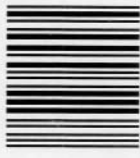


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you, Ms. Lawson, with a stack of exhibits. I  
may have some more for you and I don't mean that  
as a threat --

MR. McANDREW: But if I can  
approach, Your Honor, with these exhibits?

THE COURT: Yes.

BY MR. McANDREW:

Q. You can set that binder aside and  
actually take it off of there and give yourself  
some room. Okay. Can you tell the ladies and  
gentlemen of the jury who you are?

A. Yes. My name is Kim Lawson. I'm  
an attorney that practices law in Wilmington,  
Delaware. I'm barred in Delaware and in  
Maryland. I've been practicing since about 2000  
as a lawyer. I work at a law firm called Reed  
Smith, LLP, which is an international law firm,  
does a lot of corporate work. I focus in our  
financial industry group, which is a combination  
of litigation and transactional work primarily  
focusing on financial industry clients. So my  
primary focus is bankruptcy, so I represent  
corporations and businesses in corporate  
bankrupcies. I don't do individual bankruptcies

Rudy - there  
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packet. I will  
be sending next  
that continues  
ms. Lawson's  
direct  
exam testimony.  
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cross exam  
testimony  
yet.

1 unless I'm representing a bank or another  
2 financial institution. I do litigation in  
3 bankruptcy and also I represent lenders in  
4 litigation in Federal, State Court relating to  
5 loans or loan practices and I also do some real  
6 estate work, do real estate closings and real  
7 estate transactions representing lenders or  
8 borrowers in commercial transactions. And I  
9 also do some work in chancery court, do  
10 receiverships for corporations or LLC's or any  
11 types of companies, putting them in receivership  
12 and getting control of their assets.

13 Q. All right. You sound like a  
14 corporate lawyer.

15 A. Very much so.

16 Q. Fair enough. And you mentioned  
17 the name of your law firm is Reed Smith?

18 A. Yes.

19 Q. And you described it as an  
20 international law firm?

21 A. Yes.

22 Q. How many lawyers does Reed Smith  
23 have, about?

24 A. I thing about 2,000. It kind of

1 varies depending on offices we've acquired or  
2 people coming and going, but probably  
3 approximately 2,000 lawyers.

4 Q. And how many offices?

5 A. I don't know the exact number of  
6 offices, but I would say there's at least 15 or  
7 20 throughout the world.

8 Q. All right. And you're here in the  
9 Wilmington office?

10 A. Yes.

11 Q. And about how many lawyers are  
12 here in Wilmington with you at Reed Smith?

13 A. We just had three more lawyers  
14 come over, I believe, so I would say it's around  
15 11, between 10 and 12, somewhere in there.

16 Q. All right. And you mentioned  
17 bankruptcy law. Is there a bankruptcy court?

18 A. Yes. It's part of the federal  
19 court system, so there is a United States  
20 Bankruptcy Court for the District of Delaware  
21 that sits in Wilmington.

22 Q. It's in Wilmington, it's in  
23 downtown Wilmington?

24 A. It is. It's not in this building,

1 it's in the building across the street, but it  
2 is part of the district court.

3 Q. You also mentioned something  
4 called the chancery court?

5 A. Yes.

6 Q. What's the chancery court?

7 A. The chancery court in Delaware is  
8 a separate court that only has jurisdiction to  
9 handle equitable matters, so they handle  
10 guardianships, they handle like people or  
11 property, a lot of corporate disputes where  
12 there's fights with corporations and their  
13 shareholders, they all go to chancery court to  
14 litigate those cases. So it's an equitable  
15 court for people or corporations.

16 Q. Where is the chancery court  
17 located?

18 A. The chancery court is located in  
19 the state courthouse down the street, on King  
20 Street.

21 Q. When you say the state courthouse,  
22 which courthouse are you referring to?

23 A. The New Castle County Courthouse  
24 on King Street.

1 Q. The one right down the street?

2 A. Yes.

3 Q. All right. And the one that you  
4 know Christine Belford -- where the incident  
5 occurred; is that right?

6 A. Yes.

7 Q. Okay. All right. Well, thank you  
8 for the background, but obviously we're here to  
9 talk about a different type of case from which  
10 you've just described. And in your work at Reed  
11 Smith, do you do something called pro bono  
12 practice?

13 A. I do. I did that prior to coming  
14 to Reed Smith. Shortly after graduating law  
15 school and getting my license, I took training  
16 with the State of Delaware's Office of the Child  
17 Advocate and started representing children  
18 pretty immediately within the first year of  
19 being barred and I have done that ever since.

20 Q. So when we say pro bono practice,  
21 are you being paid for that?

22 A. No, you don't get paid. Pro bono,  
23 I think the correct Latin term is pro bono  
24 publico, which means for the benefit of the

1 public, so you don't get paid for that. You  
2 volunteer and you represent different people in  
3 different capacities for free.

4 Q. Okay. How many hours do you work  
5 at a firm like Reed Smith?

6 A. Our expected billable hours are  
7 about 1,800 a year.

8 Q. My question was how many do you  
9 work?

10 A. A lot more than that. Probably  
11 over 2,000 or 2,200 hours.

12 Q. And you find time for pro bono  
13 work?

14 A. Yes. I've always done pro bono  
15 work.

16 Q. And you mentioned the Office of  
17 Child Advocate; is that right?

18 A. Correct.

19 Q. And what is that?

20 A. That's a part of the government in  
21 the State of Delaware. They created a separate,  
22 I don't know if -- whether it's a division or  
23 department, but it's called the Office of the  
24 Child Advocate and there is a child advocate,



1 her name is Tania Coley and she runs the office.  
2 They have their own lawyers in house that  
3 represent children throughout the State of  
4 Delaware, but primarily it is volunteers  
5 throughout the State of Delaware that they use  
6 to represent children in family court, which is  
7 also located for New Castle County at the  
8 courthouse on King Street.

9 Q. All right. And this is the type  
10 of pro bono work that you do?

11 A. I do that pro bono work, yes. I  
12 do other pro bono work, but 90 percent of my pro  
13 bono work has been through the Office of Child  
14 Advocate.

15 Q. And does your firm dictate what  
16 type of pro bono work you do?

17 A. No. And actually years ago we  
18 didn't get any credit for pro bono work and, you  
19 know, if you did pro bono work, it didn't count  
20 towards any of your billable hours. It was just  
21 if you did it, that was great, but they didn't  
22 consider any of that. They now have changed  
23 their policies. I was on an associate's  
24 committee years ago and, you know, our clients

1 want to know that we're doing pro bono work and  
2 the bar wants to know and the people who are  
3 coming to work at law firms want to see that  
4 you're helping your community, so Reed Smith now  
5 does consider a certain portion of your hours  
6 billable, but not the entire thing until you  
7 meet certain criteria.

8 Q. With regard to the pro bono work  
9 that you do, are there reasons for why you do  
10 that work, why you do this particular type of  
11 pro bono work with the Office of Child Advocate?

12 A. Yes. Most of my working life I  
13 have spent with children. I was a YMCA camp  
14 counselor for preschool children. I taught  
15 children dancing school. I used to dance and my  
16 dream was to sort of open up a dancing school  
17 and teach children, so sort of always had some  
18 connection or relationship to children my whole  
19 life. And so I originally went to college to be  
20 a dancer and to teach children how to dance.  
21 Due to an injury it didn't work out as I  
22 planned, so I needed a plan B. So I decided to  
23 combine sort of psychology and dance and so I  
24 did a senior project teaching mentally retarded

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1 children how to dance, then used that to go to  
2 graduate school at Hahnemann University to get a  
3 Masters Degree in Creative Arts Therapy where I  
4 specialized in movement therapy. And so I  
5 learned how to do movement analysis and to use  
6 movement to diagnose and treat psychiatric  
7 disorders. I did -- I tried to focus my  
8 internships, which we had to do throughout  
9 graduate school on children, so I worked at a  
10 public school in Philadelphia, working with  
11 severely handicapped children, and I also did an  
12 internship, doesn't exist anymore, but in  
13 Philadelphia there used to be a school, I think  
14 it was called the Developmental Center for  
15 Autistic Children and I worked there and did an  
16 internship there working with autistic children  
17 and they asked me to stay during the summer to  
18 work there as a staff member and to continue to  
19 do movement therapy, which I did. I enjoyed it  
20 very much and it was what I sort of wanted to  
21 do.

22 Q. Then you sort of throw it all away  
23 to become a bankruptcy lawyer?

24 A. Yes. Yes, I did. I went to law

1 school. I worked in mental health for years and  
2 I worked in a child and adolescent treatment  
3 unit and I was the head of the unit, so I  
4 continued to work with children. I also treated  
5 adults, but children were my main focus. I  
6 wanted to go to become an FBI agent and do  
7 criminal profiling at some point and I went to  
8 law school and I sort of had this thought that I  
9 would represent children who weren't getting  
10 health benefits for mental health when they  
11 needed it, so I could sort of sue insurance  
12 companies and help people get treatment, but  
13 that's not where I am. I went a different route  
14 somehow, so here I am doing what I do.

15 Q. So is it fair to say you found a  
16 way to combine your past interests with your  
17 current position?

18 A. I did. So that's why I did the  
19 Office of Child Advocate, because it helps me do  
20 both.

21 Q. I see. Let's shift gears and talk  
22 about a guardian ad litem. And I bring that up,  
23 because does there come a point where you are  
24 appointed as the guardian ad litem for Laura,

1 Leigh and Karen Matusiewicz?

2 A. Yes.

3 Q. All right. What is a guardian ad  
4 litem?

5 A. Well, an attorney guardian ad  
6 litem, which is what I do -- there are guardian  
7 ad litem who are not attorneys and I don't know  
8 their full function. But an attorney guardian  
9 ad litem is appointed as an attorney to  
10 represent children who are in the family court  
11 for one reason or another to represent the best  
12 interests of the children.

13 Q. And in this particular instance,  
14 I'm going to ask you to take a look at what's  
15 been marked as Government Exhibit 500.

16 MR. McANDREW: And Your Honor, I  
17 apologize. I did not begin with my normal  
18 practice of reading out the exhibit numbers, but  
19 the exhibit numbers here are 500 through 505,  
20 consecutively. 507 through 512 and 308, which  
21 we will not get to most of these until after  
22 lunch.

23 THE COURT: All right. Subject to  
24 pretrial and sidebar rulings, you are permitted

1 to use the exhibits and at lunch break we will  
2 address the other matters at hand.

3 BY MR. McANDREW:

4 Q. If I could ask you to look at  
5 Government Exhibit 500, which I'm going to put  
6 down here on the Elmo. What is this? Have you  
7 seen it before?

8 A. Yes, I have seen this document  
9 before.

10 Q. What is it?

11 A. This is the order from the family  
12 court appointing me as the attorney guardian ad  
13 litem for Laura, Leigh and Karen.

14 Q. All right. And the date on this  
15 order appointing you is what?

16 A. July 23rd, 2010.

17 Q. All right. And you are being  
18 appointed for which -- for what purpose in this  
19 particular case?

20 A. This case was a petition by  
21 Christine Belford to terminate the parental  
22 rights of David Matusiewicz.

23 Q. Now, is that something that's done  
24 under state law, under Delaware law?

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1 A. The appointment of attorney  
2 guardian ad litem?

3 Q. The termination of parental  
4 rights?

5 A. Yes, that is done under state law,  
6 that is correct.

7 Q. And what court has jurisdiction  
8 over that matters?

9 A. Family court has jurisdiction.

10 Q. Okay. So when you are appointed  
11 as the guardian ad litem, who do you represent  
12 or what interests do you represent?

13 A. I represent the best interests of  
14 the children.

15 Q. Do you represent Christine  
16 Belford?

17 A. No.

18 Q. Do you represent David  
19 Matusiewicz?

20 A. No.

21 Q. Do you represent Laura, Leigh and  
22 Karen in their individual capacities?

23 A. No, only as to their best  
24 interests.

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Q. Okay. And who appoints you?

A. Under state law there's a variety of people that can request the appointment of a guardian ad litem. One of those is the judge. The court can ask for an attorney guardian ad litem to be appointed and enter an order, so in this case the judge did it on her own. She asked that an attorney guardian ad litem be appointed.

Q. So how does that lead to you?

A. So the court contacts the Office of the Child Advocate and says that they want to appoint an attorney and then the Court and the Office of Child Advocate work out sort of who it's going to be. And they appoint a specific attorney. Before you are appointed, for ethical reasons you're given names to do a conflicts check to make sure that there are no conflicts with representing any of the parties that are involved. Once you clear conflicts, you let them know, I am cleared, I can do this and then an order is entered. It's sent to the Office of Child Advocate who then sends the order to me and from that point I have been appointed and I

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start to represent their best interests.

Q. When you were represented in this case to represent the best interests of the children, was this your first time serving as a guardian ad litem?

A. No, it is not. I've served, I think approximately 11 children prior to this appointment. And I have represented children since this appointment.

Q. And how long -- over what period of time have you acted as a guardian ad litem?

A. I can't remember the exact date of my first case because it opened at my old firm and then I moved to Reed Smith, but I came to Reed Smith in March of 2001, so it was probably around the fall of 2000.

Q. Fall of 2000. And you mentioned that you've served as a guardian ad litem, I think you described it for a number of children, you described it by the number of children?

A. Yes.

Q. And this here is what we've been referring to as a TPR proceeding, correct?

A. Correct.

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Q. Have there been other types of proceedings? Have they all been other types of proceedings?

A. Other types of proceedings in addition to TPR.

Q. All right. So after your appointed to represent the best interests of the children, what do you need to do to determine what that is, what the best interest is? What sorts of things in general does a guardian do and then what's the end result of that process?

A. So one of the things that the order does, which the statute allows me to do is it basically gives me access to any and all information from the children, sort of regardless of their parents' consent. So I can obtain information from schools, from doctors, from any type of sort of the State of Delaware, any organization. I can obtain information by providing a copy of my order about the parents, the children or anybody else that's important in their life. So what I do is I start a process of gathering information from all the resources that are applicable in a case and so I go

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1 through that process and once I've gathered all  
2 that information, I talk to the children, I talk  
3 to the parents, I talk to teachers, you know,  
4 all different people. I gather all that  
5 information and then I look at the best interest  
6 factors which are set forth directly in the  
7 Delaware statute. There are a list of  
8 approximately seven factors. They are not the  
9 only factors that will be considered by the  
10 Court, but they are factors that should be  
11 considered, but they can consider other factors.  
12 They can give certain factors more weight or  
13 less weight depending on the case, but they are  
14 like a guideline of seven factors. So I look at  
15 those factors or any other aspects of the case  
16 that I think are important as to the ultimate  
17 decision and then I formulate a position on what  
18 is best in the children's interests and then my  
19 job is to go to court and advocate that position  
20 to the Court for the kids.

21 Q. And when you go to court, this TPR  
22 proceeding, what is it, what happens at it?

23 A. So at a TPR, well, there's  
24 different ways a TPR proceeding comes up. It

1 could be that the State has taken custody of a  
2 child and is trying to terminate the parental  
3 rights of one or both parents. It could be that  
4 as in this case, it could be two parents or one  
5 parent is trying to terminate the rights of  
6 another parent. It could be a relative who has  
7 guardianship over a child who is petitioning to  
8 terminate the rights of parents. So in -- under  
9 Delaware law more than one party can seek to  
10 terminate the rights of parents or a parent. In  
11 this case Christine had petitioned the Court as  
12 the mother of the children to terminate David  
13 Matusiewicz's parental rights as the father of  
14 the children.

15 Q. All right. Now, the Court  
16 obviously is going to follow Delaware law and I  
17 don't want you to get into Delaware law on this  
18 issue, but what are the factors that need to be  
19 considered in this type of termination of  
20 parental rights proceeding?

21 A. So in this particular case what  
22 the petitioner is obligated to do is to provide  
23 one of the grounds under Delaware law for  
24 termination of parental rights, so there's a

1 statute that just says these are the grounds for  
2 when you can terminate someone's rights and the  
3 petitioner has to establish at least one of  
4 those grounds. And there's a whole list of  
5 them. They have to establish at least one.  
6 When they establish one ground for termination  
7 of parental rights, the Court then has to  
8 consider the best interest of the child and  
9 whether it would be in the best interest of the  
10 children to terminate the parental rights, so  
11 they have to do both of those things before the  
12 Court reaches a determination.

13 Q. And you mentioned before that's  
14 the standard -- that's the issue that you are to  
15 focus on as the guardian ad litem; is that  
16 right?

17 A. The best interest portion. Yes,  
18 but I also, in their best interest, would also  
19 either support or oppose the grounds that were  
20 raised for termination. Because what I'm saying  
21 is it's in the best interest to terminate, so I  
22 would support a ground for termination, I may  
23 support whoever is petitioning, whether it be  
24 the State of Delaware, a parent, an aunt. I may

1 support all grounds they raise. I may support  
2 only some of them. I may bring up totally  
3 different grounds. Doesn't -- I am not limited  
4 by what's raised by the other party.

5 Q. Well, let me ask you, are you  
6 necessarily, when you're appointed, in favor of  
7 termination?

8 A. I don't have a position. When I'm  
9 appointed, I don't know the parties.

10 Q. Let me rephrase the question,  
11 because you just talked about, you know,  
12 supporting the petition?

13 A. Right.

14 Q. May you end up supporting the  
15 respondent --

16 A. Yes.

17 Q. -- in any particular proceeding?

18 A. Yes.

19 Q. And in that case you would  
20 actually say that the best interest of the  
21 children are what?

22 A. That the best interests may be  
23 either not to terminate or to do guardianship  
24 to -- or you know, it may be a case where some

1 of the cases I have, it may be the  
2 recommendation is adoption or a guardianship or  
3 being returned to the parent. Whatever I'm  
4 advocating is just what's in the best interest  
5 of the child, doesn't matter whose side it is,  
6 it could be the respondent's side, it could be  
7 the petitioner's side, I just have to look at  
8 the whole thing and make a decision for myself  
9 as to what's best for the children that I  
10 represent.

11 Q. Under the law as you understand  
12 it?

13 A. Yes.

14 Q. Okay. And so you are not in  
15 either parties' camp necessarily?

16 A. No.

17 Q. Okay.

18 A. And sometimes I'm not in either --  
19 sometimes I'm adverse to both sides.

20 Q. Okay. You're making an  
21 independent determination?

22 A. Right.

23 Q. All right. Now, in this  
24 particular TPR proceeding, we had a number of

1 participants, right?

2 A. Yes.

3 Q. And who were those participants?

4 A. So the petitioner was Christine  
5 Belford, who was the mother. The respondent was  
6 David Matusiewicz, who was the father. I was  
7 appointed to represent the best interests of the  
8 three children that were at issue. And then  
9 there also was another attorney that was  
10 appointed to represent the best -- the  
11 children's wishes, the three children's wishes.

12 Q. And is that an attorney called a  
13 Frasier Attorney?

14 A. That's called a Frasier Attorney  
15 because the case that decided that issue was  
16 titled Frasier, so we all just refer to it as a  
17 Frasier Attorney.

18 Q. Did I hear you correctly describe  
19 it as the wishes of the children?

20 A. Yes. So one of the factors in the  
21 best interest factors, the first factor actually  
22 is the wishes of the children or the child. The  
23 statute does say that even if you're  
24 representation varies from what the child



1 wishes, depending on their age and maturity,  
2 can still represent them. In this case a  
3 three children were very young and a lot  
4 times, like from five under the courts really  
5 don't look at the child's wishes, because they  
6 are not really capable of forming what the Court  
7 believes is a competent wish. So in this case,  
8 the -- some of the children were older than five  
9 years old, primarily it was Laura. Because of  
10 Leigh's autism wasn't really capable of  
11 expressing a specific interest, so it was  
12 primarily Laura. I did raise concerns that  
13 there were conflicting wishes from her as to  
14 what she wanted or didn't want. And when that  
15 was raised, a motion was brought by David  
16 Matusiewicz's attorney to have a Frasier  
17 Attorney appointed to represent the wishes of  
18 the child. The court granted -- I didn't really  
19 oppose it. And the Court granted that motion  
20 and there was an attorney appointed just to  
21 represent their wishes and nothing else.

22 Q. And a child's wish is obviously  
23 can differ from a child's best interest?

24 A. Correct. And that's the whole

1 purpose of a Frasier attorney, if their wishes  
2 conflict with what's in their best interest.

3 Q. So you added another attorney to  
4 the mix?

5 A. We added an another attorney to  
6 the mix, yes.

7 Q. But just to be clear, you raised a  
8 point there, David Matusiewicz had counsel in  
9 that proceeding?

10 A. David had counsel, Christine had  
11 counsel, the girls had two counsels.

12 Q. And Christine's lawyer's name was?  
13 A. Timothy Hitchings.

14 Q. And David's lawyer's name was?  
15 A. It was --

16 Q. If you remember?

17 A. I do, but it might take me a  
18 minute. Don Roberts.

19 Q. Okay.

20 A. I --

21 Q. So as you come into the case, what  
22 do you need to do -- what do you do initially?  
23 Let me back up for a second. Prior to your  
24 appointment, do you know any of these people?

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A. I don't know any of these people prior to the appointment.

Q. You don't know David Matusiewicz?

A. No.

Q. You don't know Christine Belford?

A. No.

Q. You don't know Laura, Leigh and Karen Matusiewicz?

A. No.

Q. All right.

A. I actually didn't even know Tim Hitchings or Don Roberts. I didn't know anybody that was involved in the case.

Q. All right. So what's the first order of business for you in the case?

A. In this particular case the first thing was a hearing that was scheduled very soon after I was appointed and it was a discovery dispute between Christine Belford and David Matusiewicz, so it was a telephone conference with just counsel. And that was my very first responsibility in the case, so to speak. After that was over, I then asked counsel for the parties to provide me with contact information

1 and have their clients send me information on  
2 what they thought was helpful for me to consider  
3 in terms of making a determination as to the  
4 best interests. So I kind of want to find out  
5 from the parties where they go to school, you  
6 know, who is their pediatrician, who is their  
7 dentist, who are parties that would know  
8 anything about this case and what was important  
9 for me to know to make a determination.

10 Q. So you are about to begin the  
11 information gathering phase that you previously  
12 described?

13 A. Yes.

14 Q. All right. And is it fair to say  
15 that in that information gathering phase you are  
16 taking all comers in terms of information?

17 A. Yes.

18 MR. McANDREW: All right. Your  
19 Honor, we're going to launch into the  
20 information gathering phase, but I'm wondering  
21 if this might be a good time to break.

22 THE COURT: You've laid the ground  
23 work and when we come back we can go through the  
24 actual chronology.

1 THE COURT: All rise in respect  
2 for the jury.

(Luncheon recess.)

3 THE COURT: Mr. McAndrew, you had  
4 filed a response, I believe, to the motion on  
5 behalf of the meeting. Was that under seal?

6 MR. McANDREW: It was not. It was  
7 meant to be public.

8 THE COURT: Okay.

9 MR. McANDREW: I provided counsel  
10 with a copy.

11 THE COURT: Okay.

12 MR. McANDREW: I have an extra  
13 copy if you need one.

14 THE COURT: No. We'll be fine. I  
15 have entered an order on the docket scheduling  
16 oral argument for noon on Friday and I actually  
17 communicated with Mr. Finger last night to alert  
18 him to that fact.

19 MR. McANDREW: Let me state for  
20 the record we also provided a courtesy copy of  
21 the filing to Mr. Finger this morning.

22 THE COURT: I appreciate that. Is  
23 there anything else that needs the Court's  
24

*This is  
in regards  
to the  
courtroom  
being  
closed  
during  
Laura's  
testimony*

1 attention before lunch?

2 MR. McANDREW: I don't believe so,  
3 Your Honor.

4 THE COURT: We stand adjourned.  
5 Everybody at ease.

6 MR. McANDREW: Your Honor, I  
7 handed up the revised 503 that we were talking  
8 about before the break that has the redactions  
9 which I believe I have accurately done, but  
10 please let me know if I have not.

11 THE COURT: I think it's correct.

12 MR. McANDREW: Do we want the  
13 witness back in?

14 THE COURT: We're waiting for  
15 someone or not?

16 (A brief recess was taken.)

17 THE COURT: All right. We are  
18 ready for the jury. Everyone please be seated.  
19 All right.

20 MR. McANDREW: Thank you, Your  
21 Honor. Welcome back everyone.

22 BY MR. McANDREW:

23 Q. Ms. Lawson, when we left off, we  
24 were talking about your initial investigation

into your new assignment in this case?

A. Correct.

Q. And I want to orient you back to that, and we'll talk about the initial steps that you took. You have already described -- you don't need to repeat anything you have already said. You have already described a telephone conference that you were a part of with the lawyers where you told them to, you know, get you information; right?

A. Correct.

Q. And can you pick up from there and tell us about your initial steps in the case?

A. So one of the first things I did, and I don't know exactly at what point I learned this, but I had learned that there had been a kidnapping at some point and so I basically do, you know, computer searches, either on Google or Lexus or Westlaw, different databases that lawyers have access to and just general internet searches to find information.

And I came across some information on there, newspaper articles, from different places, newspapers or you know, websites, like

The information on the internet, news articles + media has all been 1 sided + very negative not providing the whole story

1 America's Most Wanted and found information on  
2 the case.

3  
4 And so some of that information I  
5 printed and kept in, you know, my files, some of  
6 the information I just looked at and passed on,  
7 there was a lot that was repetitive.

8 One of the things I did, I also  
9 got e-mails from Christine with names of  
10 different people, pediatricians, schools,  
church, different people that may have  
information about the case. She also would send  
me an E-mail with a link to a website that would  
have information that Lenore Matusiewicz I  
believe had posted.

17 And then I also started setting up  
18 meetings and phone calls. So one of the things  
19 I do towards the beginning and obviously I need  
20 to meet with the girls who most children have  
21 never been in court, have never been in these  
22 situations. So my job is to go out and explain  
23 to them who I am and what I do and why I'm there  
24 in terms that they're capable of understanding.  
Because kids don't really understand this whole  
system and a lot of adults don't either, so it's

Christine read  
the post on  
Grandmother's  
Impossible  
Choice, sent  
it to the  
Guardian ad  
Litem, BUT  
DID NOT  
PRESS ANY  
CHARGES...



1 sort of a lawyer world and little kids don't  
2 watch law shows, they're not good for them.  
3 They haven't seen Law & Order or anything to  
4 compare it to.

5 Q. And we all do know that this is  
6 exactly like Law & Order?

7 A. That's correct. It always is  
8 exactly like Law & Order.

9 So I go out to the house where the  
10 girls reside with Christine at Donegal Court,  
11 and Christine is there, her husband at that time  
12 Jerald Purcell is there, her daughter Katie  
13 Moffa and Laura, Leigh and Karen are there. And  
14 I sit down and meet mostly with -- just  
15 originally I meet with Cristine and the three  
16 girls so they're comfortable with me because  
17 they have no idea who I am, never met me before.  
18 So I sit down and introduce myself to all of  
19 them and give a very brief overview, have  
20 Christine introduce who I am.

21 And then I meet with the girls  
22 separately, because as their attorney, I have to  
23 make sure I protect attorney/client privilege  
24 and things like that. So I always meet with

1       them apart from their parents, their guardians,  
2       their foster parents, there is nobody else with  
3       us when we meet, it's always me and the  
4       children.

5               Q.    Again, Christine Belford is  
6       obviously their mother, but she's also one of  
7       the parties to the litigation that you are now  
8       involved in?

9               A.    That's correct.

10              Q.    And you're at the beginning of  
11       this process. Just to orient you, you said you  
12       went to 15 Donegal; correct?

13              A.    Correct.

14              MR. McANDREW: Your Honor, we're  
15       going to publish what's been previously been  
16       admitted which I believe is Government 242.

17              Q.    Take a look at the house here in  
18       my top level. Is that the 15 Donegal that you  
19       went to?

20              A.    Yes, it is.

21              Q.    All right. So you go out and you  
22       have this, I think you said it was an initial  
23       meeting; is that right?

24              A.    Correct.

1 Q. And did you have a chance to meet  
2 with all three of the girls?

3 A. I did meet with all three of the  
4 girls. I also had an associate from my office  
5 with me, her name is Diana Rabina, and she went  
6 with me.

7 And so we met separately with the  
8 girls so everybody else leaves and it's just us.  
9 And I meet with them.

10 You know, Leigh has autism so her  
11 communication skills are more limited, and it  
12 wasn't like I sat down and had a long back to  
13 back conversation with her. My interactions  
14 with her, I introduced myself to her, I  
15 explained who I was. She was sort of playing  
16 and moving around. There is like a dining room  
17 and off of that was like a little porch area,  
18 and in there she has like a dry erase board with  
19 markers, so she would be in there. And then she  
20 would come in and look at me and she would leave  
21 and she would come back. So she kept doing that  
22 throughout this whole meeting.

23 And at one point, you know, I just  
24 sort of sat at the chair and turned it sort of

1 away from the dining room table and just sat  
2 where she was, facing where she was, and she  
3 came out and she turned backwards and walked  
4 right in between, like she was going to sit on  
5 my lap, and she just stood there, and just said  
6 you know, will you draw with me. And so she  
7 took my hand and I went out into the board and  
8 she asked me to write the name of a movie, she  
9 said write Finding Nemo, so I wrote Finding Nemo  
10 and she spelled the letters with me and she took  
11 different letters and made pictures of them.

12 Q. About how old was Leigh at this  
13 time, if you remember?

14 A. Well, on my order it gives me all  
15 their dates of birth, so she was born in 2005,  
16 so 2010 -- no, that's Karen, so she was born in  
17 2003, so in 2010 she would have been almost --  
18 I'm trying think of the exact date I met with  
19 them, but she either would have just turned  
20 seven or she was about to turn seven. So around  
21 seven years old.

22 Q. And about how old was Laura at  
23 this point?

24 A. Laura at that point was a year

1 older, because I was appointed after her  
2 birthday. She would have been eight at that  
3 point.

4 Q. And Karen?

5 A. And Karen is in July, so I was  
6 appointed the end of July, so she would have  
7 turned five, recently turned five.

8 Q. And you also met Katie Moffa; is  
9 that right?

10 A. I did meet Katie, yes.

11 Q. And Katie is?

12 A. And Katie is Christine's daughter  
13 from a prior marriage with Bill Moffa and half  
14 sister to Laura, Leigh and Karen.

15 Q. Now, you described your  
16 interaction with Leigh?

17 A. Yes.

18 Q. What about your interaction with  
19 Karen?

20 A. Karen and I primarily played  
21 during the first meeting. You know, she loves  
22 stuffed animals, so she brought all these cats  
23 and dogs stuffed animals out and we played  
24 different games with the stuffed animals. And

1 while we were playing I would talk to her about  
2 what I do and why I was there, and she would  
3 just sort of play with the animals. You know,  
4 she didn't give me any substantive type  
5 responses, it was more like play with me as I  
6 was explaining to her who I was. She would play  
7 under the table. She was in the room I would  
8 say ninety percent of the time, but was playing  
9 all around. She's a five-year-old active,  
10 running around.

11 Q. How about Laura?

12 A. Laura sat at the table with us and  
13 was not happy that I was there in any way, shape  
14 or form. She didn't want to tell anybody else  
15 what else had happened. She wanted to know why  
16 I sort of had my nose in her business and what I  
17 was there for and why was I there. She was very  
18 guarded. And, you know, she had a little bit of  
19 an eight-year-old attitude with me. So we  
talked a little bit, you know, she shared some  
information about, you know, where they were in  
South America, and you know, that Lenore  
Matusiewicz loved owls, and she shared different  
information about sort of what happened.

"Lenore  
matusiewicz  
loved owls"  
does that  
sound like  
a comment  
from someone  
scared of  
mom? so  
what + who  
made her  
afraid?

1 Q. So based on your meeting, your  
2 time there, your initial meeting, what were your  
3 first impressions of the children and their  
4 interaction with each other and in their house?

5 A. They were -- I mean, they  
6 interacted well with each other. There was, you  
7 know, no fighting, there was nothing, they  
8 seemed comfortable. Leigh wanted food at some  
9 point, a snack, and she just went right to Laura  
10 and Laura went in the kitchen and got her a  
11 snack and she ate the snack. And Karen was in  
12 the other room playing with her stuffed animals  
13 with Leigh. They all seemed to get along. And  
14 when I got there, they were playing. They  
15 seemed healthy. They seemed happy. The house  
16 was clean. The house was organized. There was  
17 nothing from what I saw that concerned me.

18 I was given a tour of the house,  
19 which some people don't let me do that and some  
20 people do. I was given free access to sort of  
21 tour the house, and it was clean and everything  
22 looked fine. They were comfortable when their  
23 mother left them alone with me; some kids are  
24 not. They were fine with that.

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A1969

1 Q. How was the interaction with the  
2 mother?

3 A. They were great. When we were all  
4 in the same room, you know, Karen was climbing  
5 on Christine and Leigh was, you know, behind  
6 her, and you know, Laura was sort of sitting  
7 next to her. They made eye contact with her.  
8 They had to me normal interactions with her. I  
9 had no concerns about their interactions; same  
10 thing with Jerald when he was in the room and  
11 with Katie, and they were comfortable when Katie  
12 and Jerald left to leave us alone, and they were  
13 comfortable when Christine left.

14 Q. And at this initial meeting, are  
15 you there to also interview Christine or is this  
16 primarily about meeting the children?  
17

18 A. This is just the meeting about the  
19 children.

20 Q. All right. So that meeting wraps  
21 up, and you do get some information from  
22 Christine; correct?

23 A. I do get information from  
24 Christine.

Q. I'm going to direct you first to



1 Exhibit 501, Government Exhibit 501. Let me go  
2 back to the computer. Do you have that in front  
3 of you?

4 A. I do.

5 Q. Have you seen that before?

6 A. I have.

7 Q. And what is it?

8 A. So these are two e-mails that I  
9 received from Christine on September 15th,  
10 they're two different times.

11 Q. Just look at the first one, I'll  
12 take the first page first.

13 A. Okay. This is the second E-mail  
14 that day I got from Christine, and she sent it  
15 to me. This is a web blog of David's aunt  
16 supposedly telling the truth of the story.  
17 These are the allegations of the Matusiewicz  
18 clan against me. In the bottom, she said sorry  
19 this is italic, I can't turn it off. There is a  
20 link to a website there.

PROOF  
again that  
Christine  
saw the  
website  
& still  
DID NOT  
FILE any  
charges...

21 Q. All right. Jon Benet, can you  
22 read that?

23 A. It says --

24 Q. Just through the dot come?

1 A. It says

2 JonBenetTrueCaseHistory.com/grandmother's  
3 impossiblechoice.HTML.

4 Q. Do you visit this website?

5 A. I do.

6 Q. We'll talk about that in a second.  
7 Let's flip to the second page of the document.  
8 It's actually a separate E-mail as you say;  
9 right?

10 A. Yes.

11 Q. And this was an E-mail sent to you  
12 from Ms. Belford?

13 A. Correct.

14 Q. Same date, September 15, 2010?

15 A. Yes.

16 Q. And what is she providing you with  
17 in this E-mail?

18 A. She's providing me with  
19 information about people that may be relevant  
20 for me to contact to obtain information about  
21 her and the girls, and the case in general.

22 Q. And there is a list of names?

23 A. Yeah. There is a list of names  
24 with phone numbers and their connection with

1 either her or the girls or the Matusiewicz  
2 family.

3 Q. All right. And if we could just  
4 quickly go through the list. I don't want you  
5 to read all the information, but the first one  
6 under Chris B, where she signed it?

7 A. Right. It's St. John the Beloved  
8 Church which is where Christine and the girls  
9 attended church.

10 Q. Did Christine do anything at the  
11 church other than attend it to your knowledge?

12 A. Yes. She also -- they have a room  
13 where I guess children go when they're not  
14 actually in church, and she did the child care,  
15 I don't know what you would call it, but the  
16 child care portion, and she also taught some  
17 classes to children, at the church. And she  
18 also volunteered at the church. I can't think  
19 of all the things she did, but she did volunteer  
20 at the church and was a very active member of  
21 the church.

22 Q. The next name?

23 A. Samuel Romirowsky, Ph.D., he's a  
24 psychologist that had done evaluations during

*I'm just  
glad that  
Christine  
was  
attending  
church &  
finally  
found  
God.*

1 the divorce, custody proceedings.

2 Q. I'm betting the jury recognizes  
3 the name.

4 And the next name?

A. Is Marsha Orlov, DR. She was also  
a psychologist. She had been hired by David  
Matusiewicz to represent sort of him from a  
psychological point of view during the TPR  
hearing.

Q. And the next name?

A. That's Monica Bocanegra, Ph.D.,  
she is a psychologist who evaluated the girls  
upon their return from Nicaragua and also was  
the treating therapist for Laura for a long  
period of time and had also seen Karen I think  
twice to evaluate, you know, for like nightmares  
and some nervousness.

Q. The next name?

A. Appoquinimink Pediatrics,  
Dr. Jason Hann-Deschane. He was the  
pediatrician for the girls both before they were  
kidnapped and then Christine kept them with that  
doctor's office throughout the whole entire time  
I knew them, they went there.

Dr. Orlov  
was  
hired  
to  
evaluate  
the  
girls.

57  
ID #: 4878

1 Q. All right. The next page I just  
2 want to see if we can move through this a little  
3 more quickly. You see NorthStar Elementary at  
4 the top?

5 A. Yes.

6 Q. And who attended NorthStar  
7 Elementary?

8 A. Laura and Karen.

9 Q. Brennan School next to that?

10 A. Leigh attended Brennan School.

11 Q. And day care and preschool is  
12 listed as well?

13 A. Right.

14 Q. It appears to be some neighbors;  
15 is that right?

16 A. Correct. And there is a dentist  
17 and then eye doctors.

18 Q. So this is sent to you. Are these  
19 all folks that you follow-up with in the course  
20 of your investigation?

21 A. I do not follow-up with all of  
22 them.

23 Q. Fair enough. You follow-up with  
24 some of them?

1 A. Correct.

2 Q. And we'll talk about that more as  
3 we go through it. Now, back to that first  
4 E-mail, you saw the reference to the Jon Benet  
5 website which I'll call it for lack of a better  
6 word; right?

7 A. Yes.

8 Q. If you look at Government Exhibit  
9 502?

10 A. Yes.

11 Q. Do you have that?

12 A. I do.

13 Q. What are you -- do you recognize  
14 it?

A. I do.

Q. What do you recognize it as?

A. This is what I saw when I clicked  
on the link that Christine had sent to me.

Q. So you actually end up visiting  
the website; is that right?

21 A. Yes.

22 Q. This isn't actually what you saw,  
23 this is a document?

24 A. This is a printout, I read it, saw

*If this was considered harassment-charges should have been brought then*

it and printed it out.

1 Q. You printed it out?

2 A. Yes.

3 Q. If we go to the very bottom of  
4 that document, do you see a web address, a URL?

5 A. Yes.

6 Q. And a partial date there?

7 A. Yes.

8 Q. And that date is? You can read on  
9 this page?

10 A. Yeah. Well, on this page all I  
11 see is 9/27/2.

12 Q. If you look to the next page, do  
13 you see a similar date on the bottom?

14 A. Yes.

15 Q. What does that one read?

16 A. September 27, 2010.

17 Q. And this is entitled at the top?

18 A. A Grandmother's Impossible Choice.

19 Q. All right. And I just want to  
20 focus on a first paragraph of it at the moment.

21 A. Okay.

22 Q. And if you could just quickly read  
23 that first paragraph, if you can make it out.  
24

1  
2  
3  
4  
5  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24

my mother originally wrote her experiences using different names.

A. Yes. When Cathy brought her daughters home for a visit one weekend she walked into the kitchen and stroked one of her daughter's hair and said to the grandmother, when I sell your son's three, blond, white American girls I'm going to get \$50,000 each. I'll be sitting pretty and they'll never be found. Shortly thereafter while helping to take care of the children, the grandmother was stripping all the beds to clean the linens and found a rap sheet for a local pedophile under the linen of the daughter-in-law's bed. Could this be the rap sheet of the person who has already agreed to purchase the three children?

Q. Okay. Thank you. And we're not going to read all this document, but I do want to direct you to a few portions of it. If we go to page 2, do you see the paragraph of that begins one night?

A. Yes.

Q. Can you read that?

A. One night when the grandmother came home from work she walked to the living room where Emily, Suzy and Cathy were. Before



1 Sue could say hello she saw Cathy reaching to  
2 her right and let the mud spattered dog into the  
3 house. With the same hand she touched the dog  
4 with Cathy began throwing food on the dirty rug.  
5 As the dog rolled on the food and rug to dry  
6 off, Suzan could hear Cathy say come on, Suzan,  
7 pick up your food, it's time to eat. The  
8 grandmother went to the kitchen and prepared  
9 fresh food, returned to the living room and  
10 called her grandchild to her. The grandchild  
11 came and while eating the fresh food she never  
12 once took her eyes from her mother who was  
13 across the room glaring at both the grandmother  
14 and the child.

15 Q. You can stop there. And then down  
16 below on this page it reads, see where it says  
17 the grandmother?

18 A. Yes. The grandmother was left  
19 with an impossible choice. If she did nothing  
20 one day she might come home to three missing  
21 grandchildren. Remember the comment that she  
22 could get \$50,000 for each child or risk the  
23 serious injury or possibly death of one or all  
24 of the grandchildren by the hands of an unstable

1 mother whose mind was set on maliciously hurting  
2 her husband in order to own his business, his  
3 money and his house while seeing to it that he  
4 would be incarcerated. What will the FBI and  
5 local authorities think after realizing that  
6 just as she has manipulated her husband's life  
7 she is manipulating them. Do you want me to  
8 keep reading?

9 Q. No, that's okay. It does say,  
10 though, this could be --

11 A. This could be you and your  
12 grandchildren.

13 Q. And then down below that?

14 A. What would you do? How far would  
15 you go to protect your grandchildren from this  
16 manipulative, deceitful, unstable woman?

17 Q. And if we go to the last page of  
18 the document, I'll just focus your attention on  
19 the top portion. If you could read, this  
20 frail --

21 A. This frail 65-year-old grandmother  
22 is now in jail. Her name is Lenore Lee  
23 Matusiewicz and if anyone wishes to come to the  
24 aid of this grandmother, she is presently being

1 held in the Delores J. Baylor Correctional  
2 Institute in New Castle, Delaware. Her son,  
3 David Matusiewicz, is presently held in a  
4 correctional institute in Philadelphia,  
5 Pennsylvania. This is a father who has  
6 simply --

7 Q. Resize this sorry. Go ahead.

8 A. Where were we? This is a father  
9 who is simply trying to protect his three  
0 children from their mother because he believes  
1 she is more than capable of releasing them to a  
2 pedophile or taking their lives. Remember the  
3 pedophile's rap sheet discovered under the  
4 mother's bed linens and her statement to the  
5 grandmother regarding selling each child for  
6 \$50,000 a piece.

7 Q. You printed this out, you said?

8 A. Yes.

9 Q. Was that upon your first visit to  
0 the website?

1 A. That was the first visit I made to  
2 the website, yes.

3 Q. Printed out for your use in the  
4 case?

1 A. Yes. Well, and it's a little bit  
2 longer and so I wanted to be able to print it  
3 out and look at it and analyze it and see if it  
4 was something that I would use. At this point I  
5 don't know what I'm going to use in the case,  
6 I'm just gathering information.

7 Q. If we could switch gears and go to  
8 Exhibit 503. Do you have 503 in front of you?

9 A. Yes.

10 Q. And this was an email that  
11 Christine Belford sent you?

12 A. Yes.

13 Q. And it's entitled on the subject  
14 line?

15 A. Matusiewicz children and Marsha  
16 Orlov.

17 Q. And it reads?

18 A. Dear Ms. Lawson, I have already  
19 sent this email to my attorney and cc'd Doctor  
20 Sam R. I thought you may be interested in the  
21 last meeting that took place between me and  
22 Doctor Marsha Orlov.

23 Q. Okay. And if we go below,  
24 obviously some of this text is missing, but of

the text that's here, it begins --

A. Says Dear Tim, we talked a little yesterday about the final meeting with Marsha. Now that I have had time to, in quotes, process the info, there's some things that you should know or may be helpful.

Q. And then if you skip down.

A. I was very disturbed by the next part. Lenore told Marsha, she told her Laura was abused because she, Lenore, checked Laura's hymen and it was ripped. I also now fully believe she was the one that started the lie in the first place like a brush fire that became a 10-alarm in David's already fragile mind.

THE COURT: Members of the Jury, portions of the document that are missing are because I deemed that they are irrelevant to the case. That's the only reason why some of it is missing.

MR. McANDREW: Thank you, Your Honor.

BY MR. McANDREW:

Q. Okay. So these are some communications you receive in September of 2010

1 from Ms. Belford and this web address you  
2 visited as a result of her telling you where it  
3 is; is that right?

4 A. Correct.

5 Q. All right. Now, again, you're  
6 representing the best interests of the children  
7 and you've gotten part of the story from Ms.  
8 Belford; is that right?

9 A. Through these emails, yes. I have  
10 not talked to her yet about or interviewed her  
11 yet about the case, just what's here.

12 Q. But you also get information from  
13 the Matusiewicz family, correct?

14 A. Correct.

15 Q. All right. I want to talk about  
16 that a little bit now. And who do you interview  
17 in the family?

18 A. I talked on the phone to Tom and  
19 Lenore Matusiewicz. In a separate phone call I  
20 talked to David Matusiewicz and in a separate  
21 phone call I talked to Amy Gonzalez.

22 Q. Let's talk first about your phone  
23 conversation with Tom and Lenore Matusiewicz.  
24 You recall it at least generally?

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A. I do.

Q. All right. And can you tell the jury about how long was, the phone call, if you can remember?

A. It was approximately two and a half hours. It was a fairly long conversation. We did it over the phone. As you know, they were in Texas and I was in Delaware. The interviews that I do are very open ended, because again, I don't have a lot of information, so I'm trying to gather it. So I ask very open ended questions, you know, what is sort of going on, what do you think about Christine, you know, why -- of course one of the big questions for me was sort of why did you kidnap the girls.

Q. To Lenore?

A. To Lenore and Tom. I mean, I'm -- they are together on the phone.

Q. I get it.

A. So it's to both of them. I don't speak to them separately.

Q. Okay.

A. So they are on the phone together.

1 I'm asking them questions like that, you know,  
2 can you provide me some examples of, you know,  
3 why you think Christine is a liar or why you  
4 think she's mentally ill and they provide  
5 information to me. I ask about the al -- they  
6 tell me about the allegations of abuse, and I,  
7 you know, ask about the kidnapping and did you  
8 report it and who did you report it to. I try  
9 to get as much information as I can.

10 Q. All right. What do you recall, if  
11 you can recall, what they told you at that point  
12 about the allegations of abuse?

13 A. They told me at that -- may be  
14 hard for me to remember exactly. Told me that  
15 it was Laura who was sexually abused by  
16 Christine. They told me about the lick the  
17 lollipop game, the G spot story, and in terms of  
18 the sexual abuse, that might have been it,  
19 because the bathtub is related to the --

20 Q. Just what you can remember.

21 A. Yes, those are what I remember.

22 Q. Okay. Anything with regard to  
23 Katy Moffa?

24 A. In terms of Katy, I mean they told