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me stories about what she was like as a kid,  
that she didn't live with Christine, she lived  
with Christine's ex sister-in-law or Christine's  
ex mother and father-in-law and they told me  
about her lying, but not --

Q. Okay.

A. -- that much more information that  
I recall.

Q. All right. With regard to, you  
mentioned that you asked them if they had  
reported the abuse allegations to anyone,  
correct?

A. Correct.

Q. Do you recall their response?

A. Yes. Before they kidnapped the  
girls they had not reported it to anyone.

Q. Did you ask them why?

A. Yes.

Q. And do you recall their response?

A. The response was that they don't  
trust the system, they had -- Lenore had very  
specific examples of where a child protective  
services in another stated failed in her opinion  
in two instances to protect children and

*We did not report to the proper authorities, but we did tell some people & some of them testified to that fact.*

*\*  
I'm pretty sure that we are not the 1st family, that doesn't trust the system. There are plenty of people who never report to the authorities for this reason alone.*

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therefore there was, you know, she didn't want to call the State of Delaware because that wouldn't be an effective solution.

Q. You mean before the kidnapping?

A. Before the kidnapping, this is all before the kidnapping.

Q. Okay.

A. They did explain that they have, after they were returned to the United States, and either were in prison or, you know, at some point after they returned, they did report it to a variety of different agencies, DFS, the vice-president, the governor, a bunch of people within government, federal and state, doctors, newspapers, but they had reported it.

Q. And when you say they reported it to the vice president and the governor, how did they report it to the vice president and the governor, if you know?

A. I believe it was through letters. I mean I find out later, but I don't know on the phone call if they tell me exactly how they had contacted them.

Q. All right. To the best of your

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knowledge, they weren't having an in-person meeting with those individuals?

A. To the best of my knowledge, no, they never had an in-person meeting.

Q. Okay. If we could shift gears, you said you also spoke with David Matusiewicz by phone; is that right?

A. That's correct.

Q. And about how long did you spend on the phone with him, if you can remember?

A. It was at least an hour. Might have been a little over an hour, hour and a half somewhere in that range.

Q. And what do you recall about that phone call?

A. Similar. I asked open ended questions, who do you know that could provide me information. Again I asked about the kidnapping. I, you know, asked, does he want his rights to be terminated, why should they, why shouldn't they, you know, what did he do to leave, you know, why did he leave, did he report it to anyone, similar questions basically.

Q. And what sort of --

1 A. I asked him about Christine, about  
2 the girls.

3 Q. And in a summary fashion, what  
4 sort of responses did you get to those  
5 questions?

6 A. A lot of the information was a  
7 little bit more vague on the kidnapping and what  
8 happened there. The allegations about Christine  
9 and the sexual abuse were very prominent and  
10 very specific. There was a lot of information  
11 about Christine's mental health and mental state  
12 and her inability to care for the children. He  
13 also told me about things that, you know, he had  
14 done good with the community, about his eye  
15 practice with the special Olympics of Delaware,  
16 you know, why he became a doctor. He wants to  
17 protect his girls. Everything he's doing is to  
18 keep them safe and protect them. I'm not sure.

19 Q. With regard to the abuse  
20 allegations, the sexual abuse allegations, can  
21 you recall what he said?

22 A. Yes, he said -- I asked him when  
23 he sort of discovered the abuse. And he told me  
24 it was sometime between June and July of 2007.

894  
1 Q. All right. And you know or at  
2 least you've subsequently found out if you  
3 didn't already know that the kidnapping occurred  
4 when?

5 A. In August, the very end of August  
6 of 2007.

7 Q. Okay.

8 A. Same year.

9 Q. So a month or so before the  
10 kidnapping you found out -- he found out. Did  
11 he tell you how he found out?

12 A. He told me that Laura told his  
13 mother and his sister that she had been molested  
14 and that she was wearing two layers of clothing  
15 before going to visits.

16 Q. Visit with whom?

17 A. I'm sorry, visits with Christine  
18 Belford.

19 Q. And how did -- so Laura told his  
20 mother and his sister. How did he find out?

21 A. He told me that his mother and  
22 sister told him.

23 Q. Okay. All right. You also said  
24 that you had an interview, I believe a phone

1 interview with Amy Gonzalez?

2 A. Correct.

3 Q. And do you remember that call?

4 A. I do.

5 Q. And can you summarize that call?

6 A. Yes. So I asked similar questions  
7 of Amy, because at this point I had a little bit  
8 more information, so the questions were probably  
9 a little bit more specific about what were you  
10 told about the abuse, you know, what did you  
11 know, what did you do when you heard it, you  
12 know, did you report it, why not, did anybody in  
13 your family report it, why not. And her similar  
14 information that I had heard before and, you  
15 know, I asked if she thought they should have  
16 done something differently, you know, she said  
17 well, looking back on it we should have handled  
18 it differently, and then I asked her if she had  
19 any other information that would be helpful to  
20 me to let me know.

Q. And did you do that with each individual that you spoke to in the case?

A. Yes.

Q. You generally solicited any

Ms. Lawson's opinion was since we all told her similar information we were lying... seems backwards right? It seems that it would be similar because we lived it.

# 4896

information they were willing to give you?

1 A. Yes.

2 Q. Okay. All right. So you have  
3 these interviews, you've interviewed the  
4 children, right?

5 A. Yes.

6 Q. You've interviewed --

7 A. Well, I go back and subsequently  
8 have more in-depth interview type meetings with  
9 them.

10 Q. I understand. Just the initial  
11 interviews, though?

12 A. Yes.

13 Q. You have initial interviews with  
14 the children. You have an initial interview  
15 with Thomas and Lenore by phone, an initial  
16 interview with David by phone?

17 A. Yes.

18 Q. Interview with Amy by phone,  
19 correct?

20 A. Yes.

21 Q. You have not yet spoken in any  
22 depth to Christine Belford; is that right?

23 A. Correct.  
24

1 Q. Do you do that?

2 A. I do, but I believe I talked first  
3 to Doctor Romirowsky.

4 Q. Okay?

5 A. And Doctor Bocanegra, I believe I  
6 talked to them first.

7 Q. And in general, you were talking  
8 to them about what subjects, without getting  
9 into the detail of your discussions with them?

10 A. I was just talking to them about  
11 what they knew about the case, what their  
12 involvement was, what they have done so far,  
13 what their impressions were generally.

14 Q. And did they provide you with that  
15 information?

16 A. Yes.

17 Q. All right. In what forms?

18 A. In documentation forms and also  
19 verbally.

20 Q. Okay. So you talked with the  
21 doctors who were involved in the case?

22 A. Yes.

23 Q. And then does there come a time  
24 where you talk with Christine Belford, the



petitioner?

1 A. Yes, I talked to Christine Belford  
2 by herself.

3 Q. All right. And can you describe  
4 that conversation for the jury?

5 A. That meeting lasted probably about  
6 two, two and a half hours as well. I at this  
7 point I have the website, I have talked to, you  
8 know, David and Lenore and Amy and Tom, and I  
9 have some information about abuse -- allegations  
10 of sexual abuse, about medication uses, stopping  
11 medication, mental health issues. I have at  
12 this point a lot of information about her. And  
13 again, I ask open ended questions of her, about  
14 what's going on, how are the girls, you know,  
15 things I want to know is what were they like  
16 when they came back to you, what were they like  
17 before, what are they like now, do you have any  
18 concerns about them, and then I basically  
19 confront her about everything that's been said  
20 to her. You know, I ask her about the  
21 medication, what were you on.

22 Q. You said you confront her about  
23 everything that's been said to her?  
24

1 A. To me so far about her.

2 Q. Okay. Such as?

3 A. All the medications, you know, and  
4 I ask her questions, have you seen anybody for  
5 mental health issues, who? Have you been  
6 prescribed medications, which ones, how long,  
7 for what reason, what are you on now. It's, you  
8 know, I ask her if she abused Laura or any of  
9 her children in any way. She denied that she  
10 abused them.

11 Q. But, let me just stop you there.  
12 How did you ask her that question, because  
13 that's an important question obviously?

14 A. I asked -- I asked a general  
15 question first, did you ever abuse your children  
16 physically, emotionally or sexually and she  
17 answered no. And then I went back with more  
18 specific questions based on what I had been told  
19 by other parties about, you know, lick the  
20 lollipop or the G spot or the bathtub or extra  
21 clothing or anything that I had heard. There  
22 were -- anything that I had been told I had  
23 specifically pointedly asked her about.

24 Q. Okay. And she denied those

allegations?

1 A. The sexual and physical abuse,  
2 yes, she did say she had been treated by mental  
3 health professionals and she gave me a list of  
4 who they were, medications she was prescribed,  
5 why she took them, when she stopped them, a lot  
6 of information about that.

7 Q. All right. That you followed up  
8 on?

9 A. Uh-huh.

10 Q. Okay. Was there anything else in  
11 your conversation with Christine Belford that  
12 you specifically recall is of import here?

13 A. I asked her basically history  
14 about her family, you know, her parents, the  
15 children's relationship with her parents, her  
16 grandmother. I asked about the custody issues,  
17 the case in general. I ask, you know, why the  
18 girls were saying that David versus her, why  
19 Katy was, you know, was Katy staying with her  
20 grandmother or grandfather or her aunt and why.  
21 I ask her about her husband and their  
22 relationship and general questions, how the  
23 girls were doing in school, how are they are  
24

1 doing socially, what activities do they do, just  
2 general information about the kids and her.

3 Q. So fair to say then coming out of  
4 these interviews with the various parties, you  
5 have now a much broader picture with a lot more  
6 information than you did when you started that  
7 process?

8 A. Correct.

9 Q. All right. Do you also in the  
10 course of this information gathering process  
11 receive written materials from the Matusiewicz  
12 family?

13 A. I do.

14 Q. All right. I would like to direct  
15 you then to Government Exhibit 504 first. Do  
16 you have that in front of you?

17 A. I do.

18 Q. I would like to ask to you take a  
19 look at the first page and tell me if you  
20 recognize it?

21 A. Yes, I do.

22 Q. What do you recognize it as?

23 A. This is a letter that I received  
24 from Thomas Matusiewicz in or around

1 October/November. I just can't remember exact  
2 receipt date, but it's dated October 15th, 2010.

3 Q. That's the date you're reading on  
4 the letter there?

5 A. Yes.

6 Q. And there is an address in  
7 Edcouch, Texas?

8 A. Yes.

9 Q. It's addressed to Dear Kimberly  
10 and Diane. I believe you mentioned a Diane?

11 A. Yes, she was also on the call with  
12 me with Tom and Lenore Matusiewicz.

13 Q. And if you could just read the  
14 opening lines here?

15 A. Sure.

16 Enclosed is some information that  
17 you have requested, photos, letters, et cetera.  
18 I and my family stand ready to help you in any  
19 way possible.

20 Q. There is telephone numbers?

21 A. Yes.

22 Q. And below the telephone numbers I  
23 think we see an E-mail address that Tom has  
24 provided you with?

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A. Yes.

Q. And that E-mail?

A. I think it's A1BBQ@junno.com.

Q. And if you continue on?

A. Should you wish us to testify in court we stand ready to do so, and truly appreciate any and all assistance that you care to give. We reported our concerns to --

Q. I'll resize this for a second. We reported our concerns to --

A. Dr. Monica Bocanagra, Hockessin Center For Change.

Q. That's a name you already heard through Christine?

A. Yes.

Q. Go ahead, response it says?

A. Response couldn't --

Q. Just read it if you can exactly as it's written. If you can't make it out, that's fine.

A. Couldn't take sides or report to forensic psychologist! Jeff Pelly, Department of Services For Children and Youth and Their Families, see letter response. The sexual

1 abuser, Christine Belford Purcell now.

2 Q. And if it's easier for you, you  
3 can look off of the document in front of you.

4 A. Should report herself to the  
5 authorities. Great advice. No wonder that  
6 there are so many abused children. Tom  
7 Matusiewicz.

8 Q. Now, you received more than one  
9 communication from Tom and Lenore Matusiewicz?

10 A. In this package or over the case?

11 Q. No, just overall?

12 A. Yes.

13 Q. To the best of your recollection,  
14 do you think this is the first one --

15 A. Yes, I believe this is the first  
16 one that I received.

17 Q. If you'll flip to the second page,  
18 and the packet is a sizable packet; correct?

19 A. Correct.

20 Q. If you'll flip to the second page  
21 of the packet?

22 A. Yes.

23 Q. What do we see here?

24 A. This is a letter from Jeffrey

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Pelly who is with the Department of Services For  
Children, Youth and Their Families.

Q. And it's addressed to?

A. It's addressed to Lenore  
Matusiewicz at the Baylor Correctional Facility  
in New Castle Delaware.

Q. And it reads?

A. Your second letter was received by  
the Division of Family Services on December  
23rd, 2009. In this letter you brought forth  
concerns regarding your grandchildren's possible  
mental health concerns. In regard to mental  
health issues, the Division of Family Services  
(DFS) cannot force a parent to seek mental  
health counseling for a child as per our policy.  
If the children's mother feels as though the  
child may be suffering from possible mental  
health issues, she should contact Child Mental  
Health and they will work with her in setting up  
evaluations for the children. Behavior out of  
the ordinary display by the children in and of  
itself does not rise to the level of abuse or  
neglect.

Q. There is handwriting. Can you



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make that out?

A. She is the sexual abuser and I don't think she will turn herself in, not even in the best interest of our grandchildren, Laura, Leigh and Karen.

Q. Grandchildren or granddaughters, perhaps?

A. It could be granddaughters.

Q. Okay. And the next page of that packet is another letter?

A. Yes.

Q. From the Department of Services For Children, Youth and Their Families?

A. Yes.

Q. And this letter is dated?

A. December 21st, 2009.

Q. Again to Mrs. Lenore Matusiewicz?

A. Correct.

Q. And it contains a similar text in that it's confirming a report that was made?

A. Right. It confirms that there is a letter that was written on December 9th, 2009.

Q. All right. And it says the main concerns, if you could just read that?

1 A. The main concerns that you brought  
2 to the agency's attention was regarding your  
3 children's knowledge of age appropriate  
4 statements and how they became aware of this  
5 knowledge. They were other noted concerns  
6 regarding mom and the amount of psychotropic  
7 medication that she was taking along with other  
8 possible neglectful situations which reportedly  
9 took place in 2006.

10 The report was not accepted for  
11 investigation based on the policies that our  
12 agency adheres to, and there were no other  
13 concerns that were mentioned in regards to child  
14 abuse, neglect and/or dependency.

15 Should you have any other concerns  
16 regarding your child in the future, please feel  
17 free to contact our report line at, 1-800 --

18 Q. You don't need to read that.

19 There were other documents in the  
20 packet including pictures; is that right?

21 A. Yes. But one of the things that I  
22 noted from the two letters, I read everything, I  
23 read every word, I read every page and I'm sort  
24 of in my mind trying to piece together a story

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1 to what my position is going to be, how this all  
2 falls in. When I read these two letters, there  
3 is a letter saying that they received a letter  
4 on December 9, 2009, I say this is okay, this is  
5 after the girls are returned. There is another  
6 at the time that David's sentencing hearing was  
7 in the federal criminal case, and I look at the  
8 other letter which isn't dated so I don't know  
9 when it was sent, but it indicates in here this  
10 was a second letter received by Lenore  
11 Matusiewicz and it was dated December 23rd,  
12 2009, which is after the sentencing.

13 So I'm looking at there was one  
14 letter sent on December 9th and one at least on  
15 December 23rd, and looking at the dates, so  
16 they're all after the kidnapping, after -- you  
17 know, right around the time of sentence, so it's  
18 after everybody has been charged with crimes and  
19 these are the letters.

20 Q. So you're considering that context  
21 as you're seeing these letters?

22 A. Correct.

23 Q. If we could just move on. I don't  
24 want to go through every page in this document,

So basically they are saying that we made this all up after the kidnapping even though people testified that they were told prior.

And that is exactly what we told me. Lawson that we did not report to any authorities until after the kidnapping.

1 but there is a page after the picture, if you  
2 could take a look at that page. It begins  
3 people we talked to?

4 A. Yes. That's correct.

5 Q. And it list a number of people;  
6 right?

7 A. Correct.

8 Q. Names. And what, if anything,  
9 were you able do with this information?

10 A. Unfortunately not a whole lot  
11 because there is not really enough information  
12 about who the people are, how to reach them,  
13 where they live, and so I don't have a lot of  
14 information to go on from this E-mail. There is  
15 no last names, no phone numbers, things like  
16 that, so it's a little bit harder for me to  
17 evaluate that information.

18 Q. Did anyone in the Matusiewicz  
19 family subsequently provide you with that  
20 information?

21 A. In a later letter Lenore does  
22 provide a list. I don't think it's the exact  
23 same people, but she does provide a list with  
24 more detailed information.

1 Q. Okay. If we continue into the  
2 document, the next page we see is labeled?

3 A. Yes. So the top there is a  
4 handwritten note that says Lenore (Lee)  
5 Matusiewicz and the document is entitled A  
6 Grandmother's Impossible Choice.

7 Q. All right. Now, we saw that on  
8 the website, we saw that phrasing A  
9 Grandmother's Impossible Choice on the website;  
10 correct?

11 A. Correct.

12 Q. I'm going to ask you in the paper  
13 document there to thumb through this and  
14 actually you see there it says red flag one?

15 A. Yes.

16 Q. Will you count up the number of  
17 red flags in here?

18 A. Yes.

19 Q. You'll notice some of the pages  
20 are blank, so just skip over those.

21 A. Okay. Yes. Okay.

22 Q. How many red flags did you see?

23 A. So the last red flag I believe is  
24 red flag number thirty.

1 Q. And if you'll look at the numbers,  
2 there is a Bates number on the bottom of that  
3 document; is that right?

4 A. Yes.

5 Q. A little bit about law here. What  
6 do we call these numbers we put at the bottom of  
7 all these documents?

8 A. Bates numbers.

9 Q. Who knows why we call them Bates  
10 numbers. The Bates number on that one is?

11 A. The first page.

12 Q. That last one?

13 A. Is FD-003667.

14 Q. Now, if you go back to the first  
15 page where you saw red flag one, actually I have  
16 it pulled up here on the monitor, what's the  
17 Bates number there?

18 A. FD-003645.

19 Q. Now, can I ask you to do the math?

20 A. I don't have to do because at the  
21 bottom of the pages, they're numbered on the  
22 left-hand corner.

23 Q. That's cheating.

24 A. It goes from page 1 to 23.

Q. Fair enough.

A. We are not going to read all of these, this is in evidence, but I want to direct your attention to a few of them. If we can go to the page that's Bates labeled 3664. And if you can just tell me when you get to that.

A. I'm there.

Q. We have 3664. Do you see that?

A. Yes.

Q. I want to focus on red flag number 25. Do you see that one at the bottom?

A. Yes.

Q. If we could read through that?

A. Okay. It says red flag 25.

Christine took Laura by herself for a custody mandated visit. She had left Leigh and Karen behind. The next day Laura was so interested in going outside to play that she didn't wipe herself well enough after going to the potty. She developed a perianal rash by dinner time. When she sat down on the eat, she said that it hurt a lot.

Lee took her upstairs to the bathroom and gave her a soapy washcloth to clean

1 herself. Laura said, grandma, it hurts so much  
2 that I can't touch it. Lee patted her clean and  
3 rinsed her in the shower saying the next time  
4 you go potty, please make sure you wipe real  
5 good so this doesn't happen again. I hate to  
6 see you hurting. She explained that she was  
7 going to put some medicine on Laura's private  
8 parts to help get rid of the rash.

9  
10 Then she had Laura lay on the bed  
11 in her room so that she could cover the area  
12 with Desitin ointment to make the pain go away  
13 and heal the rash by the next morning.

14 While putting on the Desitin, Lee  
15 noticed that Laura's vaginal opening seemed  
16 rather large, though Lee didn't usually go  
17 around measuring vaginal or any other openings.  
18 Was the child at five years old putting her  
19 fingers in there to explore? Was there a  
20 problem?

21 After Lee finished putting on the  
22 ointment and Laura put on clean underwear, Laura  
23 said Grandma, I didn't like playing lick the  
24 lollipop when we first started but it's okay  
now. Lee said honey, I don't know that game.



1 Is it like the memory game we play with M & Ms.  
2 When the girls were toddlers they played a game  
3 where daddy or grandma showed them one or two M  
4 & M candies for a few seconds, hid them and then  
5 asked what's in your hand. If the child  
6 guesses, she gets the candy. A memory game with  
7 built in motivation.

8 Laura shook her head no. Lee said  
9 you'll have to teach it to me. Whom do you play  
10 it with now? Laura said, oh, anybody. Then she  
11 wouldn't say anything more, and ran downstairs  
12 to eat.

13 Lee felt as if something was  
14 wrong. She asked her daughter, Amy, to see if  
15 she could find out what was bothering Laura. It  
16 took several months before Laura told Amy and  
17 her boyfriend Juan that mommy was molesting her  
18 in the bathtub. This five year old knew all  
19 about the G spot and that mommy would go to jail  
20 if Laura ever told anybody what they were doing.  
21 Lee wondered if Laura had been trying to tell  
22 her since 2005, when she was three, that mommy  
23 had been molesting her. Putting things into her  
24 vaginal opening, hurting her mentally,

1 physically, emotionally.

2 Q. There is a question mark at the  
3 end?

4 A. Correct.

5 Q. All right. And you had previously  
6 looked at The Grandmother's Impossible Choice  
7 website; right?

8 A. Correct.

9 Q. Did you see that allegation on the  
10 first version of the website that you saw?

11 A. It's not exactly that, it's  
12 different.

13 Q. Okay. And we don't need to go  
14 through the differences, but if you'll look at  
15 red flag 26?

16 A. Yes.

17 Q. And if you could begin reading  
18 from the top there?

19 A. When Christine brought the girls  
20 home from a visit one weekend in 2007, she  
21 walked into the kitchen to return the vitamins,  
22 minerals and other supplements. She stroked  
23 Karen's hair and said, when I sell David's  
24 blonde white American girls, I'm going to get

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\$50,000 each. I'll be sitting pretty and they'll never been found because I have connections to the local crime family.

Lee was terrified. She had found the profile of a pedophile under the mattress on Christine's side of the bed after they had all moved into David's house. She asked David if she should save it. David had said throw it away.

Christine had said she looked up the names and addresses of several pedophiles in Delaware so she would know who they were and where. Sue had thought it was to protect the children. Christine had told her that she had loaded David's children into their van to go see a man listed as a pedophile in their neighborhood. She said that she was surprised to see him outside cutting his lawn.

Lee had found all kinds of pills under the stove, dishwasher, refrigerator, bathroom cabinet and under David's bed at the same time she had found the man's profile. This was a threat.

Were Christine's other statements

1 threats or warnings or what?

2 Number one. If David's children  
3 are injured or become seriously ill as their  
4 mother of course I'll be sad, but David will be  
5 devastated.

6 Number two. I know how to hurt  
7 David. All I have to do is hurt his children or  
8 take them away from him.

9 Three. I'm not afraid of you. I  
10 can get rid of you any time I want and they'll  
11 never know I had anything to do with it because  
12 I have connections to a local crime family  
13 through my ex-in-laws.

14 Four, there are going to be a lot  
15 of changes soon. I'm going to have David's  
16 house, his cars, all his money, his business and  
17 his precious children.

18 Q. If we could go to the next page,  
19 and focus on red flag 29. Do you see red flag  
20 29?

21 A. Yes.

22 Q. I'm just going to pull up a  
23 portion of that. We may skip around if you  
24 could begin just at the top?

1 A. Tom asked Christine to step  
2 outside and reached for her arm. Christine  
3 immediately jumped up and started jerking her  
4 arm back and forth, back and forth and up and  
5 down in a pattern. Tom instinctively tightened  
6 his grip as if someone were going to fall, but  
7 Christine continued to jump. You could tell Tom  
8 wasn't pushing or pulling her. She was bending  
9 her knees purposefully for leverage and she  
10 didn't move hard enough to get her arm out of  
11 Tom's grasp, but to repeatedly move her arm.  
12 Lee and Amy saw what was happening and yelled to  
13 Tom, let her go, let go of her arm, meaning  
14 she's setting you up.

15 Q. If you could skip down the last  
16 paragraph that begins, Christine came back?

17 A. Christine came back inside and  
18 spoke to David for a few minutes. Then, though  
19 petrified that Tom was going to hurt her, she  
20 and Katie walked outside behind him and sat at  
21 the picnic table to listen to what Tom had to  
22 say. Tom told her what he was thinking. He  
23 said to Christine in front of Katie, you are a  
24 two-faced lying sack of shit. Surprisingly

This is the incident  
Katy testified  
to remembering  
it differently  
than it happened.

1 there was no reaction from Christine. You are a  
2 whore bitch, Tom yelled. Christine said, I am  
3 not a whore. I'm going to kill you. I'm going  
4 to kill you both or I'm going to have you  
5 killed. Then Christine and Katie walked slowly  
6 to their car and drove away.

7 Q. And if we could go to, skip over  
8 two pages to the one that's Bates labeled 3668  
9 at the bottom?

10 A. Okay.

11 Q. And we're just going to read a  
12 portion from the bottom. On the way to Disney  
13 World?

14 A. On the way to Disney World, David,  
15 his children and his mother disappeared, but  
16 obviously didn't go far enough. They were  
17 extradited to the United States from Nicaragua.

18 Q. In the post notes just read A,  
19 Laura?

20 A. A. Laura had a recurring dream  
21 that would make her cry and wake up. In the  
22 dream, mommy was in big hotel. She turned to  
23 Laura and said I'm coming to get you Laura, and  
24 this time you'll have to come with me. Laura

would say, I'm afraid, grandma, I'm so afraid.  
Lee doesn't know how many times Laura had that  
dream or how many times she woke crying because  
of it. Then someone told Laura that her mommy  
was dead. Grandma Lee when Laura told her that  
her mother was dead asked Laura if she knew what  
it means that someone is dead. Laura said no.  
Lee explained that when someone is dead, you  
probably won't ever see them again. Laura  
sighed as if in relief and said oh. She never  
had that nightmare again.

Q. If you'll flip to the next page,  
I'm going to ask you instead of me pulling it up  
and having you read it, if you look to the  
middle of the page, you'll see a C, you'll see  
that, if you'll just read that very short  
paragraph there.

A. There are some terrible statistics  
about women who kill their children. If you do  
a search on line as Lee did, you might be amazed  
at how many articles you find concerning  
mother's who kill their children.

Q. On the next page, you'll see  
another C that begins, How many of these were

This is in regards to  
the comment that  
Laura was supposedly  
told that Christine  
committed suicide,  
when in actuality,  
verified by David's  
email + mom's comment  
here - Laura told David +  
Lee that her mother  
was dead - not  
something anyone said  
to her. Laura probably  
figured that if Christine  
wasn't with them, she  
must be dead.

Neither  
David or  
mom would  
have EVER  
said  
Christine  
committed  
suicide.  
EVER

1 warnings.

2 A. Yes.

3 Q. And if you take a look at that  
4 list, fair to say it's just a list of things  
5 about Christine Belford?

6 A. Give me one second. Most of it  
7 is -- there is a statement in here about Katie,  
8 there is some about Laura, and some from David,  
9 but primarily it's about Christine.

10 Q. And the list goes on from this  
11 page through the next page?

12 A. Yes.

13 Q. And then if we flip to the next  
14 page, if you can just read this?

15 A. These are the reasons the decision  
16 to leave was made.

17 Lee doesn't want her  
18 daughter-in-law to be added to the list of women  
19 who kill their children. She doesn't want her  
20 grandchildren to be added to the number of  
21 children killed by their mother's. She doesn't  
22 want any other child or mother added to either  
23 list either!

24 Q. If you'll flip beyond that to the



1 next page, I think you'll have 3673.

2 A. Yes.

3 Q. And you'll see that's a letter  
4 addressed to Ms. Miles. Ms. Laura Miles of the  
5 Division of Youth and Family Services?

6 A. Yes.

7 Q. And there is some handwriting at  
8 the top there?

9 A. Correct.

10 Q. That reads?

11 A. David Matusiewicz's letter to  
12 Laura Miles, supervisor.

13 Q. And in this letter, bear with me  
14 for one moment, there is a paragraph that begins  
15 in July 2007?

16 A. In July of 2007, my oldest  
17 daughter, Laura Emily, began to put on extra  
18 clothing including two pairs of underwear when  
19 she knew that she was going to be picked up by  
20 her mother for her court ordered visitation.  
21 When questioned as to why she needed extra  
22 panties she became embarrassed, but eventually  
23 disclosed to us the details of certain games her  
24 mother was playing with her when they were alone

Laura told my husband, Juan, that she had to do things to mommy to make her feel good.

1 together. One of these games involved a  
2 lollipop and out of the mouth of my then  
five-year-old daughter came the words "G spot".  
Statements such as these were made to my mother,  
Lenore, my sister, Amy, my father, Thomas, and  
Juan Gonzalez.

Q. And if you go down to the bottom  
of the page, you'll see where it begins, I beg  
you.

9  
10 A. I beg you also to please be gentle  
11 in whatever evaluation ensues with my daughter.  
12 God knows she has been put through enough.  
13 Please remained her questioner that she has been  
14 living for the past nine months with the --

15 Q. I'll skip to the next page.

16 A. -- parent who sexually molested  
17 her and has her believing that mommy will go to  
18 jail if Laura discloser her abuses.

19 Thank you in advance for any  
20 assistance you may be able to offer my  
21 daughters. Sincerely, Dr. David Matusiewicz,  
22 Salem County Correctional Facility. And there  
23 is an address.

24 Q. If you flip through the document,

1 you'll see a series of other letters?

2 A. Correct.

3 Q. Including a letter addressed, Dear  
4 Judge Sleet?

5 A. Yes.

6 Q. All right. And I just want to  
7 highlight it. We're not going to read it. But  
8 it says at the top, if you can read that  
9 handwriting.

10 A. Sentencing judge, Federal Court,  
11 Wil, W-I-L-M D-E-L-A for Wilmington, Delaware.

12 Q. Okay. Beyond that letter there  
13 appears to be another letter that begins Your  
14 Honor; is that right?

15 A. Yes.

16 Q. That's bates number 3677 at the  
17 bottom, right?

18 A. Correct.

19 Q. And it has handwriting at the top  
20 that says?

21 A. Written by David Matusiewicz.

22 Q. All right. And if you continue  
23 flipping back you come to a page that has more  
24 handwriting; is that right?

1 A. Yes.

2 Q. And it says?

3 A. At the top it says Kim and Diane,  
4 you can contact our son at -- and they cross out  
5 the address that used to be there and wrote new,  
6 Bastrop Federal Correctional Institute, mail to  
7 David Matusiewicz, 81910-004 --

8 Q. You don't need to read the  
9 address. That's fine. If you continue flipping  
10 back through the document, now this is all still  
11 part of the document, the initial document you  
12 received from Tom Matusiewicz is that right?

13 A. Yes.

14 Q. All right. To a Juno email on the  
15 web?

16 A. Yes.

17 Q. Printout of an email, it's FD  
18 3686. Do you see that?

19 A. Yes.

20 Q. And the the top it reads from?

21 A. M-A-I-M at --

22 Q. I'm not sure you can make that  
23 out.

24 A. M-A-I-M at A-I-M dot com.

1 Q. Okay. Do the best you can make it  
2 out.

3 A. Yeah.

4 Q. Includes a two addresses.

5 A. Atlarge at Fox News and Fighting  
6 Blue Hens at gmail dot come and a albbq at Juno  
7 dot come.

8 Q. And the date?

9 A. Sunday, January 10th, 2010.

10 Q. David's sentencing here in federal  
11 court was when?

12 A. I think it was December 10th.

13 Q. The previous month?

14 A. 2009, yes.

15 Q. And the handwriting here reads?

16 A. This letter was sent by our  
17 daughter, Amy Matusiewicz.

18 Q. All right.

19 MR. IBRAHIM: Your Honor, I have  
20 an objection, just so it's clear who sent the  
21 witness this document.

22 MR. McANDREW: We can clarify  
23 that.

24 THE COURT: That point is well

1 taken. You can do that now, Mr. McAndrew.

2 MR. McANDREW: Certainly this is  
3 all part of the packet of materials.

4 BY MR. McANDREW:

5 Q. If you flip back to the first page  
6 that has a name and address of Tom Matusiewicz  
7 in Edcouch, Texas; is that right?

8 A. Yes.

9 Q. So this was all part of the  
10 package of materials?

11 A. This was all part of the one  
12 package I received.

13 Q. Incidentally, the handwriting  
14 you're seeing throughout the document, does it  
15 all more or less appear to be in capital  
16 letters?

17 A. Yes.

18 Q. Okay. All right. This is, just  
19 reading the first line of the email, if you  
20 would to give the jury a sense of what it's  
about?

A. I have sent this letter to Channel  
3, 6, 10, PrimeTime, 20/20, World News with  
Diane Sawyer, CNN and Oprah Winfrey in hopes

Hawkins Reporting Service  
715 North King Street - Wilmington, Delaware 19801  
(302) 658-6697 FAX (302) 658-8418

21  
If I am  
supposedly  
harassing  
or stalks  
someone,  
why would  
I be  
contacting  
National  
Investigative  
Journalists?

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07

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that someone will finally listen to our story  
and be able to help us with this request. We  
were told by my brother's lawyer that David  
should have called you while he was in hiding  
with his children and maybe if you were the  
person -- maybe if you were the person who  
revealed his entire story things would turn out  
very differently for him and my three nieces.

Q. All right. We don't need to go  
through this whole letter. But essentially it  
solicits contact information?

A. Yes.

Q. And beyond this, if you flip back  
you'll see what appears to be another document  
addressed Dear Mrs. Miles, Ms. Miles?

A. Yes. And the date matches up with  
the date in the response from Mr. Pelly at DFS.

Q. Okay. And in the course of this  
letter, at the bottom it says it's sincerely  
from. Can you read who it's from?

A. Sincerely from Doctor David T.  
Matusiewicz, Salem County Correctional Facility.

Q. All right. And there's a  
paragraph in the middle of it that begins it

A2025

1 seems... I have that highlighted on the screen.

2 A. It seems quite simple to me that  
3 I, either Laura's mother's or I am lying about  
4 the sexual molestation of one of Delaware's  
5 children, my daughter. An evaluation by a  
psychiatrist specializing in sexual molestation  
cases should put to rest whether Laura Emily was  
molested by her mother. Every day that passes  
is another day of potential abuse for my  
daughters.

That's all  
David was  
asking was  
to have  
Laura  
evaluated  
by someone  
who  
specializes  
in sexual  
molestation.

11 Q. Okay. If you flip on, you'll see  
12 a handwritten letter.

13 A. Yes.

14 Q. That appears, it reads sincerely  
15 and there's a name on the bottom of it?

16 A. David Matusiewicz, comma, O period  
17 D period.

18 Q. All right. And if you flip beyond  
19 that, you'll see another letter?

20 A. Yes.

21 Q. And this one is addressed to?

22 A. The Honorable Judge Jane Brady,  
23 Superior Court building, State of Delaware.

24 Q. All right. And do you recognize



1 her as the judge who presided over Lenore  
2 Matusiewicz's criminal case?

3 A. Correct.

4 Q. All right. And this is a letter  
5 that is quite lengthy; is that right?

6 A. Yes.

7 Q. If you'll flip to the end of the  
8 letter, is there a name on the end of the  
9 letter?

10 A. Yes. It's signed Doctor David T.  
11 Matusiewicz, Salem County Correctional Facility.

12 Q. All right. All right -- and this,  
13 if we go back to the beginning of the letter,  
14 there's a paragraph that begins there is another  
15 side to our story?

16 A. Yes. Read it?

17 Q. I don't think you need to, but if  
18 you go below that letter it asks a series of  
19 questions; is that right?

20 A. Yes.

21 Q. And they are questions that,  
22 without having to read them all, relate to what  
23 we've been discussing here, the allegations  
24 against Ms. Belford?

1 A. Yes.

2 Q. Okay. All right. And if we go to  
3 the very last page of the document, I think you  
4 have a copy there of the envelope?

5 A. Yes.

6 Q. And it's -- the return address is?

7 A. Tom Matusiewicz, Box 6, Edcouch,  
8 Texas.

9 Q. And the recipient is?

10 A. Ms. Kimberly Lawson, Reed Smith,  
11 LLP, 1201 North Market Street, Suite 1500,  
12 Wilmington, Dela 19801.

13 Q. Is that the address for Reed Smith  
14 in Delaware?

15 A. Yes.

16 Q. At least as of that point?

17 A. Yes.

18 Q. And that's the initial packet you  
19 received from Tom Matusiewicz; is that right?

20 A. Yes.

21 Q. You received additional packets?

22 A. This is the initial package, yes.

23 Q. That's the initial. Did you  
24 receive any additional packets?

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A. Yes.

Q. I'm sorry. Bear with me for one moment. I'm going to direct your attention to exhibit 507. Do you have 507?

A. I do.

Q. All right. If we could just take a look at the top of it, it has an address on it, correct?

A. Yes.

Q. And that address is, you can go ahead?

A. It says Matusiewicz, Box 6, Edcouch, Texas, 78538, October 27, 2010.

Q. All right. And it reads the salutation?

A. Hi Kim.

Q. All right. And you can begin reading that?

A. Okay. Sorry this is taking so long to collect, but everything has been moved from one house to another and then to another. Enclosed is some information from Mike O'Rourke's agency, a copy of an audio recording, a psychological evaluation.