7 I continue to quote: "Most  
8 significant is your complete failure to account  
9 for or even reference any unexplained  
10 dissimilarities between the questioned and known  
11 samples. You are willing to conclude with 100  
12 percent certainty that a writing was authored by  
13 a particular person based on some threshold level  
14 of similarities without any mention that there may  
15 be 10, 100, or 10,000 unexplainable  
16 dissimilarities between the known and unknown  
17 writings. I know of no reputable forensic  
18 document examiner who will not agree that  
19 unexplainable dissimilarities between a person's  
20 natural writing and questioned handwriting will

21 preclude a positive identification.  
22 "In fact, where the degree of  
23 unexplained dissimilarity is high, it may result  
24 in an elimination, in spite of the existence of a  
25 number of points of similarity."

0131

1 And then I go down to state: "In  
2 addition to your technical deficiencies," I quote,  
3 "there are other reasons for our decision. I  
4 would note that you have engaged in a campaign of  
5 promoting your opinion in a manner that would  
6 surely open your credibility to doubt on  
7 cross-examination in a judicial proceeding.  
8 "As an experienced trial attorney, I  
9 believe that an expert witness who has attempted  
10 to insinuate herself," or himself, "into a  
11 particular criminal investigation through a public  
12 media campaign would appear less than objective  
13 and professional to a jury."

14 Now, I make that statement because I  
15 misspoke earlier when I made a statement about a  
16 letter sent by Michael Kane to you. In fact,  
17 the letters were sent by Michael Kane directly to  
18 Cina Wong and to David Liebman in January of  
19 1999.

20 You received copies of those letters  
21 before this lawsuit was filed. You published  
22 those letters on the internet, and I simply make  
23 this record because I now note there can be no  
24 dispute about what Michael Kane said about your  
25 alleged experts, and your knowledge.

0132

1 MR. HOFFMAN: About how they became  
2 available to the public.  
3 MR. WOOD: There is no -- I don't  
4 think there is any dispute about what Michael  
5 Kane has said about their methodology and their  
6 credibility. That is why this is important to be  
7 put into the record, since you have referred to  
8 them earlier today.  
9 And I do that not only to clarify  
10 the record but also to point out that this is  
11 another one of the reasons that we filed what is  
12 now correctly identified by me as the 15th  
13 defense, going on. I earlier said the 13th  
14 defense. That instead of bringing this legal  
15 action out of a concern for some real injury to

16 reputation, Plaintiff Wolf and his counsel bring  
17 this lawsuit as a publicity stunt. They have  
18 thus joined legions of persons who have tried to  
19 make personal profit from the brutal murder of  
20 defendants' child. Neither plaintiff Wolf nor his  
21 counsel possesses any admissible evidence that any  
22 defendant murdered JonBenet Ramsey.

23 That is verbatim the 15th defense.

24 There was some question in the litigation raised  
25 earlier in the deposition about whether that had  
0133

1 been made in the pleadings. It is a defense to  
2 this case asserted in the 15th defense in our  
3 answer.

4 With those clarifications to the  
5 record, I have nothing further.

6 MR. HOFFMAN: I would just only like  
7 to point out one thing with respect to Mr. Kane's  
8 objection. The operative word there is  
9 "unexplained dissimilarities." And the fact is  
10 that Mr. Liebman and Ms. Wong felt that these  
11 dissimilarities were explained by the fact that  
12 the person in question, in their opinion, was  
13 trying to disguise their handwriting.

14 And in disguising your handwriting,  
15 occasionally, you are going to create  
16 dissimilarities which are not unexplained. They  
17 are dissimilarities, but they are not unexplained  
18 dissimilarities. And that is the point I would  
19 like to make with that. And thank you.

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

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1 Mr. Epstein and Mr. Ziegler. We look forward to  
2 that day --

3 MR. HOFFMAN: Thank you very much.

4 MR. WOOD: -- when we can present  
5 them the questions and get the answers from them.  
6 Thank you.

7 MR. HOFFMAN: All right. Thank you.

8 Again, Mr. and Mrs. Ramsey, thank you  
9 for being here today.

10 THE WITNESS: We have had our

11 differences, but we are all children of God, and  
12 I respect you for that.

13 MR. HOFFMAN: Thank you very much.

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

16 (A recess ensued.)

17 MR. WOOD: Just before we complete  
18 the record, I wanted to state that, on behalf of  
19 the Ramseys, and in this instance particularly  
20 John Ramsey, that we do not claim any  
21 confidentiality as to this deposition.  
22 The Ramseys agree that this deposition  
23 of John Ramsey, just like the deposition of Patsy  
24 Ramsey, can be presented publicly with no claim  
25 of confidentiality, unlike every other witness and  
0135

1 party in the case to date.  
2 Every other witness, including Steve  
3 Thomas, including, in part, Mr. Wolf, and the  
4 other witnesses so far, Alex Hunter, Mark Beckner,  
5 Carey Weinheimer, have all claimed a measure of,  
6 if not entire, confidentiality.  
7 The Ramseys want the whole truth in  
8 this case out, and they are willing for the  
9 public to see their depositions in its entirety.  
10 So we make no claim to confidentiality.

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

18 MR. WOOD: I appreciate that.  
19 On behalf of the Ramseys, we would  
20 ask you to do the same thing they are doing,  
21 that is, let the entire truth come out about  
22 Chris Wolf and not prevent the public from  
23 knowing all aspects of his life, including those  
24 that you have chosen selectively to deem  
25 confidential.

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1 I would like for Mr. Wolf's deposition  
2 in its entirety to be made public, not just the  
3 selected portions. I think the truth -- that is  
4 why I haven't let it out, because I don't want  
5 -- I want the whole truth out, not just parts of

6 it. Let it all come out.

7 (Whereupon, the deposition was

8 concluded.)

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#### 1 DESCRIPTION OF EXHIBITS

##### 2 Plaintiff's

##### 3 Exhibit Description

4 14 Printout from NBC website

5 15 Article from Boulder News Ramsey Archive,

6 "John Ramsey's Statement"

7 16 Photocopy of ransom note

8 17 Printout from Rocky Mountain News, "Ramsey

9 investigators to tail possible suspects"

10 18 Printout from Denver Post, "Parents' book

11 will name suspects, publisher says"

12 19 Printout from The Daily Camera, "Ramseys

13 turn to work of deceased psychic"

14 20 Printout from Ramsey Family website

15 .

##### 16 Defendant's

##### 17 Exhibit Description

18 1 Photocopy of letters from Mr. Hunter to

19 Ms. Wong and Mr. Liebman

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0138

1 STATE OF GEORGIA:

2 COUNTY OF FULTON:

3 I hereby certify that the foregoing  
4 transcript was reported, as stated in the  
5 caption, and the questions and answers  
6 thereto were reduced to typewriting under my  
7 direction; that the foregoing pages represent  
8 a true, complete, and correct transcript of  
9 the evidence given upon said hearing, and I  
10 further certify that I am not of kin or  
11 counsel to the parties in the case; am not  
12 in the employ of counsel for any of said  
13 parties; nor am I in anywise interested in  
14 the result of said case.

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0139

1 Disclosure Pursuant to Article  
2 8(B) of the Rules and Regulations of the  
3 Board of Court Reporting of the Judicial  
4 Council of Georgia, I make the following  
5 disclosure:

6 I am a Georgia Certified Court  
7 Reporter, here as a representative of  
8 Alexander Gallo & Associates, Inc., to report  
9 the foregoing matter. Alexander Gallo &  
10 Associates, Inc., is not taking this  
11 deposition under any contract that is  
12 prohibited by O.C.G.A. 5-14-37 (a) and (b).  
13 Alexander Gallo & Associates,  
14 Inc., will be charging its usual and  
15 customary rates for this transcript.

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19 ALEXANDER J. GALLO, CCR-B-1332

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1 CAPTION

2 The Deposition of John Bennett

3 Ramsey, taken in the matter, on the date,

4 and at the time and place set out on the

5 title page hereof.

6 It was requested that the deposition

7 be taken by the reporter and that same be

8 reduced to typewritten form.

9 It was agreed by and between counsel

10 and the parties that the Deponent will read

11 and sign the transcript of said deposition.

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1 CERTIFICATE

2 STATE OF :

3 COUNTY/CITY OF :

4 Before me, this day, personally

5 appeared, John Bennett Ramsey, who, being duly

6 sworn, states that the foregoing transcript

7 of his/her Deposition, taken in the matter,

8 on the date, and at the time and place set

9 out on the title page hereof, constitutes a

10 true and accurate transcript of said

11 deposition.

12

13 John Bennett Ramsey

14 .

15 SUBSCRIBED and SWORN to before me this

16 day of , 2001 in the

17 jurisdiction aforesaid.

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19 My Commission Expires Notary Public

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0142

1 DEPOSITION ERRATA SHEET

2 .

3 RE: Alexander Gallo & Associates

4 File No. 1637

5 Case Caption: Robert Christian Wolf vs.

6 John Bennett Ramsey, et al

7 Deponent: John Bennett Ramsey

8 Deposition Date: December 12, 2001

9 .

10 To the Reporter:

11 I have read the entire transcript of my

12 Deposition taken in the captioned matter or

13 the same has been read to me. I request

14 that the following changes be entered upon

15 the record for the reasons indicated. I

16 have signed my name to the Errata Sheet and

17 the appropriate Certificate and authorize you

18 to attach both to the original transcript.

19 .

20 Page No. Line No. Change to:

21

22 Reason for change:

23 Page No. Line No. Change to:

24

25 Reason for change:

0143

1 Page No. Line No. Change to:

2

3 Reason for change:

4 Page No. Line No. Change to:

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6 Reason for change:

7 Page No. Line No. Change to:

8

9 Reason for change:

10 DEPOSITION OF JOHN BENNETT RAMSEY

11 .

12 Page No. Line No. Change to:

13

14 Reason for change:

15 Page No. Line No. Change to:

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17 Reason for change:

18 Page No. Line No. Change to:

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20 Reason for change:

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23 Reason for change:

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0144

1 Reason for change:

2 Page No. Line No. Change to:

3

4 Reason for change:

5 .

6 .

7 SIGNATURE: \_\_\_\_\_ DATE: \_\_\_\_\_

8 John Bennett Ramsey

9 .