

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

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

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

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

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

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

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

Page 1

1 IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF COLORADO

2

Civil Action No. 98-WY-528-CB

3

4 STEPHEN MILES, )

) VIDEO

5 Plaintiff, )

vs. ) DEPOSITION OF

6 )

JOHN RAMSEY, NATIONAL ENQUIRER, ) JOHN RAMSEY

7 INC., JOHN SOUTH, DAVID WRIGHT, )

and JOHN DOES NOS. 1 - 20, )

8 )

Defendants. )

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PURSUANT TO NOTICE, the video deposition of

11 JOHN RAMSEY was taken by the Plaintiff at the offices of

White & Steele, P.C., 1225 - 17th Street, Denver,

12 Colorado, beginning at 9:36 a.m. on Tuesday, October 20,

1998, pursuant to the Federal Rules of Civil Procedure,

13 before JOHN J. SPERA, Certified Shorthand Reporter and

Notary Public for the State of Colorado.

14

15 APPEARANCES:

16 W. LEE HILL, Attorney at Law, P. O. Box 21181, Boulder,

Colorado 80308, appearing for the Plaintiff

17

JOHN P. CRAVER, Attorney at Law, WHITE & STEELE, P.C.,

18 1225 - 17th Street, Ste. 2800, Denver, Colorado 80202,

appearing for John Ramsey

19

WILLIAM R. GRAY, Attorney at Law, PURVIS, GRAY, SCHUETZE &

20 GORDON, Exeter Building, 1050 Walnut Street, Ste. 501,

Boulder, Colorado 80302, appearing for John Ramsey

21

BRYAN MORGAN, Attorney at Law, HADDON, MORGAN & FOREMAN,

22 P.C., 150 East Tenth Avenue, Denver, Colorado 80203,

appearing for John Ramsey

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Page 2

1 APPEARANCES CONTINUED:

2 MATTHEW J. HERRINGTON, Attorney at Law, WILLIAMS &

CONNOLLY, 725 Twelfth Street, N.W., Washington, D.C.

3 20005, appearing for the National Enquirer

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5

ALSO PRESENT:

6

Mr. Stephen Miles

7 Ms. Julia Yoo

Peter Morgan, Esq.

8 Mr. Bill Myers, videographer

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11

12 I N D E X

13 MARKED

14 Exhibit 1: Computer printout photograph

10-20-98 76

15 Exhibit 2: Computer printout photograph

10-20-98 76

16 Exhibit 3: National Enquirer article,

10-21-98, two pages 76

17 Exhibit 4: National Enquirer article,

one page 76

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21 Marked questions: 32, 57

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25

Page 3

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

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

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

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

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

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

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

8 for the District of Colorado.

9 Will counsel please introduce themselves?

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

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

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

13 Miles.

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

15 representing John Ramsey.

16 MR. GRAY: William Gray here on behalf of Mr.

17 Ramsey as well.

18 MR. HERRINGTON: Matt Herrington on behalf of

19 the National Enquirer, John South and David Wright.

20 MR. CRAVER: Also present is Bryan Morgan also

21 counsel for John Ramsey.

22 This morning we're taking -- the plaintiff is

23 taking the videotape deposition of John Ramsey. We are

24 taking this deposition pursuant to a stipulated protective

25 order entered into between the plaintiff and Mr. Ramsey.

Page 4

1 I want to make sure that everybody in the room

2 acknowledges that the court has ordered this deposition

3 sealed and therefore the content of any testimony or

4 activities within this room are to be maintained

5 confidential.

6 Is everybody in this room agreeable to abide by

7 that order?

8 MR. MORGAN: Yup.

9 MR. CRAVER: I see nothing but affirmative nods.

10 Nobody has indicated otherwise; is that correct?

11 MR. HILL: That's correct.

12 MR. CRAVER: Further, the parties have agreed

13 that the information conveyed in this deposition as well

14 as the content will remain confidential until ordered

15 released by the court or released by agreement of John

16 Ramsey through his counsel.

17 MR. HILL: Correct.

18 MR. CRAVER: And it is also agreed that these

19 proceedings will not be commercially marketed without the

20 agreement of John Ramsey.

21 MR. HILL: Correct.

22 MR. CRAVER: Everybody in the room understands

23 that agreement?

24 MR. MILES: Yes.

25 MR. CRAVER: Within the parameters of those

Page 5

1 agreements, I'll allow you to proceed, Mr. Hill.

2 MR. HILL: Thank you.

3 JOHN RAMSEY

4 was called for video deposition and after having been

5 first duly sworn, testified as follows:

6 EXAMINATION

7 BY MR. HILL:

8 Q. Good morning, Mr. Ramsey.

9 A. Good morning.

10 Q. As I introduced myself earlier, my name is Lee

11 Hill. I wanted to started initially and with all respect

12 by expressing my personal sympathy and my client's

13 sympathy and everyone who works on my team for your tragic

14 loss.

15 A. Thank you very much.

16 Q. I'll do my best not to touch upon sensitive -- I

17 mean, I realize all of this is sensitive, but I'll do my

18 best to make it as easy and painless as possible.

19 A. Thank you.

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

21 about this procedure. I don't know if you've ever had

22 your deposition taken before?

23 A. (Shakes head.)

24 Q. This is, of course, a stenographer, a court --

25 certified court reporter. He's administered an oath to

Page 6

1 you and even though this setting is relatively casual,

2 more casual than a courtroom appearance, everything you

3 say under oath will have the same full force and effect as

4 if you were testifying in court. Do you understand that?

5 A. Uh-huh.

6 MR. GRAY: Try to say yes or no, John.

7 THE WITNESS: Yes, I understand that.

8 Q. Because we have a court reporter typing down

9 essentially every phonetic sound that we make, it's real

10 important for us to deviate a little bit from standard

11 conversational practice. If I say uh-huh, unt-un, it

12 results in a garbled record. The same for you.

13 A. Okay.

14 Q. A couple of things are real critical, but real

15 easy to adjust to. Basically, we must let everyone

16 complete their sentences before someone else begins to

17 speak. That's because we don't have stereo court

18 reporting going on here.

19 A. Okay.

20 Q. Also, we need to respond with audible words.

21 A. Uh-huh.

22 Q. Do you understand?

23 A. I understand.

24 Q. Fantastic. We've got that down. I will be

25 trying to ask questions that are understandable and

Page 7

1 coherent. Sometimes I don't always succeed. So I ask for

2 your help in making sure that you understand my questions

3 before you respond.

4 If you don't know the answer to a question, "I

5 don't know" is a perfectly understandable answer. If you

6 don't remember, "I don't remember" is perfectly fine. I'm

7 not asking you to guess about anything. I am asking you

8 to do your best to be as complete and as candid and as

9 truthful as possible, and I trust that you'll abide by

10 that.

11 A. Certainly will.

12 Q. As I mentioned earlier, if at any point during

13 the deposition you need to take a break, please just let

14 us know and we'll accommodate you, no problem.

15 A. Okay.

16 Q. I need to ask you a couple of other questions

17 that might sound awkward, but it's my attempt to insure

18 that we're getting your best testimony today.

19 I don't know, for example, whether you might be

20 under the influence of any medication or alcohol or

21 anything else?

22 A. No alcohol certainly, but I've been under

23 doctor's care for almost two years now and take Prozac.

24 Q. Yes, sir. That doesn't affect your ability to

25 recall though, does it? Maybe slightly?

1 A. It seems like.

2 Q. Can't remember whether it affects it or not?

3 I'm not going to be --

4 A. I don't know whether it's that or just the

5 trauma we've been through, but --

6 Q. Yes, sir. I understand. We'll just deal with

7 that the best we can.

8 Are you comfortable right now?

9 A. Uh-huh, yes.

10 Q. As we go through the questions, eventually

11 you'll have an opportunity to review the written

12 transcript of what we've said here today and at that time

13 you'll have the opportunity to make corrections.

14 Sometimes, as infallible as they generally are,

15 court reporters may make a mistake. You can catch those

16 mistakes. You'll have an opportunity to correct the final

17 record.

18 Ordinarily, that has little to no significance.

19 However, if you were to make a sweeping change, a

20 substantive change -- for example, changing a yes to a no,

21 we might have an opportunity to comment upon that later if

22 this matter were to go to trial. Do you understand that?

23 A. Yes.

24 Q. So with that in mind, if corrections occur to

25 you as the deposition proceeds, please feel free to

Page 9

1 interject and help us tidy up the record before we

2 conclude today.

3 A. All right.

4 MR. HILL: Does anyone need to take a break at

5 this point?

6 MR. CRAVER: You're the only one talking.

7 Q. Do you have any questions about this process so

8 far?

9 A. No.

10 Q. Very briefly, I was going to ask you some

11 biographical questions. I understand that you're from

12 Michigan originally?

13 A. Originally from Nebraska. I was born in

14 Nebraska, left there at the end of the 6th grade, moved to

15 Michigan.

16 Q. And you attended Michigan State University?

17 A. Yes.

18 Q. As did I.

19 A. Okay.

20 Q. I was going to ask you, did you ever live on

21 campus?

22 A. I lived in -- I did.

23 Q. Do you remember the dorms or what they looked

24 like?

25 A. I remember the dorm well. Emmons Hall, perhaps.

Page 10

1 Q. I lived in Snyder Phillips which was one of the

2 old Gothic -- one of the original dormitory buildings.

3 What did you major in?

4 A. Electrical engineering.

5 Q. When did you attend?

6 A. I think I graduated from high school in 1961.

7 So I started that fall and then went through 1966 and then

8 went on for graduate studies which were interrupted by

9 Navy service.

10 Q. It saddens me to confess that I also share naval

11 service experience with you. What type of work did you do

12 with the Navy?

13 A. I was in the civil engineer corps and went

14 through OCS, officer candidate school.

15 Q. At Newport?

16 A. At Newport.

17 Q. Were you in NROTC?

18 A. No.

19 Q. So you graduated Michigan State with a

20 undergraduate degree in what year?

21 A. 1966.

22 Q. Was that a BS degree?

23 A. Uh-huh.

24 Q. Is that when you enrolled at OCS?

25 A. Yeah.

Page 11

1 Q. Were you drafted?

2 A. No.

3 Q. Just volunteered?

4 A. Uh-huh, yes.

5 Q. After you completed OCS, where did you go next

6 for training in the Navy?

7 A. I went to Port Waneenee, California, which is

8 the civil engineer corps school.

9 Q. How long were you there?

10 A. A couple months. I don't remember the duration,

11 but it was 10 weeks maybe.

12 Q. What was your next stop in the Navy?

13 A. Then I was assigned to the Philippines, Subic

14 Bay.

15 Q. What unit were you in?

16 A. I was with the public works center.

17 Q. Were you an ensign at that time?

18 A. Yes.

19 Q. What type of work did you do with the public

20 works center?

21 A. I was a facilities engineer and I had

22 responsibility for the naval supply depot facilities, as I

23 recall, most of the time I was there.

24 Q. Do you remember your commanding officer at that

25 time?

Page 12

1 A. When I got there, I believe it was Captain

2 Laland.

3 Q. Can we spell that for the court reporter's

4 convenience?

5 A. I'd be taking a guess. I think it was

6 L-a-l-a-n-d. I think.

7 Q. Thanks. How was he as a CO?

8 A. A gentleman.

9 Q. You're lucky. I was an aviation intelligence

10 officer, so I went through ASCS in Pensacola and ended up

11 in the 14th Squadron out of Miramar and deployed on

12 America, did an Indian Ocean cruise via the Med.

13 Did you ever deploy? Were you ever at sea?

14 A. No, I wasn't.

15 Q. That's the only way to be in the Navy. How long

16 were you at Subic?

17 A. It was approximately two years. I don't

18 remember exactly.

19 Q. During that time, did you ever get to come back

20 home or was it an uninterrupted stay?

21 A. It was uninterrupted.

22 Q. During that time, were you able to travel at all

23 through the rest of the --

24 A. We traveled a bit, yeah, on R&R.

25 Q. Do you remember what countries you visited

1 during that time?

2 A. We visited Japan, Hong Kong, Taiwan, Thailand.

3 I think that was it.

4 Q. Were you required to maintain a security

5 clearance?

6 A. Yes.

7 Q. What level of security clearance did you have?

8 A. Top secret.

9 Q. Was it compartmented also or a standard gen-cert

10 top secret clearance, if you remember?

11 A. I don't remember.

12 Q. If you don't remember, it was probably gen-cert?

13 A. Yeah.

14 Q. And that was a result of -- was it a special

15 background investigation, do you know?

16 A. As I recall, it was, yeah.

17 Q. SBI by the defense investigative service?

18 A. The FBI or somebody. I don't remember who did

19 it.

20 Q. How long did you remain in the Navy?

21 A. I was on active duty a little over three years I

22 think and then I stayed in the reserves for another --

23 gosh, I don't know, eight years maybe.

24 Q. Did you drill at all?

25 A. I did.

Page 14

1 Q. What units did you drill with?

2 A. I was with the -- this was in Atlanta. I was

3 with the naval air station, Cecil Field group for a while.

4 And then I was with the officer in charge of construction

5 for -- gosh, I don't remember -- the southeast or -- I

6 forget the unit name. It was a civil engineer corps unit.

7 Q. This is the one-weekend-a-month situation?

8 A. Right.

9 Q. Did you ever do the two weeks active duty

10 stints?

11 A. Uh-huh.

12 Q. Do you remember places?

13 A. Cecil Field in Florida several times. That's

14 the only one I remember.

15 Q. Throughout your reserve duty, did you maintain

16 your same security clearance?

17 A. I believe so.

18 Q. Have you ever had a current clearance revoked?

19 A. Not that I know of.

20 Q. Leaping ahead, from the termination of your

21 naval career to date, at any time during that period have

22 you received and maintained a government security

23 clearance?

24 A. No.

25 Q. In connection with your work with Access

Page 15

1 Graphics, did you receive any clearance?

2 A. No.

3 Q. Were you ever briefed or debriefed by any

4 federal agency with respect to security issues?

5 A. I don't recall.

6 Q. Needless to say, if you weren't maintaining a

7 clearance, no clearance was ever taken away from you

8 during that period, correct?

9 A. Not that I know of,

10 Q. Your departure from the Navy, do you recall what

11 rank you were at the time?

12 A. I left active duty I think as lieutenant.

13 Q. Your discharge was honorable?

14 A. Yes.

15 Q. Anything else eventful occur during your naval

16 service?

17 A. My first child was born.

18 Q. Congratulations. When were you first married?

19 A. 1966.

20 Q. When was your first child born?

21 A. 1969.

22 Q. Who was --

23 A. It was Elizabeth.

24 Q. I understand you lost another daughter?

25 A. Elizabeth.

Page 16

1 Q. I'm sorry --

2 A. Thank you.

3 Q. -- about that too: I'm going to go through a

4 couple of just necessary tidy-up questions. I expect I

5 know the answers to these, but in order to be complete --

6 let me explain something to you also.

7 There are a lot of hurtles that my client has to

8 clear in order to get at the source of these horrible

9 articles that were published about him. Have you read

10 those articles at all?

11 A. (Shakes head.)

12 Q. I brought copies with me to show you. I should

13 clarify too that you shook your head negatively?

14 A. No, I have not read the articles.

15 Q. While we have a visual record, we also have to

16 take care of our typed record here. I brought you a

17 couple of those articles to show you and, with your

18 attorneys permission, I'll let you look over those during

19 our first break.

20 You may be informed though that my client has

21 been the unwitting recipient of attention from the

22 national tabloid press. I'm informed that you have been

23 too?

24 A. I understand how that feels.

25 Q. I expected that you would, and also I'd like to

Page 17

1 express our empathy for you in that record.

2 A. Thanks.

3 Q. So we anticipate quite a bit of issues and

4 haggling regarding journalism shield laws, for example.

5 And it is our task to cover every bit of ground we can in

6 order to make it plain to the court ultimately -- I'm kind

7 of revealing my strategies.

8 MR. HERRINGTON: I'm getting this all down.

9 Q. So that we can take shots at that and try and

10 find out where these stories came from. So I'm going to

11 ask you questions that seem obvious or stupid. Please

12 don't take offense.

13 For example, if I ask you, have you ever been

14 convicted of a crime -- I don't think that you have.

15 Correct me if I'm wrong.

16 A. I have not.

17 Q. Have you ever been subject to a courts martial?

18 A. No.

19 Q. That prelude really overwhelmed the question

20 itself, didn't it? I'm from the South originally and I

21 suffer from long-windedness, so I'll try and cut it down.

22 You live in Atlanta. You can probably relate to that too.

23 Did you ever read any of the tabloid press

24 before two years ago?

25 A. No. It was not in my diet of information.

Page 18

1 Q. Me either, but I've learned a little bit about

2 them since then. I trust you've probably learned a little

3 about them since then too?

4 A. Regretfully I have, yes.

5 Q. We'll talk more about that in a little while,

6 but I'll like to invite you to start thinking about it

7 because I want to learn from you, if I can, what you've

8 learned about their tactics and the approaches that they

9 take.

10 Going through this preliminary material, I trust

11 that you've been impacted by the articles that have been

12 published?

13 A. Well, they've been very hurtful certainly, the

14 ones we're aware of.

15 Q. Exacerbating a tragic situation, correct?

16 A. Yes.

17 Q. Have you ever had occasion to speak with any of

18 the people who are directly involved with the tabloid

19 press?

20 A. The only time I've knowingly talked to someone

21 that I know of was this fellow Jeffrey Shapiro.

22 Q. When did you speak with him?

23 A. He called our house this past summer.

24 Q. What tabloid does he work for?

25 A. He said he worked for the Globe.

Page 19

1 Q. Had you ever met him before?

2 A. No.

3 Q. How many times did he call you?

4 A. I only remember that one time. That's the only

5 time I remember.

6 Q. He actually called you at home?

7 A. Yeah.

8 Q. Did you enter into a conversation with him?

9 A. Uh-huh.

10 Q. That would be yes?

11 A. Yes.

12 Q. Do you remember the substance of that

13 conversation?

14 A. He called and said he was moved to call, that he

15 felt badly for what he had done and that he felt I was

16 innocent and he wanted me to know that. And I said thank

17 you.

18 Q. Do you recall how long the conversation lasted?

19 A. Oh, I don't know. 20 or 30 minutes maybe.

20 Q. Have you ever corresponded with any member of

21 the tabloid press?

22 A. Not that I'm aware of. Let me put it that way.

23 Q. By "corresponded", I mean you writing them, not

24 them writing you.

25 A. Correct. I guess just to be perfectly clear --

Page 20

1 Q. Yes, sir.

2 A. How do we define "tabloid press," which is one

3 of the bigger challenges.

4 Q. I think that's a fantastic question. How would

5 you want to define it?

6 A. I would define it as the National Enquirer, the

7 Globe, the Star, the Examiner.

8 Q. Shall we throw any television programs into that

9 mix?

10 A. I think it would be very easy to do, but --

11 Q. Let's include everybody, why don't we, and then

12 we can separate what we agree to describe as the

13 main-stream press. Is that fair?

14 A. Sure.

15 Q. What is there, Hard Copy, American Journal,

16 Inside Edition?

17 A. I would never -- we've been chased by them and

18 pursued, but never knowingly made ourselves available to

19 them.

20 Q. Have you been the victim of any intrusive

21 investigative tactics, to your knowledge?

22 A. We've certainly felt they've been intrusive,

23 yes.

24 Q. I'd like you to help me develop that

25 anecdotally, if you don't mind.

Page 21

1 MR. GRAY: You're speaking of tabloid

2 investigative tactics?

3 Q. Or any other investigative tactics that you

4 don't know where they came from, for example.

5 MR. GRAY: This is not confined to the Enquirer?

6 MR. HILL: Correct.

7 MR. GRAY: Could you help me understand, what's

8 the relevance of that?

9 MR. HILL: The tabloid journalists I know talk

10 to each other. So as we try to find out where this

11 material derived from, I'd like to find out everyone who

12 had access to information regarding Mr. Ramsey's matter.

13 MR. GRAY: This is going to be a very long

14 deposition if you want to ask about every contact he's

15 ever had with harassing investigative techniques that

16 don't even involve parties to this litigation, Mr. Hill.

17 I'm just trying to understand what we can

18 anticipate for future questioning along this route or if

19 this is a relatively narrow area of your inquiry?

20 MR. HILL: It's just a developing area of my

21 inquiry and I'm sure it will go faster if we don't quarrel

22 too much.

23 MR. GRAY: I'm not trying to quarrel. I'm

24 wondering what the relevance is of questions about parties

25 that aren't involved in this litigation?

Page 22

1 MR. HILL: If I'm not mistaken, irrelevance is

2 an appropriate trial objection, but in this context, I

3 need to restrict my questions to what's reasonably

4 calculated to lead to the discovery of admissible

5 evidence.

6 MR. GRAY: And that's really what I'm asking.

7 What is it that we're looking at? Go ahead, John.

8 MR. CRAVER: Is there a question?

9 Q. I'm just looking for intrusive investigative

10 or --

11 A. We've had people parked outside of our home for

12 hours with binoculars and cameras. We've had people come

13 to our door with cameras.

14 Q. Was that here in Boulder?

15 A. No, it was Atlanta.

16 Q. How about here in Boulder?

17 A. Yeah, it was massive at the beginning.

18 Q. I may change places from time to time, and

19 reassuring your counsel and also reassuring you, I'm

20 paying for every word that's being written here, so I

21 don't want to protract this or make this any longer than

22 necessary.

23 You may have learned also already that out of

24 respect for the delicate nature of an on-going grand jury

25 investigation I think we all have respect for, we've

Page 23

1 agreed not to make inquiry of any issues directly

2 associated with the homicide investigation.

3 A. Yes.

4 Q. Although reserving an opportunity to come back

5 to ask questions about that if it seems necessary at a

6 later time after you may be called to testify before the

7 grand jury.

8 So I say all of that by way of explaining that,

9 you know, I expect this can go fairly quickly and

10 seamlessly, although we may not conclude today. We may

11 have the opportunity to declare a conclusion or resume

12 later at a time and place that's convenient for you.

13 I wanted to continue developing my understanding

14 of your career progression following your departure from

15 active duty. What did you do after you got out of the

16 Navy?

17 A. I went back and finished graduate school at

18 Michigan State, a master's degree in business. That took

19 about a year, I think, 15 months. Went to work for AT&T.

20 Q. Where?

21 A. In -- I was hired in Chicago, but I went to work

22 in Columbus, Ohio.

23 Q. What type of work were you doing for them?

24 A. I was in an initial management development

25 program that they had for new college hires.

Page 24

1 Q. You were on the career path?

2 A. I was -- they start you out in a supervisory

3 role. I supervised a -- what was it called -- a test

4 board. I forget the name of the test board.

5 Q. When you were in the Navy, I take it you also

6 supervised personnel; is that correct?

7 A. Yes.

8 Q. How many people at any given time were you in

9 charge of?

10 A. Gosh, I don't remember. In the order of a 100,

11 maybe.

12 Q. Did you live on base?

13 A. In the Philippines, I lived off base until we

14 were able to get on-base housing. I lived on base.

15 Q. Was your wife there with you in the Philippines?

16 A. Yes.

17 Q. How long did you stay with AT&T?

18 A. One year.

19 Q. So that brings us up to what year, '67, '68?

20 A. No, it would have been early '70s. I don't

21 remember the exact year.

22 Q. And from AT&T, where did you go?

23 A. I went to work for a company called BCS

24 Associates.

25 Q. What does BCS stand for?

Page 25

1 A. They were a manufacturer's representative for

2 electronic equipment in the Southeast. I was a salesman

3 for them.

4 Q. How long did you work for them?

5 A. Two years maybe, three years.

6 Q. Did you leave AT&T on favorable terms?

7 A. As far as I know.

8 Q. You weren't fired from AT&T?

9 A. Well, the program was a -- let's try it for a

10 year, then make a decision whether or not this is going to

11 work or not. And we both concluded it wasn't.

12 Q. So it was a mutual decision or was it --

13 A. Well, it was -- AT&T had the right to decide,

14 and they did decide that I wasn't a good fit for their

15 management, top management rank.

16 Q. Do you know what they based that decision on or

17 what --

18 A. I think I wasn't as aggressive or as strong a

19 personality as they felt they needed to see in a big

20 organization.

21 Q. You weren't enough of a jerk?

22 A. Didn't have enough of an impact.

23 Q. Did you hear my question?

24 A. Yeah.

25 Q. Is that what it boils down to?

Page 26

1 A. I think it -- yeah, they were looking for people

2 that would come in and challenge the system and make

3 waves.

4 Q. Was BCS better for you then?

5 A. Yeah, yes.

6 Q. Where did you go after BCS?

7 A. I went to work for a company called Vidar,

8 V-i-d-a-r.

9 Q. What did they do?

10 A. They made process monitoring systems.

11 Q. Your transition of out BCS, can you tell me

12 about that?

13 A. I had represented Vidar in my sales position,

14 had accepted a job, a new job with a company and then

15 Vidar approached me and said, gee, if you're going to

16 leave, we'd like you to come work for us.

17 So at the last minute, I decided to turn down

18 the original position I left for and took a job with

19 Vidar.

20 Q. Where were they located?

21 A. Vidar?

22 Q. Yes, sir.

23 A. Mountain View, California.

24 Q. Did you relocate?

25 A. I was based in Atlanta.

Page 27

1 Q. How long did you work for Vidar?

2 A. Probably about five years I think.

3 Q. This brings us up to about what time?

4 A. It should be maybe 1977, approximately.

5 Q. When you began or when you ended?

6 A. When I ended.

7 Q. Vidar?

8 A. Vidar.

9 Q. Please tell me a little about the terms of your

10 departure from Vidar and where you went next.

11 A. They wanted me to move to Mountain View to take

12 a product management role, and I just couldn't figure out

13 who how I could afford to do that because of the cost of

14 housing and so forth.

15 So I proposed to them that I represent them as a

16 manufacturer's representative in the Southeast as an

17 independent and --

18 Q. That was the nature of your next transition, you

19 became an independent contractor still working with Vidar?

20 A. Correct.

21 Q. And you were based out of Atlanta?

22 A. Right.

23 Q. How long did you maintain that position?

24 A. Well, that basically allowed me to start my own

25 little business, which was a manufacturer's rep company,

Page 28

1 Vidar being the heart of it, and that continued for --

2 well, really until we started Access Graphics.

3 Q. When did you start Access Graphics?

4 A. Well, Access was started by merging three

5 companies together in 1989, I think.

6 Q. The company that you established and two others?

7 A. It was -- basically, yeah.

8 Q. What was the corporate title of your company?

9 A. Of my company in Atlanta?

10 Q. Yes, sir.

11 A. The company that we merged was called Advanced

12 Products Group, and by that time we had become a

13 distributor of product, not just a manufacturer's rep.

14 Q. What kind of product were you working with?

15 A. We were working with computer aided design, PC

16 based computer aided design products.

17 Q. Software products or finished products?

18 A. Primarily hardware.

19 Q. So like mainframes that did CAD work or --

20 A. No, this is when CAD migrated to the PC market.

21 Q. CAD, C-A-D?

22 A. Right.

23 Q. For the reporter's -- I'm not trying patronize

24 you, but just to clarify this. Like --

25 A. Plotters, digitizers.

Page 29

1 Q. Pins, that sort of thing?

2 A. Uh-huh.

3 Q. I'm going to leap out of sequence here briefly

4 and ask you -- Access Graphics, once that was formed, what

5 type of product or service did Access Graphics provide?

6 A. It was initially largely based on computer aided

7 design products.

8 Q. And then what did it become involved with?

9 A. Well, it's real success story was Sun

10 Microsystems.

11 Q. Can you elucidate that? Because I know nothing

12 about Access Graphics.

13 A. Access Graphics, basically, was a distributor

14 that sold to re-sellers of product. Re-sellers took the

15 product to users, typically industrial/commercial users.

16 And Sun Microsystems was anxious to develop an

17 independent re-seller channel, which we were part of in

18 the early '80s -- well mid '80s I guess, and that was a

19 very good opportunity for us. That really helped the

20 company grow.

21 Q. At that point, were you selling mainframes or --

22 A. We were selling Unix workstations.

23 Q. Were you still selling drafting hardware?

24 A. Uh-huh.

25 Q. Were you involved in software development?

Page 30

1 A. No. Not development, no.

2 Q. Is that the way business continued at Access

3 Graphics through 1996?

4 A. Basically, by adding product lines, but Sun was

5 the bulk of our business.

6 Q. You qualified it as "basically". What were

7 other ancillary product lines or service lines offered?

8 A. Oracle database software.

9 Q. What is Oracle.

10 A. Oracle is a Unix-based database software system.

11 Q. What does it do?

12 A. It is -- it's basically the ability to

13 manipulate data from a number of databases for accounting

14 or order processing or manufacturing uses. So it can be

15 tailored to different applications, but all based on the

16 fundamental requirement of underlying database

17 requirement.

18 Q. What other products or services did you feature?

19 A. Silicon Graphics, which was another Unix

20 workstation product, Hewlett Packard. A lot of little

21 things, pieces and parts.

22 Q. Access Graffics' office spaces are on the mall,

23 right, in Boulder?

24 A. Uh-huh.

25 Q. Did you have satellite offices anywhere?

Page 31

1 A. We had warehouses in -- in 1986, we had

2 warehouses in California and Pennsylvania. We had sales

3 people in probably 25 cities, but typically they'd either

4 work out of an executive suite or out of their home.

5 Q. A virtual office?

6 A. Yeah. We had an office in Amsterdam, Holland.

7 Q. And servicing your employees and their virtual

8 office stations, I trust you had a telecommunications

9 network established; is that correct?

10 A. We had E-mail, basically was the main way we

11 communicated.

12 Q. Did you maintain an E-mail station at your home?

13 A. No.

14 Q. Well, that's a luxury I prefer to claim as well.

15 I was going to offer or propose to take a brief recess at

16 this point to refill coffee cups, if that's agreeable to

17 you.

18 A. Sure, fine.

19 MR. MYERS: Off the record approximately 10:17.

20 (A recess was taken.)

21 MR. MYERS: We're back on the record

22 approximately 10:28.

23 Q. Thank you, Mr. Ramsey. Just to remind you, the

24 oath that you took earlier continues as we continue the

25 interview.

Page 32

1 A. I understand.

2 Q. I've wondered about Access Graphics, learning

3 about it. I've heard reports that it was the most

4 profitable subdivision of Lockheed Martin?

5 MR. CRAVER: I'm not going to let him answer any

6 questions regarding profitability of this company. So if

7 that's the area you're going to --

8 MR. HILL: You'll mark the record where the

9 witness is instructed not to answer.

10 MR. CRAVER: Correct.

11 MR. HILL: So you're instructing him not to

12 answer any, for example, net worth questions?

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

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

15 as well know that now.

16 MR. HILL: Okay, that saves us some time.

17 Q. I may ask you a couple of more questions along

18 those lines to perfect the record, and I encourage you not

19 to be too alarmed when the lawyers disagree and start

20 talking lawyer language. That's what we're paid sometimes

21 to do.

22 Nevertheless, with respect to the question I was

23 starting to ask, what I'm leading up to is an inquiry

24 regarding the type of services and equipment you provided

25 to Lockheed Martin or under U.S. Government contract. If

Page 33

1 you could inform me a little bit about that.

2 MR. CRAVER: To the extent that you don't

3 violate any secrecy or contractual agreements which your

4 company may have with Lockheed Martin, I'll permit you to

5 answer. You're the only one that would know about those

6 agreements, John.

7 A. We provided Sun workstations to Lockheed under a

8 contract that was negotiated between Sun, Lockheed and

9 ourselves. We provided Unix help-desk services to

10 Lockheed. That's really all I remember that we ever did

11 with Lockheed.

12 Q. Did you have any type of non-disclosure

13 agreements or secrecy agreements with Lockheed Martin or

14 any other recipient or client of your services?

15 A. Quite often we would have non-disclosure

16 agreements relating to new products that were disclosed to

17 us before they were released. Those kind of things.

18 Q. But no standard, blanket sort of secret

19 briefings?

20 A. (Shakes head.)

21 Q. You're shaking your head negatively?

22 A. No, not that I remember ever --

23 Q. As I asked earlier, no briefings by the U.S.

24 Government at any time?

25 A. No.

Page 34

1 Q. Regarding government classification or secrecy

2 issues?

3 A. No.

4 Q. So your spaces on the mall, for example, were

5 not hardened against electronic surveillance or otherwise

6 secured with respect to classification concerns?

7 A. No.

8 Q. Nor was your home?

9 A. That's correct.

10 Q. You were CEO of Access Graphics?

11 A. Yes.

12 Q. Did you enjoy any protective services from

13 Lockheed Martin's security?

14 A. No.

15 Q. Did you have a security network in place at

16 Access Graphics?

17 A. No.

18 Q. Did you ever receive any type of -- or were you

19 ever invited to participate in any type of corporate

20 security briefings by Lockheed Martin's security?

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

22 Q. Did you know anyone at Lockheed Martin's

23 security?

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

25 Q. When you say you don't think so, is there

Page 35

1 someone --

2 A. I knew a lot of people at Lockheed, but I don't

3 know that anyone was associated directly with their

4 security group, if they have -- I don't even know if they

5 have a security group. I assume they do, but --

6 Q. You don't know whether they do or not?

7 A. (Shakes head.)

8 Q. The answer is no?

9 A. The answer is no, yeah.

10 Q. Did you ever travel to any foreign countries

11 during the time that you were CEO --

12 A. Uh-huh.

13 Q. -- of Access Graphics?

14 A. Yes.

15 Q. Which countries did you travel to?

16 A. Holland, France, England. I think that was it.

17 That's all I can remember going to anyway.

18 Q. Do I understand correctly that you divorced your

19 first wife?

20 A. Uh-huh.

21 Q. What year was that?

22 A. 1978, I believe.

23 Q. What was her name? What is her name?

24 A. Lucinda.

25 Q. When did you remarry?

Page 36

1 A. In November, 1980.

2 Q. And that was?

3 A. Patricia.

4 Q. Where did the ceremony occur?

5 A. The marriage was in Atlanta.

6 Q. I'll refer to her as Mrs. Ramsey, if that's all

7 right?

8 A. Uh-huh.

9 Q. Mrs. Ramsey was with you in each of your

10 stations during your professional development?

11 A. Yeah, starting in 1980.

12 Q. In 1980?

13 A. Yes, with the exception of a period of time that

14 I commuted from Atlanta to Boulder before we moved.

15 Q. When was that?

16 A. Gosh, it would have been 1989/1990 kind of time

17 frame.

18 Q. How did you decide to come to Boulder?

19 A. When my son told his teacher that his mother

20 lived in Atlanta and his dad lives in Colorado, we decided

21 that wasn't a good idea. So we decided to go ahead and

22 move the family.

23 Q. How did you decide to bring your business to

24 Boulder?

25 A. Access Graphics was formed by putting three

1 small companies together, one of which was based in

2 Boulder.

3 Q. Which company was that?

4 A. CAD Distributors was the name of that company,

5 and it was larger than the other two, so it became kind of

6 the de facto headquarters.

7 Q. So when did you completely relocate your entire

8 family here in Boulder?

9 A. I think it was 1991, middle of 1991.

10 Q. Did you know anyone else who lived here in

11 Boulder before you moved here, apart from your immediate

12 business associates?

13 A. I knew Mel Phillips, who --

14 Q. Is that Mel?

15 A. Mel Phillips, who lived in Atlanta and moved to

16 Boulder.

17 Q. What does Mel do?

18 A. He's an attorney. I think that was the only

19 person that I learned that lived in Boulder that I had

20 known before.

21 Q. Mr. Phillips was married to Judith Phillips at

22 the time; is that correct?

23 A. Yeah.

24 Q. Did you also know Judith Phillips?

25 A. Uh-huh.

Page 38

1 Q. Before you moved here?

2 A. Yes.

3 Q. You were acquainted with her too?

4 A. Right.

5 Q. As you lived in Boulder and your family sent or

6 picked up the kids to and from school, did you develop a

7 social network in Boulder?

8 A. Yes.

9 Q. Who became your friends?

10 MR. CRAVER: At what time? 1991?

11 MR. HILL: 1991 through today.

12 A. Well --

13 MR. CRAVER: I've got to object. It's

14 over-broad. But you can answer it, John, to the extent

15 you're able.

16 Q. I'm looking for, you know, as best you can, a

17 comprehensive list of your friend and associates.

18 A. Friends -- they typically revolved around

19 children. John and Barbara Fernie, Fleet and Priscilla

20 White, Larry and Pinky Barber. I think those are probably

21 our three --

22 Q. The top of the list?

23 A. Yeah.

24 Q. How about any others that you would consider to

25 have been social acquaintances on a friendly basis?

Page 39

1 A. There were lots of people that would fall in

2 that category by the end of five years.

3 Q. I know it's daunting, but as best you can, if we

4 can get a list of as many of those as you recall today, it

5 would be very helpful, please.

6 MR. CRAVER: Social acquaintances on a friendly

7 basis?

8 MR. HILL: Right.

9 MR. CRAVER: People that you knew through the

10 church, activities through the church, things of that

11 nature, through work?

12 Q. Who would be invited to your house for dinner,

13 for example?

14 A. Well, our neighbors across the street, Betty and

15 Joe Barnhill. We had Betsy -- I can't think of their last

16 names. Roxy and Stewart Walker. We knew lots of people,

17 but then that's kind of the people we socialized with.

18 Q. Is that pretty much the complete list of people

19 that you would want to spend time with?

20 A. I don't know if it's a complete list. It's all

21 that comes to mind. Penny and Dr. Buff.

22 Q. If more names do come to mind between now and

23 when you review the transcript, if you don't mind just

24 inking that in so we have the best, most complete list we

25 can get, I would appreciate that.

Page 40

1 And the court reporter might leave a couple

2 blank lines to accommodate or remind you that we'd like to

3 do that, if you don't --

4 A. Yeah.

5 ( )

6 MR. GRAY: Is this the list of people that have

7 been to dinner at his house, a list of close friends, or a

8 list of -- I just want to make sure we understand what

9 you're asking him to make a list of, please?

10 MR. HILL: People Mr. Ramsey considers to be

11 social friends, including especially close friends and

12 people that the Ramseys invited to dine in their home.

13 THE WITNESS: We had, for example, a church

14 dinner at our house. There were 80 people there and I

15 didn't know --

16 Q. I'm not too worried about that. If there were

17 members of that group that came again, for example,

18 individually, I would be interested in having those

19 indicated. Does that help?

20 A. Yes.

21 Q. I understand a lot of people came to your house.

22 For example, from what I've read, you maintained open

23 houses from time to time?

24 A. We did an open house to benefit the historical

25 society one year.

Page 41

1 Q. Did you maintain a guest book at the house?

2 A. We didn't. I don't know --

3 Q. If the historical society did?

4 A. Yeah, if they did. And they sold tickets to go

5 through several houses at Christmas time.

6 Q. Actually, you occasionally also entertained at

7 your home, if I remember correctly?

8 A. Yes.

9 Q. Prior to the unfortunate tragedy, you

10 entertained at your home; is that correct?

11 A. Uh-huh.

12 MR. CRAVER: What do you mean by "prior"? You

13 mean during the years prior?

14 MR. HILL: During the month prior.

15 MR. CRAVER: Okay.

16 A. Yes.

17 Q. I have information that you hosed a party on

18 December 23; is that correct?

19 A. That's correct.

20 Q. Who did you invite to that party?

21 A. They were a group of friends and their children.

22 Certainly some of the people I've mentioned were there.

23 Priscilla White's parents were there. Some guests they

24 had, who we didn't know, were there. There might have

25 been others. That's all I can remember.

1 Q. Did you send out invitations?

2 A. No.

3 Q. Or --

4 A. I don't think so. They were probably -- I don't

5 know for a fact, but I believe Patsy called and invited

6 people.

7 Q. So she would know who was invited?

8 A. Perhaps.

9 Q. I don't know, for example, if there was

10 designated seating?

11 A. It wasn't a dinner. It was just a

12 family/children's get-together.

13 Q. Were gifts exchanged?

14 A. Patsy had little gifts for each of the children

15 and at least some of the adults, just token gifts.

16 Q. So somewhere we could expect that there is a

17 record of, for example, how many people attended the party

18 and who was there?

19 A. There wouldn't be a record.

20 Q. Someone would remember? Who is the best person

21 that would remember?

22 A. I think we've gone through that, hadn't we -- I

23 don't know -- for the police, but --

24 Q. I don't know anything -- I haven't been a part

25 of that or privy to it, so that's why I'm asking you.

Page 43

1 A. I mean, the best way we would have to remember

2 is to just sit down and try to remember. I think we've

3 done that, but I don't remember what we came up with.

4 Q. There may be --

5 A. The Barnhills were there, I remember that.

6 Q. As best you can insert then a complete list of

7 people who were at the party in the deposition transcript

8 as you review it, I would ask you to do that.

9 A. All right.

10 Q. Did your circle of friends include any public

11 officials in Boulder, County or Boulder City government?

12 A. No.

13 Q. Did your circle of friends include any

14 journalists?

15 A. I don't believe so, no.

16 Q. The time period that I'm inquiring about are,

17 let's say, from '94 to 1996, just to narrow it down a

18 little bit. Did your circle of friends include any law

19 enforcement officers?

20 A. No.

21 Q. Any lawyers?

22 A. Not our close circle of friends, no, that I can

23 recall. I don't think any lawyers.

24 Q. What's the first tier where a lawyer turns up?

25 A. Well, we knew people -- Noel Phillips was a

Page 44

1 lawyer, became a lawyer. That's the only one I can think

2 of that I knew.

3 Q. Were your friends the same as your wife's

4 friends?

5 A. Yeah, basically.

6 Q. Completely?

7 A. Well, within the people that we socialized with,

8 yeah. Pretty much, it was couples and family activity.

9 Q. Did either of you enjoy any degree of separate

10 social environment or milieu?

11 A. I mean, I had business entertaining that we

12 would do from time to time, which Patsy -- I never drug

13 her along, not particularly, that I can remember.

14 Q. Some couples, you know, share every friend in

15 common and others will have, you know, separate friends

16 interested in different things. I wouldn't expect you to

17 be a member of a sewing circle, for example. I don't know

18 if your wife was either.

19 What I'm asking is if -- I realize you don't

20 know who she would consider -- well, I'm asking you, do

21 you know whom she would consider to be in her close circle

22 of friends?

23 A. I think it would be the people we socialized

24 with as couples, Pinky Barber, Barbara Fernie, Priscilla

25 White, Roxy Walker.

Page 45

1 Q. Judith Phillips, would you consider her to be a

2 close friend?

3 A. No.

4 Q. I'm not asking currently, but previously.

5 A. No.

6 Q. If I'm not mistaken, she's made representations

7 in interviews that she was a close friend of the family's,

8 is that incorrect, or do you disagree with that?

9 A. Well, I think that's --

10 MR. CRAVER: Let me ask -- I object to the form

11 of the question. I think you're asking two questions in a

12 row. Can you just state one or the other?

13 MR. HILL: Sure.

14 Q. If she's made statements to the press that she

15 was a close friend of the family's, do you differ with

16 that?

17 A. I never considered her a close personal friend.

18 Q. Do you know if your wife considered her to be a

19 close personal friend?

20 A. I don't know for sure, but I would suspect not.

21 Q. What type of friend was she? How would you

22 characterize her friendship?

23 MR. CRAVER: At what time?

24 Q. During the two years preceding the tragedy.

25 A. She was Mel's wife. I had -- Mel and Patsy

Page 46

1 worked together in Atlanta. That's how we got to know

2 them. Mel was the friend. He was the reason for the

3 contact.

4 Q. At some point, Ms. Phillips became involved with

5 your late daughter's photographic portfolio development;

6 is that correct? Did she take photographs?

7 A. She took pictures of Patsy and the kids. I

8 don't know if there is others or not. That's the only

9 ones I'm aware of.

10 Q. Let me ask you very broadly. Did you maintain

11 the friendships that you had prior to the tragedy after

12 the tragedy occurred to date or have you lost any friends

13 along the way?

14 A. Not from our perspective.

15 Q. You haven't lost any friends along the way?

16 A. Not as I look at them.

17 Q. Can you tell me how you look at them? Some

18 relationships must occur to you as you qualify your

19 response in that way.

20 A. Well, friends are people that you've let in your

21 life and are sympathetic to their needs as people and

22 their well-being. There is no one that we don't think of

23 in that light.

24 Q. When you say "we", to whom are you referring?

25 A. Patsy and I.

Page 47

1 Q. Focusing for the moment upon your relationship

2 with Mr. and Mrs. White, is it your testimony that your

3 relationship continues on the same level of friendship as

4 it did prior?

5 A. No, we haven't talked to them probably for a

6 year and a half.

7 Q. Why not?

8 A. You'd have to ask them. I don't know.

9 Q. Why haven't you called them, for example?

10 A. I have.

11 Q. And what was the nature of the exchange?

12 A. I didn't get a response.

13 Q. They refused to talk to you since 18 months ago.

14 What was the precipitating moment you recognize that they

15 no longer were going to talk to you?

16 A. Well, we were pretty much in isolation for a  
17 long time just because we were devastated. Some people, I  
18 think around any tragedy, have difficulty being there. So  
19 we never really -- and we weren't particularly open to  
20 wanting to socialize for a long time. So I can't say  
21 there is any, you know, time.

22 Q. What was the last time you had direct contact,  
23 person-to-person, with the White family?

24 A. I think it was when I was in our priest office,  
25 Fleet White came in and spent a few minutes. That was --

Page 48

1 I don't know, I don't even remember when it was. It was  
2 quite a while ago.

3 Q. Was that here in Boulder?

4 A. Yes.

5 Q. When was the last time you had any contact with

6 Mrs. White?

7 A. Probably at -- might have been at the memorial

8 service for JonBenet here in Boulder, which I think was

9 when we came back, but I don't remember the time sequence.

10 Q. Was that before or after the Atlanta, Georgia

11 service?

12 A. I don't remember. I don't remember. It was in

13 the same time period.

14 Q. Did they attend the Atlanta memorial service?

15 A. Yes. Well, they were in Atlanta. I don't

16 remember much about the Atlanta memorial service, who was

17 there. As far as I know, they were there.

18 Q. Is it true that there was an altercation between

19 you and Mr. White in Atlanta around the time of the

20 memorial service?

21 MR. CRAVER: I don't understand the potential

22 relevance of that at all. At this stage, I have to judge

23 whether that's a question intended to embarrass or harass

24 him. Where are you going with this, Lee?

25 MR. HILL: I'm looking for sources. I'm looking

Page 49

1 for people who have an ax to grind with Mr. Ramsey.

2 MR. CRAVER: All right. I'll allow him to

3 answer the question.

4 A. There was no altercation.

5 Q. This is with all respect, sir, as I said to you

6 earlier. And I appreciate you hearing my clarification.

7 MR. CRAVER: Okay.

8 Q. We had been informed that there was some sort of

9 dispute or disagreement, that police were called. Is that

10 all hog-wash?

11 A. To my knowledge, yeah. I am not aware of any of

12 that.

13 Q. Also, I think much has been made about the

14 Whites traveling to Atlanta on the company plane that was

15 made available, but not traveling back on the company

16 plane. And I'm wondering if you could better inform me

17 about that?

18 A. I don't think Fleet was on the plane going out

19 to Atlanta. I don't remember if Priscilla was or not. I

20 remember that Fleet was not. That, I know for sure.

21 Q. He came down some other way to Atlanta?

22 A. Right.

23 Q. So it's your testimony that there was no heated

24 disagreement between you and the White family during that

25 time span?

Page 50

1 A. That's correct.

2 Q. Concerning Ms. Phillips, it's my perception that

3 there has been, in her view, a degradation of the warmth

4 and social relationship that she claims to have enjoyed

5 with your family post-tragedy. Can you tell me about

6 that?

7 A. Well, I think we've really limited ourselves to

8 the amount of social contact we have with anybody. It's

9 very difficult.

10 Q. Sure.

11 A. And we certainly haven't talked to or heard

12 from, to my knowledge, Judith, Judy.

13 Q. Do you have anyone running interference for you

14 with respect to social contacts or attempts? Anyone

15 taking calls or screening calls?

16 A. Not -- we did for a while, only because we lived

17 with some people.

18 Q. Who were those people?

19 A. Susan and Glenn Stine.

20 Q. Should I add them to your list of close friends?

21 A. They were not close friends, believe it or not.

22 They were friends, but we didn't socialize a lot with

23 them.

24 Q. Can you help me complete a list of people who

25 would be on the same level of relationship as the Stines

Page 51

1 were to your family?

2 MR. CRAVER: At what time, Lee?

3 MR. LEE: Beginning in 1994 to date.

4 A. I can't think of the names.

5 Q. Mr. Ramsey -- to try and put you at ease -- it's

6 not intended to be a memory test at this moment, but as

7 those names occur to you, I would ask that you supplement

8 the deposition transcript.

9 A. Be glad to.

10 Q. Thank you. When did you live with the Stines?

11 A. Early 1997, probably until June, July I think.

12 Q. Where do they live?

13 A. They lived at the time on 10th I think, 10th

14 Street.

15 Q. Where do they live now?

16 A. They live in Atlanta.

17 Q. Do you continue a relationship with them?

18 A. Yes.

19 Q. What do they do?

20 A. What do they do?

21 Q. Yes, sir.

22 MR. CRAVER: Mr. or Mrs.?

23 MR. HILL: Both.

24 A. Glenn Stine now works with me. He joined our

25 company in August of this year, and Susan takes care of

Page 52

1 her son.

2 Q. How old is their son?

3 A. He's Burke's age. He's 11.

4 Q. When did you first meet the Stines?

5 A. Gosh, I don't know. It would have been when we

6 lived in Boulder. I don't remember when we first met

7 them.

8 Q. Were they also at your Christmas party in 1996?

9 A. Gosh, I don't remember. Possibly, but I don't

10 remember.

11 MR. HILL: I hate to take another break, but --

12 MR. CRAVER: Let's just go off the record for a

13 minute and chat.

14 MR. MYERS: Off the record approximately 11:02.

15 (A recess was taken.)

16 MR. MYERS: We're back on the record

17 approximately 11:14.

18 Q. Mr. Ramsey, I'm going to hand these to your

19 lawyers. These are photocopies of the Enquirer articles.

20 I won't ask you any questions about them now, but over the

21 lunch break, if you have a chance to read them over and

22 get a sense of where we're coming from, it will be

23 informative.

24 I also caution you that, of course, as is their

25 consistent theme, it contains information sensitive to

Page 53

1 your family's interests and adverse to your family's

2 interests in my view, and I apologize for confronting you

3 with that and providing it for your reference with respect

4 to our claims.

5 A. Okay.

6 Q. Following the tragedy, I'm informed from

7 material I've read in the main-stream press that you

8 assembled a group of people to assist you and your family

9 dealing with the challenges that arose related to the

10 tragedy; is that correct?

11 A. Are you referring to attorneys or --

12 Q. They're included, but I was going to ask you for

13 information regarding everyone that you assembled,

14 everyone who came together to assist you and your family.

15 MR. CRAVER: I need to object to the form of the

16 question. I think that -- my form is that that was a

17 compound question, but I'm not sure what you mean by

18 "assembled". People he hired? People he -- you know, can

19 you find another term because that has different

20 connotations.

21 Q. I'm interested very much in finding out everyone

22 who was hired to assist you in meeting these challenges,

23 these various challenges. I'm referring to all the

24 challenges. I mean, even something as mundane as making

25 airline reservations following the tragedy. Everyone

Page 54

1 hired to assist you.

2 A. Well, my friend, Mike Bynum, basically asked me,

3 would you trust me to do some things that I feel need to

4 be done for your family? And I said yes.

5 Q. When did he ask that?

6 A. That was probably on the 26th or 27th.

7 Q. How long had you known Mr. Bynum?

8 A. I had known him for two or three years, I guess.

9 Q. Was he a professional associate or a social

10 friend?

11 A. He was I guess more of a professional associate.

12 Q. Also something of a friend as well?

13 A. Sure.

14 Q. What strata would he belong in? Would he be

15 roughly in the same category as the Stines?

16 A. Uh-huh.

17 Q. Yes?

18 A. Yes.

19 Q. Specifically, he offered to arrange for

20 everything that was necessary, in his words, or words to

21 that effect; is that correct?

22 A. He, as I recall, said, I think there is some

23 things that need to be done. Will you trust me to do

24 them? I said yes.

25 MR. CRAVER: Before you go any further, I think

Page 55

1 Mike Bynum had an attorney/client relationship with Mr.

2 Ramsey, and --

3 MR. HILL: Let's find out.

4 MR. CRAVER: I'm going to instruct him, if he

5 did hire him as an attorney, that he should not answer

6 questions regarding his communications with Mr. Bynum.

7 You can lay the foundation if you need.

8 Q. Sometimes the lawyers wear different hats,

9 particularly, for example, in the entertainment industry.

10 They'll work as a producer one moment, as a lawyer the

11 next.

12 When we refer to the attorney/client privilege,

13 it's a very strong privilege, but actually fairly narrow

14 in terms of its applicability. And so we should explore

15 that because I don't want to ask you anything that you

16 shouldn't be talking to me about.

17 On the other hand, if it doesn't fall into that

18 category, we should talk about it to facilitate the

19 resolution of, you know, open questions that we have.

20 Did you hire Mr. Bynum to represent you as a

21 lawyer?

22 A. He might have -- his firm might have been doing

23 work for Access Graphics.

24 Q. But that would have been commercial work?

25 A. Correct.

Page 56

1 Q. Transactional work, primarily?

2 A. Right.

3 Q. So Mr. Bynum was not employed by you as your

4 personal lawyer with respect to any of these issues, was

5 he?

6 A. Prior to December '96, I don't believe so.

7 Q. After December '96?

8 A. Mike's firm set up the children's foundation,

9 for example, for us.

10 Q. Any other types of legal services that he

11 provided?

12 MR. CRAVER: That's enough, Lee. That's an

13 attorney/client relationship. They were performing legal

14 work, setting up a foundation. So I think we'll assert

15 the privilege as to any communication between he and Mr.

16 Bynum as of that date.

17 Q. Was Mr. Bynum involved in establishing the

18 foundation?

19 A. He was involved, yes, as I recall.

20 Q. When did -- you actually cut a check to his firm

21 to establish the foundation?

22 A. We have paid some monies to them, yeah.

23 Q. When did those payments take place?

24 A. I don't know. I'd have to look.

25 Q. Will you do that?

Page 57

1 A. Uh-huh.

2 Q. And let us know. It wasn't within the first two

3 months after the tragedy, was it?

4 A. I don't know. I'd have to look. I really don't

5 remember.

6 Q. To the degree his firm has provided you with

7 legal assistance, it's strictly related to the

8 establishment of this charitable fund; is that correct?

9 MR. CRAVER: I'm going to object and I'm not

10 going to allow him to answer that question. I think the

11 extent to which an attorney has represented a person in

12 the context of an attorney/client privilege is in fact

13 privileged information itself.

14 MR. HILL: You'll mark that question, please.

15 You're instructing him not to answer?

16 MR. CRAVER: Yes, I'm going to instruct him not

17 to answer any questions regarding the extent or activities

18 Mr. Bynum undertook for he or his family.

19 Where do you think you're going on that?

20 MR. HILL: Where I'm going with it is my

21 business completely. It's within the parameters of our

22 federal discovery, in response to your question.

23 MR. CRAVER: I understand. I'm trying to --

24 pursuant to Rule 30, I'm trying to confer with you to see

25 if we can reach a middle ground. But I've got to protect

Page 58

1 the attorney/client privilege because that's the first

2 attorney he contacted and that's the first attorney who

3 had acted as an attorney in a relationship with Mr.

4 Ramsey.

5 MR. HILL: Actually -- again working with you

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

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

8 I'm trying to determine.

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

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

11 public relations personnel, spokespersons designated, that

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

13 behalf with members of the media, for example.

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

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

16 what Mr. Bynum was doing for him.

17 MR. HILL: Right.

18 MR. CRAVER: You're so instructed.

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

20 A. Yeah. Our attorneys hired -- I can't remember

21 his name -- Corson or something like that, who was

22 retained by them to be a focal point and a barrier to all

23 the questions and phone calls they were getting.

24 And the way it was put to me was that they

25 needed to do their jobs as attorneys and somebody needed

Page 59

1 to be responsible for answering the phone, I guess.

2 Q. Whoever your attorneys hired to work on your

3 behalf, they did so with your sanction, with your

4 authority, correct?

5 MR. GRAY: Object to form. It's confusing when

6 you say, work on his behalf, because it's not been

7 established it was --

8 Q. Work on your family's behalf.

9 A. I don't understand the question, I guess, at

10 this point.

11 Q. Let me put it this way. Did you examine and

12 review every person retained by your lawyers to work on

13 your behalf?

14 MR. CRAVER: It's compound, Lee. "Examined and

15 review", why don't you break it down?

16 Q. Were you aware of every person your lawyers

17 hired to help you out, your family out?

18 A. I can't say that I was aware of every person,

19 no.

20 Q. They had the authority, your authority to hire

21 whoever they needed to to do the work that needed to be

22 done; is that a fair statement?

23 A. We were on --

24 MR. CRAVER: You know, Lee, I've got to ask you

25 to re-state these questions. When you ask whether they

Page 60

1 had the authority, you're invading the attorney/client

2 relationship. You're actually asking him what the nature

3 of the agreements were between he and his counsel.

4 Can you perhaps ask the question, do you know of

5 an independent source, you know, who they hired, because I

6 can't let you ask him about his communication with his

7 lawyers.

8 Q. Do you know --

9 A. I'm not sure I understand.

10 Q. Do you know who they hired? Do you know

11 everyone they hired?

12 A. I suspect not.

13 Q. Do you know some of the people that were hired?

14 A. I'm aware of some of the people, yeah. I know

15 some of the people.

16 Q. Can you tell who the ones are that you know

17 about?

18 MR. MORGAN: This is Bryan Morgan speaking. The

19 question was, tell us what you know or the persons you

20 know that we hired. If that information came through us,

21 then I'm going to instruct my client not to answer that

22 question. That is in the privilege.

23 MR. HILL: Not from your firm, Mr. Morgan, but

24 from any other firm's or professional relationships he may

25 have --

1 A. I don't think we employed anybody that wasn't --

2 Q. Did someone, working on your behalf --

3 MR. CRAVER: He didn't finish his answer.

4 MR. HILL: I'm sorry.

5 A. -- that was not through the work that Bryan

6 Morgan was doing.

7 Q. When did you hire Mr. Morgan's firm?

8 A. I was introduced to Bryan by Mike Bynum shortly

9 after the murder. I don't remember. The 27th, the 28th,

10 something like that.

11 Q. And you hired him?

12 A. I didn't do anything at that time other than --

13 I mean, I was crushed. Mike introduced me to him.

14 Q. Do you know where the Enquirer -- actually, this

15 kind of lacks foundation because you haven't read the

16 articles, according to your testimony. Let me put it this

17 way.

18 Have you learned who the source is that's

19 referenced in the Enquirer articles?

20 MR. CRAVER: I'll instruct the witness only to

21 testify to the knowledge he may have other than what he

22 gained from his attorneys.

23 A. I did not know of the article. I did not know

24 of Mr. Miles and the controversy until I learned that I

25 was being sued.

Page 62

1 Q. Since that time, have you learned who the source

2 is?

3 A. I have -- no, I have not.

4 Q. Do you know anyone who does know who the source

5 is?

6 A. Not that I'm aware of.

7 Q. Have you had friends or associates who have

8 rallied to support you since the tragedy occurred who were

9 not directly hired by the lawyers employed to represent

10 you?

11 A. We've had lots of supporters, people we knew and

12 didn't know.

13 Q. Will you please list all of them that you're

14 aware of as you sit here today?

15 A. I mean, we've gotten -- I've gotten boxes of

16 letters from all over the world.

17 Q. I understand that and I'm not asking you to list

18 every letter you've got, but I am interested in learning

19 the people who have counseled with you, who have met with

20 you, have spoken about this matter with you, your friends,

21 associates, well-wishers, volunteers so-to-speak, who have

22 offered you direct support following the tragedy who were

23 not employed by lawyers.

24 A. Well, Rol Hoverstock, our priest; my brother.

25 Q. What is his name?

Page 63

1 A. Jeff. My stepmother.

2 Q. Her name, please?

3 A. Irene.

4 Q. Ramsey?

5 A. She was re-married and her --

6 Q. It's not a memory test. At least she's not your

7 mother-in-law?

8 A. That's terrible. I'm blanked. I don't know.

9 The Stines; Doug and Mary Justice in Atlanta.

10 Those are the kinds of people that have supported us.

11 Q. We'll leave space in the transcript for you to

12 insert other names if that's all right.

13 A. Okay.

14 ( )

15 Q. We won't show this to your stepmother. The

16 court order is going to protect us all.

17 You never met Mr. Miles before today, did you?

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

19 Q. You never suspected Mr. Miles was the

20 perpetrator?

21 A. I didn't know his name or anything about him,

22 no.

23 Q. You did have certain people that you suspected

24 may have been involved in the incident; is that correct?

25 A. I had no -- we didn't feel that we knew anybody

Page 64

1 that was this evil. So no, I didn't have any suspects.

2 Q. Did you ever present a list of persons you felt

3 the police should look into, to the police?

4 A. The police asked me, in the very beginning,

5 certain categories; who had keys to the house, who might

6 be angry with you. Those kinds of categories. We tried

7 to come up with, as best we could, the answers to those

8 questions, but they were in response to those kinds of

9 category questions.

10 Q. Did any of your friends, supporters, volunteers,

11 people other than your lawyers or people employed by your

12 lawyers, ever offer to you suggestions of people they

13 thought may be suspicious with respect to the murder?

14 A. We have had people both we knew and didn't know,

15 yeah.

16 Q. Among the people you knew, who has offered you

17 names or descriptions of people they thought were worth

18 looking into?

19 MR. CRAVER: People he knew outside the

20 attorneys?

21 MR. HILL: Roger.

22 MR. CRAVER: And the people he's retained,

23 correct?

24 MR. HILL: Roger.

25 MR. CRAVER: Just want to make sure that's

Page 65

1 correct.

2 MR. HILL: You bet.

3 A. There were a number of people that questioned

4 the Whites' behavior to us. Why are they acting so

5 strange?

6 Q. Do you remember who those people were? This

7 item is really important. This is kind of the heart of

8 this whole interview, so work with me as much as you can,

9 please.

10 A. Well, my brother had commented on that. The

11 Westmorelands in Atlanta; the Davises; Patsy's sister, Pam

12 Paugh; the Stines.

13 Q. So far the Stines are the only ones who live in

14 Boulder; is that right?

15 A. Yeah, so far on that list.

16 Q. Who lived in Boulder?

17 A. Right.

18 Q. Anyone else in Boulder?

19 A. Not that I recall.

20 Q. Did the Walkers ever make any suggestions to

21 you?

22 A. Not now -- I mean, not that I remember.

23 Q. Is it possible that they may have made

24 suggestions to your wife that you're unaware of?

25 MR. CRAVER: Don't speculate.

1 A. Yeah, I don't know. I mean, I don't know.

2 Q. You don't know whether they did or didn't?

3 That's what I'm asking.

4 A. Correct.

5 Q. Do you currently suspect anyone in particular of

6 having committed the crime?

7 MR. GRAY: Of having committed the crime?

8 MR. CRAVER: I've got to object on several

9 bases. If you're asking him if he personally does, I have

10 no objection to him answering the question.

11 If you're asking him to impart to you any

12 information he's received from his attorneys or others,

13 I'm instructing him not to impart that information.

14 MR. HILL: I understand.

15 Q. I'm just inquiring into your personal,

16 current -- your contemporary personal suspicions. Do you

17 suspect anyone of having committed the murder of your

18 daughter?

19 A. Let me say two things. One, when you have

20 something like this happen in your life, you lose trust.

21 Virtually anyone. So do you suspect everyone? Yes.

22 Secondly, I try to remind myself to not rush to

23 judgment, as obviously happened in this case, and I don't

24 want to be guilty of that myself.

25 Unfortunately, you suspect everyone.

Page 67

1 Q. Can you help me narrow that down to the leading

2 suspects because, as you probably recognize, someone who

3 anticipates being targeted may have caused this story to

4 be produced in order to deflect attention from them.

5 So it's very informative and helpful to us if

6 you can let us know. And remember, please, this is

7 completely privileged. All this information stays in

8 here. It's protected by court order.

9 MR. CRAVER: Same instruction, John. Don't

10 testify to anything you've learned through your attorneys.

11 Q. I'm not asking for communications. I'm asking

12 for his current memory based upon whatever it's based

13 upon.

14 A. Ask me again.

15 Q. Who do you suspect? You've got -- when you say

16 you suspect everybody, some people rise to the top of that

17 broad category?

18 A. We were told by -- I don't know if that gets

19 into --

20 MR. MORGAN: Excuse me. I think you are getting

21 involved in the privilege. You should tell Mr. Hill, do

22 you have any opinions that you can separate from what

23 you've learned from us and from the people you hire --

24 THE WITNESS: I can't, no.

25 MR. MORGAN: -- as opposed to your own.

Page 68

1 THE WITNESS: No, I cannot.

2 MR. HILL: Take a break for a minute while I

3 talk with Mr. Morgan. I'm trying to figure out a way for

4 us to -- I'm not trying to co-opt your work product or any

5 attorney/client privileged information, but it would be

6 very helpful if we could get a sense of who Mr. Ramsey

7 believes, based upon anything he may have learned -- and I

8 will not get into -- I will not attempt to interrogate

9 regarding the basis of those opinions.

10 MR. MORGAN: Let me make a statement with the

11 understanding that this is not a waiver of that privilege.

12 MR. HILL: Sure.

13 MR. MORGAN: We have spent a lot of time and

14 effort and energy trying to develop leads that we thought

15 were useful. A lot of junk comes in over the transom, and

16 it's junk.

17 There is stuff that, in our view, was not junk.

18 When it was appropriate, when we thought that Mr. Ramsey

19 would have information bearing on that, we have discussed

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

21 list.

22 I find it impossible for him to answer your

23 question, in my view, given the number of conversations we

24 have had and the work that we have done to try to develop

25 some useful lead for the police.

Page 69

1 I don't think he can possibly answer that

2 because of the number of discussions that we have had on

3 that, and the information that we have given him coming

4 through our sources is vast.

5 If there were a way to -- I'm willing to think

6 about whether or not there is a way that we can provide

7 you information that, first of all, is not a waiver, and I

8 take the representations on the record as protecting that.

9 MR. HILL: Yes, sir.

10 MR. MORGAN: But our experience has been that

11 anytime anything like that is said, then it is immediately

12 leaked and it appears in the tabloids with the worst

13 possible spin on it. And we are extremely leery of that.

14 And I will say on the record that that has been

15 our experience with the Boulder Police Department as well.

16 Therefore, we have been burned more than once on this

17 subject and it's not so much a question of the trust of

18 people in this room as it is to me others.

19 So I need to think about that. If there is a

20 way that we can deal with it, I willing to think about it,

21 but I sure can't commit to it. And I rest on John's

22 statement that, with my background, that the number of

23 discussions we have had on this subject are just virtually

24 countless and I find it impossible to believe that he can

25 answer that question without getting into things that we

Page 70

1 have told him. And I leave it at that.

2 MR. HILL: I appreciate your help.

3 MR. MORGAN: I'll do what I can, but I commit to

4 nothing.

5 THE WITNESS: Thank you, senator.

6 MR. MORGAN: I want to be real clear about that.

7 MR. HILL: With that said, while we're still on

8 the record, acknowledging, you know, our information that

9 there is a tabloid reporter lurking downstairs -- I don't

10 want to sound paranoid or spooky about this, but can you

11 all check to make sure we're not being -- that we're not

12 broadcasting right now?

13 Do you know who cleans your office spaces or who

14 has access to this space? I mean, because I don't want to

15 be nailed for this. I'm not going to let any of this out.

16 I give you my personal word as well as assurance that I

17 respect and abide by the court's orders, and the people

18 who work for me and my client do too. He's burned in the

19 sale way. He's burned in the sale way.

20 MR. CRAVER: I did not search the room for

21 mikes.

22 MR. HILL: I don't want you all to think that

23 I'm --

24 MR. CRAVER: I trust that we can proceed with

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

1 question. I'll let you ask him if he has any knowledge of

2 suspects from sources other than his attorneys. And if he

3 answers that question no, then the questioning stops

4 there.

5 MR. HILL: But, Mr. Morgan, I trust you'll

6 continue to work with us to try and develop as much

7 information as may be useful to us as we search for our --

8 MR. MORGAN: Our job is, with the -- without the

9 power of the state, without police search warrants,

10 without the right to pick up people and interrogate,

11 without all of those things, to try to find the person who

12 did this.

13 If that results in information that might be

14 useful in terms of pointing towards the source, then we

15 will consider it.

16 MR. HILL: I appreciate that.

17 MR. MORGAN: If we are that fortunate.

18 Q. Now, do you understand what's left of the

19 question?

20 A. Well, I think so. I really go back to what I

21 said earlier. We honestly don't think we know anybody

22 that could be this evil. So -- I mean, that was the blank

23 that we were presented with.

24 I can't recall any -- for months, for the better

25 part of a year, we just didn't answer the phone. We

Page 72

1 didn't communicate. You know, we just -- and so from time

2 to time, there were names that I believe all came through

3 the tip line which came through you guys.

4 MR. CRAVER: Indicating his attorneys.

5 THE WITNESS: Yeah.

6 MR. CRAVER: You should not say anything more.

7 A. But -- well --

8 Q. Again, kind of bringing this -- attempting to

9 bring this into focus in an acceptable line of inquiry, no

10 friends or neighbors or volunteers who directly came to

11 you and said, hey, you ought to look into Steve Miles, for

12 example?

13 A. No. No one said that to me, certainly.

14 Q. Or anyone else other than Steve Miles? You

15 mentioned the Whites.

16 A. Well, that friends had commented on their

17 strange behavior.

18 Q. Anyone else that came to your attention through

19 avenues other than your lawyers?

20 A. I don't believe so, if I remember.

21 Q. I'm not trying to trap you or anything.

22 I have a very poor photograph -- two very poor

23 photographs that I'll show you all.

24 MR. CRAVER: Whose are those?

25 Q. I think one purports to be a photograph of you

Page 73

1 with a reporter and the other purports to be a photo of

2 your wife with a reporter. They're really crappy

3 photographs.

4 MR. CRAVER: Don't speculate.

5 MR. HILL: Definitely, don't speculate.

6 MR. CRAVER: There is not a question on the

7 table. Wait for a question.

8 Q. I'm just going to ask you if you have seen

9 either of these photographs before?

10 A. No, I haven't.

11 Q. If you recognized any of the people depicted in

12 the photographs?

13 A. No, other than, that appears to be me.

14 Q. You don't remember -- you can barely see this

15 man's face. I believe he's a Globe employee. I'm

16 informed that he's a Globe employee. I'm not trying to

17 impeach you or anything else technical. I'm just offering

18 this to ask if you recall having any communications with

19 any other tabloid reporters besides Jeff Shapiro?

20 A. I was accosted by the Globe when I got off the

21 airplane once in Denver, and they took pictures of me as I

22 tried to escape.

23 Q. That may be where that comes from.

24 A. The only thing I said to them was, gentlemen,

25 please respect my privacy. Because I was told that's what

Page 74

1 I should say.

2 Q. Were you ever accosted overseas by any tabloid

3 reporter?

4 A. I was a couple of weeks ago.

5 Q. Can you tell me more about that?

6 A. I was at a meeting in Amsterdam and was walking

7 with my business associates from dinner and this fellow

8 came up and said he was Craig Lewis, I think it was, from

9 the Globe and would I talk to him. And I said, absolutely

10 not, and walked on.

11 Q. Any other contacts?

12 A. I mean, not that I remember. We had people

13 that -- there was a lady once from the Enquirer -- I

14 shouldn't say that. I don't know where she was from. We

15 were told later she was a tabloid reporter who was

16 painting a picture in front of our house. They said she

17 was just an artist, and Patsy liked art and liked to

18 paint, and they talked. But she represented herself as a

19 tourist. We were told later she was a tabloid reporter.

20 Q. Was this in Boulder?

21 A. No, this was in Charlevoix, Michigan. Another

22 time, one came to my mother-in-law's home, said she was a

23 representative of Princess Diana and wanted to bring

24 flowers on behalf of the British people. And we learned

25 later she was a reporter from supposedly the Star.

Page 75

1 So, you know, I say -- when I say, I don't think

2 I have -- in terms of people that came to me and said "I

3 am a reporter from," I can pretty well say no.

4 Q. I take it that you have no interest in

5 cooperating or promoting tabloid journalism with respect

6 to this case?

7 A. No, absolutely not.

8 MR. GRAY: I didn't hear the last part of your

9 question.

10 MR. HILL: With respect to this case.

11 MR. GRAY: John, wait until he finishes the

12 question.

13 THE WITNESS: Okay, sorry.

14 MR. HILL: There are only five minutes remaining

15 before the videotape would have to be changed anyway. I

16 was going to suggest that we go off the record and take

17 our lunch break now and come back earlier, if that's

18 agreeable to everyone here.

19 MR. CRAVER: Sure, that's fine.

20 MR. HILL: And also -- let's go ahead and go off

21 the record, but I wanted to discuss a couple of --

22 MR. MYERS: Off the record approximately 11:53.

23 This is the end of tape 1.

24 (The lunch recess was taken.)

25 MR. MYERS: We're back on the record

Page 76

1 approximately 1:10. This is tape 2.

2 Q. Good afternoon, Mr. Ramsey. Thank you for the

3 break and I remind you that you're still under oath from

4 this morning as we continue with the interview.

5 A. Yes.

6 Q. Did you have a chance to look at these?

7 A. I did.

8 Q. I'm referring to -- let me take care of some

9 administrative work.

10 MR. HILL: Earlier I referred to two computer

11 printouts of poor photographs downloaded from the Internet

12 which I'd like to attach as Exhibits 1 and 2. It doesn't

13 matter what order.

14 (Exhibits 1 through 4 were marked for

15 identification.)

16 MR. HILL: It looks like we have labeled the

17 xeroxed Enquirer article as Exhibit 3, which is the

18 October 21 cover story of the National Enquirer, and

19 Exhibit 4, which is the November 11 story, although that

20 date, if I'm not mistaken, does not appear on this page.

21 Q. Did you read the articles?

22 A. Yes, I did.

23 Q. What were your reactions?

24 A. Well, in this article --

25 Q. Referring to Exhibit No. 3.

Page 77

1 A. -- my reactions are, the photos appear to be not

2 real photos, not without some modification, but the things

3 that are attributed to us in terms of statements we made

4 or mentioning Mr. Miles are totally false, period.

5 Q. It's your testimony that you never planned to

6 claim that the real killer was Stephen Miles; is that

7 correct?

8 A. That's absolutely correct. I didn't know Mr.

9 Miles' name. I don't believe we ever met. And the first

10 time I knew his name was when I was advised that I was

11 being sued.

12 Q. Is it your testimony that you never discussed a

13 plan to name a neighbor as the real killer?

14 MR. CRAVER: Wait a second. I'm going to object

15 to the form of your question. When you say "discussed",

16 you can't ask him about discussions he's had with his

17 counsel. Who are you suggesting he discussed it with?

18 MR. HILL: I bet I probably can ask him about

19 any discussions in which he identified plans to name a

20 neighbor as a real killer.

21 A. Well, I can tell you that's -- I did not.

22 MR. HILL: Thanks. I'm not trying to undercut

23 your objection, but --

24 MR. CRAVER: My objection stands. Just so that

25 you note that objection before his answer over my

Page 78

1 objection.

2 MR. HILL: I appreciate it.

3 A. Our objective always has been to find the

4 killer.

5 Q. Yes, sir.

6 A. And that's --

7 Q. A quote is attributed to you and I'll read from

8 the article -- actually, the quotation marks are placed in

9 kind of an unusual spot. It says, "John Ramsey has

10 confided, 'I expect that both Patsy and I will be charged

11 with the murder of our daughter, but we expect to be

12 exonerated. We think we will be able to prove that the

13 real murderer was an intruder and most likely a pedophile.

14 We plan to suggest it was a neighbor, Stephen Miles'".

15 A. Totally false.

16 Q. Never said anything like that, did you?

17 A. Never. I didn't know Mr. Miles' name at that

18 time.

19 Q. You can see why Mr. Miles might be concerned

20 about these articles, can't you?

21 A. Certainly.

22 Q. Did you have any comments or reactions to the

23 second article?

24 A. Well, we certainly never gave the investigators

25 a list of people we thought could be responsible, for one

Page 79

1 thing.

2 Q. Never gave them -- I didn't hear you, I'm sorry?

3 A. We never gave a list to the police of people we

4 thought could be responsible, which negates a lot of stuff

5 that follows, certainly.

6 Again, I did not know Mr. Miles' name until I

7 was notified that I was being sued.

8 Q. Did you have any other remarks about the

9 article?

10 A. This thing about Lou Smit getting a name of a

11 54-year-old neighbor from us, I don't know who that would

12 be. That doesn't appear to be accurate.

13 Q. How long did you know the Phillips -- have you

14 known the Phillips?

15 MR. CRAVER: When you say "Phillips", are you

16 referring to them as a couple?

17 MR. HILL: Yes.

18 A. Well, Patsy worked with Mel when she was

19 working, which was in the early '80s, and so I guess we've

20 known them since then. '82 maybe or something like that.

21 Q. How many of your friends or close acquaintances

22 on the level of Judith Phillips and above do you know to

23 have cooperated with tabloid journalists including

24 television and print?

25 MR. GRAY: Cooperated?

Page 80

1 MR. HILL: Yes.

2 MR. GRAY: Meaning providing information, giving

3 directions?

4 MR. HILL: All those things or any of those

5 things.

6 A. Well, again, defining tabloids as, you know,

7 your Enquirer or the Star or the Globe, Examiner -- I

8 don't know anyone that cooperated with them from the

9 standpoint of providing information. They were certainly

10 called and accosted and, you know, approached and --

11 Q. Providing photographs, for example.

12 A. Well, certainly there have been photographs

13 provided, none that I am aware of that -- 'cause I haven't

14 seen them all, obviously.

15 No. I mean, I don't know of anybody that's

16 willingly given them photographs.

17 Q. Are you aware that Judith Phillips has sold

18 photographs to the National Enquirer of your family?

19 A. I have heard that, but I don't know if -- that

20 that's true or not.

21 Q. Are you also aware of Mr. White's cooperation

22 with members of the tabloid media?

23 A. No, I'm not aware of that.

24 Q. Would it surprise you to find out that that was

25 true?

Page 81

1 A. Yeah. Yeah, it would.

2 Q. What were the circumstances under which you met

3 the Stine family?

4 A. I think it was probably through school. Doug

5 and Burke were the same age, same class, same grade, and

6 that's probably where we met.

7 Q. Since the tragedy, you've stayed in other

8 families' homes other than your former home on 15th

9 Street; is that correct?

10 A. Uh-huh.

11 Q. Whose homes have you stayed in?

12 A. We stayed in Jay Elowsky's home for a period of

13 time. We've stayed in the Stines'. Both of those were

14 for extended periods. We've stayed at people's houses,

15 you know, a day or the two at a time.

16 Q. Who would that include?

17 A. Well, the Westmorelands in Atlanta for a few

18 days; my brother's house; my parents-in-law's home.

19 Q. Where is that?

20 A. It's in Atlanta.

21 Q. Anyone else?

22 A. We stayed at Byron Chrisman's condominium at

23 Snowmass -- not Snowmass, Streamboat for a few days. We

24 were trying to escape the media. That's all I can

25 remember.

Page 82

1 Q. You mentioned Jay Elowsky and I think it's the

2 first time you've mentioned his name today. Where does he

3 fall in your spectrum of social contacts?

4 A. Jay certainly was a friend. He was a friend

5 that we didn't necessarily socialize with, but I certainly

6 considered him a friend. I helped him with his business a

7 bit. I tried to.

8 Q. When you say you helped him, was that in the

9 status of an investor or partner?

10 A. Investor, yeah. Needless to say, he was a good

11 friend, but we didn't socialize with him.

12 Q. Was that at Pasta Jay's or some other business?

13 A. Uh-huh, Pasta Jay's, yeah.

14 Q. Do you still have an interest in it?

15 MR. CRAVER: There again, you're going into his

16 financial interests. Can you tell me any reason you need

17 to know that?

18 MR. HILL: Yeah, lots of reasons actually.

19 MR. CRAVER: I'll let him answer that limited

20 question, but I'm not going to let him go into how much --

21 MR. HILL: I'm not trying to go into --

22 A. Yes, at the moment, I do.

23 Q. Just in that enterprise or other enterprises?

24 A. No, just that one.

25 Q. Did you happen to watch Larry King Live last

Page 83

1 night?

2 A. (Shakes head.)

3 Q. Are you aware that Ms. Paugh appeared?

4 A. I was aware that -- somebody told me she was

5 going to, but I haven't watched television. We took

6 television out of our house in March.

7 Q. Probably a good idea.

8 I'm told that Pam Paugh, your sister-in-law,

9 expressed that she believed someone close to you was

10 responsible for providing material to the Enquirer that

11 resulted in the stories about Stephen Miles. I was

12 wondering if you knew anything about that?

13 A. No, I don't.

14 Q. Have you had any discussions with Ms. Paugh

15 about this case, referring to the Miles case?

16 A. No.

17 Q. Have you discussed the Miles case with anyone

18 other than your lawyers?

19 A. I probably mentioned them to my brother and the

20 Stines that I was being sued, but that's probably the

21 extent of it.

22 Q. Do you recall the occasion when you discussed

23 this case with the Stines, when and where that occurred?

24 A. No. It wouldn't have been a discussion of the

25 case. It would just have been a comment.

Page 84

1 Q. Since you did become aware of my client, Stephen

2 Miles, have you -- has anyone, other than your lawyers,

3 approached you to discuss Stephen Miles or his background?

4 A. No.

5 Q. You're acquainted with Ms. Walker, Roxanne

6 Walker?

7 A. Uh-huh.

8 Q. Have you ever stayed at her house?

9 A. No.

10 Q. Has your wife ever stayed with Ms. Walker?

11 A. Not that I'm aware of.

12 Q. Have you ever stored belongs or an automobile at

13 Ms. Walker's house?

14 A. She borrowed a car of ours for a while, yeah.

15 Q. Are you aware of where Ms. Walker lives with

16 respect to my client?

17 A. Well, she lives -- I've only learned this in the

18 last few months. She I believe lives across from Judith

19 Phillips, and I believe you live next door, is what I've

20 been told. But that's recent knowledge.

21 Q. Do you know where the Stines lived when they

22 were still in Boulder relative to my client's house?

23 A. Well, more or less. I mean, I know where the

24 Stines lived and I know where the Walkers live, so yeah.

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

Page 85

1 discussions with the Stines regarding Stephen Miles?

2 A. I've commented that I'm being sued to them, just

3 one more thing that's a burden.

4 Q. Did they ever mention anything about the

5 articles that were published?

6 A. Not that I recall.

7 Q. Did they ever tell you, we spoke with the

8 Enquirer trying to help you out?

9 A. Did the Stines?

10 Q. Yes, sir.

11 A. No.

12 Q. Did the Walkers ever say, we spoke to the

13 Enquirer trying to help you out?

14 A. I see what you're saying. No.

15 Q. No in both cases?

16 A. No in both cases.

17 Q. Have either the Stines or the Walkers ever

18 acknowledged making an effort to help you out, help your

19 image out?

20 A. I wouldn't -- certainly Susan and Glenn Stine

21 have been very helpful to us as a family, but it hasn't

22 been focused or concerned with our image. So no.

23 Q. Have you ever asked either the Stines or the

24 Walkers to make statements on your behalf in connection

25 with this case?

Page 86

1 A. No.

2 Q. Have you ever asked anyone else who is not an

3 attorney working for you or an employee of an attorney

4 working for you to make statements on your behalf?

5 A. No.

6 Q. How did you decide to participate in the

7 documentary film produced by Mr. Glick and Mr. Tracey?

8 A. Well, our interest in this was to somehow make

9 something good come out of it that was significant. One

10 of the real sicknesses I think we have in this country is

11 our media system and its unaccountability and inaccuracy.

12 So this appeared to be a venue that would

13 highlight that based on what's going on in our case. We

14 were going to participate, try to make a difference. That

15 was the only reason.

16 Q. Did you make the initial approach to the

17 producers or did they approach you initially?

18 A. They approached us, I'm sure. It wouldn't have

19 crossed our mind.

20 Q. Did you participate in any of the editorial

21 decisions related to the documentary?

22 A. No. That was right up-front.

23 Q. They maintained creative control?

24 A. Precisely, yeah.

25 Q. Did the Stines participate to any degree in the

Page 87

1 production of the documentary?

2 A. Susan was interviewed.

3 Q. Any other degree of participation?

4 A. Not, other than being with us when we were

5 interviewed, to my knowledge.

6 Q. Were you happy with the documentary?

7 A. Was I happy with it?

8 Q. Yes.

9 A. I thought they conveyed the message pretty well

10 that they were trying to convey; that at least the vocal

11 part of the media had taken great license with accuracy

12 and verification of facts.

13 Q. Why haven't you sued the National Enquirer?

14 MR. CRAVER: I'm going to object. That would

15 obviously be between he and his lawyers and that would be

16 privileged information.

17 Q. Have you wanted to sue the National Enquirer?

18 A. I will say, the thought has certainly crossed my

19 mind, although they haven't been -- I've had lots of other

20 people I'd much rather go after.

21 Q. Present company accepted?

22 A. Oh, yeah. The Globe has been my --

23 MR. GRAY: But you're on the list.

24 A. You get angry, you know. People don't like

25 untruths said about them.

Page 88

1 Q. Let me ask you about the Globe. You described a

2 conversation with Jeff Shapiro that lasted as much as 20

3 or 30 minutes, and you gave me a real broad overview of

4 it. What did he have the gall to say to you?

5 A. His fundamental reason for calling was to say

6 that he felt badly as a person. He wanted to apologize

7 and hoped I wouldn't hang up on him. That's fundamentally

8 all I remember about it. He just sounded like a person

9 that was genuinely hurting.

10 Q. Let me ask you -- did he make any statements

11 that would -- could be fairly construed to be admissions

12 of dirty dealings by the tabloid press? Did he apologize

13 on behalf of the industry that he's employed by?

14 A. I don't know that he went that far.

15 Q. Did he say, for example, I'm sorry for what's

16 being done to you, or words to that effect?

17 A. Perhaps words to that effect, yeah.

18 Q. What did you understand him to be referring to?

19 A. Just that we were being attacked for profit.

20 Q. Did he say as much?

21 A. No.

22 Q. That's the inference you drew?

23 A. Basically, yeah.

24 Q. Too bad we can't leak this to the tabloid press.

25 Are there any members of the tabloid media that

Page 89

1 you have a warm spot for, that you're not totally angry

2 at?

3 A. That would be quite a stretch. No.

4 MR. HILL: Will you give me just a minute to

5 collect some of my thoughts?

6 THE WITNESS: Sure.

7 Q. You referred earlier to inquiries that police

8 made to you regarding categories of people. If I remember

9 correctly, you clarified that Stephen Miles was never in

10 any of those lists?

11 A. That's correct.

12 Q. Has anyone -- did the police, for example, ever

13 bring up or introduce Stephen Miles in discussions with

14 you?

15 A. No.

16 Q. Who was on -- who did you indicate to the police

17 as belonging to the several categories that they outlined

18 for you?

19 A. I can't accurately remember. I mean, the

20 categories were, who had keys to the house, who might be

21 angry with you? Those kinds of questions. And there were

22 unfortunately a lot of people who had keys to our house,

23 contractors, plumbers, cleaning ladies, neighbors. But I

24 couldn't give you a complete list from memory.

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

Page 90

1 circumstances that may have given rise to the information

2 apparently delivered to the National Enquirer that may

3 have been misconstrued by the person delivering that

4 information to the National Enquirer, any discussions that

5 may have been overheard by someone potentially that could

6 have developed into this, say the third person to hear it

7 down the line?

8 A. Discussions from me?

9 Q. That occurred around you.

10 A. No. I've said it before, but I did not know

11 Mr. Miles' name.

12 Q. Any discussions about anyone near Mr. Miles or

13 in that neighborhood?

14 A. No.

15 Q. Any discussion where someone who knew

16 Mr. Miles -- even recognizing that you don't know --

17 didn't know Mr. Miles, could someone have overheard you

18 talking about someone else and mistaken your remarks to

19 apply to Mr. Miles?

20 MR. CRAVER: I've got to object to the form of

21 that question?

22 A. I don't believe so.

23 MR. HILL: Inartfully posed, my question.

24 MR. CRAVER: I think he's answered it anyway.

25 MR. HILL: I'm going to ask you if I can take a

Page 91

1 five-minute break.

2 THE WITNESS: Sure.

3 MR. MYERS: Off the record approximately 1:40.

4 (A recess was taken.)

5 MR. MYERS: We're back on the record

6 approximately 1:55.

7 Q. Thank you for the break, Mr. Ramsey.

8 Did either of the Walkers ever mention anyone

9 that they suspected may have been involved in the tragic

10 event?

11 A. No.

12 Q. Did either of the Stines ever mention anyone at

13 all that they suspected may have been involved in the

14 tragic event?

15 A. Not other than they thought the Whites were

16 acting very strange.

17 Q. I'd like to learn more about concerns that have

18 been expressed to you about the Whites because, if I

19 remember correctly, you indicated that your brother, the

20 Westmorelands, the Stines, Ms. Paugh -- is that the

21 correct way to pronounce her name?

22 A. Yeah.

23 Q. -- expressed concerns about the Whites. What

24 were the nature of their concerns? What exactly are they

25 concerned about?

Page 92

1 A. Just that their behavior was very odd.

2 Q. What behavior were they referring to?

3 A. Oh, Fleet White barged into Glenn Stine's office

4 unannounced and through a receptionist and --

5 Q. Through a receptionist?

6 A. Uh-huh.

7 Q. Physically assaulted a receptionist?

8 A. I don't think he assaulted her. You know, he

9 was vice president of the university and probably not

10 accustomed to have people just walking off the street into

11 his office.

12 Q. You mean t-h-r-o-u-g-h, through the

13 receptionist?

14 A. Right.

15 Q. Not t-h-r-e-w the receptionist?

16 A. Correct, yeah.

17 Q. Of course, I read letters, correspondence that

18 have been published by the Whites that appear to be very

19 critical of the district attorney's office investigation

20 of the circumstances surrounding the death of the your

21 daughter. Is that also included in the odd behavior?

22 A. Probably, yeah.

23 Q. Anything else that the Whites have done to your

24 family that have impressed you or the people that you

25 listed as being suspicious of the Whites as being odd or

Page 93

1 suspicious?

2 A. No. I think just a lot of very, very strong

3 emotions that could have just as well been from the

4 trauma.

5 Q. Whose emotions are you referring to now?

6 A. Primarily Fleet's, Fleet White.

7 Q. What emotions has he expressed that fall into

8 this category that you're describing now?

9 A. Well, the only ones I've observed would have

10 been just a very strong, fearful reaction to the media.

11 Q. Do you perceive Mr. White to be angry at you at

12 all?

13 A. No, not since I've talked to him last. No, not

14 at all.

15 Q. At any point post-tragedy, has he expressed

16 anger towards you or vented anger at you or your family?

17 A. No, not to me.

18 Q. Did Mr. White ever discuss with you anyone that

19 he suspected may have been involved?

20 A. No.

21 Q. Have you ever indicated to anyone your suspicion

22 that a photographer may be involved in the death of your

23 daughter?

24 A. I'm sorry, say that again.

25 Q. Have you ever expressed --

Page 94

1 A. Have I ever expressed that?

2 Q. To anyone, suspicion that a photographer may

3 have been involved.

4 MR. GRAY: Excluding communications with your

5 lawyers, of course.

6 A. No.

7 Q. And you already know -- it encompasses the

8 caveat that Mr. Gray interjected?

9 A. Right.

10 Q. Have you ever suspected that a photographer was

11 involved in the death of your daughter?

12 A. No, I have not.

13 Q. At no point?

14 A. No.

15 Q. At no point -- yes, at no point you've never --

16 MR. CRAVER: How many negatives would you like

17 in the sentence?

18 A. No. As I say, our fundamental frustration is,

19 we don't think we've ever been around anybody that could

20 be this evil, period.

21 Q. Do you suspect that Mr. White may have been

22 involved?

23 A. No, no reason to.

24 Q. No reason to expect that?

25 A. (Shakes head.)

1 Q. Again, I'm not trying to encroach upon valid

2 assertion of the attorney/client privilege. What I am

3 seeking to do is determine how many people -- you know,

4 the identities of the persons who have been involved in

5 public relations activities, public relations research on

6 your behalf, anyone who may have been in a position to be

7 aware of strategy discussions concerning your family's

8 interests.

9 I'm not looking for communications between you

10 and any of these employees, just the identities. I

11 believe you mentioned Mr. Corson?

12 A. Well, the only people -- the only person almost

13 that I -- or people, I guess, that I have ever authorized

14 or relied upon to speak for me have been Bryan Morgan and

15 I guess in some cases Bill Gray on some of these other

16 issues.

17 There have been a lot of people, I'm sure, that

18 have spoken for me, but without my awareness or

19 authorization in terms of -- you know, we were very

20 careful and I think have a reputation for being reclusive in

21 terms of willingness to talk to the press or anyone else.

22 Our focus was that we wanted this case to be out

23 of the media limelight so it could be investigated

24 properly, because this was a drain on the police as well.

25 It was not productive.

Page 96

1 So our interests were not to fan that fire at

2 all, and consequently did very little. But in terms of

3 any statements that were made with my knowledge, would

4 have come only through Bryan.

5 Q. When Mr. Bynum gave statements to television

6 reporters, was that with or without your approval?

7 A. It was with my awareness. He told me he was

8 going to do it. And I said, well, that's -- I never saw

9 that program, so I don't even know what he said.

10 Q. And that was in his capacity as a friend of

11 yours, not as your lawyer?

12 A. Correct. I guess -- I mean, I didn't see the

13 program, so I don't know.

14 Q. Okay.

15 A. It's tough for us to watch that stuff, frankly.

16 Q. Sure, absolutely. Does Mr. Corson still work

17 for you?

18 A. No. Well, I assume not, not that I'm aware of.

19 He was hired by you guys. To my knowledge, no.

20 Q. Did you ever have any direct dealings with

21 Mr. Corson or any member of his firm?

22 A. I talked to him briefly once that I can recall.

23 Q. Do you recall the substance of that

24 communication?

25 A. It was, hi, how are you -- you know,

Page 97

1 nice-to-meet-you kind of conversation. That was about it.

2 Q. Do any other public relations personnel --

3 MR. MORGAN: I'm going to instruct you not to

4 answer that question. Your testimony on the record is

5 that anybody that was authorized to speak for you was

6 hired through me. To my knowledge that is correct. And

7 the identify of those people as well as others, in my

8 view, is privileged, unless they have made public

9 statements.

10 Q. What about the private statements to members of

11 the press? That's really what I'm looking for.

12 A. I have not authorized anyone to make statements

13 on my behalf to the press, with the exception of any

14 comments that might go through Bryan Morgan's firm. And

15 those have been fairly few and far between.

16 MR. HILL: You're in partnership with

17 Mr. Haddon?

18 MR. MORGAN: That's correct.

19 MR. HILL: You're aware of the affidavit that

20 Mr. Haddon --

21 MR. MORGAN: Yes, I am.

22 Q. We've left certain spaces in the deposition

23 transcript for you to supplement if you remember other

24 people or other names. Did you have an opportunity to

25 review any documents to refresh your memory in connection

Page 98

1 with this deposition today?

2 A. No.

3 Q. Do you have any notes or documents that relate

4 to this case or issues associated with this case?

5 A. Yes.

6 Q. What type of notes and documents do you have?

7 A. I think they're virtually all correspondence

8 with Bryan or someone in his firm.

9 Q. Any other documents, any journals, any notes to

10 yourself, any memos regarding Mr. Miles?

11 A. No, absolutely no memos regarding Mr. Miles.

12 Q. In the category of people who may have been

13 angry with you, were there any photographers listed in

14 that category?

15 A. No.

16 Q. In the category of people with keys to your

17 house, were there any photographers listed?

18 A. I don't believe so. No, I'm sure not.

19 Q. Was Leslie Durgan a guest at your home on

20 December 23, 1996?

21 A. No, not that I recall.

22 Q. You indicated that your brother, the

23 Westmorelands, the Stines, Ms. Paugh had expressed that

24 they were suspicious of the Whites. Who else did they

25 indicate that they may be suspicious of?

Page 99

1 A. No one that I recall, and they were suspicious

2 only because of very strange behavior.

3 Q. Have you ever made a complete list of the

4 strange behavior?

5 A Have I?

6 Q. Yes.

7 A. No.

8 Q. Can you supplement it so I have --

9 MR. CRAVER: He means, have you told him all the

10 strange behavior that you can recall at this time?

11 A. Yeah. In general, it was just very strong

12 anguish and anger and apprehensiveness and very strong

13 emotions about certain things that should and shouldn't

14 be.

15 Q. Like what?

16 A. Such as, we should do the CNN interview that we

17 did. That was done entirely because of Fleet White's

18 angry and -- or emotional insistence that we do so.

19 Q. He pressured you to do the CNN interview?

20 A. He was very strongly promoting it, yes.

21 Q. Did that seem perplexing to you?

22 A. Well, the stated reason was that we were getting

23 crucified in the press. We ought to let people see who we

24 were. Certainly, probably the last thing we wanted to do

25 was -- parents of a child be destroyed. Very much against

1 having lawyers.

2 Q. At all?

3 A. At all.

4 Q. Yeah, I'd --

5 A. I'm sure he wasn't right.

6 MR. GRAY: Let's be clear. Mr. Ramsey isn't

7 saying that he listed them as a suspect.

8 MR. HILL: I know.

9 THE WITNESS: No. It's that they were good

10 close friends.

11 MR. HILL: Right. There is a lot of pressure

12 this is about lawyers and lawyering, and I can understand

13 why.

14 THE WITNESS: Certainly learned that, when

15 you're dealing with the law, it's best to deal with people

16 in the law that practice it. You won't hear any lawyer

17 jokes coming from me.

18 MR. HILL: People complain about lawyers except

19 their own. I've tried to change the hot water heater pump

20 on my plumbing and know what that's like.

21 THE WITNESS: Yeah, same reason.

22 Q. Where do you think we should look as we search

23 for the source of these damning remarks that were

24 published in the National Enquirer?

25 A. Well, I don't know. I mean, that's one of the

Page 101

1 problems I think in our media system, is that we have

2 accepted information provided by anonymous sources and

3 that's probably just a step above gossip.

4 I think it's a fundamental problem with the

5 entire media system. I mean, that's one of the problems I

6 think we have in our system. So I don't know. That's --

7 because so much of that is how all media reports these

8 days, it seems to me.

9 Q. Speaking of the media, you made reference to

10 Fleet White's strong fearful reaction to the media. Did

11 he make those expressions after he encouraged you to

12 appear on CNN or before?

13 A. Well, after, I guess is the -- in terms of the

14 instance I can think of.

15 Q. How did those reactions -- how did those strong

16 beliefs manifest? Was he yelling about it? What was he

17 trying to get you to do?

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

19 Hoverstock, out minister, he came into the office and had

20 a note from a reporter that said, I think, did you or John

21 go down the basement first? I need to know which is true.

22 Fleet was just beside himself. My reaction was,

23 you can't let that get under your skin. It certainly

24 appeared to be very troublesome to him. He was very

25 anxious about it, didn't know what to do. He seemed very

Page 102

1 genuinely afraid of what might be said about him in the

2 media, is my impression.

3 Q. You've done a great job of telling me who all is

4 authorized to make statements on your behalf. Patsy has

5 her own group of lawyers, doesn't she?

6 A. (Nods head.)

7 Q. Yes?

8 A. Yes.

9 Q. Who represents your wife?

10 A. Pat Burke.

11 Q. Anyone else?

12 A. Pat Furman works with Pat Burke, but Pat Burke

13 is Patsy's lawyer, is how we look at it.

14 Q. Do you know if they have hired any public

15 relations personnel to assist with these concerns?

16 A. Not that I'm aware of.

17 Q. When you say "not that I'm aware of," do you

18 know that they haven't, or do not know whether they have

19 or haven't?

20 A. I don't know -- I'm not aware that they have, is

21 the way I would answer it. To my knowledge, no.

22 Q. You don't know that they have not?

23 A. I would be surprised because I would probably

24 see the bill if they had.

25 Q. Do you discuss these concerns, these issues with

Page 103

1 your wife?

2 MR. MORGAN: You can answer the question, but

3 beyond that, that's a spousal privilege issue.

4 A. Yes. I mean, I discuss a lot with Patsy.

5 Q. However, I trust that she doesn't discuss with

6 you the details of her communications with her lawyers?

7 MR. CRAVER: I'm going to instruct him not to

8 answer that question. Spousal privilege.

9 Q. Was either Alex Hunter or Tom Koby a guest at

10 your December 23rd party?

11 A. No. I didn't know either of those fellows

12 either.

13 Q. I didn't think you did. Rumors fly. I guess

14 you're aware of that more than anybody, probably. And

15 nothing offers better rumor control than going directly to

16 the source. And I really appreciate your availability

17 today and also your forthright demeanor with me.

18 I'd like to be able to eliminate potential

19 sources of this defamation of my client with respect to

20 your wife and her defense team. However, my efforts to do

21 that have been frustrated. We requested an affidavit

22 similar to the one that Mr. Morgan's office provided us.

23 It was from Mr. Burke and Mr. Furman. And they decided

24 not to do that for us.

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

Page 104

1 recently about possibly locating a convenient time and

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

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

4 exchange broke down into something of a shouting match.

5 So I really am determined not to make this any

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

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

8 pinpoint the source of this information.

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

10 kind of abuse than you are because of the relative

11 circumstances, the contrasts. There are similarities, but

12 there are also contrasts. We have other opportunities.

13 So that's why I've been asking you questions

14 about who works for your wife. She has a PR machine?

15 A. No. She has not. I'm certain of that.

16 Q. She might also have awareness of conversations

17 or communications that occurred, people who were

18 cooperating with the tabloid press that you're unaware of;

19 is that a fair --

20 MR. CRAVER: Let me just instruct my witness not

21 to answer that question. I would be interested in

22 suggesting an alternative off the record that maybe we can

23 cooperate with without waiving the privilege, but I'm

24 hesitant to waive the privilege at this time.

25 MR. HILL: Okay. We'll travel further across

Page 105

1 that bridge in a minute. Actually, why don't we do that

2 now. We'll go off the record, take a little break and

3 then wrap it up.

4 MR. CRAVER: You mean wrap up the depo? Wrap up

5 that issue?

6 MR. HILL: Wrap up this part of the depo, of

7 course reserving opportunities to reschedule it.

8 MR. CRAVER: Let me chat with Bryan and Bill

9 about that. We're off the record.

10 MR. MYERS: Off the record approximately 2:20.

11 (A recess was taken.)

12 MR. MYERS: We're back on the record

13 approximately 2:31.

14 Q. I hope it's of some reassurance to you the

15 genuineness of our intent. I'm not trying to beat a dead

16 horse with a dead stick here.

17 A. You've been very courteous.

18 Q. Thank you, and I appreciate your candor and

19 courtesy. I'll ask you again if there is anything else I

20 should ask of you that will help me to narrow our field of

21 investigation so that we can locate the --

22 MR. CRAVER: I can't allow him to answer that

23 question, whether you should ask him anything else --

24 you're the lawyer. You know the elements of your case.

25 MR. HILL: It's not a trick question. I'm just

Page 106

1 asking Mr. Ramsey if he has any suggestions of any source.

2 MR. CRAVER: Why don't you ask him the question,

3 whether he has any information himself as to the identity

4 of the source.

5 MR. HILL: Let's take that question.

6 THE WITNESS: No, I do not.

7 MR. HILL: Under the terms of the stipulated

8 protective order, you know, I don't have any further

9 questions at this time.

10 MR. CRAVER: Obviously, we reserve the rights to

11 object to a later deposition on all bases with -- but at

12 least we moved the case forward, moved the ball forward a

13 little bit.

14 MR. HILL: I don't know if you have any

15 questions?

16 MR. HERRINGTON: I don't have anything today.

17 MR. CRAVER: We'll handle signature, please.

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

19 THE REPORTER: Mr. Herrington will get a copy.

20 I assume Mr. Hill wants a copy and you'll get a copy.

21 MR. CRAVER: Gentlemen, with regard to --

22 MR. GRAY: You understand that because this is

23 sealed, nobody else can order a copy.

24 MR. CRAVER: Nobody else can order a copy.

25 MR. GRAY: Only the parties.

Page 107

1 MR. CRAVER: And the same with videotape. I'll

2 want one copy of the videotape.

3 With regard to anybody making copies of their

4 copies, I interpret the order to be that we cannot make

5 copies of the copies. But if we need additional copies,

6 we have to go to the reporter and obtain additional sealed

7 copies. Do you understand what I mean?

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

9 prohibitive of distribution of any images or any

10 recordings based upon the deposition.

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

12 MR. HILL: Absolutely.

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

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

15 that they bring it to our attention.

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

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

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

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

20 this protective order, that the other parties are entitled

21 to prior notice of that and opportunity to object.

22 MR. CRAVER: Right.

23 MR. HILL: I don't even intend to request a copy

24 of the videotape unless we go to trial.

25 MR. HERRINGTON: I would think that notice

Page 108

1 should be accompanied by your license to practice because

2 that in itself would be a violation.

3 MR. GRAY: Exactly. I'm speaking of, for

4 example, experts, just as a hypothetical, that they would

5 not receive a copy absent prior notice to us and an

6 opportunity to set terms.

7 MR. HILL: Sure.

8 MR. CRAVER: That's all I'm really concerned

9 about now.

10 MR. HILL: As I mentioned, unless there is a

11 need for it, unless we, you know, are preparing for trial,

12 I don't -- I'm not even going to order a copy of it.

13 MR. CRAVER: Thank you.

14 MR. MYERS: Off the record approximately 2:35,

15 tape 2 of 2.

16 (The deposition concluded at 2:35 p.m.)

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Page 109

1 CERTIFICATE OF WITNESS

2

STATE OF \_\_\_\_\_)

3 ) ss.

COUNTY OF \_\_\_\_\_)

4

5

I, JOHN RAMSEY, a witness in the above

6 deposition, do hereby acknowledge that I have read the

foregoing transcript of my testimony, and state under oath

7 that it, together with any attached amendment to the

deposition, constitutes my sworn testimony.

8

I ( ) have ( ) have not made

9 corrections on the attached amendment to the deposition

form.

10

11

12 \_\_\_\_\_

JOHN RAMSEY

13

14

15 SUBSCRIBED AND SWORN to before me this \_\_\_\_\_

day of \_\_\_\_\_.

16

My commission expires \_\_\_\_\_.

17

18

---

19 Notary Public, State of \_\_\_\_\_

Street Address \_\_\_\_\_

20 City and State \_\_\_\_\_

21

22

23

24

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Page 110

1 CERTIFICATE OF DEPOSITION OFFICER

2 STATE OF COLORADO )

)

3 COUNTY OF DENVER )

4

I, JOHN J. SPERA, a Certified Court Reporter

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

commissioned to administer oaths, do hereby certify that

6 previous to the commencement of the examination, the

witness was duly sworn by me to testify the truth in

7 relation to matters in controversy between the said

parties; that the said deposition was taken in stenotypy

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

reduced to typewritten form by me; and that the foregoing

9 is a true and correct transcript of my stenotype notes

thereof.

10

That I am not an attorney nor counsel nor in

11 any way connected with any attorney or counsel for any of

the parties to said action nor otherwise interested in

12 the outcome of this action.

13 IN WITNESS WHEREOF I have affixed my signature

and seal this day of , 1998.

14

My Commission expires March 10, 2002.

15

16

---

17 JOHN J. SPERA

Certified Shorthand Reporter

18 Notary Public, State of Colorado

1874 South Pontiac Way

19 Denver, Colorado 80224

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February 6, 2000