

IN THE CIRCUIT COURT OF THE
NINTH JUDICIAL CIRCUIT IN AND
FOR ORANGE COUNTY, FLORIDA

ZENAIDA FERNANDEZ-GONZALEZ,

Plaintiff/Counter-Defendant,

vs.

CASE NO.: 08-CA-24573

CASEY ANTHONY,

Defendant/Counter-Plaintiff.

The videotaped deposition of CINDY ANTHONY taken pursuant to Notice on behalf of the Plaintiff/Counter-Defendant on Thursday, April 9, 2009, beginning at 1:25 p.m., at the law firm of Morgan & Morgan, 20 North Orange Avenue, 16th Floor, Orlando, Florida, before Laura J. Landerman, R.M.R., C.R.R., F.P.R., and Notary Public, State of Florida at Large.

A P P E A R A N C E S:

JOHN W. DILL, ESQUIRE
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For the Plaintiff/Counter-Defendant,

No appearance on behalf of the
Defendant/Counter-Plaintiff,

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For the Deponent, Cindy Anthony.

THE VIDEOGRAPHER: Lee Fouraker of Ron Fleming
Video Productions

ALSO PRESENT: Zenaida Gonzalez
George Anthony

I N D E X

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REPORTER'S NOTE: Plaintiff's Exhibit No. 1 was
not provided to the court
reporter following the
deposition to attach to the
transcript.

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

It is hereby stipulated and agreed between counsel
for the respective parties and the witness that the
reading and signing of the deposition be reserved.

1 THE VIDEOGRAPHER: Good afternoon. The date
2 is April 9, 2009. This is the deposition of Cindy
3 Anthony, being taken in the matter of Zenaida
4 Gonzalez versus Casey Anthony. The time is 1:26
5 p.m. We're on record.

6 Counsel, please introduce yourselves.

7 MR. DILL: John Dill, along with John Morgan
8 and Keith Mitnik representing the plaintiff.

9 MR. CONWAY: I'm Brad Conway for Cindy
10 Anthony.

11 THE VIDEOGRAPHER: Court reporter please wear
12 in the witness.

13 - - - - -

14 CINDY ANTHONY

15 having been first duly sworn testified as follows:

16 DIRECT EXAMINATION

17 BY MR. DILL:

18 Q Please state your name, ma'am.

19 A Cynthia Marie Anthony.

20 Q You have a daughter named Casey Marie Anthony;
21 is that correct?

22 A Yes.

23 Q And had a granddaughter, Caylee, as well?

24 A Correct.

25 Q I'm going to ask you some questions about the

1 time period before and leading up to your granddaughter's
2 disappearance and then we're going to go through some
3 other questions. Okay?

4 So right now I'm going to ask some questions
5 particularly about the household and the setup of the
6 household, who lived there during the time period, let's
7 say, about March or April of last year. Okay?

8 A Explain to me the relevance of the question
9 regarding the civil lawsuit with Zenaida
10 Fernandez-Gonzalez, please.

11 Q Ma'am, the attorney may have told you we're
12 going to ask questions in this case. He's the one who
13 objects. I need you to answer the questions because
14 we've noticed this case. We've subpoenaed you. So if
15 you can do your best to answer me, but I will say if you
16 don't understand --

17 A I'm not understanding what you're asking for,
18 the relevance. Okay?

19 Q Ma'am. I am --

20 A I'm just asking a question.

21 MR. CONWAY: Let him do the questioning.

22 Q We'll try to make this quick if you can answer
23 what I do ask you. If you don't understand what I ask
24 you, not why I ask you something, but if you don't
25 understand what I've asked you, let me know. I'll be

1 sure to repeat it.

2 A okay. Please repeat the question.

3 Q I'll get to that and ask you in a second. Let
4 me tell you a couple other things. I might talk
5 confusing a little bit, maybe too fast. If you don't
6 understand me, let me know and I'll reask it. If you do
7 answer one of my questions, I'm going to assume that you
8 did understand it; is that fair?

9 A That's fair.

10 Q Let's go on back to about March of last year.
11 What house did you live at?

12 A 4937 Hopespring Drive.

13 Q And who lived there with you?

14 A Casey, George and myself, and Caylee Marie.

15 Q Tell me a little bit -- how many bedrooms was
16 the house?

17 A We have four bedrooms.

18 Q And did Caylee Marie have her own bedroom?

19 A Yes, she did.

20 Q During that time period, was it your
21 understanding -- and this is in the beginning of last
22 year -- was it your understanding that your daughter
23 Casey had a job?

24 A Yes, it was.

25 Q Where was she working, to your knowledge, at

1 that point in time?

2 A To my knowledge, Universal Studios and Hard
3 Rock Café.

4 Q And that was something that she told you
5 during that time period?

6 A Yes.

7 Q Did you ever learn from any other source
8 during that time period that she was working there; in
9 other words, somebody from the Hard Rock Café ever call
10 her for work? Did somebody from Universal ever contact
11 the house?

12 A Not that I'm aware of.

13 Q So the only source of information would have
14 been from your daughter, is that fair to say, from Casey?

15 A Yes.

16 Q And you also knew some of your daughter's
17 friends is my understanding?

18 A Some of them, yes.

19 Q Amy -- well, Amy Huizenga was a friend?

20 A I never met Amy Huizenga in March. I didn't
21 know Amy Huizenga until July the 15th of 2008.

22 Q Thanks for clarifying that. So of Casey's
23 friends -- during, let's say, the early time period of
24 last year, of Casey's friends, did you ever hear from
25 them, anybody mention where, in fact, she worked?

1 A I didn't talk to Casey's friends.

2 Q So it's -- I apologize. So my understanding
3 is what you're telling me is Casey's the one who told you
4 she had a job back during that time period; is that
5 correct?

6 A That is correct. I actually was with her when
7 she met her first boss back in June of 2004.

8 Q All right. Now, but I'm talking about in
9 2005.

10 A I have never -- I had never had a reason to
11 believe she did not still have her job which I did have
12 knowledge of that she did have a job.

13 Q And that first boss was who?

14 A You know, I can't remember his name right now.
15 It's not on the tip of my tongue. I'll probably remember
16 it before this is over, though.

17 Q I'm sorry. What year was that?

18 A 2004, I believe, is when she started. It was
19 the year before Caylee was born.

20 Q Now, do you or your husband claim Casey, your
21 daughter, as a dependent on your taxes?

22 A No. I haven't claimed Casey since she was 18
23 years old.

24 Q So it's fair to say she paid her own taxes or
25 should have paid her own taxes?

1 A Yes.

2 Q Did you ever see any documents coming in like
3 a W-2 --

4 A Yes.

5 Q -- to the house?

6 A I have seen a W-2 form.

7 Q Another thing I should have told you earlier
8 and I apologize. I'm going to ask a question. You
9 probably know what I'm asking you, but because we want to
10 make this clear, let me finish -- I appreciate what
11 you're doing, but let me finish my question and then
12 we'll go from there.

13 So back during the 2004 time period, are you
14 saying you saw a W-2 come in?

15 A Yes, I did.

16 Q How about in 2005?

17 A I don't recall.

18 Q Don't recall seeing it. And how about going
19 forward from there 2006, 2007?

20 A No.

21 Q And then 2008?

22 A The only reason is because that was her first
23 W-2, and I actually helped her with her taxes. I did not
24 need to help her do that after that year, so that's why I
25 would not have had a reason to look at her --

1 Q But on that point, after 2005, did you ever
2 see her doing her taxes?

3 A No.

4 Q Do you know if she ever received a tax refund?

5 A All I've seen was an H&R Block card from her.

6 Q All right. So as far as -- let's go back now
7 to the period when -- she was taking care of Caylee and
8 there were issues about baby-sitters. I just want to
9 focus in on your understanding was she had a job that was
10 the same job of the boss that you had met back in 2004?

11 A Yes, similar.

12 Q Similar. Was it at the same company?

13 A Not really because she never worked for
14 Universal Studios. She worked at Universal Studios.
15 These were companies that were contracted by Universal
16 Studios.

17 Q Have you subsequently come to learn about when
18 the last time was she actually did, in fact, have a job?

19 A I can't remember the exact date.

20 Q Is it fair to say, though, that you've come
21 now at this point in time to find out that she did not
22 actually hold a job at Universal Studios back in -- about
23 a year ago or so back in March or April of last year?

24 A She never worked for Universal Studios.

25 Q Did she have any job you're aware of now in

1 March or April of last year where she received a
2 paycheck?

3 A Yes.

4 Q where was that?

5 A Through my -- where my son works.

6 Q And what's that?

7 A Click and Park.

8 Q I'm sorry?

9 A Game Day, Click and Park. I'm not sure of the
10 exact name, but I know that she did receive a paycheck
11 because she did help him.

12 Q How much did she receive; do you know?

13 A I have no idea.

14 Q And what was her position?

15 A She just helped him with some of his work on
16 the Super Bowl last year, a year ago.

17 Q So Super Bowl a year ago would have been in,
18 obviously, end of January, early February. Other than
19 helping your son, Lee Anthony, are you aware of any other
20 payments or source of income that she would have been
21 receiving last year?

22 A Not -- no, not to my knowledge.

23 Q So is it fair to say your understanding is
24 that she did not have a source of income certainly from
25 Universal or any of those other entities associated

1 within Universal back in 2008?

2 A That's correct.

3 Q Okay. Now, your husband has testified and
4 we've heard from him about who watched your
5 granddaughter. And it's my understanding that she lived
6 in your house, of course. And did you help contribute
7 for feeding her and clothing her, all that type of stuff?

8 A Yes, I did.

9 Q Paid medical bills, I assume?

10 A No, I never paid -- I think I only paid one
11 medical bill for Caylee, and that was right after Caylee
12 was born.

13 Q Is it fair to say that you were involved
14 actively in raising her?

15 A Yes.

16 Q And of -- my understanding is you work full
17 time?

18 A Yes.

19 Q And where was it you were working back in
20 2008?

21 A Gentiva Home Care.

22 Q What was your position?

23 A I'm a nurse manager.

24 Q And do you have a certain shift that you work?

25 A I work day term.

1 Q Is that 7:00 to 7:00 or --

2 A My -- you know, I could go in at 7:30. I
3 could go in at 8:00. I could be there at 7:00. It just
4 depends on what time I wanted to be there. But usually
5 there at least by 8:30 and then till 5:00, 5:30, 6:00 or
6 whatever.

7 Q Is that a Monday through Friday --

8 A Monday through Friday.

9 Q Home health nurse is what you are?

10 A Nurse manager in a home healthcare company.

11 Q There's night shifts and then there's day?

12 A Not in my company.

13 Q So just day shift?

14 A Not for what I do.

15 Q And your husband was also working back in
16 2008; is that correct?

17 A Yes.

18 Q And what was his job, let's say, starting with
19 January through December 2008?

20 A You know, I can't remember. George has had a
21 couple jobs in 2008. I can't remember what he had.

22 Q There were periods of time, though, that both
23 of you were working; is that correct?

24 A Yes.

25 Q Now, at the times that George wasn't working,

1 would George be actively involved in the watching of your
2 granddaughter?

3 A George was actively involved with Caylee when
4 he was working or when he wasn't. We both were.

5 Q I want to be clear on my question so let me
6 clarify it again. And I apologize.

7 A I thought you were finished. I apologize.

8 Q That's okay. What I'm saying is when he
9 wasn't at the office or wherever he was working and he
10 was at home, would he be the one that was in charge of
11 watching her and babysitting for her, taking care of her?

12 A If Casey wasn't there, yes.

13 Q Now, if Casey wasn't working during this time
14 period and your husband was taking care of your
15 granddaughter, do you know where Casey would have been
16 going if she wasn't working or do you have any
17 information on that?

18 A I -- I have no idea.

19 Q Aside from you watching your granddaughter and
20 George watching your granddaughter and then, of course,
21 Casey, of the three of you watching her, what would you
22 say the percentage was? Do you think that you and your
23 husband watched her more than Casey back in, let's say,
24 before 2008, the 2007 time period?

25 A No. I think Casey watched Caylee more than

1 any of us did.

2 Q Okay. So a statement that 99 percent of the
3 time was you or your husband, you're saying that Casey
4 watched her more often?

5 A Casey watched her more often. I was --
6 Casey -- when I would come home from work, I would be
7 there.

8 Q Right.

9 A And I would not necessarily watch Casey, I
10 mean, Caylee, but Caylee was in the same house.

11 Q I understand.

12 A So unless Caylee -- you know, unless Casey was
13 gone from the house, then I didn't have to, quote,
14 unquote, baby-sit her --

15 Q I understand that.

16 A -- and on the weekends. So if I'm working
17 Monday through Friday 40 to 50 hours a week --

18 Q Now, and if your understanding is that Casey
19 doesn't have a full-time job during this time period, if
20 she wasn't watching her and your husband wasn't watching
21 her and you weren't watching her, did you all have any
22 other baby-sitter during this time period?

23 A There was different people that babysat
24 Caylee.

25 Q Let's kind of go back on that. Would one of

1 those people be Lauren Gibbs?

2 A Yes.

3 Q And what --

4 A But not in 2008.

5 Q I appreciate you clarifying. Let's go back.

6 Lauren Gibbs would --

7 A Lauren Gibbs.

8 Q Lauren Gibbs would have babysat her when?

9 A Right after Casey went back to work, which was
10 three months after Caylee was born.

11 Q So do you know how long a time period it was
12 that Lauren Gibbs watched her?

13 A Lauren Gibbs watched her probably until about
14 January, roughly. I can't say for sure on the dates.

15 Q January what year would that be?

16 A 2006.

17 Q And do you know if she was ever compensated or
18 paid for watching her?

19 A I don't believe so. Lauren did that as a
20 favor because she was Casey's best friend.

21 Q And as far as other people in that same
22 category, people who did it because they were friends
23 with either you or your husband or the family, who else
24 would be in the category of let's call them baby-sitters?
25 who else would there be?

1 A I know her fiance at that time, Jesse Grund,
2 watched Caylee. He watched her either at his parents'
3 home or at my home. I know his father, Richard Grund,
4 his father, or his mother, Deborah Grund, watched Caylee
5 for Casey while Casey would work. I know that Kristina
6 Chester watched Caylee. Holly Gogniat (ph) watched
7 Caylee.

8 Q Let me just stop you there. So we have Lauren
9 Gibbs, Jesse Grund -- and Jesse Grund, obviously, knew
10 the family and knew you; is that right?

11 A Uh-huh.

12 Q You have to answer out loud because she's
13 taking it down.

14 A Yes.

15 Q And Richard and Deborah Grund, you knew them
16 and they also knew the family?

17 A Yes.

18 Q Holly Goniatt?

19 A Goniatt.

20 Q Holly Goniatt, you know her as well?

21 A Yes.

22 Q And the family knows her?

23 A Yes.

24 Q And Kristina what was her name?

25 A Chester.

1 Q Gesture?

2 A Chester, C.

3 Q You know her and the family knows her as well?

4 A I did not meet Kristina Chester till -- you
5 know, I met Kristina Chester briefly when Casey was
6 pregnant. I met her at a, like, Babies R Us, and that
7 was the only real time that I had met her before. I
8 didn't really know her that well. She was a schoolmate
9 of Casey's.

10 Q Fair. Somebody who knew Casey and you
11 actually had laid eyes on and talked to; is that right?

12 A Uh-huh, actually, because I ran into her one
13 day when Casey and I were shopping for Caylee's things.

14 Q It's your understanding, correct me if I'm
15 wrong, that Holly Goniatt, the Grund family and also
16 Kristina Chester, they did it, again, because they were
17 friends with the family and they weren't compensated; is
18 that right?

19 A As far as I know.

20 Q Well, you certainly never paid them?

21 A No, I didn't.

22 Q And you don't believe your husband paid them
23 either?

24 A No, I didn't. Wouldn't have been our
25 responsibility to do that.

1 Q On that point, though, did Casey ever say to
2 you that she paid any of these people to watch your
3 child?

4 A We never discussed that.

5 Q So no knowledge if she did or not?

6 A Never discussed it with her. It wasn't an
7 issue.

8 Q Now, all these people -- again, we're talking
9 about the time period when your granddaughter was from an
10 infant through being a toddler, of all these people,
11 though, they were all people that you could reach out to
12 and get ahold of, if necessary; is that fair to say? If
13 something happened and something happened to either you
14 or your husband --

15 A No, that's not true. I never had Jesse
16 Grund's cell phone number. I never had Richard Grund's
17 cell phone number. I do not know where they lived. I
18 never went to their house. So, no, that's not correct.

19 I never had Kristina's phone number. Lauren
20 was the only one that I had a phone number for and I knew
21 where she lived.

22 Q Let me go back, though. But you knew
23 Richard's first name and last name, Richard Grund and
24 Deborah Grund, Jesse's first name and last name, and you
25 had actually met them?

1 A Yes. I'm sorry.

2 Q You actually met them and they were people
3 that if they walked in the room, you would recognize
4 them; is that right?

5 A Yes, correct.

6 Q Now, have we covered all the people?

7 A No. There was other friends of Casey's that
8 watched Caylee.

9 Q Now, the people that you know and that you've
10 met -- and all the people you listed for me are people
11 that you know and you've met?

12 A I wouldn't say I know them.

13 Q I understand. When I say "know," I mean it
14 like I met you.

15 A I could identify them.

16 Q I met you and you could identify me and I
17 could identify you.

18 A I probably wouldn't be able to pick out
19 Kristina again except we got close after Caylee went
20 missing. I would know her now, but prior to that, I
21 wouldn't be able to pick her out of a line-up.

22 Q All right. Now, did you -- at some point in
23 time -- these were baby-sitters. Was anybody in this
24 group, were they ever referred to as a nanny?

25 A No.

1 Q And your understanding is a nanny is somebody
2 that's compensated or paid for their services?

3 A You're assuming that's my understanding of a
4 nanny. I really have never thought of what a nanny is.
5 A nanny is someone that helps watch a child.

6 Q All right. Well, in your experience, a nanny
7 generally, correct me if I'm wrong --

8 A Jesse is the one, excuse me, that started
9 calling Zanny the nanny. Okay? Casey called her the
10 baby-sitter. So the nanny came from the Grunds.

11 Q Fair enough. And we're going to get -- I
12 haven't gotten there yet. I know you're fast-forwarding
13 to that.

14 A I just don't see the relevance.

15 Q I understand, ma'am, and we're going to get
16 there in a moment.

17 So of all these people, though, it's fair to
18 say that baby-sitters that you've listed for me are
19 baby-sitters that you knew and if push came to shove, you
20 could get ahold of them somehow. Something happened to
21 you, your husband or Casey, you could get ahold of these
22 people?

23 A I'm not sure at the time if I could have
24 gotten ahold of the Grunds without contacting Casey. You
25 know, there was other people. I saw pictures of Jeffrey

1 Hopkins. The other gentleman that Zenaida watched, Zanny
2 watched, her son Zachary, I saw a picture of Zachary and
3 Jeff. I could pick them out because I saw pictures of
4 them.

5 Q Have you ever seen a picture of Zanny?

6 A No, I haven't.

7 Q Now, I wanted to clarify --

8 A But I have a picture in my head from
9 descriptions from the last two and a half years.

10 Q But unlike the people that you listed to me,
11 because you've never met Zanny, I assume, you can't --
12 you can't tell me what she looks like from your own
13 personal observations; is that right?

14 A That's correct.

15 Q So this isn't somebody that if something had
16 happened to either yourself or your husband that you had
17 a method of reaching out and get ahold of this --

18 A Actually, I had phone numbers for Zanny at
19 different times and I had addresses at different times.

20 Q Why don't you tell me the phone number.

21 A I don't have it now.

22 Q Where is it?

23 A I -- I don't have it now.

24 Q Where would it have been?

25 A Would have been in an address book, something

1 that Casey had or I had.

2 Q So when you say you had -- let me get this
3 straight. You had addresses and phone numbers of Zanny
4 and Zanny is -- your understanding, when you're saying
5 Zanny, I want to make sure, Zanny is the person that you
6 were saying was watching --

7 A Casey always gave me a phone number, yes.

8 Q And these phone numbers, you're saying they
9 are in existence and you've written them down somewhere
10 in an address book and they're out there somewhere to be
11 found; is that right?

12 A I gave all that to the sheriff's department.

13 Q So then the sheriff's department will have all
14 that?

15 A I gave it all to the sheriff's department.

16 Q That will include the address of Zanny, of
17 this person?

18 A Anything I had I gave to the sheriff's
19 department.

20 Q The phone numbers, do you remember the area
21 code of them?

22 A No.

23 Q How about the address, for instance, of the
24 part of the town where the address was?

25 A From my knowledge, Casey told me there was

1 like four different addresses over the course of three
2 years, that she moved quite frequently.

3 Q And these four -- the addresses, then, and the
4 phone numbers, they all came from Casey?

5 A Yes.

6 Q Did Zenaida or Zanny, the person that you
7 believed was watching Caylee, did she in any way provide
8 to you a phone number or an address?

9 A No, never needed to talk to her.

10 Q Did she --

11 A I never needed to talk to her.

12 Q If the need arose that you needed to talk to
13 her, get ahold of her, you would have had to go to these
14 addresses and phone numbers that Casey gave you; is that
15 right?

16 A Yes, correct.

17 Q Did you ever dial or call or talk to this
18 person?

19 A No, I have not.

20 Q And let me -- I just want to clarify some
21 things. We have some things that I need to ask about
22 this, and I just want to clarify so we're clear on a
23 couple of different things.

24 (Whereupon, a video is being played for the
25 witness not reported by the court reporter.)

1 BY MR. DILL:

2 Q Let me ask that question. The statement that
3 you made there about this is a person who's been in
4 normal conversations with for three years prior to
5 Caylee's birth, is that accurate?

6 A No, that was a misstatement. And that was a
7 week after my granddaughter went missing.

8 Q I understand. The reason I made --

9 A That was like three days after Caylee went
10 missing. And do you know what? That was -- that was
11 just a misstatement.

12 Q And that's fine. We're clarifying. That
13 statement there that this is somebody whose name you had
14 heard --

15 A And probably no sleep for, you know.

16 Q -- that statement, just to be clear on the
17 record, that this is somebody whose name has been in
18 normal conversation around your house for three years
19 prior to Caylee's birth, that's inaccurate?

20 A That's inaccurate.

21 Q Right.

22 A From about 2006, to clarify that.

23 Q So you're sitting here, as we sit here
24 today -- again, this is at a different circumstance than
25 that. Are you saying that her Zanny's identity was

1 conversed around your house from when until when?

2 A Zanny's name came up back around when Jesse
3 and Casey were engaged, and that was in 2006.

4 Q So in 2006, you first heard the name "Zanny."
5 Did you ever hear Jesse talk about Zanny?

6 A Yes.

7 Q Did Jesse Grund talk about Zanny?

8 A Yes.

9 Q What did Jesse Grund say as far as who --

10 A I can't remember. I just know the name came
11 up while he was --

12 Q When I say talk about Zanny, I want to be a
13 little bit more clear about that. Did Jesse Grund ever
14 tell you that he had met or seen Zanny?

15 A No.

16 Q So where the name came up, it may have been in
17 conversation, as you said, but it wasn't like I just came
18 from Zanny and --

19 A No.

20 Q -- Zanny was watching Caylee; is that right?

21 A No, correct.

22 Q Let me expand that question out a little bit.
23 Is there any other person besides your daughter that has
24 told you that they have met or seen Zanny?

25 A No, but Caylee talked about Zanny's dog.

1 Q We'll get to that in a second.

2 A She's another person.

3 Q I appreciate that. I just want to be clear.

4 A If there's a dog that belongs to Zanny, then
5 there must be a Zanny.

6 Q Fair enough. Besides your daughter and Caylee
7 saying that about the dog, okay, is there any other adult
8 that has said to you I have met Zanny or I know who she
9 is?

10 A Not that I'm aware of.

11 Q I'm just going to hit this briefly on this
12 point. You said Caylee talked about the dog. Describe
13 for me what time period we're talking about that was.

14 A Probably sometime between March and May of
15 2008.

16 Q March and May --

17 A May have been even before that.

18 Q Anything else besides the statement about the
19 dog?

20 A She talked about her dog.

21 Q Okay.

22 A Caylee loved dogs.

23 Q So I assume there is a statement about the dog
24 and that would be the extent of it?

25 A Uh-huh.

1 Q So sort of backing up, then, as far as whether
2 Zanny was somebody that any adult saw, you don't have any
3 knowledge that this Zanny person who was watching Caylee
4 was seen by any adult; is that right?

5 A I wouldn't know if anybody saw her, you know.

6 Q That's kind of what I'm getting at. You
7 wouldn't know --

8 A How would I know if you saw somebody? I
9 wouldn't know if she saw me. I'm not in someone else's
10 head, so I have no idea if anybody saw it. That's kind
11 of a question I couldn't answer.

12 Q Okay. Did anybody say to you, hey, I met
13 Zanny. She's a nice girl?

14 A No. I never -- Zanny never came up in
15 conversation with anybody other than Casey, typically.

16 Q So where you're saying here on Greta
17 VanSustern -- and we got the dates wrong, but you're
18 saying in normal conversation around your house, that
19 normal conversation you're talking about is from Casey
20 and you; is that right?

21 A Right, or my husband George.

22 Q And it's your understanding that he had never
23 seen Zanny either; is that right?

24 A That's correct.

25 Q And, once again, as far as the phone number

1 and how to get ahold of her or address, that would have
2 been all information that had been given to you by Casey
3 and you say you've turned all that over?

4 A Right. Casey would give me a new phone number
5 for Zanny probably every three months because she said
6 the girl changed her phone number almost like she changed
7 her address.

8 Q Did Casey tell you that she was paying Zanny?

9 A I never asked her.

10 Q Okay. What was your understanding of whether
11 Zanny was doing it for free or whether she was getting
12 compensated?

13 A My understanding was Jeffrey Hopkins was
14 paying Zanny, who was his ex-girlfriend, to watch his
15 little boy Zachary when Casey first met Zanny, and
16 Jeffrey was compensating for both children.

17 Q Okay.

18 A And then later on --

19 Q Let me stop you there, and we'll get to that
20 in just a second.

21 A I'm answering your question.

22 Q You are, ma'am, and I appreciate that. Your
23 understanding is that Jeffrey Hopkins was the
24 ex-boyfriend of Zanny?

25 A Yes.

1 Q And how did you gain that understanding or
2 that knowledge?

3 A Because that's what Casey told me. When she
4 first met Jeff, she was working for -- I believe she was
5 still working for Colorvision or Kodak, one of them, I
6 don't know when they changed hands, and Jeffrey was a IT
7 tech at Universal.

8 Q Okay.

9 A And that's when I saw his picture and
10 Zachary's picture.

11 Q Now, where is Jeffrey Hopkins today?

12 A I have no idea.

13 Q Now, the information that Zanny was the
14 ex-girlfriend or girlfriend of Jeffrey Hopkins came to
15 you by Jeffrey Hopkins?

16 A No. I never met him.

17 Q How did you get that information --

18 A From Casey.

19 Q I'll finish the question and we'll get it.
20 You know what I'm asking and I appreciate it.

21 The information about Jeffrey Hopkins being
22 the boyfriend of Zanny --

23 MR. CONWAY: It's all right.

24 THE WITNESS: He just asked me a question how
25 I got it and I answered it.

1 BY MR. DILL:

2 Q I'll reask it. I appreciate that.

3 A Raise your hand when you're finished and I'll
4 know that you're done.

5 Q I think you'll know when I'm finished, ma'am.

6 A I thought I did. Obviously, I was wrong.

7 Q Jeffrey Hopkins and this relationship between
8 him and Zanny and this being the boyfriend and also the
9 part about him compensating Zanny, that information came
10 from Casey?

11 A Yes, it did.

12 Q You've never spoken to Jeffrey Hopkins about
13 this relationship between Zanny and him?

14 A No.

15 Q Have you ever spoken to Jeffrey Hopkins?

16 A No, I haven't.

17 Q So the only information that you have -- and
18 if there's more, tell me. The only information you have
19 about Jeffrey Hopkins having a girlfriend named Zanny who
20 was watching the kids came from your daughter Casey?

21 A Correct.

22 Q And there's no other source out there?

23 A Correct.

24 Q All right. So it's your understanding, based
25 upon what Casey told you, that Jeffrey Hopkins was paying

1 for Zanny to watch both children. How long a time period
2 was that and how did you learn that? Is that from Casey?

3 A From Casey. I think that was until December
4 of 2007.

5 Q How about after December 2007? Obviously, you
6 had an understanding that she was being paid by Jeffrey
7 Hopkins. Did you come to an understanding as to who now
8 was paying Zanny after Jeffrey Hopkins was no longer
9 paying her?

10 A I didn't ask. Wasn't an issue.

11 Q Did you have an assumption in your head that
12 Zanny is someone who charges for her services?

13 A Again, the -- it never came up.

14 Q Little different question, though. Did you
15 have an assumption in your head that Zanny was somebody
16 who charges for childcare?

17 A By that time, Casey and Zanny had been
18 friends, so a lot of Casey's friends volunteered to watch
19 Caylee. Caylee was a delightful young child --

20 Q Yes, ma'am.

21 A -- that everybody liked to watch, so -- you
22 asked me a question. Let me finish it. What I'm telling
23 you is it never came up, and I didn't think about it.
24 And I'm answering your question.

25 Q Just so I'm clear, you had an understanding in

1 your mind that at one point in time Zanny was being
2 compensated by Jeffrey Hopkins; is that correct?

3 A That's correct.

4 Q And as you said that ended around the end of
5 2007; is that correct?

6 A From my understanding.

7 Q And after that, do you have an understanding
8 in your mind as to who, if anybody, was compensating
9 Zanny for her childcare services?

10 A No, because I was never -- I never spoke to
11 Casey about that. So, again, Casey told me that she was
12 being compensated by Jeffrey. When Jeffrey moved, I
13 didn't ask who was compensating Zanny, so I have no
14 understanding. I do not know. Again, Zanny was a friend
15 of Casey's, so she could very well have volunteered.
16 That did not come up.

17 Q Did Casey say to you that Zanny, my friend, is
18 volunteering to watch my daughter?

19 A The subject did not come up.

20 Q So when you're saying it could have happened,
21 that's not something you know either --

22 A I can't speculate.

23 Q Ma'am, I appreciate that. Let me finish my
24 question, if you don't mind.

25 when you're saying it could have happened,

1 that isn't something you know by fact that you've learned
2 from anybody; is that right?

3 A No.

4 Q So as far as whether she was volunteering,
5 this Zanny person, or whether she was being compensated
6 from 2007 on, you really don't know?

7 A No. And I don't know if Casey ever paid
8 Lauren or anybody else, either, because I never asked
9 them.

10 Q I appreciate that.

11 A Again, that didn't come up, so I never -- I
12 never interviewed any of her baby-sitters to find out if
13 they were getting paid or not. It wasn't my position to
14 do that.

15 Q I understand that, ma'am. That wasn't really
16 my question, ma'am.

17 A I'm trying to clarify the question when you
18 ask me specifically about Zanny, so I'm clarifying it
19 wasn't just Zanny that I didn't have that knowledge of.
20 I didn't have the knowledge for any of them. She asked
21 several people to watch. I don't know if they were paid
22 or not. I assume they didn't get paid. But, again,
23 Casey was working then, so it's irrelevant to C. Zenaida
24 Gonzalez. I'm sorry.

25 Q You said two things, but let me just go on

1 back. During this time period, you have no specific
2 knowledge if Zanny was doing it for free or whether she
3 was being paid; is that correct?

4 MR. CONWAY: Mr. Dill, she's answered the
5 question over and over again.

6 MR. DILL: Sir, you can make your objection.
7 You know you can make your objection.

8 BY MR. DILL:

9 Q I just want to clarify. You have no specific
10 knowledge that Zanny was doing it for free or being paid
11 from 2007 on; is that correct?

12 A As I stated, I have no particular knowledge.

13 Q Now, when you said Casey was working after
14 2007, is this based on the information you told me before
15 about her working at Universal or is it based on some
16 other fact that we haven't talked about?

17 A Casey never worked at Universal Studios for
18 Universal Studios.

19 Q I misunderstood when you said that before.
20 Anybody affiliated with Universal Studios or Hard Rock
21 Café, which you told me about earlier. Do you have any
22 understanding or information that Casey was working for
23 any entity after 2007 when Jeff Hopkins was out of the
24 picture going forward?

25 A At this -- at that point, I was under the

1 impression that she was working. I do not have any proof
2 that she was working.

3 Q And you've come to learn that she was not
4 working; is that correct?

5 A That's correct.

6 Q So when you said before that Casey was working
7 then, it's your understanding now that Casey was not
8 working then; is that right?

9 A My understanding now is that she wasn't
10 working at those particular places.

11 Q Or anywhere else?

12 A I don't know that.

13 Q So you don't have any information that she was
14 working anywhere else?

15 A I don't know that. I can't answer that.

16 Q All right. So you told me before you never
17 talked to Zanny on the phone. Did you ever talk to Casey
18 when she was with Zanny or said she was with Zanny?

19 A Possibly.

20 Q Don't have a recollection specifically?

21 A I don't have a specific date. That's
22 possible.

23 Q All right. Now --

24 A I know she called me from Zanny's apartment.

25 Q Because she told you she was at Zanny's

1 apartment?

2 A Because she told me she was at the apartment.

3 Q Which apartment was that?

4 A Again, I can't tell you. I'd have to have a
5 specific date to tell you what end of town she lived on
6 that particular time.

7 Q Let's go general to make it easier. At what
8 point in time was it that you were called from Zanny's
9 apartment knowing anywhere in town or any of the counties
10 around here, including Osceola and Sanford, that she was
11 calling from somewhere?

12 A Zanny only lived in Orange County.

13 Q She only lived in Orange County. And how do
14 you know that?

15 A Because Casey told me.

16 Q All right. And when did Casey tell you that?

17 A Over the years that we talked about Zanny,
18 that she lived -- the places that she described, the
19 areas of town that she described was only in Orange
20 County.

21 Q So when she called from the apartment, did
22 Zanny ever have a house or was it always an apartment?

23 A It was always an apartment, to my knowledge,
24 except her mom had a house -- I believe it was a house.
25 It could have been an apartment.

1 Q You're getting that information about her mom
2 from Casey?

3 A Casey, of course.

4 Q And so all the information you have about
5 Zanny -- ma'am, if I may. All the information you have
6 about Zanny comes from Casey?

7 A Of course, because Caylee's too little to tell
8 me about it.

9 Q So when you're saying that she called from an
10 apartment, that would have been Casey telling you I'm
11 calling from Zanny's and it's wherever it is?

12 A Right. She'd say I'm going to stay at Zanny's
13 tonight.

14 Q How many times did Casey stay out of the house
15 with Zanny and with Caylee? I mean, we're talking about
16 before --

17 A What time frame?

18 Q Let me narrow it down. How many times was it
19 before June 15th that Casey stayed out of the house with
20 Zanny and with Caylee?

21 A Maybe on an average once or twice a month.

22 Q And during this time period, you're saying
23 that Caylee was able to speak and talk about where she
24 had been or where she had gone?

25 A Well, Caylee's been speaking since she was 18

1 months in phrases, but she's two. Unless I specifically
2 asked her questions, her point of reference is what's
3 right in front of her.

4 Q So she would never volunteer about -- other
5 than the dog, as you told me -- never volunteer about,
6 let's say, where she was or anything like that?

7 A Right.

8 Q Now, so during this time period -- and we're
9 going to go on forward a little bit here in the March
10 time period because we're already into 2008, March
11 through May of 2008. It's your understanding that Zanny
12 is a baby-sitter for Caylee, is that correct, or a nanny,
13 baby-sitter, whatever you want to use?

14 A Yes.

15 Q And that's all, again, based upon what Casey
16 has told you, essentially, that she's the one watching
17 her; is that right?

18 A Right.

19 Q All right.

20 A And that wouldn't be very often.

21 Q How often would it be?

22 A You know, just -- most of the time Casey was
23 gone in the evenings so I would watch Caylee.

24 Q So when you said that there were times where
25 she would stay over at Zanny's house, that would be how

1 many times would you estimate?

2 A I said once or twice a month.

3 Q Once or twice a month. We're starting at what
4 time period of once or twice a month she stayed over
5 there?

6 A It would have had to have been when -- she had
7 to have gone when I was at work because if I had been
8 home, she wouldn't have needed to take her.

9 Q How about with the staying over part because
10 you would be home every night, wouldn't you?

11 A Right. But if she was already gone and I was
12 at work --

13 Q So once or two times a month?

14 A Yes.

15 Q Okay. And it's your understanding that the
16 Zanny --

17 A Most of the time Caylee -- Casey brought
18 Caylee up to my office and dropped her off and then I
19 took her home.

20 Q Couple other questions here on the dog issue.
21 What kind of dog was it? Was it ever described?

22 A You know, it was a little white dog. I don't
23 remember if it was a Pomeranian mix or what it was.

24 Q And when she's saying she liked playing with
25 the dog, how did she describe the dog?

1 A She just called it her -- the new puppy.

2 Q So --

3 A I can't remember the name. It was several
4 months ago.

5 Q She talked about the new puppy, then how did
6 you get in your mind about Zanny and the new puppy?

7 A Because I asked her if it was Zanny's puppy.

8 Q And she responded yes?

9 A Yes.

10 Q So there is no other description besides the
11 new puppy in all that?

12 A Correct.

13 Q What time period was this that that was said?

14 A I believe I told you somewhere between March
15 and May, and it could have been earlier than that.

16 Q So when she stayed out of the house, let's
17 say, during the March and May time period, if it's a
18 couple times or once or twice a month, that would have
19 been in March or May, from March going forward to May?

20 A It was all the time.

21 Q All the time?

22 A Uh-huh, once or twice a month.

23 Q Going back to when?

24 A Probably December.

25 Q December 2 --

1 A January or December.

2 Q January, December 2007. So you're saying once
3 or twice a month from January to December --

4 A Yeah, January 2008, December 2007.

5 Q Till May. Again, you never picked up either
6 your daughter or Caylee at this apartment or location
7 where this was?

8 A Never had to.

9 Q And it never actually physically --

10 A The need never arose.

11 Q I understand. You never physically went there
12 to this apartment?

13 A Correct.

14 Q And you never physically saw a dog or anything
15 that your granddaughter had been talking about?

16 A No.

17 Q Was there ever a time that you told law
18 enforcement about Caylee talking about Zanny's dog?

19 A I believe so.

20 Q Do you know if you were asked that by law
21 enforcement?

22 A I don't know if law enforcement knew to ask me
23 about a dog.

24 Q Well --

25 A Oh, actually, I do remember speaking to law

1 enforcement about it because there was a tip that came in
2 from Texas in July, and the person fit Zenaida's
3 description and she had the same type of dog. And the
4 little girl at the pool said her name was Caylee, and she
5 fit the description of my granddaughter. So I did speak
6 to them about it.

7 Q And this -- that was in response to the tip
8 later on?

9 A Yes. And that was probably in July.

10 Q Okay.

11 A Or August.

12 Q But when you told me -- you told me a few
13 minutes ago that Caylee would talk about Zanny's dog, did
14 you ever volunteer that to law enforcement?

15 A You know, I don't know. I don't know.

16 Q No recollection if you did or not?

17 A No, no. I volunteered a lot of stuff to law
18 enforcement. I gave them Zanny's curling iron. I gave
19 them some movies that came from Zanny's apartment that
20 Casey had brought home, you know, different items.

21 Q We're going to get to the curling iron and
22 movies in a second. Who was it at law enforcement that
23 you talked to about the dog; do you recall?

24 A It had to be someone from missing persons and
25 probably either John Allen or Gary Melich because they

1 were on the case, or could have been Nick Savage from FBI
2 because I spoke to them with tips.

3 Q And every one of those -- you had interviews
4 with them that were recorded; is that right?

5 A I know that now.

6 Q Okay.

7 A No one told me that when we were having them.

8 Q So is it fair to say when you were -- when you
9 were talking and you're being open and honest with them,
10 clearly?

11 A Right. It wasn't during those taped
12 interviews, though, that you guys have seen on TV.

13 Q It's another interview you're saying --

14 A It's when I used go down to the sheriff's
15 department three times a week and go over tips with them.

16 Q And it still --

17 A They didn't pull me into a room where they had
18 video, so I'm sure that was not part of the video.

19 Q So you don't know right now as you're sitting
20 here who it was from law enforcement that you spoke with?

21 A No. I'm sure it was someone from missing
22 persons because that's who I would, you know, go over
23 tips with. It was either Kari Roderick or Awilda. And
24 I'm sorry. I can't remember her last name right now.

25 Q And there was -- was that one occasion or more

1 than one occasion or just in response to that tip?

2 A I talked to them about these tips on several
3 occasions. Sometimes the same tip on several occasions
4 so I can't tell you how many times.

5 Q Now, when Casey would stay over at the
6 baby-sitter's, over at Zanny's, would they pack a bag for
7 Caylee?

8 A Casey always packed a bag for Caylee.

9 Q So she had a understanding or knowledge when
10 she was going to be staying over and she would take
11 clothes from the house?

12 A Casey always had a bag for Caylee no matter
13 where she went. If Caylee and I went to the store, we
14 always had a bag for Caylee with extra clothes and
15 diapers and things in it.

16 Q How many days worth of clothes would have been
17 in the bag?

18 A Probably two, as a normal thing. I used to do
19 that for my kids. Even if I just went to my mom's for
20 the day, I'd pack two outfits because you never know what
21 kids are going to get into.

22 Q Was there ever an extended period of time,
23 more than, say, two days that Casey was outside of the
24 house with Caylee -- I'm sorry -- that Casey and Caylee
25 were outside of the house with Zanny prior to the

1 disappearance?

2 A Casey was never -- it was never consecutive
3 two days. It was only one day at a time before June.

4 Q So there was never a period of two, three,
5 four, five --

6 A Nope. I'm saying one to two times a month.

7 Q I gotcha. So there was never an extended
8 period of time --

9 A No.

10 Q -- as we go along that she's out of the house
11 for a week at a time?

12 A No, not prior to June 16.

13 Q Zanny's curling iron and movies, where did
14 those come from and who gave them to you?

15 A I remember about a year ago Casey -- actually,
16 it wasn't a curling iron. It was a hair straightener
17 that Casey had at the house, and I saw it. And I asked
18 her, I said, where did you get that? She said, Zanny
19 gave it to me.

20 And the same thing about a year or so ago
21 Casey had some videos, and she said that Zanny didn't
22 want the videos anymore, so we had some videos at the
23 house. So I gave them to John Allen and Kari Roderick
24 from missing persons because I thought that there might
25 be fingerprints on them.

1 And I also gave them Caylee's airbed at that
2 time that Casey bought specifically for Zanny's apartment
3 if she ever had to stay overnight there.

4 Q Okay. So she would bring the airbag with her
5 to stay over --

6 A Casey had the airbag in her car so if she ever
7 needed it.

8 Q Okay. And where was -- where was the airbag?

9 A The airbag's with the sheriff's department.

10 Q Okay. So how about the time period when she
11 was gone and supposedly had given Zanny the child, where
12 was the airbag then?

13 A What do you mean supposedly? Clarify that
14 question.

15 Q Okay. Well, there came -- we're going to get
16 to in a second, but there came a point in time when your
17 daughter was supposedly, according to her, gave Caylee to
18 the baby-sitter or the baby-sitter had the -- had the
19 child.

20 A What specific date are you talking about?

21 Q Okay. We're at June 15th moving forward.

22 A All right.

23 Q All right. So at that point in time, the
24 airbag that you're telling me about --

25 A Casey, from my understanding, never gave

1 Caylee to Zanny.

2 Q Okay. I think you understand what I'm asking.

3 A (Shakes head.)

4 Q When she went missing on June 15th, there
5 seemed to be --

6 A She didn't go missing on June 15th. It was
7 June 16th.

8 Q Oh, I'm sorry, ma'am. June 16th, moving
9 forward, was this airbag, this air mattress that you're
10 telling me about, was that in Casey's possession or your
11 possession?

12 A That was at the house at that time.

13 Q The house meaning your house?

14 A Yes.

15 Q Okay. So this wasn't a trip where, as you
16 said before, that there would be times where she slept
17 over and that the air mattress would have gone with her.
18 This wasn't one of them; is that right?

19 A No. From my understanding, on June 16th,
20 Casey was going to pick Caylee back up at 4:00 in the
21 afternoon or whatever time it was.

22 Q Okay. Well, you were aware of the presence of
23 the air mattress in your house; is that right?

24 A I didn't know it was in the house until I
25 started going through things.

1 Q When was that?

2 A Actually, I didn't even think about the air
3 mattress until -- till the day that I gave it to John
4 Allen, and I can't remember the specific date, but it was
5 the day after they did their first search of the house.

6 Q So the date they first searched your house
7 would have been after the 911 calls; is that right?

8 A Yes.

9 Q When was the date of the first search of the
10 house?

11 A That's what I'm just saying. I can't remember
12 the date of the first search of the house, but it was the
13 very next day because, because of what they were looking
14 for in the house, is when I started thinking that next
15 morning and I was cleaning. And when I saw the hair
16 straightener, I said, oh, my gosh, because they were
17 looking for evidence at that time. It was the first time
18 they were actually looking in my house for evidence, so I
19 thought something that may have fingerprints or hairs on
20 it.

21 Q Let's go --

22 A So I went through closets. I went through
23 things to see if anything would trigger in my head
24 something that they could use. So I also gave them her
25 favorite movies like Bambi and different things so that

1 they could take fingerprints off.

2 Q We're getting far afield, and I appreciate it.
3 I kinda want to focus --

4 A You asked me a question, and I'm explaining to
5 you.

6 Q Well, I'll be -- I'm not doing a good job of
7 asking, but let me ask this. This air mattresses that
8 you're telling me about, this was something that Casey --

9 A This is not what will happen.

10 Q -- Casey used to take with her to Zanny's so
11 that her child could sleep on it; is that right?

12 A If she thought that she might be staying late.

13 Q So it wasn't until after there was a search
14 through your house that you actually thought about
15 whether the air mattress had been taken to Zanny's house
16 or not?

17 A Like I said, I happened to stumble across the
18 air mattress, and I had forgotten about the air mattress.
19 I didn't realize that it was here. For all I know, it
20 could have been in someone's apartment. You know,
21 Casey -- I mean, she could have left it at Zanny's house.
22 I hadn't seen it until I started looking for it. It was
23 in a spare closet.

24 Q Did you ever tell investigators that she used
25 to take this air mattress over to have her daughter

1 Caylee sleep at Zanny's? Did you ever --

2 A Yes, I did. When I gave it to John Allen,
3 that was the reason I handed it to John Allen.

4 Q Let me -- let me back on up. Prior to the
5 time you handed it to John Allen, there were other times
6 you talked to investigators?

7 A Again, I forgot about the air mattress until I
8 ran across it when I was looking specifically after they
9 searched the house on the first time, so I wouldn't have
10 had a reason to think about it.

11 Q So during the 31-day time period when Caylee
12 in your mind was missing that you --

13 A 31-day period Caylee was not missing in my
14 mind.

15 Q There came a point by July 3rd, at least, that
16 you thought she was missing?

17 A No, I did not believe that Caylee Marie was
18 missing until July 15th.

19 Q Okay. So --

20 A If I would have thought that Caylee Marie was
21 missing before July 15th, I would have called 911 before
22 July 15th.

23 Q Okay. Let me -- we'll get back to the air
24 mattress in just a bit.

25 You had a Myspace account, did you not?

1 A Yes, I opened a Myspace account.

2 Q And you actually would post on Myspace, right?

3 A I posted it for my daughter's -- for Casey's
4 benefit only because I didn't have any friends on
5 Myspace, and I did it --

6 Q Let me hand you -- we'll go ahead and mark
7 this as an exhibit. And that's -- you recognize that,
8 don't you?

9 (Plaintiff's Exhibit No. 1 was marked.)

10 A Yeah, I know it. I wrote it.

11 Q You wrote it, and this is something you put on
12 Myspace, correct?

13 A Right, for Casey. And I tried to get her to
14 be my friend so she could read that.

15 Q All right. So what is the date of that
16 posting?

17 A July the 3rd.

18 Q All right. And you say, what? What is the
19 title of the posting?

20 A "My Caylee is Missing."

21 Q All right. So is it fair to say that when you
22 wrote this, your mind was that Caylee, in fact, was
23 missing?

24 A No.

25 Q Okay. So that doesn't mean -- my Caylee's

1 missing doesn't mean what it says?

2 A No.

3 Q Okay. So on July 3rd did you ever think to go
4 look for this air mattress or find out if, in fact, the
5 air mattress had been taken over to Zanny's house?

6 A No.

7 Q So this wasn't until sometime later that you
8 thought of it and you didn't --

9 A I didn't think of it until I ran across it
10 when I was looking for things in the house that could
11 potentially help the sheriff's department.

12 Q Okay. Now, you told me a few moments ago that
13 there was a time period, I guess, when she would stay
14 over at Zanny's house. Did you ever have any notation
15 anywhere of when those times could have been? You know,
16 in other words, some people keep a diary, a calendar
17 while it's going on.

18 Can you direct me specifically from this May
19 or March time period on through to June what days would
20 it have been?

21 A I have no idea.

22 Q You have no idea, and there's no way --

23 A I have no idea.

24 Q And there's nothing we could look at to tell
25 us?

1 A Absolutely not.

2 Q I'm going to -- let me clarify a couple of
3 other things here.

4 (The following text was the result of the publishing
5 of a videotaped interview:)

6 CINDY ANTHONY: If any, maybe one. And the
7 only time Casey ever told me -- the only place that
8 Caylee would ever stay over was they were crashing
9 at Zanny's.

10 BY MR. DILL:

11 Q All right. So the crashing at Zanny's I want
12 to talk about. Is that where you're describing to me
13 that she would say to you she was crashing over at
14 Zanny's?

15 A Uh-huh.

16 Q All right. And those times she was crashing
17 over at Zanny's, it's your recollection that she would
18 bring the air mattress with her?

19 A No. When Casey knew that she may work late or
20 what she had told me when she would work late, she would
21 take the air mattress and have it in her car. Okay? And
22 if she felt that it was too late to come home and to
23 disrupt Caylee, she would stay at Zanny's and stay
24 overnight and then she'd be home the next morning.

25 Q And say she was crashing?

1 A She was crashing at Zanny's. And that way she
2 could sleep on the couch or wherever next to Caylee in
3 the air mattress and then pick her up or -- and then
4 bring her home the next day.

5 Q So there would be times -- and you physically
6 saw her taking the air mattress with her when she left
7 with her daughter?

8 A No, not really.

9 Q Did you ever see your daughter Cas --

10 A Because I wasn't there when she would leave to
11 take Caylee.

12 Q So all this about whether she had the air
13 mattress or not, again, that's coming from Casey; is that
14 correct?

15 A From my understanding, I believe I saw the air
16 mattress in Casey's car quite a bit.

17 Q All right. So --

18 A But it wasn't in Casey's car when we got the
19 car on July the 15th.

20 Q Right. I understand that, and we're going to
21 get to that, but I want to kind of focus back on this
22 time period. When she's staying over at Zanny's house,
23 you're saying that when she would work late, she would
24 take the air mattress with her; is that right?

25 A No. What I'm saying is if she thought there

1 was a possibility -- if Zanny would watch her in the
2 evenings, she may have the air mattress with her. If she
3 watched her during the day, she may not have the air
4 mattress with her.

5 Q And this was, again, from March to May of
6 2008?

7 A No. Actually, I stated before it was probably
8 from January.

9 Q January to May 2008, but I thought we -- I
10 think, and maybe I'm wrong, we've already established, as
11 of now, you know that she did not have a job and so she
12 would not have been working late between January and May
13 of 2008?

14 A That's my understanding.

15 Q All right. Now, how do you reconcile your
16 understanding that she didn't have a job so she wouldn't
17 be working late and then she would be crashing at
18 Zanny's, as you said -- ma'am, if I may -- crashing at
19 Zanny's, as you told the investigators, how do you
20 reconcile in your mind those two things?

21 A You mean now?

22 Q Yes, ma'am.

23 A I don't. I don't reconcile with it.

24 Q And one --

25 A Reconciling with it it means that you've come

1 to terms with it. I haven't come to terms with it.

2 Q well, let me use a different word as opposed
3 to "reconcile." Okay? There are two different things
4 because if she doesn't have a job, she's not working
5 late, correct?

6 A (Witness shrugs.)

7 Q Is that right?

8 A I don't know. I have -- you know, I don't
9 know if she worked or not. I don't know.

10 Q Okay. well --

11 A I mean, you're asking me. I don't know. No
12 one has found pay stubs. No one has found anything. I
13 don't know.

14 Q And you, obviously, have been extremely
15 involved in this case, more than anybody as far as a lot
16 of the facts and what had happened because you were
17 looking for her. Do you have any information --

18 A Because this is my granddaughter.

19 Q I understand, ma'am. When I say during the
20 time period.

21 A Yes, I'm extremely involved in this case.
22 This is -- this is tearing me up every single day because
23 I don't have my granddaughter.

24 Q Let me direct you so we can go ahead and talk
25 about what I'm going to ask you.

1 A Can we actually get to the reason why we're
2 here today is to clear Mr. Morgan's client's name, that
3 she's not Zanny.

4 Q We're getting there in just a moment, ma'am.
5 okay?

6 A Okay, please.

7 Q But let me go on back here because I want to
8 focus. There are two different opposite things. One is
9 that she's working and she's staying out, and she has to
10 crash over at Zanny's, as you told the police officers.
11 And the other thing is that she wasn't working.

12 A I don't know if she was staying out. You're
13 speculating, and I'm not going to speculate. She could
14 have just been staying with a friend and her and Caylee
15 and the friend could have had just a nice night. I have
16 no idea, and I'm not going to speculate on where my
17 daughter was. I'm not going to speculate. And you
18 shouldn't either. You don't have a crystal ball.

19 Q Well, I thought you told the police officers,
20 and again, we just looked at the clip, that she would
21 have been crashing at Zanny's, so that would have been
22 your understanding based on --

23 A That's -- that's on the -- that's my
24 understanding was at that time. And since then I found
25 out that Casey wasn't working, and I found out a lot of

1 stuff since then.

2 Q All right.

3 A But unfortunately, you know, you're asking me
4 something I don't know. I don't know where Casey was at,
5 and I don't know the circumstances.

6 Q Is it fair to say, then, if you don't know
7 where Casey was at, it's very possible that your
8 granddaughter was never with Zanny?

9 A I can't speculate. She could very well have
10 been with Zanny.

11 Q But you really don't have any information and
12 you also know now that she wasn't working during this
13 time period that she said she was?

14 A Do you know what?

15 MR. CONWAY: Mr. Dill, are you cross-examining
16 her or are you asking a question?

17 A Yeah, I mean, I'm not on trial here.

18 MR. CONWAY: If you can ask a question --

19 A The bottom line is -- yes, thank you.

20 MR. CONWAY: Time out. Time out. If you ask
21 a question --

22 MR. DILL: Hold on. No, no. If you have an
23 objection, the rules of civil procedure are
24 objection to the form. If there is some sort of
25 privilege that I'm impinging on between

1 attorney-client, then you can get involved in this,
2 but I don't want to have you interrupting and
3 coaching this witness because I'm doing an
4 examination.

5 MR. CONWAY: I'm not coaching anyone, Mr.
6 Dill.

7 MR. DILL: If you have an objection, go ahead
8 and make the objection, but I'm entitled to do my
9 examination. I intend to go forward with my
10 examination, and that's what we're going to do.

11 MR. CONWAY: My objection is that you're
12 cross-examining her. Just ask a question and let
13 her answer it. That's what she's trying to do for
14 you.

15 THE WITNESS: Listen. The bottom line is I
16 shouldn't be answering any questions that is not
17 relevant to Zenaida Fernandez-Gonzalez that is a
18 civil lawsuit against Casey Marie Anthony. And I am
19 graciously answering these ridiculous questions that
20 have nothing to do with Mr. Morgan's client that is
21 C. Zenaida Gonzalez.

22 BY MR. DILL:

23 Q Okay. Ma'am, we're going to --

24 A okay?

25 Q I understand you want to --

1 A So --

2 Q If I may, Ms. Anthony, I appreciate it, and I
3 have a job to do here. And I understand that you want to
4 short-circuit the process, but --

5 A I'm not trying to short-circuit anything.

6 MR. CONWAY: And I object to that back
7 characterization.

8 A You're accusing of me of short-circuiting.
9 You know, I'm giving Mr. Morgan what he wants. He wants
10 a frickin' TV show. We're getting it, you know. This is
11 all he wants. This is why we're here today.

12 Q Ma'am, if you can answer my questions -- hold
13 one.

14 If you can answer my questions, if you do your
15 best to answer them.

16 A I think I've tried up until this point --

17 Q We're going to go --

18 A -- to answer your questions.

19 MR. CONWAY: Let's take the next question.

20 Q I don't want to argue with you, and I don't
21 want to argue with you. All right? So let's --

22 MR. CONWAY: No, let's just take the next
23 question.

24 MR. DILL: -- let's go forward.

25 MR. CONWAY: Okay.

1 BY MR. DILL:

2 Q So between -- during this time period up to
3 May when she said she was crashing at Zanny's, you've
4 come to learn now that it wouldn't be because she was
5 working late because she did not have a job; is that
6 correct?

7 A That's what I'm understanding.

8 Q Okay. So -- but your daughter told you she
9 was working late and working, right?

10 A Yes.

11 Q Is it fair to say, then, your daughter was not
12 being truthful with you?

13 A That's correct.

14 Q And that wouldn't have been the only time she
15 was untruthful with you; is that right?

16 A Kids are untruthful all the time.

17 Q This -- her being untruthful about this,
18 though, is particularly important because it has to do
19 with your granddaughter, though. She was untruthful with
20 you about the location of your granddaughter certainly
21 from this time period when she said when she was working
22 late she was crashing at Zanny's; is that correct?

23 A I don't know that because she could have been
24 crashing at Zanny's. You're having me speculate that
25 Casey was not at Zanny's. You're telling me that I know

1 for a fact that there is no Zanny.

2 Q Okay. Let's -- let's go forward here. I want
3 to ask you another question on that point.

4 (The following was published via videotaped during the
5 deposition:)

6 CINDY ANTHONY: Zanny became Caylee's main
7 primary baby-sitter, from what Casey said, probably
8 from October -- probably around right after Caylee's
9 first birthday until present time. You know what
10 I'm saying? So this person wasn't made up just a
11 month ago or whatever.

12 But what I'm thinking I think that Zanny at
13 this point was a real person in the beginning, but I
14 think Zanny is now whoever is watching Caylee. In
15 my mind --

16 UNKNOWN MALE SPEAKER: Transferred the
17 responsibility?

18 CINDY ANTHONY: -- the name -- yes. So I
19 think she refers to -- I believe --

20 UNKNOWN MALE SPEAKER: Do you think we're
21 spinning our wheels looking for a Zanny?

22 CINDY ANTHONY: I'm not sure, but my -- I have
23 two theories, and I'll share that with you. I think
24 Zanny could either be Amy or Jesse at this point.

25 BY MR. DILL:

1 Q All right. So, again, we're talking here, and
2 this is today -- and this interview with the police was
3 taken some time ago, obviously. I think it was in August
4 of last year; is that right?

5 A I think it was like August 1st.

6 Q And we've been talking about Zanny and her
7 watching the child, and you just told me that you don't
8 know that she wasn't over at Zanny's. Yet you told the
9 police that you're not even sure if Zanny was a person --
10 a real person moving forward from the beginning?

11 A Again --

12 MR. CONWAY: Object to the -- to the form of
13 the question because that's not what she said, Mr.
14 Dill.

15 Q Let me go back. I'll rephrase it. Okay?

16 You've told me for the last, I guess, hour and
17 a half we're talking about Zanny -- we're talking about
18 Zanny, but you've told police that it was, in your mind,
19 there was a thought that Zanny, while she may have been a
20 real person at one point in time, had evolved into
21 anybody that was watching Caylee?

22 A That was my feeling on August 1st.

23 Q Now, here we are, whatever today is, April
24 9th, you're saying what you told the police officers on
25 August 1st was not accurate?

1 A No, I'm not saying that.

2 Q Okay. So that was --

3 A And on August 1st that I believe that Zanny
4 could have been -- because Casey at one point told me
5 that one of the pictures that Caylee was taken at was
6 Zanny's apartment when it was Ricardo Morales' apartment.

7 Q Right. I understand, and the one with the
8 drums, but let's go back with this, though.

9 A There's several.

10 Q Okay.

11 A There's several. There is one with Caylee
12 with her blanket. There's several pictures of Caylee.

13 Q Let me just do this because we've got to
14 change tapes and we'll take a second here.

15 When you say in this clip and when you were
16 talking to investigators that you think Zanny may have
17 been a real person at first but then later it was
18 somebody who was watching -- ma'am, if I may -- whoever
19 was watching her, that is what you said back there in
20 August and again --

21 A That's what I said could be a possibility.

22 Q -- when you were telling the police officers?

23 A Yes. At that point we were looking at all
24 possibilities, sir.

25 MR. DILL: Let's go ahead and switch tapes.

1 THE WITNESS: Okay.

2 THE VIDEOGRAPHER: The time is 2:24. We'll go
3 off the record.

4 (A 5 minute recess was had.)

5 THE VIDEOGRAPHER: The time is 2:29 p.m.
6 We're back on record.

7 BY MR. DILL:

8 Q Okay, ma'am. You were saying some things
9 before concerning Zenaida Gonzalez. And, again, you've
10 said and have volunteered a few times that you don't
11 believe that this person, Zenaida Gonzalez, was the one
12 who was watching at any time Caylee.

13 A Absolutely not.

14 Q And as you sit here today, you don't have any
15 information that she had anything to do with watching
16 Caylee or the disappearance or anything else; is that
17 correct?

18 A Correct. I mean, on the same assumption that,
19 you know, Casey gave me information regarding Zenaida
20 Gonzalez. She told me her name was Zenaida
21 Fernandez-Gonzalez. She told me she's 25 years old. She
22 also told the sheriff's department, it's in the
23 discovery --

24 Q Right.

25 A -- page 29, her description of Zenaida

1 Gonzalez. That was her handwritten statement taken on
2 July 16th at 10500 a.m.

3 Q Let me -- let me focus in on that, and this is
4 an important point. That description you're talking
5 about, you know that your daughter gave information to
6 the police; is that right?

7 A Yes. I was there when she wrote the
8 statement. I was there when she told Gary Melich. I was
9 there when she told the other detectives.

10 Q And it's also your understanding that
11 subsequent to when she was incarcerated, when she first
12 was first put in jail, that she actually had been
13 interviewed by the police about this person, about this
14 Zenaida Gonzalez; is that right?

15 A Yes. My understanding is also what I've read
16 and I've seen on the discovery page 4 of the narrative
17 from John Allen that he pulled your Zenaida out of the
18 David file. He went down and spoke to her. And then he
19 showed Casey a picture of her, and Casey did not
20 recognize her.

21 John Allen also told me that there was only
22 two Zenaida Gonzalezes in Orlando.

23 Q Let me go to that first point because that,
24 obviously, is an important point because there was -- you
25 understand that there was a photo line-up and that your

1 daughter identified -- if I may -- your daughter
2 identified her -- didn't identify her, said I never have
3 seen her. That's your understanding, is that right, and
4 that's what the police have told you?

5 A That's what they told me, and that's what I
6 read in the discovery --

7 Q Okay. Now --

8 A -- the narrative.

9 MR. CONWAY: Can we stop it for a second? You
10 guys are making it awfully hard on the court
11 reporter. You're stepping on her. She's stepping
12 on you. Can we --

13 MR. DILL: I'll slow down.

14 MR. CONWAY: -- go to a question and let her
15 answer it for you?

16 BY MR. DILL:

17 Q I appreciate that. On this point that we're
18 talking about, though, you have an understanding that
19 there was -- your daughter had been shown the photograph.
20 I'm focusing on that now. You visited with your daughter
21 in jail right around July 25th. Do you remember that?

22 A That's correct.

23 Q And let's take a look at that visitation.

24 (The following was published via videotape during the
25 deposition:)

1 CINDY ANTHONY: Did anybody ask you to
2 describe her and they did a composite drawing of
3 her?

4 CASEY ANTHONY: Not once. And when they went
5 and interviewed that girl down in Kissimmee, they
6 never showed me a picture of her. They never
7 searched --

8 CINDY ANTHONY: Well, they told us -- they had
9 told us that you couldn't pull her out of a line-up.

10 CASEY ANTHONY: They're full of shit. I had
11 told them multiple times find a sketch artist, show
12 me pictures, show me something. I could point her
13 out to you.

14 BY MR. DILL:

15 Q Okay. Now --

16 A That's correct.

17 Q All right. So -- just so I'm understanding
18 that you were asking her about whether they ever showed
19 her a photo, and she's saying no. And didn't you just
20 tell me --

21 A That's correct.

22 Q Okay. So --

23 A What I'm telling you is based on what John
24 Allen told me and what I read in discovery is my
25 understanding --

1 Q All right.

2 A -- of what happened --

3 Q All right.

4 A -- that they showed her a picture.

5 Q So based on what -- based on what John Allen,
6 you read, it was your understanding --

7 A That's what John Allen personally told me.

8 Q And you don't believe John Allen's lying to
9 you, do you?

10 A No, I don't believe John Allen's lying.

11 Q So if John Allen's being truthful, then, in
12 fact, he showed your daughter a picture of this Zenaida
13 Gonzalez and she said she didn't recognize her, is that
14 right, based on your understanding?

15 A That's my understanding.

16 Q But we just saw your daughter say that they
17 never showed her anything and that girl that they
18 interviewed down in Kissimmee, this girl here that was
19 interviewed down in Kissimmee, they never showed her a
20 picture of that?

21 A That's what she --

22 Q Did you see that?

23 A -- states. Yes.

24 Q Okay. Do you believe that to be true or not?

25 A I have no idea. I was not in the vehicle with

1 Casey when John Allen showed her.

2 Q Well, you just told me a moment ago that you
3 believed John Allen when he said that he showed a picture
4 of Zenaida Gonzalez --

5 A You asked me if John Allen would have a reason
6 to lie, and I said, no, I don't believe that John Allen
7 would have a reason to lie.

8 Q So assume for me hypothetically John Allen's
9 being truthful and the questions you were asking her
10 were, in fact, truthful that you had been told or it was
11 your understanding there had been a photo line-up. Well,
12 your daughter's saying something quite different there,
13 isn't she?

14 A Yes.

15 Q All right. And what she's saying, based on
16 your knowledge of what happened in the investigation,
17 what she's saying is, again, inaccurate?

18 A Well, again, you know what? I don't know
19 that. I wasn't in the car with Casey. She could be
20 telling the truth. John Allen could be lying.

21 Q Okay. So --

22 A I have no idea. I don't know why he would.

23 Q At that point in time, then, who did you think
24 was telling the truth? John Allen or your daughter?

25 A At that point in time, I really didn't know

1 what to believe because at that point in time, I wasn't
2 trusting the sheriff's department.

3 Q But you had an understanding, though, because
4 you talked about it, that this person down in Kissimmee
5 had, in fact, been interviewed. You knew that, right?

6 A Correct.

7 Q Okay. As you sit here, this person down in
8 Kissimmee we're talking about, you know that we're
9 talking about Zenaida Gonzalez that is sitting here; is
10 that right?

11 A I only know that because she interviewed with
12 Channel 6.

13 Q I didn't ask why. I just need to know. When
14 you're talking about --

15 A You asked me a question.

16 Q Okay.

17 MR. CONWAY: You know, let her answer the
18 question. All right? If you ask her too broad of a
19 question, she's going to give you the answer she
20 can.

21 A Ask me a yes or no question and then I'll
22 answer yes or no. But if you ask me an open-ended
23 question, I'm going to answer the question.

24 Q Fair enough. Let's go back to this statement
25 by your daughter. At that point in time when your

1 daughter said this to you, you're saying you didn't know
2 if it was true or you didn't know it was false, right?

3 A Correct.

4 Q And you were -- when you went in there, you
5 were going on information from John Allen that you think
6 to be -- thought to be true at the time?

7 A At the time, John Allen told me that. At the
8 time, I did not read the discovery.

9 Q As we sit here now, though, you've read the
10 discovery?

11 A Yes.

12 Q And you believe the discovery to be true?

13 A Actually, I don't believe half of the
14 discovery because -- I don't --

15 Q I understand. I understand.

16 A -- because there is a lot of typographical
17 errors in the discovery.

18 Q Right.

19 A In fact, if you look at page 45 and 49, there
20 is typographical error on the card that she filled out at
21 Sawgrass Apartments.

22 Q I'm sure there is, and we're going to get to
23 that in a moment, ma'am.

24 A And it's not a typographical error because
25 someone added a Z to her name after it was picked up from

1 the sheriff's department.

2 Q I'm not talking about typographical errors.
3 I'm talking about what you -- ma'am. I didn't ask you --

4 A well --

5 Q I didn't say anything about
6 typographical errors.

7 A Gonzale and Gonzalez is two different names.

8 Q Right.

9 A So you're asking me --

10 MR. CONWAY: Just ask your question.

11 A -- a question if I believe everything that I
12 read in the discovery. I'm answering that question
13 because I'm telling you exactly why I don't believe it.

14 Q I'm sorry. I didn't ask the question, and if
15 I did ask it that way --

16 A Yeah, you did.

17 Q Ma'am --

18 A You --

19 Q -- if I asked it this way, I apologize. Let
20 me some more specific questions.

21 A Okay. Ask more specifics.

22 Q The statement made by the police officer, John
23 Allen, that he, in fact, showed her a picture of Zenaida
24 Gonzalez and she said she didn't know who it was, you
25 believe that statement to be true?

1 A He told me he pulled it up on --

2 Q Can you answer it?

3 A -- the David. I don't know what a David is.

4 I don't know if --

5 MR. MORGAN: That's a yes or no?

6 A -- it's a computer or a picture.

7 MR. MORGAN: That's a yes or no question.

8 A A picture is this.

9 Q Okay.

10 A So if you're questioning me a question --

11 Q I got it. I got it.

12 A -- yes or no, clarify for me.

13 Q No, I will clari --

14 A A picture I don't know.

15 Q Sure. I'll clarify it.

16 A I don't know.

17 Q You at this point in time, as we sit here
18 today -- ma'am, if I may, please. I'm trying to ask
19 these questions.

20 A Don't be condescending to me.

21 Q I'm trying not to do be, but I need you to
22 answer --

23 A Yeah, you are.

24 Q As you sit here today, you've read the
25 discovery and you read the part of the discovery -- and

1 this is what I'm focusing on -- about whether that he,
2 John Allen, or somebody from the police department showed
3 your daughter a picture of this Zenaida Gonzalez. You
4 understand that. Is that yes or no?

5 A He told me --

6 Q Do you have that understanding?

7 A He told me --

8 MR. CONWAY: Cindy, yes or no?

9 A Yes.

10 Q Okay.

11 A He said that he showed something with her
12 picture on it.

13 Q And you believe that statement that he told
14 you, you believe that to be true?

15 A At the time I believed it to be true.

16 Q Okay. At the time when he told you that, you
17 believed it to be true?

18 A Correct.

19 Q Was that before you spoke to her?

20 A Yes.

21 Q All right. So you knew something that you
22 believed to be true at that point in time was that this
23 police officer had shown her a photograph of our client,
24 Mr. Morgan's client, and that she had exonerated, said,
25 no, that's not the right person?

1 A Correct.

2 Q That was in your mind that that was true?

3 A That's correct.

4 Q And when you asked your daughter these
5 questions, it was also in your mind that that was true;
6 is that correct?

7 A Correct.

8 Q So when your daughter tells you that she was
9 never shown a photo line-up on this exact point, do you
10 believe your daughter at that point or do you believe
11 Mr. -- Detective Allen?

12 A At that point I can't remember what I
13 believed. At this point, I still don't know what I
14 believe.

15 Q Okay. Well, what is the truth and what isn't
16 true, then, as far as that statement -- and that's all
17 I'm talking about. This statement here that your
18 daughter was shown a photograph of Zenaida Gonzalez, my
19 client, what do you believe to be true? Do you think
20 that happened or not?

21 A My belief has nothing to do with it because I
22 wasn't there.

23 Q I understand you weren't there. Do you
24 believe that happened or not?

25 A I have no idea. I really don't know what I

1 believe, and that's the honest to God's truth.

2 Q During this time period here in July, though,
3 when you were speaking with your daughter, she was -- you
4 were asking her to relay messages to you so you could
5 relay messages through the media because you were talking
6 to the media at this point; is that right?

7 A Yes. I was talking to the media quite a
8 bit --

9 Q And did she --

10 A -- to get Caylee's picture out there.

11 Q I understand that. And obviously, we saw one
12 picture already from Greta VanSustern and there were
13 other news organizations too. But it's fair to say, like
14 we had today, there were cameras around you; is that
15 right.

16 A On which particular day?

17 Q Any time. If you wanted to talk to media --

18 A I couldn't -- I couldn't sneeze without a
19 camera around me, sir.

20 Q I understand. That's what I'm getting at. So
21 when you were talking to Casey in jail there earlier in
22 the day I think you asked her if she had any messages for
23 Zanny. Do you remember that? And she --

24 A I remember at some point. Whether or not that
25 was that particular one, I don't know.

1 Q So it's fair to say that she was giving you
2 the authority to speak for her by passing along messages
3 and stuff?

4 A Correct.

5 Q So when -- when you were talking to the media,
6 you were talking on your daughter's behalf for the
7 idea --

8 A Correct.

9 Q -- to try to find Caylee? You're speaking for
10 her; is that right?

11 A Correct.

12 Q Okay. So you're saying that on this
13 particular day, that statement, you don't know if it was
14 true or not. You don't know what to believe. Let's go
15 forward here.

16 Did you also talk to the media on the 28th?

17 (The following was published via videotape during the
18 deposition:)

19 CINDY ANTHONY: Are they lying to us when they
20 told us there's only one in Central Florida and
21 she's in Kissimmee and because, you know, my
22 daughter said that she didn't recognize her. My
23 daughter said they never showed her picture. She
24 said she didn't look at any line-ups.

25 BY MR. DILL:

1 Q Okay. So --

2 A That's true.

3 Q All right. I don't have a question pending,
4 so we'll go ahead and focus it.

5 You've gone and you've had this conversation
6 from your daughter. She's now empowered you to go ahead
7 and basically broadcast or publish what her thoughts are,
8 her statements.

9 A (Nods head.)

10 Q And as we see here, you've gone and you've
11 broadcast her statement about this particular Zenaida
12 Gonzalez really to the world; is that right?

13 A I broadcast her?

14 Q No, no. The statement, and I just heard it,
15 about the -- whether she was shown a photo line-up, that
16 type of thing --

17 A Uh-huh.

18 Q -- that was now published to anybody who wants
19 to watch; is that right?

20 A Okay.

21 Q And, obviously, this case, as we all know, has
22 a great deal of public interest, right?

23 A (Witness shrugs.)

24 Q Is that true?

25 A Of course.

1 Q So the statement that the police officers have
2 made that your daughter has denied that this Zenaida
3 Gonzalez is the actual Zenaida Gonzalez, that now has
4 been undone by this statement you've made because your
5 daughter has told you and you've broadcast to the world
6 that she never was shown a photograph?

7 A No, it's not undone because Casey's
8 handwritten statement does not describe her. Her
9 birthday is not September 1st. She not 25 years old.
10 She's not 5'7". She's not 140 pounds. She doesn't have
11 black hair. She doesn't have perfect teeth. She's not a
12 ten. I'm sorry, ma'am. You're cute, but you're not a
13 ten.

14 Q Well, ma'am, did you say all those things to
15 the press here?

16 A I didn't need to.

17 Q Okay. Well, did you say -- when the camera
18 was there, did you say anything about how you just
19 described Ms. Gonzalez for me, did you --

20 A Not on that day.

21 MR. CONWAY: Mr. Dill, ask a question.

22 A Ask me a question if I ever talked to the
23 press about that young lady.

24 Q I'm going -- we're going to go one question at
25 a time.

1 A And then I'll -- then I'll answer it.

2 Q We're going to go one question at a time,
3 please.

4 MR. MORGAN: Brad can ask her the questions in
5 follow-up.

6 MR. DILL: Yeah, that's true, too.

7 MR. MORGAN: Brad can ask -- Brad has the
8 right later, Ms. Anthony, to ask his own questions
9 for you to clarify.

10 THE WITNESS: Well, he just asked me if I ever
11 talked to the media about it, yeah, I did.

12 MR. MORGAN: Hold on. But what I'm saying is
13 we're entitled to ask our questions. And I know
14 there's questions you may want us to ask, and then
15 later Brad will have that opportunity for you to
16 be -- for you to clarify.

17 BY MR. DILL:

18 Q So on this date when this statement was
19 made -- and I'm talking about this statement here, if I
20 may. The statement to the media --

21 MR. CONWAY: Just wait for the question.

22 Q -- that your daughter has authorized you to
23 make, again, that is something that you're talking about
24 the photo line-up and whether a photograph has been shown
25 to the police about my client. That's what you were

1 talking about on this date, correct?

2 A I believe so.

3 Q All right.

4 A But that's only part of the interview. You
5 never see the whole interview on TV --

6 Q Ma'am --

7 A -- so I can't tell you if I didn't say more on
8 that day.

9 MR. CONWAY: Mr. Dill, she's entitled to
10 answer the question.

11 MR. MORGAN: No, no.

12 A You're asking me a question.

13 MR. MORGAN: You're entitled -- no.

14 MR. CONWAY: She's entitled to answer the
15 question.

16 MR. MORGAN: No, listen, Brad. She's entitled
17 to answer, and then you're entitled later to come
18 back, as you well know, and ask her your own set of
19 questions to clarify.

20 MR. CONWAY: All I'm asking is that she can
21 fully answer the questions.

22 MR. MORGAN: She will because --

23 MR. CONWAY: That's I'm asking.

24 MR. MORGAN: -- you're going to be able to ask
25 anything you want.

1 THE WITNESS: No, but he's shaking his head
2 when I'm answering a question. That's exactly what
3 the sheriff's department did to my daughter. They
4 never let her speak. You guys are doing the same
5 thing to me.

6 BY MR. DILL:

7 Q When you said that to the media -- and when I
8 say that to the media, I'm focusing you now just about
9 this statement that you said in front of the cameras on
10 July 28th referring to what your daughter had told you in
11 the jail.

12 When you said that to the media, when you were
13 out there, you had questions in your mind as to whether
14 the statement you were making was truthful or not; is
15 that fair to say?

16 A I don't get what you're asking. You're asking
17 me if I thought that the sheriff's office statement was
18 not true or Casey's statement was not true?

19 Q Either or both. You had questions in your --
20 if I may. I'll rephrase it since you don't understand.

21 You had a question in your mind when you said
22 that about your daughter told you and your daughter
23 wasn't shown a photograph, you had a question in your
24 mind as to whether your daughter was telling you the
25 truth or not; is that right?

1 A No, I didn't have a question.

2 MR. CONWAY: Yes or no?

3 A No.

4 Q No question in your mind. So you believe when
5 she said to you they didn't show me a photo line-up, you
6 believe that to be the truth?

7 A I didn't have a question whether or not she
8 was telling me the truth.

9 Q What did you have a question about?

10 A I didn't. You're asking me if I had a
11 question. I didn't have a question about any of it.

12 Q So -- all right. So now when she said to
13 you -- and you told me before you didn't know what truth
14 was. When she said to you they didn't show me a photo,
15 you believe that to be true and the police to be
16 inaccurate; is that what you're saying?

17 A No. What I'm saying is the sheriff's office
18 told me certain things. At the time when they told me, I
19 believed them. As time goes on, I'm not sure what I
20 believe. Same thing with Casey.

21 Q So when you talked to the media on this
22 date -- just this clip, this is the only clip I'm talking
23 about now -- you weren't resolved in your mind as to what
24 the truth was and what was not the truth about this
25 statement about the photo line-up for Zenaida Gonzalez;

1 is that fair to say?

2 MR. CONWAY: Yes or no?

3 A Whether or not Casey was shown a picture, I'm
4 not sure if Casey was shown a picture at that date.

5 Q And whether Casey -- how about whether Casey
6 was being truthful with you or not? Were you sure or not
7 sure or you don't know?

8 A I don't know. She had no reason to lie at
9 that point about her.

10 Q Casey, your daughter, had no reason to lie at
11 that point?

12 A She had no reason to lie about the picture
13 that they would have shown her. It would have made no --
14 it would have made no sense for her to say it's not her
15 or she didn't see the picture.

16 Q So based upon --

17 A Why would she lie about that?

18 Q Well, your daughter -- is it fair to say your
19 daughter's lied to you about many things?

20 A It's fair to say that the sheriff's department
21 lied to me about many things.

22 Q We'll get to the sheriff's department lying to
23 you in a minute, but I want to ask about your daughter.
24 Is it fair prior to this time that you made this
25 statement to the media that your daughter has lied to you

1 about many things?

2 A Correct.

3 Q And so -- and when you're saying you don't
4 know if she had a reason to lie or not, other than the
5 fact that there was some suspicion of your daughter's
6 involvement in her daughter's disappearance, do you think
7 that she was more truthful because she told you or do you
8 think she's more -- well, let me reask it. I apologize.

9 At this point in time, you're saying you're
10 not sure if your daughter was telling the truth or not
11 about the picture or do you know?

12 A I believe Casey may not have been shown a
13 picture of this particular Zenaida.

14 Q You say you believe that. You believe that
15 now?

16 A I believe that now.

17 Q Okay.

18 A That there's a possibility that she may not
19 have been shown that picture.

20 Q Okay. Now, if the flip -- now we've heard
21 through -- and you were saying it before about the
22 description and the police showing her. Are you saying
23 that the police are being untruthful about that they
24 showed your daughter a picture of my client?

25 A What I'm saying is that the sheriff's

1 department has stated many things that have been not
2 truthful.

3 Q Okay. But I want to go specifically to this
4 issue because it's an important issue, ma'am, obviously.
5 Do you believe the sheriff's department was lying to you
6 and not only lying to you lying in official documents
7 about whether they showed your daughter a photograph of
8 my client Zenaida Gonzalez?

9 A Well, the reason I believe it's a possibility
10 that they were telling me not the truth about it is
11 because they also told me in the same breath that there
12 was only two Zenaidas that they were able to pull up, and
13 I was able to pull up on the same day eleven myself. So
14 that's when the doubt came to my mind before I went to
15 see my daughter there, so, yes.

16 Q Okay. So as -- but as --

17 A The doubt is there.

18 Q But as we sit here today, I mean, we're not
19 talking about whether there's a doubt or not, do you
20 believe that the police department, the sheriff's office
21 that was charged with finding your granddaughter, do you
22 believe that they misled the public and misled you and
23 misled everybody else about that they showed Casey a
24 photograph of my client? Is that what you believe?

25 A I don't know. There's a possibility that they

1 could have.

2 Q And that's based upon the fact about the
3 Zenaida Gonzalezes you're talking about?

4 A It's because of the fact that they told me on
5 the same breath that he told me he showed her a picture
6 that there was only two, and that's why he singled her
7 out. It was John Allen that picked her, not Casey.

8 Q That John Allen picked her and not Casey?

9 A John Allen told me he's the one that went to
10 her. Casey never told him to go to Kissimmee. Casey
11 never said the person lived in Kissimmee. John Allen
12 went to Kissimmee. Read his report. He said he went to
13 Kissimmee and interviewed her. Read the discovery,
14 unless the discovery's wrong.

15 Q Well, I guess that's where we're getting at.
16 Besides the fact about the number of Zenaida Gonzalezes
17 that you just said to me, I just want to make sure are
18 you saying here now today under oath that it's your
19 belief that the police are lying --

20 A No.

21 Q -- that the police are lying about that
22 statement in the discovery?

23 A No. I'm not saying that I believe they're
24 lying.

25 Q Where did you pull up the Zenaida -- the

1 multiple Zenaida Gonzalezes? what computer would that
2 have been?

3 A what do you mean what computer?

4 Q well, you said that you pulled it up. I
5 assume you pulled it up on a computer or a --

6 A You're asking me what computer or what site I
7 pulled it up on?

8 Q Both.

9 A No, you didn't. Now you're asking both.

10 Q Okay. well, that's --

11 A well, that's what I was trying to clarify.

12 Q Yes, ma'am.

13 A But, see, now you're -- you know, because I
14 went there --

15 Q And I appreciate that.

16 A But, see, your questions aren't specific, and
17 that's why --

18 Q Okay. well, that's my fault. I'll make them
19 more specific.

20 A Okay. Please.

21 Q You said you pulled up, and to me that
22 means -- pulled up means ran a search on the Internet.

23 A Correct.

24 Q Was that on a computer?

25 A Yes.

1 Q What computer was that?

2 A It was my desktop.

3 Q The desktop that -- the Hewlett Packard
4 desktop --

5 A Yes.

6 Q -- from your house?

7 A Yes.

8 Q The one that's been seized?

9 A Actually, it was after because they only took
10 it for four days. They took it July 17, and I got it
11 back on July 27th.

12 Q So the searches that you're talking about when
13 you got it back, are you saying that they wouldn't be
14 there because you ran the search on July 27th?

15 A It was actually August the 16th when I ran
16 some searches on her because I have some printouts. I
17 probably ran it before then, but I have printouts that
18 are printed out with the date.

19 Q Well, this statement here was made on July
20 28th that you made, right? So at that point in time, you
21 didn't have any information about --

22 A What I just said, if you listen to my
23 statement, I said I have some that I printed out on
24 July -- I mean, on August the 16th, but I know I ran some
25 searches prior to that.

1 Q Okay. When you say you ran searches --

2 A My computer was back in my home on July the
3 22nd and you're saying I made that statement on July the
4 28th. So, yes, I could have ran searches after they had
5 my computer.

6 Q Okay. So --

7 A And that's where you're getting at.

8 Q I'm going to --

9 A Correct? Isn't that what you're getting at?
10 You wanted to see the time frame?

11 Q My question was a little bit more specific and
12 simple than that. You're talking about a search that you
13 ran about the multiple Zenaida Gonzalezes.

14 Are you saying here -- and again, we're under
15 oath -- are you saying here that prior to the time you
16 made this statement to the media, you made multiple
17 searches for Zenaida Gonzalezes?

18 A Correct.

19 Q So that's what you're saying. That is your
20 recollection?

21 A I started -- I started on the 16th of July
22 looking up Zenaida Gonzalez on MySpace and searches.

23 Q Okay. And there was 21 or something that came
24 up?

25 A There was eleven just in Orange County.

1 Q well, the searches that you ran, then, would
2 have been on July 16th, as you said, those would have
3 been showing up on the history for the desktop, right?

4 A Possibly.

5 Q And we could get the sites there from that.
6 Do you recall what the sites were?

7 A No.

8 Q No recollection?

9 A Probably MySpace. I think I went on MySpace
10 first.

11 Q well, when you're searching on MySpace, that's
12 not a search engine. You're searching MySpace.

13 A well, I'm searching MySpace. It's a search
14 engine.

15 Q well, maybe I'm confusing --

16 A And then I did a people search later on. And
17 I did a My Clerk -- My Orange County Clerk. I've done
18 several.

19 Q All that's later on --

20 A Yes.

21 Q -- after the fact?

22 A Yeah, because I didn't have a computer on July
23 17th.

24 Q And let me ask this. Going back -- and we're
25 going to move forward from this statement here.

1 Going back, then, as you sit here today -- and
2 this isn't what you were thinking then. This is what
3 you're thinking now -- are you saying that you think the
4 police are being untruthful about whether they showed
5 your daughter a photo of my client?

6 A What I'd --

7 MR. CONWAY: The question has been asked and
8 answered now about four different times.

9 Q I just want to know today.

10 MR. CONWAY: She said she doesn't know.

11 A What I stated is I am not sure if they did or
12 not. That's even today.

13 Q Okay. And that's not --

14 A I am not --

15 Q Today.

16 A -- sure.

17 Q You're not sure. Okay.

18 MR. CONWAY: We're all stepping on each other
19 when we're talking.

20 Q Let me backtrack here just a moment. You were
21 telling me before about addresses, that Casey had given
22 you about the addresses about Zanny. Okay. The com --
23 I'm sorry. My bad.

24 The computer search, the computer search that
25 you did that you pulled off the computer about all the 21

1 odd or different people.

2 A I never said 21. You've said 21.

3 Q whatever number it was that you said to me
4 before that cast doubt as to whether the police were
5 being honest with you, whatever number of searches and
6 all the searches and the print-ups and the things you
7 talked about, did you give those to Dominic Casey, the
8 investigator?

9 A No, I did not.

10 Q why not?

11 A Because he wasn't working for me at that time.

12 Q Was there ever a time that he was working for
13 you?

14 A Not early on.

15 Q Was there ever a time he was working for you?

16 A Yes. He still is.

17 Q All right. And when -- during the time he was
18 working with you before the December time frame, during
19 that time period when your granddaughter's missing, did
20 you ever give those addresses to Dominic Casey, the
21 Zenaida Gonzalez information?

22 A No, I didn't.

23 Q why not?

24 A Because I gave them to José Baez when I had
25 them.

1 Q And is it your understanding that José Baez --
2 do you know what he did with them?

3 A I have no idea. And I know Dominic was
4 working for him when I gave them to him.

5 Q Let me go ahead and I'm going to go through
6 some of the time line a little bit about -- around the
7 June period, okay, so we're going to focus on that right
8 now.

9 It's my understanding that around the first
10 week of June of last year, you took a vacation. You had
11 Caylee most of that week?

12 A That's correct.

13 Q Was there -- there's some talk in some of the
14 interviews about -- and when I say interviews, I mean
15 police interviews -- that Casey had been telling Amy
16 Huizenga that you and Mr. Anthony were splitting up and
17 moving out, moving to Mt. Dora, moving out of the house,
18 and that Casey would be moving into the house with Amy.

19 A I do not know what Casey told Amy Huizenga.

20 Q Well, is there -- is there any truth to that,
21 though, that you and George were going to be moving up to
22 Mt. Dora or leaving the house somehow to Casey? Is there
23 any accuracy or truth to that?

24 A No.

25 Q So there came a point in time, though, later

1 on where you did talk to Amy later on?

2 A The only time I ever talked to Amy was July
3 the 15th.

4 Q Okay. July 15th. And that's the day you
5 actually found your daughter over at was it Tony
6 Lazzaro's apartment?

7 A That's correct. Amy took me there.

8 Q All right. Now, during this -- and I'm going
9 to focus you in now. During the time after your
10 birthday -- your birthday was June 5th, right?

11 A Correct.

12 Q During that time period, was Casey saying,
13 during that time period there, what the source of her
14 income was there? Did she ever mention it specifically
15 at that point?

16 A We didn't talk about her source of income
17 during that time frame.

18 Q And did you ever come to know that both Caylee
19 and Casey were, in fact, staying over at Ricardo Morales'
20 house?

21 A Casey and Caylee did not stay at Ricardo
22 Morales' house on June 1st.

23 Q I'm not talking about June 1st.

24 A Then what are you asking? You just asked me
25 about that time frame, so --

1 Q Okay. I'm sorry. I didn't --

2 A All right. Then go back.

3 Q No problem. Let's say June 7th, around there,
4 around that time period, did you ever learn that Casey
5 and Caylee were, in fact, staying over at Ricardo's
6 house?

7 A I learned it, yes.

8 Q And you learned that later?

9 A After the fact, yes.

10 Q That was something that was inconsistent from
11 what your daughter was telling you she was doing with her
12 daughter; is that right?

13 A On June 7th, I wasn't home. I had no idea.

14 Q Okay. Well, was she telling you --

15 A That was -- she didn't tell me where she was
16 at because I wasn't home.

17 Q Did she ever tell you, Mom, Caylee and I
18 stayed over at Ricardo's house?

19 A No.

20 Q And it's fair to say that would have been
21 probably something you would have disapproved of because
22 Caylee really should have been home in her own bed.

23 A I would have to know the circumstances.

24 Q Can you think of a circumstance around the
25 June time period where it would have been something you

1 approved of having Caylee and Casey sleep over at
2 Ricardo's house without you knowing about it?

3 A I don't know what the circumstance would be.

4 Q So if, in fact, Caylee and Casey were staying
5 at Ricardo's house on June 7th --

6 A It's not my decision where Casey stays. She's
7 an adult, and Caylee's her daughter. It's not up to me
8 to say where Caylee stays --

9 Q would that have been --

10 A -- to clarify that question.

11 Q Fine. would that -- and June 7th, would that
12 be something you'd want to know about, though?

13 A No. It's none of my business.

14 Q But did you ever hear from Casey or Caylee
15 during that time period that they had stayed over at
16 Ricardo's house?

17 A No. I stay -- on the 7th of June, I was
18 staying at my -- my mom's house that night because my dad
19 was very ill.

20 Q And your dad up in the nursing home?

21 A Yes.

22 Q And that's in Lake County is my understanding;
23 is that right?

24 A It's not relevant to this.

25 Q well, it's in all the documents that it's up

1 in Lake County, so I just want -- hold on. I just want
2 to understand --

3 A My dad is irrelevant to this.

4 Q I'm not asking about your dad's condition or
5 anything else.

6 A No.

7 Q I just want to know -- ma'am.

8 A Do you know what? My parents don't need
9 people going up there with cameras, so my point is leave
10 them out of it. I'm not going to answer any questions
11 about my father or my mother.

12 Q Well, your mother did, in fact, speak with
13 investigators, did she not?

14 A To my knowledge --

15 Q Right.

16 A -- you know, only that I've heard or seen,
17 yes.

18 Q Only that you've heard --

19 A But I wasn't there.

20 Q I understand that.

21 A Okay? I --

22 Q You've heard it --

23 A I wasn't physically there.

24 Q Well, you've read the --

25 A I haven't seen video things, and I haven't

1 seen the depositions. I haven't read all of the
2 discovery. It's very hard for me --

3 Q I understand, ma'am.

4 A -- to read stuff. You know, I just -- you
5 know, we just had Caylee's memorial, you know --

6 Q Let me -- let me kind --

7 A -- two months ago.

8 Q -- of cut through this because I'm not asking
9 about all that. Really, I'm not. I just want to know --

10 A well, you're asking me if I know for a fact.
11 All I know is what I hear.

12 Q Okay. You have heard --

13 A Yes.

14 Q -- and you have an understanding that your mom
15 was interviewed --

16 A Yes.

17 Q -- by the investigator?

18 A Several times.

19 Q You also know and have an understanding that
20 your daughter had taken money from your mother; is that
21 right?

22 A Correct.

23 Q And when was that and how much was that?

24 A I believe there was a 27 dollar or 47
25 something one time and 200-some dollars one time.

1 Q And that she actually took money from your
2 grandmother -- I'm sorry -- from your mother, her
3 grandmother, by writing a bad check. Is that your
4 understanding?

5 A Correct.

6 Q And it had something to do with the Publix and
7 also Casey's birthday party, second birthday party; is
8 that right?

9 A That was the same one. The Publix was
10 Caylee's second birthday party.

11 Q When did you become aware of that fact, that
12 your mother had been -- had money taken from her by your
13 daughter?

14 A My mother told me.

15 Q When did she tell you?

16 A Shortly thereafter she found out about it, the
17 same day she found out about it.

18 Q Okay. Now, did you ever confront Casey and
19 ask why would it be that Casey, who you thought had a
20 job, would be stealing money from your mother?

21 A Yes, I did.

22 Q And what did Casey tell you?

23 A That's irrelevant to the case.

24 Q No. What did Casey tell you?

25 A It's irrelevant to this case.

1 Q Ma'am, I believe it's relevant. It isn't --

2 A No, it isn't relevant.

3 Q I'm sorry. Respectfully, it's not for you to
4 decide what's relevant and what isn't. What did Casey
5 tell you about --

6 A I can't remember the exact words. It's
7 irrelevant to this case.

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

9 Q Generally -- well --

10 MR. CONWAY: I just want to hear the question.

11 Q My question is, what did Casey say to you
12 about this allegation that she had taken money from your
13 mother?

14 A That's not the question you asked me.

15 Q Well, answer the question I did ask you.

16 A Okay. What you just asked me is what did
17 Casey say to me. She told me she was sorry. You asked
18 me a question earlier about why she took it, so ask the
19 same question because she wasn't working.

20 Q I don't believe I said that, ma'am. And if I
21 did, I apologize.

22 A Yeah, you asked me why she would take it if
23 she was working.

24 Q All right.

25 A And you wanted me to figure that out.

1 Q Let me ask you that question now.

2 A Wasn't that correct?

3 Q Is it your understanding or did you ask Casey
4 why was it -- let me reask it.

5 Did you ask Casey why was it that she had
6 taken money from your mother if, in fact, she was
7 working?

8 A I can't remember if I asked her that. What I
9 made -- what I made her do is talk to my mom, and I had
10 her and my mom work it out. It was not between me and
11 Casey. It was between my mother and Casey.

12 Q Did it cause you some concern, though, knowing
13 that this had taken place and that Casey may have been
14 hiring a baby-sitter from money that she had coming in
15 from a job? Did that cause you any concern in your mind?

16 A I did not put the two and two together at that
17 time.

18 Q Was that the only time she'd stolen something
19 from your family members?

20 A Casey has only ever taken something from her
21 grandmother.

22 Q How about from you? Did she ever use your
23 credit cards without your permission?

24 A It's not relevant to this case.

25 Q Not my question. Did she ever take and use

1 your credit cards without your permission?

2 A It's not relevant to the case.

3 MR. CONWAY: It's an ongoing investigation.

4 Just, you know --

5 MR. DILL: well, it's an ongoing -- time out.

6 Time out.

7 BY MR. DILL:

8 Q Is it an ongoing investigation of you? Are
9 you being investigated in that?

10 MR. CONWAY: We don't know. We don't know the
11 answer to that, Mr. Dill.

12 Q well, I'm going to ask the question, then.
13 The question is pretty specific. Okay? As far as your
14 interactions with your daughter, did Casey ever take
15 money from you by using your credit cards without your
16 permission?

17 A It's not relevant to this case.

18 Q That's not -- that isn't really for you to
19 decide.

20 A I'm not answering the question.

21 Q Okay. You're refuse -- I just want to make
22 sure, and you can discuss this with your attorney as far
23 as your refusal -- and again, ma'am, I'm going to tell
24 what you Mr. Morgan told your attorney earlier that this
25 isn't a situation where, you know, this is treated

1 lightly by the rules. If somebody refuses to answer a
2 valid question, we might have to come back -- we might
3 have to come back --

4 A It's not valid to this young lady --

5 Q Ma'am --

6 A -- that's sitting here.

7 Q Ma'am, ma'am.

8 A Mr. Morgan went on TV --

9 Q Ma'am --

10 A -- and said that the reason he's doing this is
11 because he wants his client cleared, so the reason I'm
12 here is to clear his client. It has nothing to do with
13 my daughter's and my relationship.

14 Q I appreciate that.

15 A So let's move on to Ms. Gonzalez so that Mr.
16 Morgan can go home and I can go home --

17 Q Okay. I --

18 A -- because I'm very tired.

19 Q I understand --

20 A It's been a long day.

21 Q I understand you're tired, but let's go back
22 to my question. Okay?

23 A I'm not answering it.

24 Q All right. Well, I just want to make sure --
25 maybe your attorney can advise you. In Florida we have

1 certain rules about not answering questions. If there is
2 a privilege that applies, in other words, if you're under
3 investigation for something, then it's okay not to the
4 answer. But here's what's going to happen.

5 We're going to go to the judge, and we're
6 going to explain it to the judge. And the judge is going
7 to say we get to come back and ask this question, and
8 this whole thing is going over one more time. I know you
9 don't want that. I know Mr. Conway doesn't want that and
10 none of us want that.

11 So before you say you're not going to answer
12 the question, maybe you want to confer with your attorney
13 about that.

14 A You might want to go to the judge and explain
15 why Zenaida has Fernandez-Gonzalez on the complaint when
16 Fernandez is not her name.

17 MR. DILL: Do you want to advise your client
18 or not?

19 THE WITNESS: It's the same thing. So, you
20 know, if you guys want to permit per -- you know, do
21 perjury, then go for it. I'll take my chances with
22 the judge.

23 MR. DILL: Okay. Mr. Conway, is that your
24 position, too, as her attorney that she is not
25 answering this question that I'm asking?

1 MR. CONWAY: We don't know whether there is an
2 investigation or not, so let's -- let's move on.

3 MR. MORGAN: Are you taking the Fifth
4 Amendment?

5 MR. CONWAY: Let's move on.

6 MR. MORGAN: You got to state your --

7 MR. DILL: I need to know -- I need to know
8 the basis.

9 MR. MORGAN: No. Are you taking the Fifth
10 Amendment here?

11 MR. CONWAY: I want to take a break and talk
12 to my client, and that's what I want to do.

13 MR. DILL: Fair enough.

14 THE VIDEOGRAPHER: The time is 3:04. We're
15 off the record.

16 (A 6-minute recess was had.)

17 MR. CONWAY: Can we go back on?

18 MR. DILL: Sure.

19 MR. CONWAY: She's over here typing away. I
20 can't get an objection in. You can't get a question
21 in. My client can't answer the question fully. If
22 we could just let each other --

23 MR. DILL: That's a good idea.

24 MR. CONWAY: And you're going fast, John, so,
25 I mean, if you can just --

1 MR. DILL: That's fair.

2 MR. CONWAY: -- slow it down because you're
3 getting like three questions into one and it's
4 impossible --

5 THE WITNESS: And you keep changing the
6 question.

7 MR. CONWAY: Cindy, let me --

8 MR. DILL: I understand, but I -- being
9 cognizant of the court reporter, I will endeavor to
10 do that.

11 MR. CONWAY: And I don't care if you ask 20
12 questions, if you can just do it one at a time.

13 MR. DILL: Gotcha.

14 MR. CONWAY: Okay? It makes it easier for me,
15 her and you, and we could get through this a lot
16 quicker. Okay? So you guys ready to go back on?

17 THE VIDEOGRAPHER: Stand by, Gentlemen, while
18 I get the tape rolling. The time his 3:11. We are
19 back on the record.

20 MR. CONWAY: Do you want to re-ask your
21 question?

22 BY MR. DILL:

23 Q Yeah. My question was, was there a point in
24 time when your daughter had used your credit cards
25 without your permission?

1 MR. CONWAY: My client's position on that is
2 that she doesn't want to answer that question right
3 now. That the purpose of this deposition has gone
4 way far afield. That the question, giving the
5 current pending criminal charges, prevent her
6 daughter from getting a fair trial and so she
7 doesn't want to answer that question.

8 MR. DILL: And I understand, but you
9 understand the rules, Brad.

10 MR. CONWAY: I do.

11 MR. DILL: You're an experienced attorney.
12 She may not want to answer the question right now,
13 but what I want to know from a legal standpoint is
14 what basis legally are you asserting for her not to
15 answer the question?

16 MR. CONWAY: That the question is entirely
17 irrelevant; that it will not lead to evidence that
18 would be admissible in any way, shape or form in the
19 civil trial.

20 MR. DILL: Let me -- just for your
21 edification, because I don't want to come back here
22 and I will tell you this, the relevance of it is if,
23 in fact, there is a financial issue concerning her
24 daughter, that tends to prove that her daughter was
25 not hiring a baby-sitter or, in fact, a nanny.

1 And also if her daughter wasn't working and
2 was having to steal money from family members or
3 other people, for instance, Amy Huizenga and the
4 other people who were stolen from by Casey, that
5 would also tend to prove that she wasn't hiring or
6 paying for a nanny, Zanny the nanny person.

7 That is the relevance, and that's why I'm
8 asking it. I'm not asking it to impede any criminal
9 case. I'm not interested and we're not interested
10 in depriving her of her right to fair trial, but I
11 am interested in getting answers to my questions.
12 So, as we say, we want to clear this person, Zenaida
13 Gonzalez, in this lawsuit, and that's what I'm here
14 to do. That's what we've been doing this morning.
15 That is the reason for the question.

16 MR. CONWAY: We're here to help you do that,
17 Mr. Dill, and in terms of payment, she's already
18 established that she doesn't know whether Zanny the
19 nanny was paid or not, so --

20 MR. DILL: I don't want -- listen. I'm not
21 going to argue with you about the case.

22 MR. CONWAY: I understand.

23 MR. DILL: We're trying to --

24 MR. CONWAY: I know.

25 MR. DILL: -- get everybody out of here, as

1 you know.

2 MR. CONWAY: Yep.

3 MR. DILL: So I just want to understand. The
4 legal basis that you were asserting, before we go
5 back in front of Judge Rodriguez, is that she
6 doesn't want to answer it. Is there another reason?

7 MR. CONWAY: My client does not want to answer
8 that because it's going to affect her daughter's
9 ability to get a fair trial on pending criminal
10 charges.

11 MR. DILL: Okay. And I assume you've advised
12 her of the implications of that.

13 MR. CONWAY: We have discussed it.

14 BY MR. DILL:

15 Q All right. So, ma'am, just so I'm clear and I
16 want -- if you can just -- I understand. These questions
17 I'm asking you about your daughter and the credit card,
18 you're refusing to answer those questions?

19 A It's not relevant.

20 Q Are you --

21 MR. CONWAY: Just yes or no.

22 Q -- refusing to answer the questions?

23 A Yes.

24 Q Okay. Now, were there ever any conversations
25 between you and your daughter Casey concerning taking

1 money from family members, including yourself or anybody
2 else, around the June time period?

3 A Around June?

4 Q Yes, ma'am.

5 A Be specific on the area around June.

6 Q Right.

7 MR. CONWAY: Just yes or no.

8 THE WITNESS: Well, I want to know --

9 MR. CONWAY: Yes or no.

10 THE WITNESS: -- what he means by "around."

11 MR. CONWAY: Yes or no and let --

12 MR. MITNIK: Are we talking about two months?

13 MR. CONWAY: -- him clarify their question.

14 Okay? Yes or no and let them clarify their
15 question.

16 BY MR. DILL:

17 Q Did you ever have a discussion --

18 A Nothing in June, no in June.

19 Q On June 15th, was there ever a discussion
20 between you and your daughter over stealing 400 dollars
21 from your account?

22 A No.

23 Q Did that ever take place?

24 A I'm not even sure we're talking 400 dollars.

25 Q Was there ever discussion with you and your

1 daughter about your daughter taking money from your
2 account?

3 MR. CONWAY: Yes or no.

4 A Yes.

5 Q when was that?

6 A I don't know.

7 Q was it --

8 A You're asking me dates. I don't know.

9 Q well, give me a ballpark. was it in the year
10 2008?

11 MR. CONWAY: Yes or no.

12 A Yes.

13 Q was it around the time period leading up to
14 the last time you saw your granddaughter prior to June
15 15th?

16 A what time frame leading up to?

17 Q Prior to June 15th, in the year 2008, let's
18 say in the May time period --

19 A I've already answered the question.

20 Q okay. well, let me get more specific.

21 A Thank you.

22 Q In May was there a discussion about or an
23 argument or any type of discussion about your daughter
24 taking money from your account and you not being happy
25 about that?

1 A Possibly in May.

2 Q Okay. And so it's fair to say that that was
3 a -- a sore subject or a point of conflict between you
4 and your daughter right around this time period?

5 A No.

6 Q So it was -- there wasn't conflict over that?

7 A No.

8 Q And --

9 A There was no argument.

10 Q Was it something you gave her permission to do
11 was to take money from your account?

12 A Again, I'm not answering those questions.

13 Q I just want to be clear. You said there was
14 no argument, so you're answering that. Was it something
15 you gave her permission to do to take money from your
16 account?

17 A I already stated that -- I already answered
18 that question.

19 Q I don't think you did, ma'am.

20 A Yes, I did.

21 Q Did you -- let me ask it again and you --

22 A Go back.

23 Q -- can answer it again. That's okay. We
24 don't need to have it reread.

25 Did you give your daughter permission to take

1 money from your account during this time period?

2 A I've already answered --

3 MR. CONWAY: Same --

4 A I already answered that question.

5 Q We're talking about credit cards before. I'm
6 talking about the account now. It's something different.

7 Did you give your daughter permission --

8 A Oh, I never answered a question about credit
9 cards.

10 Q Okay. Well, I'll ask that again too in a
11 second. We're getting --

12 A That's the one I said I wasn't going to
13 answer.

14 Q Gotcha. On credit cards or account? Just so
15 I'm clear. I don't want to confuse you. I don't --

16 MR. CONWAY: Credit cards is what we covered.

17 A You're confusing me because you keep changing
18 your question.

19 Q Okay. Well, that's --

20 A You ask me a question.

21 Q -- that's my fault.

22 A It is your fault.

23 Q That's my -- that's my fault.

24 A And you expect me -- I know I've already
25 answered these questions.

1 Q And if I asked it, I apologize, but let me ask
2 it a little bit differently.

3 Did your daughter have permission to take
4 money from your account? I'm not talking credit cards.
5 I'm talking an account.

6 A I answered that question already.

7 Q Okay. Tell me the answer. Did she have
8 permission or not?

9 A No.

10 Q Was that a point of conflict between the two
11 of you?

12 A No.

13 Q So did she -- you and her have a conversation,
14 and everything was fine about her taking money --

15 A Yes.

16 Q -- from your account?

17 A Yes.

18 Q She had taken money from your account, though,
19 right?

20 A Yes.

21 Q How much was it?

22 A I don't know the exact amount.

23 Q Was it more than 200?

24 A Somewhere around there, two or 300.

25 Q Two, 300. And it's fair to say, from my

1 understanding of reading through this, that that was not
2 probably money that you could afford to give to her at
3 that point?

4 A I gave Casey money all the time.

5 Q I'm talking about this specific one.

6 A I can't tell you if that specific one --

7 Q Okay.

8 A -- you know, mattered any different than any
9 other time.

10 Q Did she ever talk about moving out around this
11 time period?

12 A No.

13 Q Never discussed that with you?

14 A No.

15 Q Now, before the -- before the disappearance,
16 before June 15th, what friends did Casey have at the
17 Sawgrass Apartments?

18 A That I knew then or that I know now?

19 Q Either one, ma'am. But let's break it down.
20 That you knew then, what friends did she have at the
21 Sawgrass Apartments?

22 A I had no idea at that time.

23 Q Currently, what friends that you've learned
24 that Casey had at the Sawgrass Apartments, who were her
25 friends there?

1 A I know at some point Annie lived there. I
2 know at some point Ricardo and JP lived there.

3 Q Now, Annie being Annie who?

4 A Dowling.

5 Q Dowling. Because there's another Annie is my
6 understanding. Or Amy. I apologize.

7 Annie Dowling lived there. Ricardo, would
8 that be Ricardo Morales?

9 A Morales.

10 Q who was her boyfriend at one point in time,
11 right?

12 A which I know now.

13 Q Okay. Do you know when it was that Ricardo
14 Morales, her boyfriend, lived at the Sawgrass Apartments?

15 A No.

16 Q who else was it? Annie and Ricardo and who
17 else?

18 A JP's his roommate.

19 Q JP. And do you know his last name?

20 A Chatt.

21 Q And you've learned all this information from
22 where?

23 A From her friends.

24 Q Being who?

25 A From those people.

1 Q They told you or you --

2 A They told me.

3 Q Okay. Do you know if she, your daughter, knew
4 anybody who worked at Sawgrass?

5 A No.

6 Q You don't know?

7 A I don't know.

8 Q So these people, Ricardo Morales and Annie
9 Dowling, you've come to learn that there was a time that,
10 in fact, they lived there at Sawgrass?

11 A Correct.

12 Q And they lived there prior to the
13 disappearance is your understanding?

14 A Correct.

15 Q Now, let's go ahead to the June 15th. It's my
16 understanding this is Father's Day weekend; is that
17 right?

18 A Yes.

19 Q You had gone to -- you had gone up to visit
20 your father?

21 A Correct.

22 Q All right. And, in fact, there's a photograph
23 and that's we know was June 15 because it was Father's
24 Day weekend; is that right?

25 A Correct.

1 Q Your husband was working at that time period,
2 wasn't he?

3 A Yes.

4 Q And on June 15th, when you got home, was your
5 husband at home that night when you got home?

6 A When I got home in the evening, no one was
7 home.

8 Q Did there come a point -- and where had --
9 where had Casey been during the day?

10 A I don't know if she was with friends or where
11 she was at. I just had taken Caylee for the day to see
12 my dad.

13 Q I see. There came a point in time, though,
14 that Casey came home, and you were at home and Casey's at
15 home and Caylee was at home?

16 A Correct.

17 Q Was there ever any type of -- strike that.
18 What time was it you that got home?

19 A I want to say somewhere around 4:00 whatever
20 because -- just because I remember I fed Caylee dinner
21 when I got home and then we went swimming.

22 Q Swimming and obviously --

23 A In the pool. We were in the pool when Casey
24 came home.

25 Q Did Casey get in the pool or was it just --

1 A She started to --

2 Q -- you and Caylee?

3 A -- and realized -- I told her it would be
4 going to be too cold for her because we were just -- the
5 sun was starting to go down. We were getting a little
6 bit chilled, and I told her I was about ready to take
7 Caylee out.

8 Q Was there any type of disagreement or
9 discussion between you and your daughter Casey that
10 night?

11 A Absolutely not, no.

12 Q So statements about somebody overhearing a
13 loud argument at the house -- if I may. The statements
14 in the police reports about people overhearing a loud
15 argument at the house, you're saying that there was no
16 loud argument at the house?

17 A Correct.

18 Q There was no, we've seen in some reports, no
19 altercation between you two?

20 A Correct.

21 Q Do you know why it would be, then, that the
22 next morning Casey would have left with her daughter and
23 not returned?

24 A I have no idea why Casey and Caylee did not
25 come back. I mean, I know why Casey didn't come back

1 now, but I don't know why Caylee didn't come back.

2 Q And during -- I'm just going to go through
3 this quickly.

4 During the time period when they leave on June
5 15th, this would be something out of the ordinary --

6 A They left on June 16th.

7 Q I'm sorry. The morning of June 16, and
8 actually George was the one, I think, fed Caylee
9 breakfast that morning, if you know?

10 A I don't know. I have no idea who fed Caylee
11 breakfast that morning. I was at work.

12 Q You had already gone to work?

13 A Yes.

14 Q But we do know that none of the clothes that
15 were Casey's or, rather, Caylee's clothes, none of those
16 clothes, to your knowledge, were taken for a 5-, 10-,
17 15-day trip?

18 A No.

19 Q And, once again, we know that the air mattress
20 that you told me about, we know that was in your house
21 because later on we found it at the house?

22 A I don't know when the air mattress was -- you
23 know, I don't know when the air mattress came back to the
24 house or whatever. I just know the day that I found it,
25 I gave it to the sheriff's department.

1 Q All right. That's fair. But it certainly was
2 in your house and at the time --

3 A I have -- I don't have knowledge to that
4 whether it was in the house on the 16th or not.

5 Q Okay. Well --

6 A I wasn't looking for it then.

7 Q Certainly --

8 A Casey was in and out of the house in June. I
9 have no idea.

10 Q Did you see Casey -- you say Casey was in and
11 out of the house. But to your knowledge, I know your
12 husband saw her at one point in time, after June 15th,
13 you didn't see her until when?

14 A Casey?

15 Q Yes, ma'am.

16 A July the 15th.

17 Q Okay. And so to your knowledge during that
18 time period, did she ever say to you, hey, I took the air
19 mattress?

20 A No.

21 Q Never said that?

22 A No.

23 Q Now -- and, again, this would be out of the
24 ordinary for her to be out of the house for more than two
25 days in a row with Caylee.

1 A Correct.

2 Q Is that correct? All right. And you were
3 calling Casey from your home phone?

4 A I called Casey from my home phone and my cell
5 phone.

6 Q And from -- and the records actually have you
7 calling her several different times during this time
8 period; is that right?

9 A Correct.

10 Q Now, did you ever talk to your granddaughter,
11 Caylee, after June 16th on the -- I'm talking on the
12 telephone, did you ever speak to her or talk to her?

13 A No.

14 Q Did you ever hear her in the background?

15 A No.

16 Q And during this time period -- during this
17 time period, what was your understanding of what Casey
18 was doing?

19 A Casey was with friends and she was working.

20 Q And I'm asking you now, though, as you know
21 that she was not working because she did not have a job,
22 what was your understanding as we sit here today now of
23 what Casey was doing?

24 A She was with her friends.

25 Q And what friends were those?

1 A From what my understanding is, she was with
2 Tony Lazzaro. She spent time with Jesse Grund. She
3 spent time with Amy. She spent time with Ricardo.

4 Q Right.

5 A And there's several people that she saw during
6 that time.

7 Q And I've seen that from the records. None of
8 those people saw your granddaughter during that time
9 period, though; is that correct?

10 A I don't know if they did or not. I have no --

11 Q To your knowledge.

12 A I have no idea. You'd have to ask those
13 people.

14 Q Well, you have read certain parts of the
15 police report. That would be an important piece of
16 information for not only the police to know but for you
17 to know as to when somebody last saw your granddaughter;
18 is that right?

19 A Correct.

20 Q So as far as --

21 A If they're telling the truth.

22 Q You, however, were talking to your daughter, I
23 think, you said every day.

24 A Correct, just about every day.

25 Q And she would tell you that the child was with

1 her or the child was with the nanny?

2 A Not necessarily.

3 Q What would she tell you?

4 A She would tell me that she was sleeping or
5 something.

6 Q Sleeping or something meaning --

7 A Yeah.

8 Q Meaning that the child was sleeping where?

9 A I didn't ask her. Taking a nap, you know, or
10 whatever.

11 Q Did it cause you concern, though, as the time
12 went on?

13 A Yeah. I missed my granddaughter.

14 Q Right.

15 A I had never gone more than 24 hours without
16 seeing Caylee.

17 Q Let me ask you, though, what in your mind was
18 the reason why now on June 15th now we've got an extended
19 period of time when you're not seeing Caylee? What in
20 your mind was the reason for that?

21 A In my mind at that time was everything that
22 Casey told me that she was doing.

23 Q Meaning that she said she was working?

24 A She said she was working. She said she was
25 spending time with friends. She said she was spending

1 time with Caylee.

2 Q And that was totally out of the ordinary,
3 though, from anything that had happened prior?

4 A It was out of the ordinary but long overdue
5 because Casey had never taken a vacation since Caylee was
6 born. Casey barely would see her friends. She'd go
7 months without seeing friends.

8 Q Well -- okay. If she wanted to take a
9 vacation, though, couldn't you and your husband have
10 watched Caylee?

11 A But she wanted to take a vacation with Caylee
12 is what she told me.

13 Q She said that. She said I want to take a
14 vacation with Caylee?

15 A Yes.

16 Q And she told you that on the phone?

17 A At some point, she said that they were
18 spending some time together.

19 Q Okay. Well, did she say I'm taking a vacation
20 with Caylee or did she say we're spending time together?

21 A She said she's spending time with her.

22 Q And so she said that the purpose of her taking
23 the vacation was, in fact, to spend time with Caylee. Is
24 that what she told you?

25 A In essence, yes.

1 Q Okay. Now, why then --

2 A But she --

3 Q Why, then, would she need a nanny if she
4 wanted to take a vacation with her daughter?

5 A You're --

6 MR. CONWAY: You know, you're asking for a
7 speculative answer.

8 Q I just want to --

9 A Number --

10 Q I just want to --

11 MR. CONWAY: Then ask her a specific question
12 and she'll give it to you --

13 A Number one is what I was --

14 MR. DILL: Make an objection. Make an
15 objection.

16 MR. CONWAY: It's a speculative question.

17 A I'll answer his question. Bottom line is what
18 you -- what you asked me is why would she need a nanny
19 during that time she's taking a vacation. She wouldn't
20 need a nanny during that time she took a vacation. But
21 some of the people that she was with were supposed to
22 have been Zanny during that time.

23 Q When you say some of the people she was with
24 were supposed to have been Zanny, what do you mean by
25 that? Are you talking what you're talking about here --

1 A Several weeks that she --

2 Q -- with Amy?

3 A Several weeks she told me she was with Zanny.

4 Q That she was with Zanny herself?

5 A Yes.

6 Q Casey was?

7 A Casey and Caylee were with Zanny.

8 Q So as part of her vacation, she was going on a
9 vacation with Caylee and Zanny but Casey with her?

10 A Yes.

11 Q So she told you there were times that Casey
12 and Caylee and Zanny were all together. That would have
13 been after June 15th, right?

14 A Correct.

15 Q Okay. So was there a time later on that you
16 heard that first version of events that she had dropped
17 off her daughter, Caylee, at the Sawgrass Apartments?
18 Did you hear that?

19 A Yes.

20 Q And that was -- you heard that actually around
21 June 15th, right?

22 A No. I heard that on July 15th.

23 Q I'm sorry, ma'am. You're right. July 15th.
24 okay.

25 So when she was saying that she was -- talking

1 on the phone and saying that she was with Zanny and her
2 daughter, during that time, did you ever talk to your
3 daughter -- I mean, your granddaughter?

4 A I already -- I already said that.

5 Q So you did not?

6 A Correct.

7 Q So during that time when she had been telling
8 you that she was with -- that Casey was with Zanny and
9 your grandchild, based on what you learned on July 15th,
10 that was not accurate?

11 A Correct.

12 Q Why would she lie to you about that, ma'am?

13 A I don't know.

14 Q And how do you reconcile your belief that
15 there was a Zanny person watching this child with the
16 fact that you can't answer that question as to why she
17 would lie to you about that?

18 A I don't know that Casey --

19 MR. CONWAY: Just answer the question.

20 A What she told me and what I found out was two
21 different things. I don't know Casey's reasons for
22 telling me except that what she told me. She told me she
23 was protecting Caylee and she's protecting the family.
24 And until this day, I still believe that she's protecting
25 Caylee and the family.

1 Q Okay. But during the time period when you
2 were making many calls, and I think you said you spoke to
3 her every day, your daughter was not telling you the
4 truth about where she was in relation to her daughter
5 Caylee; is that fair to say?

6 A Correct.

7 Q Because she was telling you --

8 A Correct.

9 Q -- that Zanny was and they were together, but
10 that wasn't accurate or true?

11 A Correct.

12 Q All right. So --

13 A But I don't know when that stopped. I don't
14 know what day.

15 Q Well, there came a point in time that you and
16 your husband, I'm sure, got more concerned about it. In
17 fact, there was a time that your husband basically saw
18 Casey and kind of chased after her -- saw her in the car,
19 kind of chased after her. Did you understand that?

20 A Yeah, and he was wrong on the dates of that.
21 That was actually in April or May because Caylee was with
22 me when George went after Casey that day.

23 Q Okay. So --

24 A So George was --

25 Q So when George --

1 A George was wrong on his dates.

2 Q Was it your understanding that he saw her
3 during this time period or not?

4 A He saw Casey during the time period.

5 Q Right.

6 A But he never followed Casey. The statement
7 that he made that he followed Casey on the Expressway --

8 Q Right.

9 A -- and when we went through E-PASS, it wasn't
10 there. And I told him, I said, if you recall the night
11 that you followed Casey, Caylee was with me in the living
12 room because we were sitting coloring when he took off.

13 Q How about the statement that she tried to
14 prevent him from getting into the trunk? Was that an
15 accurate statement, to your knowledge?

16 A I have no idea. I wasn't there, sir.

17 Q So in April -- yeah, let me just follow up on
18 that. In April, when he saw her and was following her,
19 what was that all about?

20 A You'd have to ask my husband.

21 Q Okay. Well, did -- I mean, you've said to me
22 that that was in April, so you became aware that it was
23 in April. What were the circumstances, to your
24 understanding, as to why he was doing that?

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

1 calls for information that's privilege, marital
2 privilege.

3 Q was anybody else present when the statement
4 was made?

5 A what statement? what statement?

6 MR. CONWAY: I don't know. He's going to have
7 to ask the question.

8 Q was there -- okay. Let me ask it this way.
9 was there any conflict going on that would have caused
10 your husband to chase around Casey back in April?

11 A You'd have to ask George.

12 Q Are you aware of any?

13 A Not that I'm aware of.

14 Q So does that strike you as odd that George was
15 chasing Casey in April as opposed to this time period
16 when you were out kind of looking for her?

17 A I found out about that after the fact. Okay?
18 So I don't --

19 Q Found out --

20 A I found out about him going after Casey.

21 Q what was your understanding why he was going
22 after her?

23 MR. CONWAY: Same objection.

24 A Again, I have no idea.

25 MR. CONWAY: Same objection.

1 Q You have no idea. But does it strike you as
2 odd, then, that he would have been chasing after her if
3 you're not aware of any conflict?

4 A You'd have to ask my husband.

5 Q All right. Now, as far as the -- Casey trying
6 to keep him from getting in the trunk of the car, I think
7 you told me that you don't have any information as to
8 whether that happened or not?

9 A I -- I was not present. I never heard that
10 she kept him --

11 MR. CONWAY: Just yes or no. Yes or no.

12 A No. I have no knowledge of that.

13 Q You've seen your husband in the statement,
14 though, haven't you?

15 A No, I haven't read --

16 Q You haven't read over his statement?

17 A -- his statement. No, I haven't.

18 Q So when he told the police officers about that
19 and he told the FBI about that, you're not a -- you
20 haven't reviewed that or are aware of that?

21 A No. There is a lot of stuff that I haven't
22 reviewed.

23 Q So there comes a point in time -- is it fair
24 to say -- because we've got the phone records here --
25 there were many, many calls where there were attempts

1 from the Anthony home, from your house, to call Casey
2 during this time period?

3 A Correct.

4 Q And it's also fair to say you're getting more
5 concerned about Caylee because you haven't seen her in a
6 long period of time?

7 A Correct.

8 Q Now, do you think, in fact, that it's possible
9 that Casey was fabricating the story about Zanny because
10 she was wanting to stay over at some boy's house or a
11 guy's house?

12 MR. CONWAY: I'm going to object to the form
13 of the question. It calls for speculation.

14 Q Do you believe that she was fabricating the
15 story during that time period because her motivation was
16 not to let you know that she was staying with a guy -- at
17 some guy's house?

18 A No. I think she fabricated the stories
19 because she didn't have Caylee with her, and she knew if
20 she came home without Caylee, there would be a red flag.

21 Q And that red flag would mean that something
22 was probably wrong?

23 A Something happened, right.

24 Q And that's the reason -- you think that that's
25 what her reasoning was --

1 A Correct.

2 Q -- for fabricating the story; is that right?

3 A Correct.

4 (The following is published via videotape during the
5 deposition:)

6 CINDY ANTHONY: -- so that she would justify
7 to me why I couldn't talk to Caylee because she knew
8 that if it wasn't a reasonable thing, then I would
9 say where the hell are you? I'm coming to pick
10 Caylee up because something's wrong.

11 A That's what I just said.

12 Q Right. I understand.

13 A You didn't need to make me live through that
14 again. Thank you very much. That was a painful time in
15 my life.

16 Q Ma'am, what I just want to clarify, then --

17 A No. What you're trying to do --

18 Q No, ma'am. I --

19 A -- is add insult to injury.

20 Q I'm really not getting in --

21 A You know, I really don't --

22 Q I'm really not getting into that.

23 A -- need to sit again when I find out that I've
24 been videotaped. That was a cruel thing in my life that
25 they did to me, okay, to tape me on a day that I go in

1 there and, you know, and I'm distraught over my
2 granddaughter and everything. And it's cruel for you to
3 sit there and make me watch it again.

4 Q Okay, ma'am. Well, let me just ask some
5 questions about it. And we won't talk about the video.
6 Was it your belief when you made this statement that she
7 was fabricating where she was --

8 A I just --

9 Q -- for some reason?

10 A I already answered this question.

11 Q And you believe she was fabricating?

12 A I already answered the question. I'm not
13 answering it again.

14 Q Now, at the time that you made that statement,
15 though, to the police, you had already heard or already
16 had an understanding that Casey told you that Zenaida or
17 Zanny was threatening your family; is that right?

18 MR. CONWAY: Can you repeat that question?

19 MR. DILL: Sure. Sure.

20 MR. CONWAY: I'm not even sure what you asked.

21 BY MR. DILL:

22 Q Yeah, it's not very clear. Do you need a
23 moment as far as -- let me ask this.

24 When you made that statement there about
25 fabrication, you already knew from Casey that Casey told

1 you she was protecting the family because of Zenaida or
2 Zanny. Do you remember that?

3 MR. CONWAY: That's not what she said on
4 there, Mr. Dill. That's not what she said. I mean,
5 ask --

6 MR. DILL: well, just make your objection,
7 Brad, make your objection and then move on. That's
8 fine.

9 MR. CONWAY: My objection is you're not asking
10 a question --

11 MR. DILL: I'll reask it.

12 MR. CONWAY: -- that's relevant to what you
13 just showed her. So --

14 MR. DILL: You know what?

15 MR. CONWAY: -- just ask a relevant question.

16 MR. DILL: I can ask -- I can ask the question
17 to something I didn't show her.

18 MR. CONWAY: Ask her a question, though.

19 MR. DILL: Do me a favor. Let me just move
20 on.

21 BY MR. DILL:

22 Q When you made the statement that you thought
23 she was fabricating because of the motivation, the red
24 flag and all this stuff you just told me about, you knew
25 at that point in time from your daughter that your

1 daughter was protecting the family and that's why she'd
2 been lying to you; is that right?

3 MR. CONWAY: Yes or no.

4 A Yes.

5 Q So did you believe what your daughter was
6 telling when you she said that she was lying to you to
7 protect the family or did you believe what you said to
8 the police officers about the fabrication and the reason
9 for that?

10 A It's both. It's true -- both things is true.

11 Q So she was lying to protect you and also lying
12 so you wouldn't be upset or find out?

13 A Exactly, because she knew that I would look
14 for her. That's exactly what I said. It doesn't change.
15 It's the same thing.

16 Q And you went looking for her, though, didn't
17 you?

18 A I never went looking for Casey until the 15th
19 of July is the first time I went looking for Casey.

20 Q Okay. well, how about on July 3rd? Did you
21 ever go to Universal to attempt to pick up Caylee?

22 A I went to Universal.

23 Q why?

24 A Not --

25 MR. CONWAY: Yes or no.

1 A Yes.

2 Q Why did you go to Universal?

3 A To go pick up Caylee.

4 Q Okay. And what was it that motivated you to
5 go pick up Caylee at Universal?

6 A Because Casey told me Caylee was there.

7 Q And did you come to find out that, obviously,
8 Casey and Caylee weren't at Universal?

9 A Yes.

10 Q Did that cause you concern?

11 A Yes.

12 Q Did you call the police at that point?

13 A No.

14 Q Why not?

15 A Because I still believed my daughter.

16 Q But did you also find out while you were at
17 Universal that she didn't work there?

18 A No, I did not.

19 Q How did you go about trying to find her? Did
20 you go to --

21 A When I got there, I called her, and she told
22 me she was not there, so I went home.

23 Q Did she also tell you that she was in
24 Jacksonville around July 4th?

25 A Yes.

1 Q And that turned out to not be true?

2 A Correct.

3 Q So -- and the reason why, in your mind, is
4 that --

5 A It would have been a red flag.

6 Q A red flag to you and others --

7 A Yes.

8 Q -- if she had told you that?

9 A If I thought that Caylee was in danger at any
10 point, I would have gone --

11 Q And I understand.

12 A -- and called 911 or gone to the sheriff's
13 department. I've already stated that, so you just asked
14 me a question why I didn't go to the police that day.

15 Q Well -- okay. So you didn't think that there
16 was anything wrong about the --

17 A I didn't --

18 Q I just want to ask about it.

19 A -- think there was anything wrong with Caylee.

20 Q Okay. And that's because Casey was telling
21 you everything was fine?

22 A Yes.

23 Q Now, let's go to July 15th.

24 A Because Casey didn't want me to worry.

25 MR. CONWAY: Just listen to the question.

1 okay?

2 THE WITNESS: okay.

3 BY MR. DILL:

4 Q All right. All right. Let me fast-forward,
5 ma'am, probably in a little -- in a different subject so
6 we'll get away from this subject matter right here.

7 There came a point in time, and we're into the
8 December time period now, that the police executed a
9 search warrant on your house. They came looking for
10 certain materials. Do you remember that in December?

11 A There's two search warrants in December.

12 Q Right.

13 A So which one we talking about?

14 Q One or both. I just want to direct you to the
15 December time period to get your mind and memory there.
16 okay?

17 The police came and they executed -- they were
18 looking for certain materials, and I don't know what, but
19 they came and they executed the search warrant. Did you
20 ever tell one of the police officers who executed the
21 search warrant that you had sent someone to look in the
22 woods around Suburban Drive --

23 A No, I did not.

24 Q -- back -- let me get the question out because
25 I know you want to answer this.

1 Did you ever tell one of the investigators
2 that you had sent someone to look in the woods around
3 Suburban Drive back in November?

4 A No, I did not.

5 Q That did not happen?

6 A That did not happen.

7 Q So if that's somewhere in one of the police
8 reports, you would have issue with that?

9 A I would have huge issue with that.

10 Q And you would say that would be a falsity?

11 A That would be a bold-faced lie.

12 Q Now, just so I understand, Dominic Casey
13 during this time period, to your knowledge, was he
14 working for you around November, working for --

15 A Dominic Casey's been working for us.

16 Q Who paid Dominic -- well, do you know who paid
17 Dominic Casey?

18 A (Shakes head.) Paid Dominic Casey for what?

19 Q To work for you.

20 A Dominic Casey and I have a contract.

21 Q Okay. And who has that contract?

22 A I have a copy of it. Dominic Casey has a copy
23 of it.

24 Q Are you the only two parties to the contract?

25 A George is on there too.

1 Q You and George and Dominic. And when was that
2 signed?

3 A It was signed probably in October, but we had
4 a verbal contract prior to that.

5 Q I understand. Anybody else -- did anybody
6 else sign the contract?

7 A Yes.

8 Q who?

9 A We have Sherry Millstead. And did Dennis sign
10 it too? I don't know. I can't ask him.

11 Q who is Sherry Milstead and Dennis?

12 A From Kid Finders. It was notarized.

13 Q This notarized contract, who has possession of
14 it?

15 A I already stated Dominic has a copy and I have
16 a copy.

17 Q Okay. And he was being retained, in your
18 mind, to do what?

19 A Dominic did whatever we asked him to do.

20 Q Okay. And what were you asking him to do?

21 A Look for Caylee.

22 Q Do you know if he was ever given any
23 information about Zanny or Zenaida Gonzalez?

24 A Yes.

25 Q When was that?

1 A Him and I talked about Zenaida Gonzalez all
2 the time.

3 Q You talked about it all the time, but did he
4 ever report to you what his efforts to find Zenaida
5 Gonzalez or Zanny were?

6 A There were several, yes.

7 Q Did he give you --

8 A On several occasions.

9 Q And when were those, and did he give them to
10 you in writing?

11 A I don't have anything in writing.

12 Q What did he tell you?

13 A He told me several things. We have a Zenaida
14 Fernandez-Gonzalez Rivera in Puerto Rico that he had been
15 watching, still watching.

16 Q I see. All right. So of all of that during
17 that time -- during this time period when you're talking
18 about Zenaida Gonzalez, do you know -- did he ever report
19 to you what the leads were he was following up or
20 anything like that?

21 MR. CONWAY: Yes or no.

22 A Yes.

23 Q He did report. What did he --

24 A Yes.

25 Q -- report to you?

1 MR. CONWAY: I'm going to object to work
2 product. It's privilege.

3 MR. DILL: I just wanted to clarify it, just
4 so we're clear. We have a contract now between a
5 private entity, a private individual and Kid Finders
6 and these folks.

7 A Kid Finders is --

8 MR. CONWAY: Cindy.

9 A Hold on. They were just witnesses to the
10 contract.

11 MR. CONWAY: Cindy.

12 BY MR. DILL:

13 Q I appreciate that.

14 A They're just witnesses -- you asked me who
15 else signed the contract. They're witnesses.

16 Q And thanks for clarifying. It makes --

17 A Yes. well --

18 Q -- it easier. This is directly between --

19 THE WITNESS: I answered his question, but he
20 got it wrong.

21 MR. CONWAY: Just listen to the question.
22 Okay?

23 THE WITNESS: Okay.

24 MR. DILL: Ms. Anthony, Ms. Anthony. That's
25 fine. I want to make sure for your objection.

1 These private citizens have retained a private
2 attorney to work for them, and you're --

3 MR. MITNIK: Private investigator, not an
4 attorney.

5 MR. DILL: I'm sorry. Private investigator to
6 work for them. And you're taking the position that
7 there is a privilege that applies that makes it not
8 discoverable in a civil lawsuit about the substance
9 of any conversations or anything else?

10 MR. CONWAY: The conversations between them,
11 correct.

12 MR. DILL: And what is the basis for that?

13 MR. CONWAY: Product, work product.

14 MR. DILL: And what -- okay. Do you
15 understand -- I mean, I'm not trying to -- hold on.
16 I'm not trying to argue here, but I just want to be
17 clear.

18 work product means that there is something in
19 pending litigation, it's made in anticipation of --
20 in existing or pending litigation. Is there
21 existing or pending litigation against these
22 individuals, the Anthonys, that I'm not aware of?

23 MR. CONWAY: There may be.

24 MR. DILL: Okay. What I want to know is there
25 or not?

1 MR. CONWAY: You guys are on a fishing
2 expedition, and a lot of your questions go to what
3 she said and whether she republished a defamation,
4 so, yes, sir, there is. Not only that. This is an
5 ongoing investigation, and it affects the criminal
6 trial as well as the civil trial.

7 MR. DILL: I understand. Just so I'm clear,
8 you're claiming work product on these
9 conversations --

10 MR. CONWAY: Yes, yes.

11 MR. DILL: -- between the Anthonys --

12 MR. CONWAY: On behalf of my client, yes, sir,
13 I am.

14 MR. DILL: And we'll deal with that later.

15 MR. CONWAY: And to clarify one more thing,
16 Sherry Millstead is a witness.

17 MR. DILL: Got it. Just so --

18 MR. CONWAY: Not a party to the contract.

19 MR. DILL: And I understand that. When you
20 said they signed the contract, they signed it as
21 witnesses --

22 MR. CONWAY: Yeah.

23 MR. DILL: -- it was just between George and
24 Cindy and Mr. Casey?

25 MR. CONWAY: They are not parties to the

1 contract.

2 BY MR. DILL:

3 Q When's your understanding of -- let me clarify
4 that.

5 There's -- our lawsuit was filed sometime
6 later. Was the contract and these conversations about
7 Zenaida Gonzalez, was that prior to our lawsuit being
8 filed; do you know?

9 A We had a verbal contract.

10 MR. CONWAY: Yes or no.

11 A Yes.

12 Q That was prior to the lawsuit?

13 A Yes.

14 Q How about the written contract? That was
15 before the lawsuit. The conversations, before the
16 lawsuit's filed?

17 A We had two written contracts, and I can't tell
18 you the first conversation.

19 Q The conversations, though, when were those?
20 Those were before the lawsuit was filed?

21 A Yes.

22 MR. DILL: Are you still asserting the
23 privilege?

24 MR. CONWAY: When was the lawsuit filed? I
25 don't know the answer to that.

1 MR. DILL: All right. Well, let's look back
2 to that.

3 MR. CONWAY: If we can just do time frames,
4 it's going to make it a lot easier.

5 MR. DILL: We'll come back to it.

6 BY MR. DILL:

7 Q Now, I'm not going to go through the 911 call
8 with you, but I do -- I have it here, but I want to ask
9 specifically. There were three calls to the police on
10 the 15th; is that correct?

11 A Correct.

12 Q You had found your daughter Casey at Tony
13 Lazzaro's apartment?

14 A Correct.

15 Q You had talked to Amy Huizenga, and she had
16 given you the location?

17 A Amy took me to the location.

18 Q Okay. She took you to the location. You went
19 in and there was Casey; is that right?

20 A I didn't go into the apartment.

21 Q Did Casey come out at some point?

22 A Yes.

23 Q And did you ask her where Caylee was?

24 A Yes.

25 Q And what did she tell you?

1 A With Zanny.

2 Q And did you say where's Zanny?

3 A Yes.

4 Q And what did she tell you?

5 A She said she was at her apartment, and I said
6 okay. We're going to go get her.

7 Q And so -- well, did you go to the apartment to
8 go get her?

9 A No.

10 Q Where'd you go?

11 A I took her to the police station.

12 Q Okay. So you took her to -- you took her to
13 the police station. Why was it that you took her to the
14 police station?

15 A Because she didn't take me to the apartment,
16 and I didn't know where she lived.

17 Q And that gave you a concern. Were you driving
18 the car or was she?

19 A I was.

20 Q And she wouldn't tell you where the department
21 (sic) was?

22 A Correct.

23 Q And that caused you concern?

24 A Correct.

25 Q And because of that, you took her to the

1 police station?

2 A Correct.

3 Q And you told the police officer -- and you
4 called, I guess, at Pershing first -- that you
5 had somebody --

6 A I was sitting at Pershing.

7 Q Right.

8 A And they were closed.

9 Q And you called in, and you said I have someone
10 that needs to be arrested?

11 A Correct.

12 Q And --

13 A Because I wanted to scare her to having me
14 take her.

15 Q And then you made another call, the second 911
16 call, which --

17 A Was from the house.

18 Q From the house. And you said that at that
19 point that your daughter had been missing. You just
20 found her. You need to get a grand theft. What was the
21 grand theft?

22 A The car is still registered in my name, even
23 though, essentially, the car was her's.

24 Q Okay.

25 A Just like when we bought the car --

1 Q Right.

2 A -- you know, for Lee back in 2000 or whatever
3 when --

4 Q So you thought it --

5 A -- we bought the car.

6 Q -- was a grand theft because she had taken
7 your car?

8 A I wanted them to come out and help me, so I
9 said whatever I said to have them come out to help me --

10 Q Help you --

11 A -- talk to Casey. I was hoping I could go in
12 and talk to a police officer without calling 911, so
13 that --

14 Q I -- I --

15 A You wanted my reasoning. I'm telling you.
16 That's not a yes or no question.

17 Q Okay. That's fair.

18 MR. MITNIK: It was served September 26, '08.

19 MR. DILL: September 26, '08. Let me finish
20 this, and we'll go back to that.

21 BY MR. DILL:

22 Q There's a third call, though. Okay? And this
23 is about -- after the officers are already on their way.
24 And you say in the call -- and I'm sure you remember it.
25 I could play it, but we don't have to.

1 A You don't have to tell me what's in the call.

2 Q Okay. Okay. We're not going to do that, but
3 I am going to ask you. You said my daughter finally
4 admitted to me that somebody took her or Zanny took her.

5 A Correct.

6 Q Tell me the circumstance between that first
7 call and the second call because there's a time period in
8 between it. What happened? What did she tell you?
9 Where were you? How did the conversation -- because I'm
10 sure you remember that. Tell me what happened.

11 A I can't get into that conversation.

12 Q Why not?

13 A I can't.

14 Q And the reason why is what?

15 A Number one is I can't remember exactly the
16 conversation verbatim --

17 Q Right.

18 A -- what it was. Essentially, I asked her --
19 my son was there when we got home. He asked her. She
20 told me she'd take me there the next day, and that wasn't
21 good enough for me.

22 Q Right. But --

23 A So finally I left Lee alone and he talked to
24 Casey. And when I was coming back in -- because the
25 sheriff's office on the second phone call made it sound

1 like they could be there --

2 Q Right. And it took --

3 A -- any time.

4 Q And it took a while.

5 A It could be two hours. It was a nonemergency
6 phone call, per them. That's why every phone call got
7 more urgent.

8 Q So when -- but there's three so that --

9 A When I walked back in --

10 Q Lee -- I want to ask about that. In between
11 the time of the first call when you think they're coming
12 over shortly and the second call, are you saying that Lee
13 talked to her?

14 A Yes.

15 Q And she talked -- were you present in that
16 room for that conversation?

17 A Not during the whole conversation because I
18 kept walking outside. I kept hearing a door. I had the
19 garage door open. I kept hearing a car door. And every
20 time I'd go out there, I'd think it was the sheriff's
21 office.

22 Q Right. So Lee came in and he told you what?

23 A Lee didn't tell me anything.

24 Q Did Casey tell you something?

25 A No. I walked in and overheard Casey telling

1 Lee.

2 Q what did she say?

3 A I can't remember exactly the words, but I
4 heard her saying that it had been 31 days or something
5 that she had seen Caylee.

6 Q And that caused you again to call back at that
7 point.

8 A Yes.

9 Q Right?

10 A That was the -- that was the reason for the
11 third phone call.

12 Q Right. But when you say she finally admitted,
13 does that mean after all this time she's admitting now in
14 your mind --

15 A That Caylee was missing.

16 Q That Zanny had taken her?

17 A That Zanny had taken her.

18 Q Now, as you sit here today and everything
19 you've learned and everything you've seen, do you believe
20 that to be true?

21 A I have no -- I don't -- I have no idea who
22 had -- who took Caylee.

23 Q But there's one thing we are sure of, and that
24 is, that this person, Zenaida Gonzalez, despite what your
25 daughter had said, you don't believe at all that this

1 person had anything to do with it?

2 A Casey never said that this person right here
3 (indicating).

4 Q I'm asking you, though, at this point.

5 A I never said that that person had anything to
6 do with Caylee.

7 Q So you don't believe this person has
8 anything --

9 A I never did, no. The first time I saw her,
10 even when her face was blotted out, I called Channel 6
11 News --

12 Q Right.

13 A -- and spoke to Henry Maldonado. And I asked
14 what the hell are you doing putting this poor woman on
15 the stand because she's been through enough. You know,
16 the police department's the one that fingered her, not
17 Casey, and they said that she came willingly down there
18 to talk to her. You know, it would have just -- it would
19 have just all blown away for her if she wouldn't have
20 gone and had her little Channel 6 and then Mr. Morgan
21 parading her all around, so --

22 Q Well, I appreciate you want to say all that
23 ma'am. But you know what? That --

24 A Well, I'm telling you the truth. I am --

25 Q But I'm not asking you those questions. I'm

1 really not. So let's just make it --

2 A I know you're not. That's okay. That's okay.
3 I'm getting you the answers. You asked me --

4 Q Ma'am --

5 A -- if I thought it was her to the point
6 that I --

7 Q I didn't say that. I didn't say that.

8 A Okay. Wait a minute. You asked me if I
9 thought it was her and if Casey thought it was her.

10 Q No, I didn't. But let me just clarify --

11 A Yes --

12 Q Ma'am.

13 A Yes, you did.

14 Q Ma'am.

15 A Yes, you did say it. You asked me --

16 Q Do you know what? We're almost -- the good
17 news is --

18 A You asked me if I --

19 Q The good news, ma'am, is we're almost --

20 A -- I thought it was her and if Casey thought
21 it was her and I said no to the point that I called the
22 news station and said what are you doing putting her on.

23 Q I got it.

24 A So I'm going you the question -- or answering
25 your question.

1 Q well, good. Let me ask another question,
2 then, because you're answering a question I'm not asking
3 you.

4 A But you did ask the question.

5 Q I don't want to argue. I really don't want to
6 argue with you.

7 A No.

8 Q Honestly.

9 A Read back the transcript.

10 Q when you --

11 A watch it later.

12 Q when you --

13 A That's why you've got it on video.

14 MR. MORGAN: Brad, Brad, can you --

15 MR. CONWAY: Cindy.

16 MR. MORGAN: -- get control?

17 MR. DILL: Yes. I mean --

18 MR. MORGAN: Brad, please.

19 THE WITNESS: Get control of him, Mr. Morgan.

20 MR. CONWAY: Cindy.

21 BY MR. DILL:

22 Q This is my question, and I'm going to try to
23 make it simple. In your mind, as you sit here -- and
24 we're talk -- as you said before, you want to clear her
25 name.

1 In your mind, this Zenaida Gonzalez has
2 absolutely nothing to do with what happened to your
3 granddaughter?

4 A Correct.

5 Q Okay. And we've already gone through what you
6 said to the press and what was said earlier back in --
7 back during that time period about your daughter. We
8 already went through all that; is that right?

9 But as you sit here today, you don't believe
10 she had anything to do with it?

11 A I've never thought that she was from today
12 back to when you filed the frivolous lawsuit to when she
13 went --

14 Q And it's --

15 A -- in front of the news --

16 Q Once again, the good --

17 A -- or whatever.

18 Q The good news is, Ms. Anthony, we're almost
19 done, and I promise you that. So if you want to talk to
20 the press again and say all these things, that's fine,
21 but I'm going to ask my questions and we're going to wrap
22 this thing up. Okay?

23 So there came a point in time, though, that
24 when Casey came home, that she changed the version of
25 events that you understood about Sawgrass Apartments --

1 THE WITNESS: I'm done. I've already answered
2 the question. She's not the one. I'm done.

3 MR. CONWAY: Cindy, Cindy.

4 MR. MORGAN: Let me just say this for the
5 record -- hold on, Brad. Let me --

6 THE WITNESS: I'm done.

7 MR. MORGAN: Let me say this.

8 THE WITNESS: I'm done. Listen.

9 MR. CONWAY: Go ahead.

10 THE WITNESS: I'm tired of getting beat up.
11 He asked me a question, and he won't let me finish
12 it. He's just like everybody else. They want to
13 cut you off --

14 MR. MORGAN: Cindy, let --

15 THE WITNESS: -- when they don't want to hear
16 the answer.

17 MR. CONWAY: All right.

18 MR. MORGAN: Brad, if she's going to walk out,
19 we're going to move to find her in contempt of
20 court. We're going to be seeking sanctions,
21 attorneys' fees.

22 THE WITNESS: Ask me the last question.

23 MR. MORGAN: Ma'am, we --

24 MR. CONWAY: We're not walking out, Mr.
25 Morgan. Ask the last question --

1 THE WITNESS: Ask me the last question.

2 MR. MORGAN: It's the last question --

3 THE WITNESS: I'm sitting in the seat. Ask me
4 the last question.

5 MR. MORGAN: We need to mic up.

6 THE WITNESS: I don't need to mic anything.

7 MR. MORGAN: Ma'am --

8 MR. CONWAY: Cindy, it's okay. Come on.

9 THE WITNESS: I never agreed to have a mic on.

10 MR. CONWAY: Cindy.

11 MR. MORGAN: Ma'am.

12 THE WITNESS: I'm not mic'ing up.

13 MR. MORGAN: well, then --

14 THE WITNESS: Someone touches me I'm going to
15 file harassment charges that someone's touching me.

16 MR. DILL: Are you getting all this?

17 THE WITNESS: I'm not mic'ing up. I'll talk
18 loud enough that your --

19 MR. CONWAY: Do you know what? Can we --

20 THE WITNESS: -- frickin' cameras can hear me.

21 MR. MORGAN: Brad --

22 MR. CONWAY: Just could we take a break,
23 please?

24 MR. MORGAN: Sure.

25 MR. DILL: Let's go out again.

1 THE VIDEOGRAPHER: The time is 3:53. We'll go
2 off the record.

3 (A 6-minute recess was had.)

4 THE VIDEOGRAPHER: Stand by one moment,
5 please. The time is 3:59. We are back on record.

6 - - - - -

7 DIRECT EXAMINATION

8 BY MR. MORGAN:

9 Q Cindy, there came a time where your private
10 investigator, Dominic Casey, summoned one of your
11 security people, Mr. Hoover, to his office at 8:00 on a
12 Saturday morning before -- about a month before the body
13 was found. When did you become aware of that meeting?

14 A In Mr. Conway's office. It was -- what day
15 did we go into your office? Was it the 17th? No, the
16 13th or something.

17 Q Of what month?

18 A December.

19 MR. CONWAY: Approximate, roughly.

20 A It was -- it was after we got -- it was the
21 day that we got fingerprinted at Brad's office.

22 Q And Mr. Casey was with you, then?

23 A Yes, and Mr. Hoover.

24 Q And that's the -- that's the first time they
25 told you that they had gone into the woods?

1 A Yeah, Mr. Hoover's the one that told me.

2 Q And it was -- they told you that they'd gone
3 into the woods based on a tip --

4 A Yes.

5 Q -- that had been received by Mr. Casey?

6 A Correct.

7 Q Did Mr. Casey tell you who gave him that tip?

8 A Yes.

9 Q And who did he say gave him that tip?

10 A I'm not sure what Ginette's last name. I
11 think it's Lucas.

12 Q And who is Ginette Lucas?

13 A She's a psychic or a medium or whatever she
14 is. She has some kind of ability that she sees things in
15 like, you know, visions or whatever. I'm not sure how it
16 works.

17 Q And he told you that that day in Brad's
18 office?

19 A They -- he told me -- they told me about the
20 time that they went out there, yes, in Brad's office.

21 Q And did they actually tell you they'd been out
22 there three times?

23 A I just --

24 MR. CONWAY: Mr. Morgan, if you could just
25 clarify for -- you keep saying "they" and

1 referring --

2 Q Dominic Casey and Mr. Hoover. Sorry.

3 MR. CONWAY: Thank you.

4 A Yeah, I really didn't realize he was out there
5 three times until I heard it all on the news.

6 Q But the whole time he had worked for you up
7 until the day at Brad's office, they had never told you
8 about this tip or about going out on any day?

9 A Correct.

10 Q And when you finally learned about it that day
11 in Brad's office, what did he tell you?

12 A Mr. Hoover is the one, I believe --

13 MR. CONWAY: Again --

14 Q Mr. Hoover.

15 A -- is the one, I believe, brought it up and
16 said something. I can't recall. That day, you know, I
17 can't recall exactly what was said. That was a very
18 emotional day --

19 Q Of course.

20 A -- because it was two days after we found out
21 that it could possibly be Caylee. And it was the first
22 day I was actually able to go back into my home after we
23 had been away and found the house ransacked just before
24 we got there. So it was very emotional. I can't
25 remember exactly what the words were, but I know they

1 talked -- James told me about a snake that he had seen
2 and --

3 Q James being?

4 A Hoover, Mr. Hoover.

5 Q Did Mr. Hoover tell you that day --

6 A And Mr. Hoover was never employed by us.

7 Q He was like a volunteer security?

8 A He volunteered. He -- I thought he was a
9 stalker at first.

10 Q Did Mr. Hoover tell you where the tip came
11 from?

12 A No, Mr. Hoover never did.

13 Q But Mr. Casey told you?

14 A Correct.

15 Q Did Mr. Hoover hear Mr. Casey tell you that?

16 A You know, I can't remember.

17 Q Did Mr. -- whoever is telling you about the
18 medium, did they tell you what the medium had said to Mr.
19 Casey?

20 A No.

21 Q Did you ever hear or understand that the
22 medium or psychic in conversation with Mr. Casey told Mr.
23 Casey the approximate area where she believed the body
24 was located?

25 A I found that out, you know, watching the news.

1 Q Okay. And did you also find out watching the
2 news that the medium had said when you walk into the
3 woods here, there will be pavers that --

4 A I remember the pavers.

5 Q Now, you all have pavers at your home,
6 correct?

7 A Correct.

8 Q Where do you -- who worked with the pavers at
9 your home?

10 A Our pavers are not the same pavers that they
11 found there that were shown in the photographs. We have
12 peach-colored pavers. Those pavers were white. Those
13 were 12-by-12. Ours are 16-by-16 and 14 by whatever.
14 Our pavers are like a peach color.

15 Q So it's your understanding --

16 A We've never had white pavers at our house.

17 Q So it's your understanding that the location
18 that Mr. Casey went to on multiple times did, in fact,
19 turn out to be the area where Caylee was ultimately
20 found?

21 A My understanding -- I don't know exactly where
22 Mr. Casey went in relation because you can't tell by his
23 pictures with the way it looks now --

24 Q But there on that drive -- what road did you
25 say, on what?

1 A Suburban.

2 Q Suburban. But he went to Suburban Road on
3 his visits into the woods, correct?

4 A That's what he says.

5 Q Okay. And he did that solely based on his
6 conversation with this psychic?

7 A Correct.

8 Q Okay. Now, if the psychic didn't tell him
9 this, someone else would have; true? If the tip didn't
10 come from the psychic, the tip --

11 A I think the sheriff's department already
12 established that it was the psychic through her phone
13 records and his phone records. And she's also come to
14 the sheriff's department and told them or spoken with
15 them.

16 So my understanding it is Ginette because
17 she's already given her records and Dominic's given his
18 records voluntarily to Sergeant Allen and Nick Savage to
19 verify that, indeed, it matches the time on the time
20 stamp of the video that Mr. Hoover took.

21 Q And where does Ginette live?

22 A I think Virginia.

23 Q Okay. And is it fair to say if it was not the
24 psychic, that the only other person it could have been
25 would have been someone who had firsthand knowledge of

1 how --

2 A You know, I don't know what to say to that
3 because, from my understanding, is they've already
4 confirmed that it was her who he spoke to and he was
5 speaking to her while he was there. So that's already
6 been established. So I could not speculate on anything
7 else.

8 Q But if that is not, in fact, the case --

9 A I have no idea. I would not want to speculate
10 on that, sir.

11 Q Okay.

12 A That would be an ongoing investigation.

13 Q But just a hypothetical, then --

14 A I don't do hypotheticals, sir. You need to
15 ask me a question that I can actually answer, and I'll
16 answer.

17 Q The question would be if it wasn't the
18 psychic that -- if it wasn't the psychic --

19 A Well, he didn't find Caylee that day, so
20 obviously, you know --

21 Q He never found Caylee.

22 A No, he didn't, and neither the psychic had a
23 premonition prior to her being found. Now, we did work
24 with the psychic before that up until November believed
25 that Caylee was, indeed, alive.

1 Q Wasn't there a time where -- was it the same
2 psychic or different psychic?

3 A It was the same psychic.

4 Q Okay. So the psychic and you were having
5 conversations --

6 A I never spoke to the psychic. In fact, I
7 never knew her last name or anything until after the
8 video came out.

9 Q So Dominic was having conversations --

10 A Dominic was having conversations.

11 Q -- with the psychic? And Dominic was
12 giving the psych -- to tell the psychic what was going on
13 in the investigation?

14 A No. Dominic -- from my understanding, she
15 would seek him out when she had a vision.

16 Q Okay. And the question, then, is if it was
17 not the psychic --

18 A There is no question in my mind that it isn't
19 the psychic because of Dominic's phone records who he was
20 speaking with at the time and his statements to the
21 sheriff's department, and his phone records and her phone
22 records coincide with the video. So there is no
23 speculation. There is nothing in my mind that it is not
24 her.

25 Q Okay.

1 A okay?

2 Q I understand that, but there is -- Dominic was
3 speaking to a lot of people.

4 A I'm not aware of that. His phone records
5 don't show that. His phone records show that he spoke to
6 his daughter --

7 Q well, you're aware that Mr. --

8 A -- and to her.

9 Q You're aware that Mr. Hoover believes that the
10 tip didn't come from the psychic because he didn't
11 believe --

12 A Mr. Hoover -- you know, Mr. Hoover can believe
13 what he wants, but if you could check Lee's phone records
14 and Dominic, they didn't even speak that day. So Mr.
15 Hoover -- you know, it's like Mr. Hoover. I mean, mr.
16 Hoover wants to make money off of this like a lot of
17 people.

18 I don't believe anything Mr. Hoover says. Mr.
19 Hoover was videotaping us getting fingerprinted and we
20 had no idea in Brad's office. And John Allen found out
21 about it because it was on Mr. Hoover's camera when
22 Sergeant Allen confiscated his camera. So I don't
23 believe a dang-gone thing that Mr. Hoover states.

24 Q There was a time when Casey was saying that,
25 from jail or at home, I feel like she's close. I feel

1 like Caylee is close to home. Do you remember that?

2 A I remember what she said.

3 Q It turned out she was right, wasn't she?

4 A well, people heard that.

5 Q No, ma'am. That's a yes or no.

6 MR. CONWAY: Yes or no.

7 Q It turns out that Casey was right when she
8 said I feel like --

9 A Yes.

10 Q -- Caylee is close?

11 A Yes. And someone probably heard that and put
12 Caylee's body there after the fact.

13 Q what does that mean? Say that again.

14 A what does that mean? She wasn't there when
15 Dominic was there in November, so --

16 Q How would Casey --

17 A -- someone had to put her there.

18 Q How would Casey know that she was close?

19 A She felt -- what she meant by that is, what
20 she explained to me, is that she felt that Zanny was
21 still in the area because Zanny told her she'd bring her
22 back to her in 50 days, which was Caylee's birthday.

23 Q So when --

24 A So don't take stuff out of context and think
25 that just because it's said that, you know, that it means

1 anything.

2 Q well, I think that's part of the problem here
3 that what is said is --

4 A No, part of the problem is, number one, again,
5 this person, this case and why I'm here today and why
6 this lawsuit is here and why I'm here is to state that
7 this person had nothing to do with Caylee's
8 disappearance.

9 Q Let me just -- let me focus --

10 A And you said on TV if I said and if Casey said
11 that she had nothing to do with it, that's all you
12 wanted. You said that on -- you said that on November
13 17th with your Channel 9 interview that you had here.

14 Q I do want to -- I do want to commend you. You
15 know your dates --

16 A Yeah, I do because I --

17 Q -- and page numbers better than anybody.

18 A -- did my homework before I came here today,
19 sir, and I got prepared for this.

20 Q Okay. well, you're the most prepared witness
21 I've ever had.

22 A well, you know what, sir? This is -- this
23 is --

24 MR. CONWAY: Cindy --

25 A This is important to me because this

1 affects --

2 Q Of course.

3 A -- my granddaughter. This affects me.

4 Q what all --

5 A okay?

6 Q what all did you do to prepare for this today?

7 A why I did to prepare for this is I watched
8 your interview and I pulled three things. I pulled
9 the -- you asked for it. I pulled the Sawgrass apartment
10 where someone signed C. Zenaida Gonzale.

11 Q where did you get that from?

12 A From the discovery. It's page 45.

13 Q okay. Are you --

14 A Do you want a copy of it?

15 Q Are you aware of the day that she filled out
16 that form at Sawgrass?

17 A June the 17th.

18 Q Isn't that right after that Casey had a fight
19 with her family --

20 A Yeah, it is.

21 Q -- and left the home?

22 A She didn't have a fight with me. Go there.
23 Go there, Mr. Morgan. She didn't fight with me, sir.

24 MR. CONWAY: Cindy.

25 THE WITNESS: No, no.

1 MR. CONWAY: Listen --

2 THE WITNESS: Let it go. Let him look like an
3 ass on the thing. Go ahead.

4 BY MR. MORGAN:

5 Q Isn't that at the time that Zenaida
6 Gonzalez -- you are aware that this Zenaida Gonzalez was
7 at Sawgrass Apartments, are you not?

8 A Whether or not she was or not, what I am aware
9 of -- is that her signature?

10 Q You said --

11 A Is that her signature?

12 Q You just said --

13 A Did she sign it C --

14 Q Hold on.

15 A No, answer the question is did she -- you're
16 asking me did she sign that. Okay?

17 Q I'm asking you --

18 A All right. You're asking me a question and I
19 want to verify it. Did she sign that Sawgrass thing C.
20 Zenaida Gonzale? She just shook her head yes.

21 Q Let me ask you a question.

22 A So was your client there --

23 MR. CONWAY: Let him ask the question.

24 A -- and she, in fact, signed that?

25 MR. CONWAY: Cindy, let him ask the question.

1 THE WITNESS: Go ahead. Ask me the question.

2 BY MR. MORGAN:

3 Q You said you have prepared to get ready today
4 because this is an important --

5 A Yes.

6 Q -- day for you?

7 A Yes.

8 Q And you said that one of the things you did in
9 the preparation was you examined the signature from C.
10 Zenaida Gonzalez at Sawgrass Apartments?

11 A Right, from the discovery.

12 Q From the discovery. And you said you're here
13 to clear this Zenaida Gonzalez's name?

14 A Correct.

15 Q Isn't it true, ma'am, that the date that you
16 examined that signature was on June 17th?

17 A No.

18 MR. CONWAY: Yes or no.

19 A The date that I examined that signature --

20 Q No, the date that she was there.

21 A -- was two days ago. You just asked me the
22 other question.

23 Q Okay. when you examined -- when you examined
24 that document --

25 A Yes.

1 Q -- didn't you find that Zenaida Gonzalez was,
2 in fact, at that Sawgrass apartment on June 17th, 2008?
3 Yes or no? And I know that's the way you look it.

4 A I would not know --

5 Q I know that's the way you like it.

6 A -- if that's her signature. If that's her
7 signature, then the answer is yes.

8 Q Okay.

9 A If it's not her signature, then the answer is
10 I don't know. Is that fair to say that?

11 Q It's more than fair.

12 A Okay. Is that her signature?

13 Q And finally, isn't it true that two days
14 before Zenaida Gonzalez signed that at Sawgrass, that
15 Casey Anthony, your daughter, had had a fight with the
16 family and left the family and didn't return for 30 days
17 and was hanging out at Sawgrass Apartments and would have
18 had time to see this person at Sawgrass Apartments and
19 would have had a time to talk to people about her visit
20 to Sawgrass Apartments?

21 A No, because we did not have an argument.

22 MR. CONWAY: Yes or no.

23 A No. We did not have an argument on June --

24 Q Take the argument out. Isn't it a fact that
25 even if there's no argument, as you say, and Casey left

1 the home, that during those last -- those two days, that
2 she had the opportunity to go where her friends lived at
3 Sawgrass, to hang out at Sawgrass, to sleep at Sawgrass
4 and to see this person pull in and to get information
5 about Zenaida Gonzalez being at the Sawgrass Apartments?

6 A Then she -- then she would have told --

7 Q Yes or no?

8 A -- told the sheriff's department --

9 Q Yes or no?

10 A -- that it was C. Zenaida Gonzale --

11 Q Yes or no?

12 A -- and not --

13 Q Yes or no?

14 A -- Zenaida Fernandez-Gonzalez.

15 Q Yes or no? You like it --

16 A No.

17 Q -- this way.

18 A No, no. It's not fair to say.

19 Q Okay.

20 A It's not fair to say.

21 Q And why is that?

22 A Because -- you're asking me why is that?

23 Because if you're saying that Casey's accusing her, then
24 on her statement on July 16th, she would have said the
25 nanny was C. Zenaida Gonzale, okay, without a Z on it.

1 Q And then from --

2 A Where's the Fernandez come in?

3 Q Let me tell you --

4 A Casey gave that.

5 Q Let me say this to you.

6 A So there you go, Mr. Morgan. Where did she
7 get the Fernandez? Where did you get the Fernandez? Why
8 don't you tell the camera and all the viewers out there
9 where Fernandez came from. It's not on her DMV record.

10 Q I'm going to --

11 A That's part of our homework too.

12 Q Casey, your daughter --

13 THE WITNESS: What's your date of birth?

14 MR. MORGAN: Ma'am, please.

15 THE WITNESS: 10/1/1970?

16 MR. MORGAN: Brad, for God's sake. This is
17 outrageous.

18 MR. CONWAY: Cindy.

19 THE WITNESS: It's not outrageous.

20 MR. DILL: This is a court proceeding.

21 MR. MORGAN: This is a court proceeding. This
22 is going to be played at a trial at some date. For
23 your own good, please stop.

24 MR. CONWAY: Cindy, you've got to listen to
25 the question.

1 THE WITNESS: I got it out. Yeah, my chest is
2 pounding. It hurts. I got it out because he's got
3 to prove it now. He opened the door. Thank you.

4 MR. CONWAY: Just --

5 THE WITNESS: Thank you, Mr. Morgan. Thank
6 you. Go ahead. I'm done.

7 BY MR. MORGAN:

8 Q You're going to be thanking me for something
9 else here in a minute.

10 A I'm thanking because you opened the door. You
11 said she signed it that day so now you've got to prove.

12 Q Casey, your daughter, was at Sawgrass
13 Apartments.

14 A I don't know.

15 Q She had friends at Sawgrass Apartments who
16 lived there, didn't she?

17 A I don't know if they lived there on the 16th
18 or not or the 17th.

19 Q Okay. Or the 15th?

20 A I don't know.

21 Q And you don't know if she was visiting friends
22 there on the 17th, do you?

23 A No.

24 Q And so if she was, you wouldn't know one way
25 or the other?

1 A That's correct.

2 Q So you've come here to clear this woman?

3 A Correct.

4 Q We go all the way back to the beginning.

5 You've been told that -- by the police officers that your
6 daughter had identified in a line-up or had cleared this
7 woman in a line-up and that she did not -- that this was
8 not the Zenaida Gonzalez. The police told you that,
9 correct?

10 A The police told me that, correct.

11 Q And then you went and met with Casey, and she
12 told you that she had never seen a line-up and she had
13 never said that wasn't the person, correct?

14 A Correct.

15 Q And then, ma'am -- and this is what you're
16 going to thank me for. And then despite that fact and
17 despite that lie that you knew, you went on TV and you
18 said that this is the person --

19 A No, I did not.

20 Q Ma'am.

21 A I did not say that this is --

22 Q We've already --

23 A -- the person.

24 Q We have played this.

25 MR. CONWAY: Let him ask the question.

1 Q You went on television -- instead of clearing
2 this person's name when you had the opportunity on
3 television to clear this person's name, even though that
4 the police had told you, that Casey had told you that,
5 this Zenaida Gonzalez was not the person she picked out,
6 you went on TV and did not clear her name that night, did
7 you?

8 A No, because I didn't know --

9 Q Yes or no the way you like it?

10 A I didn't --

11 Q Yes or no the way you like it?

12 A No, because I didn't know her name was C.
13 Zenaida Gonzalez or I would have -- Gonzale or I would
14 have cleared her name.

15 Q Let's don't play games. You like it --

16 A I said Zanny.

17 Q You like it --

18 A I didn't say C. Zenaida. What's C stand for?

19 Q You know --

20 A Zenaida's probably her middle name.

21 Q You knew when you went on TV that night that
22 this woman was not the Zenaida Gonzalez and you did not
23 clear her name, did you? Yes or no, if you dare?

24 A No.

25 Q Thank you.

1 A No.

2 Q And then, ma'am, in fact, you published the
3 defamation and you slandered this woman yourself in that
4 publication; isn't that true? Yes or no?

5 A No.

6 MR. MORGAN: That's all I have.

7 THE WITNESS: Nope. You slandered me --

8 MR. CONWAY: Stop.

9 THE WITNESS: -- on TV.

10 MR. CONWAY: Stop.

11 THE WITNESS: And you've perjured yourself
12 with this --

13 MR. CONWAY: Stop.

14 THE WITNESS: -- because she's not Fernandez.

15 MR. DILL: Let's go off the video record.

16 THE WITNESS: So there you go. You want to
17 fight it, go for it. Prove to us that she is
18 Zenaida Fernandez-Gonzalez.

19 THE VIDEOGRAPHER: The time is 4:17. We'll go
20 off the record.

21 THE WITNESS: Prove it.

22 MR. MORGAN: I have, Cindy. I have.

23 MR. CONWAY: Do you know something? This is
24 completely out of hand.

25 MR. MORGAN: Well --

1 THE WITNESS: Because if we were in a
2 courtroom, the judge wouldn't have let you talk to
3 me that way either.

4 MR. MORGAN: Well, you've told the truth at
5 least.

6 THE WITNESS: I always told the truth, Mr.
7 Morgan.

8 MR. CONWAY: Stop.

9 THE WITNESS: I went on TV a while ago and
10 said --

11 MR. DILL: Let's go off record. We'll go --

12 THE WITNESS: -- that it wasn't her because
13 you responded back and told me that I shouldn't be
14 praying --

15 MR. DILL: -- ahead and go off --

16 (Off-the-record discussion was had.)

17 (The proceedings were concluded at 4:18 p.m.)
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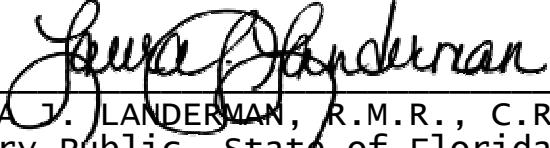
1 CERTIFICATE OF OATH

2 STATE OF FLORIDA

3 COUNTY OF ORANGE:

4 I, LAURA J. LANDERMAN, R.M.R., C.R.R., F.P.R.,
5 certify that CINDY ANTHONY personally appeared before me
6 on the 9th day of April, 2009, and was duly sworn.

7
8 WITNESS my hand and official seal this 17th day of
9 April, 2009.

10 
11 LAURA J. LANDERMAN, R.M.R., C.R.R., F.P.R.
12 Notary Public, State of Florida at Large
Commission No. DD 485623
Commission Expires: Feb. 20, 2010



- - - - -
CERTIFICATE OF REPORTER

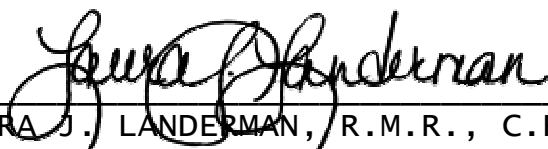
STATE OF FLORIDA:

COUNTY OF ORANGE:

I, LAURA J. LANDERMAN, R.M.R., C.R.R., F.P.R., do hereby certify that I was authorized to and did stenographically report the deposition of CINDY ANTHONY; that the review of the transcript was requested; and that the foregoing transcript, pages 1 through 186, inclusive, are a true and complete record of my stenographic notes.

I further certify that I am not a relative, employee, attorney or counsel of any of the parties nor am I a relative or employee of any of the parties' attorneys or counsel connected with the action, nor am I financially interested in the outcome of the action.

DATED this 17th day of April, 2009.



LAURA J. LANDERMAN, R.M.R., C.R.R., F.P.R.

DEPOSITION OF: CINDY ANTHONY- 04/09/09
CASE STYLE: Gonzalez v. Anthony
CASE NO.: 08-CA-24573

At the time of the reading and signing of the deposition, the following changes were noted:

PAGE #	LINE #	CORRECTION	REASON
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[illegible]

Under penalties of perjury, I have read my deposition in this matter and it is true and correct, subject to any changes in form or substance as reflected above.

Dated: _____ Signed: _____