

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION
ROBERT CHRISTIAN WOLF,
Plaintiff,

CIVIL ACTION FILE

vs.

NO. -CIV-1187(JEC)
JOHN BENNETT RAMSEY and PATRICIA PAUGH RAMSEY,
Defendants.

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VIDEOTAPED DEPOSITION OF  
JOHN BENNETT RAMSEY  
December , :49 a.m.

The Candler Building  
127 Peachtree Street, N.E.  
Atlanta, Georgia  
Alexander J. Gallo, CCR-B-1332, CRR

APPEARANCES OF COUNSEL

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-and-

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Also Present:

Patricia Paugh Ramsey

Michael McElroy, Videographer

Deposition of John Bennett Ramsey

December ,

VIDEOGRAPHER

We are on the video record at :49.

DARNAY HOFFMAN

Good morning. This is the deposition of John Ramsey in the case of Robert Christian Wolf versus John Bennett Ramsey and Patricia Paugh Ramsey. I am the lead counsel for the plaintiff Chris Wolf. Would the gentlemen here identify themselves?

LIN WOOD

My name is Lin Wood. I represent the defendants John and Patsy Ramsey.

JIM RAWLS

My name is Jim Rawls. I am co-counsel for the defendants, John and Patsy Ramsey.

PATSY RAMSEY

I am Patsy Ramsey.

MAHALEY PAULK

Mahaley Paulk.

ERIC SCHROEDER

Eric Schroeder.

EVAN ALTMAN

Evan Altman, co-counsel with Darnay Hoffman, representing  
the plaintiff.

LIN WOOD

The deposition is taken pursuant to the Federal Rules of  
Civil Procedure. The deposition is taken pursuant to  
agreement of counsel.

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

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

DARNAY HOFFMAN

No. Sounds like pretty much what we agreed yesterday was  
the case. And I believe yesterday you also explained what  
you believe the claims were, in fact, that would be  
relevant with respect to the deposition.

So based on yesterday's statement, we will just continue  
the deposition.

LIN WOOD

Do you want to swear the witness, please.

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

EXAMINATION BY-MR.HOFFMAN:

DARNAY HOFFMAN

Your full name, please, sir?

JOHN RAMSEY

John Bennett Ramsey.

DARNAY HOFFMAN

Have you ever attended a deposition before?

JOHN RAMSEY

Yes.

DARNAY HOFFMAN

Are you familiar with the deposition procedure?

JOHN RAMSEY

I wouldn't say I am familiar with it. I have been at one

deposition.

DARNAY HOFFMAN

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

LIN WOOD

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

DARNAY HOFFMAN

This is my deposition, Mr. Wood.

LIN WOOD

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

DARNAY HOFFMAN

Mr. Ramsey, who is Chris Wolf?

JOHN RAMSEY

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

DARNAY HOFFMAN

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

JOHN RAMSEY

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

DARNAY HOFFMAN

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

JOHN RAMSEY

I am sure we referred it to our attorneys through -- or through our attorneys to our investigators.

DARNAY HOFFMAN

All right. Do you know which investigators were responsible for investigating that claim on your behalf?

JOHN RAMSEY

Not for certain. I think probably they were involved, each involved at different stages.

DARNAY HOFFMAN

Do you know the names of the investigators that were involved?

JOHN RAMSEY

I do.

DARNAY HOFFMAN

Could you give me their names?

JOHN RAMSEY

Well, there was a group called Ellis Armistead & Associates. David Williams. John -- and I can't think of his last name. Those were the principal investigators that our attorneys retained.

DARNAY HOFFMAN

Without revealing the substance of what you were given with respect to any reports that your investigators may have given you, do you remember if you ever saw any investigative reports concerning Chris Wolf?

JOHN RAMSEY

I don't remember seeing any investigative reports regarding Chris Wolf.

DARNAY HOFFMAN

Do you remember whether or not you were shown investigative reports with respect to any of the other potential suspects that you may or may not have been looking at?

JOHN RAMSEY

I don't recall ever seeing a report on any suspect that they might have looked at.

DARNAY HOFFMAN

All right. For the purpose of my next question, I would like the court reporter to please mark this as Plaintiff's Exhibit for identification. And, actually, I am going to turn to the portion to which I am going to direct Mr. Ramsey to look at this.

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

JOHN RAMSEY

You want me to read this part that is highlighted?

DARNAY HOFFMAN

Yes. After you had an opportunity to read it to yourself,  
please read it out loud.

JOHN RAMSEY

You want me to read it out loud? I am sorry; I wasn't  
listening. I was reading.

DARNAY HOFFMAN

Yes, Mr. Ramsey.

JOHN RAMSEY

"Katie Couric: You also mentioned Chris Wolf, a total  
stranger whose girlfriend reported that he had disappeared  
on Christmas night and was very agitated rather when he  
watched the news of the murder on TV.

"John Ramsey: Uh-huh.

"Katie Couric: Why do you mention him?

"John Ramsey: Because he had been widely mentioned in the  
news, and we wanted to clarify the facts that we knew.

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

DARNAY HOFFMAN

Do you remember making this statement?

JOHN RAMSEY

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

DARNAY HOFFMAN

In fact, just simply for the record, I believe this is the Katie Couric Today Show. It was aired on, I believe, March 24th. And I believe it was in the year .

LIN WOOD

Are you talking about his statement to Katie or the statement to the investigator?

DARNAY HOFFMAN

The statement to Katie that --

LIN WOOD

Did you understand he was asking you if you remember making a statement to Katie as opposed to the investigator?

JOHN RAMSEY

Yeah.

DARNAY HOFFMAN

Okay. Now, do you remember who it was that you were -- that you made the statement, This is it, this is the killer? Do you remember who that person was, the investigator that had shown you material on it?

JOHN RAMSEY

Yes.

DARNAY HOFFMAN

Can you name that person?

JOHN RAMSEY

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

DARNAY HOFFMAN

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

JOHN RAMSEY

No. That is correct.

DARNAY HOFFMAN

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

LIN WOOD

Do you mean how was he imparted, the information imparted to him by Helgoth?

DARNAY HOFFMAN

Yes. I had asked him earlier if he ever had an opportunity to review any of the investigative files on any of the murder suspects.

LIN WOOD

No, you didn't. You asked him if he had ever reviewed any investigative reports.

DARNAY HOFFMAN

All right. Reports.

LIN WOOD

And now you are asking him how he obtained the information about Helgoth?

DARNAY HOFFMAN

Uh-huh, yes. If he

hadn't seen any investigative reports.

JOHN RAMSEY

I think -- I don't recall specifically whether my attorney told me about him or one of the investigators, but typically I communicated with my attorney.

DARNAY HOFFMAN

Were you actually shown evidence or were you just simply given a summary?

JOHN RAMSEY

I have not seen any evidence that the police have.

DARNAY HOFFMAN

Any evidence that your investigators have?

JOHN RAMSEY

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

DARNAY HOFFMAN

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

JOHN RAMSEY

I was not.

DARNAY HOFFMAN

Then what was, basically, your association with the private investigation of the potential suspects in the murder of JonBenet Ramsey?

JOHN RAMSEY

The investigators were retained by our attorneys, and they stated to me that the principal purpose of those investigators was to prepare a defense in the case that the police might bring a charge against me.

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

DARNAY HOFFMAN

For a moment, I just want to direct you to the morning of December 26th. And to the degree that you can remember things today, I would like to ask you if you could just

briefly summarize what happened when you got up that morning.

JOHN RAMSEY

Well, I got up, was showering, getting prepared for a trip that we would be leaving on early that morning. I heard Patsy scream. I ran downstairs. She told me that JonBenet was missing, that there was a ransom note. She asked me, What should we do?

I said, Call the police.

Sometime during that frantic period, we checked on Burke.

He appeared to be asleep to us. A uniformed officer arrives reasonably quickly, and I focussed all the energy I could focus on getting my daughter back from that point on.

DARNAY HOFFMAN

When the police officer arrived, do you remember the name of the police officer?

JOHN RAMSEY

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

DARNAY HOFFMAN

Did you have an opportunity to observe what Officer French

did at that point when he arrived? Did he speak to you?

JOHN RAMSEY

He spoke to me. I told him my daughter had been kidnapped. He said, Do you think she might have just run away? And I said, For heaven's sake, she is only six years old; no, I don't. He asked us all to, Patsy and I, to stay in the sunroom, which is a small room off our living room. So I didn't see all that he did beyond that.

DARNAY HOFFMAN

You say that he asked you to stay in the sunroom. Did you remain in the sunroom the whole morning?

JOHN RAMSEY

We did not. Other people arrived. The police arrived. They asked to use our cell phones because theirs were dead. They asked us to do a number of things that required us to leave that room.

DARNAY HOFFMAN

Did Officer French give you any explanation as to why he wanted you just to remain in the sunroom?

JOHN RAMSEY

No.

DARNAY HOFFMAN

Did anybody ask you to go back to the sunroom and remain there?

JOHN RAMSEY

No.

DARNAY HOFFMAN

Did any other law enforcement official ask you to remain in any other part of the house?

JOHN RAMSEY

No.

DARNAY HOFFMAN

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

JOHN RAMSEY

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

DARNAY HOFFMAN

Did you ever have occasion prior to, say, : in the  
afternoon to go down to the basement?

JOHN RAMSEY

Yes.

DARNAY HOFFMAN

How many times?

JOHN RAMSEY

Twice.

DARNAY HOFFMAN

Prior to :?

JOHN RAMSEY

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

DARNAY HOFFMAN

Prior to the time that I believe it was Linda Arndt had  
asked people to begin looking around the house?

JOHN RAMSEY

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

DARNAY HOFFMAN

Did she ask anybody else to do it?

JOHN RAMSEY

I don't remember her specific instruction, no.

DARNAY HOFFMAN

Prior to Linda Arndt asking you to look around the house,  
how many times did you go to the basement?

JOHN RAMSEY

Once.

DARNAY HOFFMAN

Do you remember at what time in the morning you went to  
the basement?

JOHN RAMSEY

I do not.

DARNAY HOFFMAN

Do you remember what you saw in the basement when you went  
down there?

JOHN RAMSEY

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

DARNAY HOFFMAN

When you would -- did you see anything else there?

JOHN RAMSEY

Not that looked out of the ordinary.

DARNAY HOFFMAN

May I ask why you went to the basement at that time?

JOHN RAMSEY

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

DARNAY HOFFMAN

Did anyone ask you to go to the basement at that time?

JOHN RAMSEY

No.

DARNAY HOFFMAN

Do you know if anybody saw you go to the basement at that  
time?

JOHN RAMSEY

I have no idea.

DARNAY HOFFMAN

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

JOHN RAMSEY

I don't recall specifically if I did or not. I have a vague recollection of telling Linda Arndt that I found an open window with broken glass, but that I perhaps had broken that glass myself months earlier.

DARNAY HOFFMAN

Do you think you might have mentioned that to any other law enforcement officer beside Linda Arndt?

JOHN RAMSEY

Not that I recall.

DARNAY HOFFMAN

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

JOHN RAMSEY

I don't remember the time. I really don't.

DARNAY HOFFMAN

When she asked you to go down to the basement, could you explain why you chose going to the basement since you had already been there earlier?

JOHN RAMSEY

She told me to go through the house and look for anything -- go through the house thoroughly, as I recall, and look for anything that seems out of place. And so my intent was to do it thoroughly.

DARNAY HOFFMAN

Did you ask Fleet White to join you?

JOHN RAMSEY

I think I did, as I recall.

DARNAY HOFFMAN

Do you remember exactly the sequence of events when you went down to the basement the second time?

JOHN RAMSEY

Uh-huh (affirmative).

DARNAY HOFFMAN

Can you tell me where you looked?

JOHN RAMSEY

I went back into the train room, showed Fleet the broken window, explained to him that I might have broken it myself months ago. I showed him the suitcase that I saw under the window, which I felt was very out of place. We looked for any large pieces of broken glass. And then I got up and went to the cellar room, opened the door, and found JonBenet.

DARNAY HOFFMAN

Do you remember why you decided to go to the cellar door at that particular time?

JOHN RAMSEY

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

DARNAY HOFFMAN

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

JOHN RAMSEY

There is no external exit from that room, so I was -- the first time I went to the basement, I was trying to figure

out how someone could possibly have gotten into our home.

DARNAY HOFFMAN

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

JOHN RAMSEY

I don't remember that he said anything.

DARNAY HOFFMAN

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

JOHN RAMSEY

I don't know.

DARNAY HOFFMAN

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

JOHN RAMSEY

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

DARNAY HOFFMAN

Had you turned the light on or --

JOHN RAMSEY

I don't remember turning the light on.

DARNAY HOFFMAN

When you found the white blanket, what did you do?

JOHN RAMSEY

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

DARNAY HOFFMAN

Did you do anything then after that?

JOHN RAMSEY

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

DARNAY HOFFMAN

Do you know what, if anything, Fleet White was doing at that time?

JOHN RAMSEY

I have no idea what he was doing. I wasn't aware that he

was around me.

DARNAY HOFFMAN

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

JOHN RAMSEY

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

DARNAY HOFFMAN

Do you remember asking him to go upstairs and get assistance or help?

JOHN RAMSEY

I did not. I did not ask him that.

DARNAY HOFFMAN

During the time -- I am going to direct your attention to the time that is earlier than the time you found JonBenet's body, and that is the time when the police were in the house, between the time Officer French first arrived and the time Linda Arndt asked you to make a more thorough search of the house. Were you questioned by the police?

JOHN RAMSEY

Yes, I think I was.

DARNAY HOFFMAN

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

JOHN RAMSEY

I remember responding to a number of questions they had.

DARNAY HOFFMAN

Do you remember if you were asked whether or not the house was secured when you went to bed the night before?

JOHN RAMSEY

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

DARNAY HOFFMAN

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

JOHN RAMSEY

I remember telling, I believe it was Linda Arndt, that I thought all the doors were locked, and I didn't understand how someone could have gotten in. Of course, I learned

later that one of the doors was found wide open.

DARNAY HOFFMAN

Did you know whether or not the security alarm was on that night?

JOHN RAMSEY

It was not on.

DARNAY HOFFMAN

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

JOHN RAMSEY

I don't --

DARNAY HOFFMAN

-- the night before?

JOHN RAMSEY

No. I don't believe I did.

DARNAY HOFFMAN

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

JOHN RAMSEY

I responded to a number of questions they had.

DARNAY HOFFMAN

Do you remember some of those questions?

JOHN RAMSEY

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

DARNAY HOFFMAN

And do you remember what you answered?

JOHN RAMSEY

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

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

DARNAY HOFFMAN

Anyone else?

JOHN RAMSEY

I don't believe so.

DARNAY HOFFMAN

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

JOHN RAMSEY

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

DARNAY HOFFMAN

Were you asked at any time by law enforcement during this period what had transpired the night before in your home?

JOHN RAMSEY

During that period?

DARNAY HOFFMAN

Uh-huh (affirmative).

JOHN RAMSEY

I don't recall that they asked that.

DARNAY HOFFMAN

Can you remember what occurred on December 25th, say, from the morning on?

JOHN RAMSEY

Generally, I can.

DARNAY HOFFMAN

Could you give me just a general summary, to the best of your knowledge?

JOHN RAMSEY

I remember the kids bounding into our room that morning excited to open their presents. Our normal tradition is that I go downstairs, turn on the Christmas tree lights. I brought a bicycle out of the garage that I had as a surprise for Patsy.

The kids came down. We opened presents. JonBenet wanted me to take movies, but my battery was dead. We had breakfast, Christmas breakfast.

DARNAY HOFFMAN

Do you remember what was served at that breakfast?

JOHN RAMSEY

Not -- no, I don't. Probably pancakes.

DARNAY HOFFMAN

Was that one a family favorite?

JOHN RAMSEY

Yes.

DARNAY HOFFMAN

Who --

LIN WOOD

Wait. You asked him a question, and he was trying to answer. Why don't you let him finish his answer.

DARNAY HOFFMAN

All right. Sorry.

JOHN RAMSEY

I enjoyed making pancakes with kids, and JonBenet enjoyed decorating them. So, yes, it was kind of a special treat.

DARNAY HOFFMAN

And after you finished breakfast, do you remember what you were doing?

JOHN RAMSEY

At some point, I went out to the airport to pre-pack some gifts in the airplane, check it out, get it ready for an early morning departure. I remember kids being in and out of the house when I was there, neighborhood kids.

We were going to go to the Whites' that evening for a dinner. I remember JonBenet asking me to help her ride her bike around the corn- -- around the block, her new bike that she had gotten for Christmas.

That is generally what I remember that day.

DARNAY HOFFMAN

Do you remember what happened in the evening, what you were doing in the evening?

JOHN RAMSEY

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

DARNAY HOFFMAN

Do you remember anything else about that Christmas dinner at Fleet White's?

JOHN RAMSEY

Nothing notable. It was a family dinner.

DARNAY HOFFMAN

What, if anything, did you do after Fleet White's dinner?

JOHN RAMSEY

We left. Patsy wanted to drop two gifts off at the Walkers' and the Stines', which we did on the way home.

We pulled in the driveway into the garage. And JonBenet was asleep in the back of the car. I carried her upstairs and put her to bed.

DARNAY HOFFMAN

Is that the last time you saw JonBenet alive?

JOHN RAMSEY

Yes, it was.

DARNAY HOFFMAN

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

JOHN RAMSEY

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

DARNAY HOFFMAN

Do you remember what JonBenet was doing that evening when  
you were over at Fleet White's?

JOHN RAMSEY

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

DARNAY HOFFMAN

Do you remember anything else?

JOHN RAMSEY

That is the highlight of my memory.

DARNAY HOFFMAN

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

JOHN RAMSEY

She was asleep.

DARNAY HOFFMAN

How soon after you left Fleet White did she go to sleep?

JOHN RAMSEY

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

DARNAY HOFFMAN

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

JOHN RAMSEY

She did not.

DARNAY HOFFMAN

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

JOHN RAMSEY

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

DARNAY HOFFMAN

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

JOHN RAMSEY

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

DARNAY HOFFMAN

Did you do anything else?

JOHN RAMSEY

Not that I remember.

DARNAY HOFFMAN

Did you use anything to help yourself go to sleep?

JOHN RAMSEY

I took a melatonin tablet.

DARNAY HOFFMAN

Do you know the amount of melatonin you took?

JOHN RAMSEY

No. It was an over-the-counter tablet.

DARNAY HOFFMAN

Was it a single tablet or half a tablet or two tablets?

JOHN RAMSEY

I think it was a single tablet, as I recall.

DARNAY HOFFMAN

Do you remember the brand?

JOHN RAMSEY

No.

DARNAY HOFFMAN

Do you know or remember whether or not you read anything  
before going to sleep?

JOHN RAMSEY

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

DARNAY HOFFMAN

Do you remember at any point Patsy joining you in bed that  
night?

JOHN RAMSEY

Patsy was in bed before I went to bed.

DARNAY HOFFMAN

Do you remember what Patsy was wearing when she got into  
bed or was in bed?

JOHN RAMSEY

I don't remember specifically, no.

DARNAY HOFFMAN

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

JOHN RAMSEY

I did not.

DARNAY HOFFMAN

Was this routine pretty much the normal routine when you  
went to bed at night when you were at home?

LIN WOOD

To take off his clothes, brush his teeth --

DARNAY HOFFMAN

Was anything different than that?

LIN WOOD

-- put on his pajamas and go to bed?

DARNAY HOFFMAN

Yes.

DARNAY HOFFMAN

Anything different than that?

JOHN RAMSEY

Pretty standard routine.

DARNAY HOFFMAN

Pretty standard routine? And --

JOHN RAMSEY

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

DARNAY HOFFMAN

Why were you taking the melatonin that night?

JOHN RAMSEY

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

DARNAY HOFFMAN

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

JOHN RAMSEY

Not to my knowledge.

DARNAY HOFFMAN

Any melatonin?

JOHN RAMSEY

No, I don't believe so.

DARNAY HOFFMAN

You mentioned that you were going to fly to -- where was  
it?

JOHN RAMSEY

Minneapolis and then on to Charlevoix, Michigan.

DARNAY HOFFMAN

You have a pilot's license, I presume?

JOHN RAMSEY

Yes, I do.

DARNAY HOFFMAN

Would you tell me what sort of pilot's license you have?

JOHN RAMSEY

I have a commercial license, I have a flight instructor license for airplanes, for instrument flying. I have a multi-engine rating, and I have an instrument rating.

DARNAY HOFFMAN

What sort of planes does that allow you to fly?

JOHN RAMSEY

Anything below 12,5 pounds gross weight.

DARNAY HOFFMAN

Does that include twin engines?

JOHN RAMSEY

Yes.

DARNAY HOFFMAN

Does it include any kind of a jet?

JOHN RAMSEY

Most jets are over 12,5 pounds that I know of.

DARNAY HOFFMAN

May I ask you where you learned to fly?

JOHN RAMSEY

My dad taught me.

DARNAY HOFFMAN

Did you ever have occasion to fly when you were in the  
military?

JOHN RAMSEY

No, I did not, other than in flying clubs.

DARNAY HOFFMAN

Was that the normal means by which you would travel; you  
would fly yourself, or did you take commercial airlines?

LIN WOOD

Travel in?

DARNAY HOFFMAN

Travel around the country whenever you would travel.

JOHN RAMSEY

If I was flying for business, I normally would take  
commercial airlines. If I was flying personally with my  
family, we normally flew ourselves.

DARNAY HOFFMAN

You say that -- and I understand that you were in the Navy; is that correct?

JOHN RAMSEY

Yes.

DARNAY HOFFMAN

All right. When you were in the Navy, would you describe, if you remember, pretty much what area you were responsible for as a serviceman?

JOHN RAMSEY

Well, I was a Civil Engineer Corps officer. I was stationed in the Philippines for two years. I was the civil engineer for the Naval supply depot in the Philippines. I was transferred to Atlanta where I was the base engineer for the Naval Air Station in Atlanta.

DARNAY HOFFMAN

Would you describe what you were doing as an engineer?

JOHN RAMSEY

Contract management. We ran all the base utilities, maintenance and repair, road construction, long-term planning, site planning.

DARNAY HOFFMAN

Were you actually involved in any hands-on engineering projects?

JOHN RAMSEY

I had a staff that did that. I was in charge of the staff.

DARNAY HOFFMAN

So were you ever involved in any of the actual construction?

JOHN RAMSEY

Did I help pound nails? No.

DARNAY HOFFMAN

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

JOHN RAMSEY

In the military?

DARNAY HOFFMAN

Yes, in the military.

JOHN RAMSEY

I did not.

DARNAY HOFFMAN

When you were not in the military, did you do that?

JOHN RAMSEY

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

DARNAY HOFFMAN

Did you do any remodeling in your home in Boulder?

JOHN RAMSEY

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

DARNAY HOFFMAN

Did you have occasion to do remodeling in any of your  
other homes?

JOHN RAMSEY

We have remodeled every home we have owned.

DARNAY HOFFMAN

Have you personally done any remodeling in any of these  
homes?

JOHN RAMSEY

Yes.

DARNAY HOFFMAN

When you were in the Navy, you went through basic training, naturally?

JOHN RAMSEY

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

DARNAY HOFFMAN

And would you just describe briefly what your basic training was like?

JOHN RAMSEY

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

DARNAY HOFFMAN

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

JOHN RAMSEY

Navigation and piloting. You were being prepared to

captain a ship.

DARNAY HOFFMAN

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

JOHN RAMSEY

No.

DARNAY HOFFMAN

Do you sail at all?

JOHN RAMSEY

I used to.

DARNAY HOFFMAN

Did you pilot your own sailboat or did you --

JOHN RAMSEY

Yes.

DARNAY HOFFMAN

-- have someone --

JOHN RAMSEY

Yes.

DARNAY HOFFMAN

-- do it for you?

JOHN RAMSEY

No.

DARNAY HOFFMAN

Did you receive any training in sailing?

JOHN RAMSEY

No.

DARNAY HOFFMAN

Are you familiar with the various knots involved in sailing?

JOHN RAMSEY

I am really not. I should be, but I am not.

DARNAY HOFFMAN

All right. So how would you generally moor your craft?

JOHN RAMSEY

I would tie it up on a cleat.

DARNAY HOFFMAN

Was there any sort of knot that you used that you could identify that has a technical term?

JOHN RAMSEY

I don't know the technical term for it.

DARNAY HOFFMAN

Have you had occasion to be able to look at the knot that was tied around the so-called paintbrush garotte?

JOHN RAMSEY

I have not.

DARNAY HOFFMAN

Is there any reason why you haven't?

JOHN RAMSEY

It is very painful for me, Mr. Hoffman.

DARNAY HOFFMAN

I understand that. But with your nautical training, do you think that you could in any way be able to identify the sort of knot?

JOHN RAMSEY

No.

DARNAY HOFFMAN

Okay. Do you know whether or not any -- if your private investigators hired anyone to look at the way in which that knot was made and to give a report on it?

JOHN RAMSEY

Not to my knowledge.

DARNAY HOFFMAN

Do you know if any of your investigators have been involved in trying to look at forensic evidence?

JOHN RAMSEY

What is "forensic evidence"?

DARNAY HOFFMAN

Any of the physical evidence that might have been at the scene that you might have had occasion to have.

JOHN RAMSEY

Well, I think any evidence that was at the scene was in the possession of the police. I don't know that we had any physical evidence that --

DARNAY HOFFMAN

Would the ransom note be considered physical evidence, in your mind?

JOHN RAMSEY

Absolutely.

DARNAY HOFFMAN

Do you know whether or not your investigators had occasion to have anyone who was professional in this area examine the ransom note?

JOHN RAMSEY

I believe they did.

DARNAY HOFFMAN

Do you know -- well, first of all, were you ever given a copy of the ransom note?

JOHN RAMSEY

Patsy handed it to me that morning, yes.

DARNAY HOFFMAN

Do you know what happened to the ransom note after Patsy handed it to you?

JOHN RAMSEY

I gave it to Officer French when he arrived.

DARNAY HOFFMAN

Did you give the ransom note to any of the friends that you had invited to come over?

JOHN RAMSEY

I did not.

DARNAY HOFFMAN

Do you know if the ransom note was passed around to other police officers? Did you have occasion to observe that?

JOHN RAMSEY

I don't -- I don't know.

DARNAY HOFFMAN

Do you know what happened to the ransom note after you gave it to Officer French?

JOHN RAMSEY

Not for certain. I think they took it and made copies of it.

DARNAY HOFFMAN

Do you remember the next time you saw a ransom note?

JOHN RAMSEY

I think Linda Arndt or someone gave me a Xerox copy of it that morning as we were waiting.

DARNAY HOFFMAN

Do you know why she gave you a Xerox copy of it?

JOHN RAMSEY

No.

DARNAY HOFFMAN

Did you ask for a Xerox copy of it?

JOHN RAMSEY

No.

DARNAY HOFFMAN

You say you had an opportunity to read the ransom note when it was initially discovered by Patsy --

JOHN RAMSEY

Yes.

DARNAY HOFFMAN

-- is that correct? Would you tell me how much time you spent reading it?

JOHN RAMSEY

Not specifically. It was -- I spread it out on the floor and tried to read it as quickly as possible.

DARNAY HOFFMAN

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

JOHN RAMSEY

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

DARNAY HOFFMAN

Do you know how she was able to make a copy for you?

JOHN RAMSEY

I do not.

DARNAY HOFFMAN

Once she gave you a copy of the ransom note, did you at any point in the morning read it again?

JOHN RAMSEY

Yes.

DARNAY HOFFMAN

Did you read it more than once?

JOHN RAMSEY

Yes.

DARNAY HOFFMAN

Do you remember how many times you may have read it?

JOHN RAMSEY

No.

DARNAY HOFFMAN

Would you say a dozen times?

JOHN RAMSEY

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

DARNAY HOFFMAN

And were you looking at the ransom note for that purpose?

JOHN RAMSEY

Yes.

DARNAY HOFFMAN

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

JOHN RAMSEY

The whole thing was peculiar. We were addressed as "Mr. and Mrs. Ramsey," and then they switched to "John" personally. They asked for twenty dollar bills and hundred dollar bills, as I recall. The amount was a very odd amount.

The way the note was signed was very odd. The cruelty that they threatened was bizarre. It was a very sick mind that wrote that note.

DARNAY HOFFMAN

Were there any phrases in that ransom note that you thought were peculiar?

JOHN RAMSEY

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

DARNAY HOFFMAN

When you say "we focused in on some phrases" that were peculiar, would you identify the "we"?

JOHN RAMSEY

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

DARNAY HOFFMAN

Would you tell me what phrases you were focusing on as peculiar?

JOHN RAMSEY

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

DARNAY HOFFMAN

"Use your good common sense, John"; do you remember that phrase?

JOHN RAMSEY

Your good southern common sense, or something like that.

DARNAY HOFFMAN

Did those phrases seem peculiar to you?

JOHN RAMSEY

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

DARNAY HOFFMAN

Had you ever heard any of those phrases used in relation to you before?

JOHN RAMSEY

In relation to me?

DARNAY HOFFMAN

Uh-huh (affirmative).

JOHN RAMSEY

No.

DARNAY HOFFMAN

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

JOHN RAMSEY

Yes.

DARNAY HOFFMAN

Would you identify them?

JOHN RAMSEY

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

DARNAY HOFFMAN

Any other phrases that you can remember somebody using?

JOHN RAMSEY

No.

DARNAY HOFFMAN

Did anybody in your family ever use any of those phrases?

JOHN RAMSEY

No.

DARNAY HOFFMAN

The phrase "common sense" or "good southern common sense,"  
have you ever heard anybody use that before?

LIN WOOD

Are you asking has he ever heard anybody use the term  
"common sense"?

DARNAY HOFFMAN

No.

LIN WOOD

Why don't you give him the precise phrase from the ransom note so that we don't have any misunderstandings about what you are asking, Mr. Hoffman.

DARNAY HOFFMAN

I will go back and ask him that. I will get the ransom note in a bit. I just want to see what he remembers.

LIN WOOD

Darnay, he is telling you what he remembers in response to your question, but when you ask him, Have you ever heard anybody use the phrase "common sense" or "good common" -- I want to make -- I want to know precisely what you are asking him.

DARNAY HOFFMAN

All right. Fine.

LIN WOOD

He is entitled to do that, and that is your obligation in terms of asking a proper question.

DARNAY HOFFMAN

Are you finished?

LIN WOOD

He will be glad to look at the note if you want him to.

DARNAY HOFFMAN

Thank you. May I continue, Mr. Wood?

LIN WOOD

Absolutely.

DARNAY HOFFMAN

Thank you.

DARNAY HOFFMAN

Mr. Ramsey, so you are certain that you don't remember anybody in your family using any of the phrases in the ransom note?

JOHN RAMSEY

I am certain I don't remember ever hearing anyone in my family using any of those phrases.

DARNAY HOFFMAN

Now, just briefly, do you know how your children were disciplined if they did something that was against a family rule or any wishes of their parents in your family?

JOHN RAMSEY

Yes.

DARNAY HOFFMAN

Would you tell me how they were disciplined.

JOHN RAMSEY

I disciplined my children by raising my voice.

DARNAY HOFFMAN

Do you know how your wife disciplined them?

JOHN RAMSEY

I think in a similar manner.

DARNAY HOFFMAN

Did you personally ever have occasion to spank any of your  
children?

JOHN RAMSEY

I did not.

DARNAY HOFFMAN

Do you have a philosophy with respect to corporal  
punishment in child-raising?

JOHN RAMSEY

Yes.

DARNAY HOFFMAN

Can you tell me what that is?

JOHN RAMSEY

I don't believe it is appropriate to strike a child.

DARNAY HOFFMAN

Do you know whether or not your wife ever had an occasion  
to strike any of the children?

JOHN RAMSEY

I have never seen her spank any of our children.

DARNAY HOFFMAN

With respect to corporal punishment, do you know if she  
has any philosophy that she has expressed to you?

JOHN RAMSEY

I have only seen it demonstrated. We have never talked  
about philosophy of corporal punishment.

DARNAY HOFFMAN

Have you ever discussed how the children should be disciplined?

JOHN RAMSEY

No.

DARNAY HOFFMAN

No time during the marriage?

JOHN RAMSEY

Well, at no time have we ever discussed how the children should be disciplined? I am sure we have.

DARNAY HOFFMAN

Do you remember any time?

LIN WOOD

All of his children to the present date?

DARNAY HOFFMAN

The two children that you had with Patricia Ramsey.

JOHN RAMSEY

You know, I don't. They were good kids. I don't remember ever talking about discipline. It didn't seem to be necessary.

DARNAY HOFFMAN

Could I take a break for just about five minutes at this point? I want to start going into different areas.

VIDEOGRAPHER We are off the video record at :35.

(A recess was taken.)

VIDEOGRAPHER We are on the video record at :53.

DARNAY HOFFMAN

Thank you.

DARNAY HOFFMAN

Mr. Ramsey, I forgot to ask you a couple questions before I asked for a break, and they regard any personal observations with respect to your daughter JonBenet. Do you know if she liked to draw on her hand? Did you ever personally see that?

JOHN RAMSEY

Not that I recall.

DARNAY HOFFMAN

Do you remember whether or not she had drawn anything on

her hand that night?

JOHN RAMSEY

I don't remember seeing anything on her hand.

DARNAY HOFFMAN

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

LIN WOOD

"Away a great deal...on business or whatever?"

DARNAY HOFFMAN

Yes.

LIN WOOD

Why don't you clear that question up. It is sloppy.

DARNAY HOFFMAN

Did you ever --

DARNAY HOFFMAN

Mr. Wood --

LIN WOOD

I object to the form of the question. The question is

vague and ambiguous and sloppy.

DARNAY HOFFMAN

I object to the characterization. No, that is not a proper objection. "Sloppy" is not an objection to evidence.

LIN WOOD

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

DARNAY HOFFMAN

All right.

LIN WOOD

Let's go.

DARNAY HOFFMAN

All right. Mr. Ramsey, how much time would you say you were at home in the year prior to her death, JonBenet Ramsey's death?

JOHN RAMSEY

Well, I was normally gone Monday through Friday from : in the morning until : or : at night every day. I traveled occasionally. I don't remember specifically that year. I

tried to make my trips either one-day trips or one or two nights out. Typically, they were to California, Boston.

Twice a year I probably went to Europe to visit our offices there.

DARNAY HOFFMAN

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

JOHN RAMSEY

I don't remember. I really don't. Certainly, more than I would have liked, I am sure, but I ran the company. I had to be there more often than not.

DARNAY HOFFMAN

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

JOHN RAMSEY

Her treatment -- yes, I do.

DARNAY HOFFMAN

Could you tell me what you do know about her treatment?

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

VIDEOGRAPHER We are on the video record at :.

DARNAY HOFFMAN

Would the reporter please read back the last question that  
I asked Mr. Ramsey?

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

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

DARNAY HOFFMAN

Mr. Ramsey, before you answer that question, I am  
withdrawing that question. Thank you very much.

DARNAY HOFFMAN

Mr. Ramsey, I am going to ask you to look at page 145 of  
"the Death of Innocence." And I am going to just simply  
ask you to look at the highlighted area at the very top.  
And after you have read it, I would like you to have an  
opportunity to just read it out loud.

JOHN RAMSEY

Just the highlighted part?

DARNAY HOFFMAN

Yes, please, Mr. Ramsey.

JOHN RAMSEY

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

DARNAY HOFFMAN

Thank you very much. Now, Mr. Ramsey, I am also going to

--

DARNAY HOFFMAN

First of all, I am going to ask the reporter to please mark this document Plaintiff's Exhibit for identification.

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

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

(Discussion ensued off the record.)

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

DARNAY HOFFMAN

All right. Have you had a chance to read it, Mr. Ramsey?

JOHN RAMSEY

Yeah.

DARNAY HOFFMAN

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

JOHN RAMSEY

Do I recognize this as --

DARNAY HOFFMAN

As the language, not the article, but the actual language in this, do you recognize it at all?

JOHN RAMSEY

You know, I really don't.

DARNAY HOFFMAN

Okay.

JOHN RAMSEY

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

DARNAY HOFFMAN

I am going to ask you just to look at the second page and

the highlighted area. Just simply look at the different elements here of this profile. Is this profile familiar to you?

JOHN RAMSEY

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

DARNAY HOFFMAN

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

JOHN RAMSEY

I don't remember. It is possible, but I don't remember.

DARNAY HOFFMAN

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

And I am assuming that, correct -- Mr. Ramsey, do you -- Did you put this statement in the book because you subscribe to that as true?

JOHN RAMSEY

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

DARNAY HOFFMAN

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

JOHN RAMSEY

Uh-huh (affirmative).

DARNAY HOFFMAN

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

JOHN RAMSEY

No.

DARNAY HOFFMAN

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

JOHN RAMSEY

No.

DARNAY HOFFMAN

Do you feel that Mrs. Ramsey took too much responsibility on herself, helping herself and other people?

JOHN RAMSEY

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

DARNAY HOFFMAN

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

JOHN RAMSEY

Absolutely not.

DARNAY HOFFMAN

Okay. The second element here is "A triggering event, such as a job crisis or crisis in a personal relationship, may have caused this individual to vent anger, perhaps at a

female close to him"--

Or to her, though it doesn't say "her" here. -- "and perhaps at me personally."

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

JOHN RAMSEY

No.

DARNAY HOFFMAN

Were you having any marital problems?

JOHN RAMSEY

Absolutely not.

DARNAY HOFFMAN

None. Okay. Now, with respect to two elements down, "He possibly has increased his consumption of alcohol or drugs," do you - did you have occasion to observe Mrs. Ramsey drink at any point during this period?

JOHN RAMSEY

During what period?

DARNAY HOFFMAN

The Christmas holidays.

JOHN RAMSEY

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

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

DARNAY HOFFMAN

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

JOHN RAMSEY

Not that I recall.

DARNAY HOFFMAN

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

JOHN RAMSEY

Do I know if she was?

DARNAY HOFFMAN

Yes.

JOHN RAMSEY

Not to my knowledge.

DARNAY HOFFMAN

Now, the next element is "He may have even turned to religion." Was it your observation that Patsy was a particularly religious person?

JOHN RAMSEY

We both were.

DARNAY HOFFMAN

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

JOHN RAMSEY

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

DARNAY HOFFMAN

Do you or Patsy believe in the Holy Spirit?

JOHN RAMSEY

Yes, I do.

DARNAY HOFFMAN

Do you believe that the Holy Spirit is an agent for healing by God?

JOHN RAMSEY

I believe the Holy Spirit is part of the Trinity of God. And I don't know that I understand the Holy Spirit's role in healing, no. I don't know that one way or other.

DARNAY HOFFMAN

Are you familiar with Pentecostal religious beliefs that the true purpose of Christianity and Jesus' purpose was a healing ministry, and that the Holy Spirit was involved in that healing ministry?

JOHN RAMSEY

I am not familiar with that.

DARNAY HOFFMAN

Also, are you familiar with the religious concept of what is known as "being in right relation to God"?

JOHN RAMSEY

I don't know of that as a concept. I have heard that phrase.

DARNAY HOFFMAN

I was just wondering if you understood what that phrase meant to you.

JOHN RAMSEY

Do I understand the phrase "being in a right relationship with God"?

DARNAY HOFFMAN

Yes. "One being in right relation to God."

JOHN RAMSEY

Well, I would -- that would not be how I would describe my relationship with God.

DARNAY HOFFMAN

All right. I just wanted to know that.

JOHN RAMSEY

Uh-huh (affirmative).

DARNAY HOFFMAN

The next statement: "He may be rigid, nervous and preoccupied in casual conversation."

How would you describe your observations of Patsy -- of Mrs. Ramsey's -- excuse me -- Mrs. Ramsey's conversational, you know, attitude? Do you find her to be rigid or nervous or preoccupied in conversation?

JOHN RAMSEY

You mean in general?

DARNAY HOFFMAN

In general.

JOHN RAMSEY

No.

DARNAY HOFFMAN

During the Christmas holidays, leading up to the death of your daughter, did you find her to be in any way rigid, nervous, or preoccupied --

JOHN RAMSEY

No.

DARNAY HOFFMAN

-- in conversations?

JOHN RAMSEY

No.

DARNAY HOFFMAN

Well, the next one I think speaks for itself. "He may have tried to appear very cooperative with the authorities."

Have you tried, to the best of your knowledge, to cooperate with the authorities?

JOHN RAMSEY

Well, I think we detailed that pretty accurately. We were very willing to cooperate with them, given that their intentions were to be trusted.

DARNAY HOFFMAN

"He may have quickly constructed an alibi for his whereabouts the night JonBenet was killed." That brings me to the issue of the next area I want to go into, which is the area of the ransom note, which I am going to show you at page , which I showed Mrs. Ramsey yesterday, in your book with respect to the ransom note.

Would you read that aloud? I had Mrs. Ramsey do it yesterday too.

JOHN RAMSEY

Number . "The ransom note. Considered earlier and throughout the book, the note was written by the killer and remains an extremely important clue. An adequate amount of handwriting samples from the killer should conclusively tie him to the long and rambling note."

DARNAY HOFFMAN

Do you still believe that statement to be true?

JOHN RAMSEY

That is my opinion, yes.

DARNAY HOFFMAN

Yes. In your opinion?

JOHN RAMSEY

Yes.

DARNAY HOFFMAN

May I ask you if any of your investigators made any attempt to examine or prepare -- did any of your investigators prepare handwriting reports with respect to your handwriting and Mrs. Ramsey's handwriting?

JOHN RAMSEY

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

DARNAY HOFFMAN

Do you know if reports have been prepared?

JOHN RAMSEY

I don't know that for a fact.

LIN WOOD

For the record, I do think we indicated in response to requests for production that there are written reports that were in the possession of Hal Haddon under a belief on his part that they are grand jury materials that he is not allowed to release even to me, present counsel for the Ramseys.

So I don't know that John knows that, but I do want to make the record clear that you know that.

DARNAY HOFFMAN

Also, just to make the record clear, I don't know what effect, if any, the July 5th ruling by Judge -- the Denver federal judge, Wiley Daniel, with respect to third-party testimony and the fact that the grand jury secrecy rule with respect to that which was declared unconstitutional.

To the extent that that would be the statement of the party -- meaning whoever the expert was, his report is, in effect, statements, whether or not that that now would be

covered under the grand jury secrecy act.  
And so for the purposes of this record, I would indicate  
that that might not be available to counsel.

LIN WOOD

I have asked Hal Haddon since that ruling to produce those  
for me, and he declined.

DARNAY HOFFMAN

Okay. Thank you.

DARNAY HOFFMAN

Mr. Ramsey, what I am going to do now is I am going to  
first have the reporter mark this Plaintiff's Exhibit for  
identification. We'll do that.

DARNAY HOFFMAN

Mr. Wood, I will show you this, and please show it to your  
client.

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

DARNAY HOFFMAN

Mr. Ramsey, I am going to ask you to look at the document  
that has been marked Plaintiff's Exhibit for  
identification, and I am going to ask you if you recognize

this document.

JOHN RAMSEY

Yes, I believe I do.

DARNAY HOFFMAN

Could you identify it, please?

JOHN RAMSEY

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

DARNAY HOFFMAN

Does it look substantially like the ransom note that you saw that morning?

JOHN RAMSEY

Yes, I think so.

DARNAY HOFFMAN

Okay. Now, Mr. Ramsey, I am going to ask you to, once again, look at it. And I am going to ask you, in looking at it, whether or not you see any similarity between your wife's handwriting and the handwriting in the ransom note; you personally.

JOHN RAMSEY

Absolutely not.

DARNAY HOFFMAN

None at all?

JOHN RAMSEY

No.

DARNAY HOFFMAN

Not even a little bit?

JOHN RAMSEY

Not even a little bit.

DARNAY HOFFMAN

Now, Mr. Ramsey --

JOHN RAMSEY

Patsy writes very neatly. She is a feminine writer.

DARNAY HOFFMAN

Right.

JOHN RAMSEY

There are misspellings in the note. She graduated at the

top of her class. She doesn't misspell words like  
"business" and "possession."

DARNAY HOFFMAN

Do you think the ransom note writer was trying to disguise  
their identity?

JOHN RAMSEY

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

DARNAY HOFFMAN

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

JOHN RAMSEY

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

DARNAY HOFFMAN

With respect to the sloppiness of the handwriting, do you  
think it is possible that the handwriting -- that the  
person who wrote this handwriting was trying to make their

handwriting look sloppier than normal?

JOHN RAMSEY

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

DARNAY HOFFMAN

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

JOHN RAMSEY

I was told that it was virtually certain that she did not write the note, but that there were some similarities which exist in all of our handwriting because we have all been taught the same, and that is how we communicate is with the written language in English. But that because of these few similarities, she could not be absolutely eliminated, but it was highly improbable that she wrote the note. And that, in fact, there were more dissimilarities in her writing than a number of other people that had been looked at.

DARNAY HOFFMAN

Right. Do you know if your handwriting was examined by the

law enforcement?

JOHN RAMSEY

As far as I know, it was.

DARNAY HOFFMAN

Do you know whether or not you were eliminated as the author of the note?

JOHN RAMSEY

I was told that, on a scale of to , Patsy was placed at a 4.5 in terms of probability. In other words, a very low probability. Mine was a .

DARNAY HOFFMAN

Just to go back to the one point that you made, it was your understanding that the reason Mrs. Ramsey could not be eliminated was because of what is, I think called, style book similarities. We all go to school, as you say; we are taught to make our letters look the same way. Is that the reason?

LIN WOOD

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

DARNAY HOFFMAN

Yes.

LIN WOOD

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

JOHN RAMSEY

Well, I don't know what that means. I told you what I was told. And I was told that by our attorneys. I was told that by -- I heard the police make that statement. I heard the district attorney make that statement, that it is highly improbable that Patsy wrote this note based on their testing and our testing.

DARNAY HOFFMAN

Do you know if she was the only one that law enforcement could not completely eliminate as the author of --

JOHN RAMSEY

No. In fact, I was told that your client had fewer dissimilarities than Patsy had with the note.

DARNAY HOFFMAN

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

JOHN RAMSEY

I don't recall. I don't recall.

LIN WOOD

I do know --

JOHN RAMSEY

I was told that there were other people that were tested that were much more interesting than Patsy in terms of a comparison.

DARNAY HOFFMAN

Now, how do you know that?

JOHN RAMSEY

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

LIN WOOD

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

DARNAY HOFFMAN

Yes.

LIN WOOD

-- who has stated there were a number of people who had not been eliminated that were under suspicion.

DARNAY HOFFMAN

I just want to know how Mr. Ramsey, if he remembers how he knows that, with respect to that.

DARNAY HOFFMAN

Now, Mr. Ramsey, I am going to ask you to do something that I did yesterday, at least on a few pages here, and that is I am going to ask you to look at Plaintiff's Exhibit No. that was marked for identification yesterday, and I would like you to look at that document.

JOHN RAMSEY

Okay.

DARNAY HOFFMAN

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

JOHN RAMSEY

I think I recognize two.

DARNAY HOFFMAN

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

JOHN RAMSEY

I do not.

DARNAY HOFFMAN

Could it be your wife's handwriting?

JOHN RAMSEY

I don't recognize it. It doesn't look like Patsy's writing. It is sloppy. It is irregular. I would not look at that and say that is Patsy's handwriting.

DARNAY HOFFMAN

Thank you. Now I am going to hand to you Plaintiff's Exhibit No. that was marked for identification yesterday, and I am going to ask you to please look at that. Now I am going to ask you if you can identify, without naming the individuals in those photographs, any of them.

JOHN RAMSEY

Yes.

DARNAY HOFFMAN

Now I am going to ask you to look at the handwriting, and tell me if you can recognize the handwriting.

JOHN RAMSEY

I do not.

DARNAY HOFFMAN

Could that be your wife's handwriting?

JOHN RAMSEY

I doubt it very seriously.

DARNAY HOFFMAN

Tell me why you don't think it is your wife's handwriting.

JOHN RAMSEY

It doesn't look like her handwriting. It is sloppy. It is -- it just doesn't look like her handwriting.

DARNAY HOFFMAN

Now I am going to ask you to look at Plaintiff's Exhibit , marked for identification, and all I am going to ask you

to do is look at this document and tell me if you have  
ever seen it before.

JOHN RAMSEY

Not that I recall.

DARNAY HOFFMAN

So would it be fair to say that today is the first time  
you ever have seen that document?

JOHN RAMSEY

I think so. I don't remember seeing it. I don't remember  
seeing it. Let me put it that way.

DARNAY HOFFMAN

Okay. Thank you very much. Now, Mr. Ramsey, do you know -  
have you ever heard the name Cina Wong?

JOHN RAMSEY

I have heard that name in association with you, yes.

DARNAY HOFFMAN

Do you know who Cina Wong is?

JOHN RAMSEY

I have no idea.

DARNAY HOFFMAN

Have you heard the name David Liebman?

JOHN RAMSEY

It was on that form right there.

DARNAY HOFFMAN

Had you ever heard the name or seen the name before this?

JOHN RAMSEY

Not that I recall.

DARNAY HOFFMAN

Are you aware those names appear in your book?

JOHN RAMSEY

It is very possible.

DARNAY HOFFMAN

So you weren't the person that provided the names in the book, in the manuscript; is that correct?

JOHN RAMSEY

I don't remember. It is possible. I found that my brain cells have depleted a lot during the last five years.

DARNAY HOFFMAN

Have you ever heard the name Howard Rile?

JOHN RAMSEY

Yes.

DARNAY HOFFMAN

Would you tell me who Howard Rile is?

JOHN RAMSEY

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

DARNAY HOFFMAN

Do you recall the context in which you heard his name?

JOHN RAMSEY

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

DARNAY HOFFMAN

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

JOHN RAMSEY

I believe that he did, yes.

DARNAY HOFFMAN

Do you know if he prepared a written report?

JOHN RAMSEY

I don't know.

LIN WOOD

Again --

JOHN RAMSEY

Isn't he the one that started the book?

LIN WOOD

No, that is someone else.

JOHN RAMSEY

Okay.

LIN WOOD

Again, we go back, and we have provided you as his counsel information that Mr. Rile and Mr. Cunningham, we are told, did prepare written reports, but they were submitted to the grand jury and they are, again, in the possession of Hal Haddon, and the question of releasing them from Mr. Haddon, at least, is something that he has not done

voluntarily yet. Whether he did that in response to a request from you, I don't know. But there are written reports from Mr. Rile and Mr. Cunningham about Mrs. Ramsey.

DARNAY HOFFMAN

Had you ever heard of the name Floyd Cunningham, Mr. Ramsey?

JOHN RAMSEY

Yes.

LIN WOOD

Lloyd.

DARNAY HOFFMAN

I am sorry. Is it Floyd?

LIN WOOD

Lloyd.

DARNAY HOFFMAN

Oh, Lloyd. All right. I am sorry. I don't know why I thought Floyd.

DARNAY HOFFMAN

Lloyd Cunningham, have you ever heard that name?

JOHN RAMSEY

Yes.

DARNAY HOFFMAN

Would you tell me in what context you heard that name?

JOHN RAMSEY

I think he was someone that was used by our attorneys and investigators to look at handwriting exemplars.

DARNAY HOFFMAN

Do you know anything else?

JOHN RAMSEY

That he is at the top of his field. That is what I remember.

DARNAY HOFFMAN

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

JOHN RAMSEY

I don't know that for a fact.

LIN WOOD

Again, same observation --

DARNAY HOFFMAN

Absolutely.

LIN WOOD

-- for the benefit of you and the benefit of the record.

DARNAY HOFFMAN

Yes.

DARNAY HOFFMAN

I want to make sure that what I am about to say is accurate, so I have to do it in summation, and Mr. Wood will absolutely correct me if I am wrong in characterizing anything that I have said.

LIN WOOD

It sounds like an invitation.

DARNAY HOFFMAN

It is, Mr. Wood, in this particular instance.

DARNAY HOFFMAN

I want to make sure I am correct. You have not personally

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

LIN WOOD

Hang on a second. Let me confer. I want to make sure we  
are not touching into an area that might go to  
attorney-client privilege --

DARNAY HOFFMAN

Okay.

LIN WOOD

-- because that report was prepared by former counsel for  
Mr. Ramsey, or at their request for Ramsey purposes.

DARNAY HOFFMAN

Well, I can remove the offending language as to prepared  
it - prepared for him. I don't know who prepared it for  
him.

DARNAY HOFFMAN

I am not asking that. That this handwriting report by Mr.  
Rile was prepared for the Ramseys, irrespective of who  
prepared it. I am not trying to identify who prepared it,  
but that it was prepared by some person for you.

JOHN RAMSEY

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

DARNAY HOFFMAN

And when you say report, I am more interested in if you had an opportunity to see any report involving handwriting of either Mrs. Ramsey or yourself by any expert that you or your agents and people that worked for you hired. Did you have an opportunity to see any report?

JOHN RAMSEY

I don't recall seeing any report.

DARNAY HOFFMAN

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

JOHN RAMSEY

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

DARNAY HOFFMAN

Then are you saying that you are relying upon the opinion or statements of people that have seen those reports as

the basis for your belief that Mrs. Ramsey is not the  
ransom note writer?

LIN WOOD

Hold on one second. I don't know how he is going to  
differentiate counsel's discussions. Do you want to omit  
counsel?

DARNAY HOFFMAN

You mean our discussions?

LIN WOOD

Well, you say that you are relying -- are you saying that  
you are relying upon the opinion or statements of people  
that have seen those reports as the basis for your belief  
that Mrs. Ramsey is not the ransom note writer?  
Do you understand what he is asking you, John?

JOHN RAMSEY

Yes.

DARNAY HOFFMAN

Well, to put it more --

LIN WOOD

I am going to let him answer.

DARNAY HOFFMAN

Oh, okay.

LIN WOOD

Let's go ahead and just let him answer.

JOHN RAMSEY

No, I do not base my opinion on the reports that I have heard from others. I base my opinion on that I know my wife. I would stake my life on the fact that she did not murder her child, she did not fake all of this nonsense, and she did not write this bizarre note. That is what I stake my belief on, Mr. Hoffman.

DARNAY HOFFMAN

So it is not based on anything empirical, such as --

JOHN RAMSEY

The empirical information supports that belief totally.

DARNAY HOFFMAN

I am just wanting to determine whether you are familiar with the empirical information that supports it.

JOHN RAMSEY

Yes.

DARNAY HOFFMAN

I am trying to distinguish between your belief in your wife, which is understandable, and a belief that comes from actually having looked at forensic evidence that you personally have had an opportunity to view.

LIN WOOD

Let me just -- again, I am going to object to the form of that question because I think -- at one point you are talking about determining whether he is familiar with the information, and then you turn it around and make it limited to reports that he has personally had an opportunity to view.

I mean, you are omitting the fact that his counsel, and present company included, may have fully apprised him of the nature of the variety of expert reports in summary fashion verbally.

DARNAY HOFFMAN

Yes.

LIN WOOD

That would go into attorney-client privilege.

DARNAY HOFFMAN

Right. Which I am not trying to go into.

LIN WOOD

But you can't omit the fact they may have received that information. I don't think it would be fair for the record to --

DARNAY HOFFMAN

No.

LIN WOOD

I don't want the record to appear that Mr. Ramsey is unaware of what Mr. Rile, Cunningham, and, obviously, the information from the Boulder authorities that we know from Mr. Smit and others in terms of -- and Mr. Hunter now, and Chief Beckner, what that -- those conclusions, even though he hasn't seen the formal report.

Am I making sense here?

DARNAY HOFFMAN

Absolutely.

LIN WOOD

I just want to make sure the record is not -- doesn't mislead one to think that Mr. Ramsey, because he may have

heard it through counsel, is unaware of it. That is my point.

JOHN RAMSEY

And I have answered the questions that I understood were, have I physically seen and read a report.

DARNAY HOFFMAN

Right. So I am now going to ask you one additional question, which may be a bit of a repetition, but I hope it will clarify it. And you may have already answered it. In light of the fact that you have admitted that you have not physically seen the handwriting reports themselves, but may be relying on summaries from the people around you, why are you so certain that Mrs. Ramsey is not the ransom note writer?

JOHN RAMSEY

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

DARNAY HOFFMAN

Are you aware that there are handwriting experts which are experts on behalf of Chris Wolf that have rendered

opinions --

DARNAY HOFFMAN

Do you want to stop there?

LIN WOOD

I just want to make sure he knows that I want to make an objection.

DARNAY HOFFMAN

Okay. Okay.

LIN WOOD

Why don't you start again.

DARNAY HOFFMAN

All right. Just simply, I just want to know what he knows or doesn't know. I am not asking him to do anything other than yes or no to this.

DARNAY HOFFMAN

Are you aware that there are handwriting experts that are working on behalf of Chris Wolf who have concluded that Patsy Ramsey is, as one of them said, without doubt the ransom note writer?

LIN WOOD

I am going to object to that question and -- on several bases.

Number one, there has been no finding of qualification of any individual submitted to date by the plaintiff as a handwriting, quote/unquote, expert, number one.

To the contrary, at least three or four of the individuals that are presently being relied upon, at least we believe, by the plaintiff, have been specifically rejected as legitimate handwriting experts by the Boulder District Attorney's office and the Boulder Police Department.

Third, you are representing, Mr. Hoffman, that one of these individuals is making a statement without doubt Patsy Ramsey wrote the ransom note, and I think that that is an unfair statement on your part because we have, as counsel for the defendants, been seeking for several months, at least the last two months, to obtain Rule reports from these individuals that you represent to be experts, so that we, according to law, could then depose them, test their qualifications, test their opinions, against cross-examination, including cross-examination of standard and fundamental handwriting practices and procedures.

So far, for whatever reason, we have not been afforded those reports, we have not been afforded the opportunity

to examine those experts to determine what, if any, opinion they may hold and what, if any, credibility that opinion is worth receiving.

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

DARNAY HOFFMAN

Just all I want to know is if he is aware.

LIN WOOD

The point is, I think it is fundamentally unfair to ask him to do that. Beyond that point, I think it is clearly a question that does not raise a reasonable chance of discovering admissible evidence because Mr. Ramsey's knowledge of that does not go to any issue of admissibility; whether he knows about something that one of your alleged experts says, I don't see how that is relevant in terms of reasonably calculated to lead to the discovery of admissible evidence. But as long as you will stipulate for me that we have not received the Rule reports and have not yet had the opportunity to cross-examine those experts, and then, obviously, we have not reached the questions about Dalbert and other cases --

DARNAY HOFFMAN

Absolutely.

LIN WOOD

-- about whether the court would allow those individuals to testify.

DARNAY HOFFMAN

Absolutely.

LIN WOOD

If you will stipulate that I am accurate in those representations, then I am going to let him answer the question. Is that fair?

DARNAY HOFFMAN

There is only one representation that I won't stipulate to, and that is two of the handwriting experts, Larry Ziegler and Gideon Epstein, for which you have, at least, there preliminary reports, one of which has that statement, "without doubt Patsy Ramsey is the ransom note writer." That you have those statements, that they were given to you, and that those two experts are not only highly qualified, but have been admitted, one of which was admitted by Judge Carnes in a case that she sat on several years ago.

So to the degree that your representation is that the

handwriting experts are, in fact, not experts, I would take - I would disagree with at least that characterization with respect to Mr. Gideon Epstein and Larry Ziegler.

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

LIN WOOD

Well, I have not and I will not, and I don't believe that I am allowed to characterize an individual as an expert. I think that is a decision that would ultimately be determined by Judge Carnes in this case. And whatever may have happened to Mr. Ziegler in another case has no bearing whatsoever on what his position will be in this case.

DARNAY HOFFMAN

All right.

LIN WOOD

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

DARNAY HOFFMAN

They are not affidavits. They are letters.

LIN WOOD

Well, that is what I -- it is my recollection there was a letter to you from each of these individuals.

DARNAY HOFFMAN

Right.

LIN WOOD

I can't recall sitting here today, because my brain cells are failing me as I age also, exactly what those letters said. But I do know this -- and I want this to be clear on the record. I know that you submitted affidavits from these two individuals, Epstein and Ziegler.

DARNAY HOFFMAN

I never --

LIN WOOD

I am sorry. Submitted  
letters --

DARNAY HOFFMAN

Yes.

LIN WOOD

-- as part of a supplemental response to mandatory disclosures.

DARNAY HOFFMAN

Right.

LIN WOOD

And I know for a fact that those letters to you, submitted by you, indicated that there were some similarities between Patsy's handwriting and the note, copy of the note they looked at. And they stated unequivocally that they believed that they could reach a conclusion if they were allowed to see other handwriting examples from Mrs. Ramsey from that time period.

Am I right so far?

DARNAY HOFFMAN

Yes.

LIN WOOD

And I do know that I have a number of public statements made by you, both on the internet and on television, wherein you made almost the identical representations that

Mr. Ziegler and Mr. Epstein would, in fact, testify conclusively that Patsy Ramsey wrote the note.

And I know as a matter of undisputed fact that you made those representations about the conclusions of Ziegler and Epstein at a time when Ziegler and Epstein had not been given any additional handwriting exemplars which they had earlier stated they had to have in order to reach the conclusions that you attributed do them.

Those, I believe, are clearly undisputed facts that can be shown. And those facts alone, before I even get to an expert's report or the ability to cross-examine that expert, say to me that Mr. Ziegler and Mr. Epstein, if you have accurately stated their conclusions publicly at the time you did state them, have some very, very serious credibility problems.

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

#### DARNAY HOFFMAN

I, just for the record, I think that that was sort of an unnecessarily long response; but irrespective of that, I would just simply like to state that the more recent statements by Mr. Ziegler and Mr. Gideon Epstein reflect the fact that they were able to actually look at the police exemplars that were given by Mr. Ramsey and Mrs. Ramsey and which were provided by you subject to a

discovery request, and that those most recent observations  
are based on that.

And to that degree, those observations are more complete.

LIN WOOD

Well, let's leave it here.

DARNAY HOFFMAN

I will withdraw this question if it is a problem.

LIN WOOD

No, I am going to let him answer whether he is aware of  
that.

DARNAY HOFFMAN

I just want to --

LIN WOOD

He probably is now after listening to us.

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

DARNAY HOFFMAN

All right.

DARNAY HOFFMAN

So, Mr. Ramsey, could you answer?

DARNAY HOFFMAN

But maybe I am going to need a read-back from the question.

DARNAY HOFFMAN

And, Mr. Ramsey, if you can answer it, please do, to the best of your ability.

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

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

DARNAY HOFFMAN

That is a yes or no.

LIN WOOD

Or answer any way you feel appropriate.

JOHN RAMSEY

I wouldn't be qualified to say that they are handwriting experts, particularly if they reach that conclusion.

DARNAY HOFFMAN

All right.

JOHN RAMSEY

They are wrong. And they made probably a serious career limiting decision if that, in fact, is their statement, because that is something that neither the CBI, the FBI, the Secret Service, nor the top experts in this country have ever said. In fact, quite the contrary.

DARNAY HOFFMAN

How do you know that, Mr. Ramsey, that they --

JOHN RAMSEY

I have heard statements from the police, I have heard statements from the district attorney, I have heard the results of what we consider and most people would consider the top handwriting experts and linguistic experts in the country, all of which have said, highly improbable that Patsy wrote the note.

DARNAY HOFFMAN

Yet you have never actually seen any of these reports?

JOHN RAMSEY

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

DARNAY HOFFMAN

That is all I want to know. In light of that, I think, then, we are just going to move on, and I am going to ask you to look at a document that I am going to have marked as Plaintiff's Exhibit .

DARNAY HOFFMAN

Okay. Would you please do that?

JOHN RAMSEY

And might I ask a question?

DARNAY HOFFMAN

Would you like to --

JOHN RAMSEY

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

DARNAY HOFFMAN

That was one of the exhibits that was attached to an early

handwriting report, and one of the reasons that we are, in fact, here asking, we have made an initial request in what is known as a notice to -- a request for admission, and there seemed to be some question as to whether or not what I had attached as an exhibit was sufficiently clear for there to be, you know, an accurate representation of yes or no.

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

Clearly, nobody wants to be drawing conclusions based on handwriting samples which are, in fact, not hers. It seems that Mrs. Ramsey doesn't remember this as being hers.

JOHN RAMSEY

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

DARNAY HOFFMAN

Nor do you. Okay. That's all --

LIN WOOD

And fairly, Darnay, let's be clear that we are talking about Plaintiff's Exhibit No. and Plaintiff's Exhibit No. . And to the extent that it is also letters from those

might be in Plaintiff's Exhibits , and I think also , as well as Plaintiff's Exhibit No. , the record should accurately reflect that each and every one of your experts, including Epstein and Ziegler, have, in fact, stated conclusions to some extent relying in part on each and every one of those exhibits except for Exhibits and , which are Cina Wong, David Liebman's exhibit. So all of your experts have relied on that to form their statements made in their reports to date, including just the recent letters we received --

DARNAY HOFFMAN

Right.

LIN WOOD

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

DARNAY HOFFMAN

Well, that hasn't been established because the argument can always be that there is always a reason why Mr. And Mrs. Ramsey might have a motive to lie. I am not saying that they are, but the fact is, there might be a reason why it is convenient for them not to be able to recognize it.

JOHN RAMSEY

I think Patsy was very clear that she did identify handwriting that she recognized as hers.

DARNAY HOFFMAN

And, quite frankly, she may very well have been telling the truth.

JOHN RAMSEY

Quite frankly, she was telling the truth, Mr. Hoffman.

LIN WOOD

And what might be interesting is to know what efforts were made by any of your so-called experts to actually authenticate those documents as Patsy Ramsey's handwriting before they were willing to go out and publicly stake their reputations that she is the author of the note based on handwriting exemplars that they didn't even have the slightest clue were written by her.

So those are --

DARNAY HOFFMAN

Not necessarily they didn't have the slightest crew. Don't mischaracterize.

LIN WOOD

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

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

DARNAY HOFFMAN

Absolutely. I will say one thing in my defense and in their defense.

LIN WOOD

What?

DARNAY HOFFMAN

If, in fact, we were concerned that there was something bogus about their examination, I think the last thing we would want to do is establish at a deposition record by the testimony of both Mr. And Mrs. Ramsey that this is, in fact, not their handwriting. I think we can let that go by the board.

LIN WOOD

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

That information was provided to you, Mr. Hoffman, in

writing from Michael Kane. And I don't think you are going to state that Michael Kane was necessarily trying to do John or Patsy Ramsey any favors in his role as a grand jury specialist for the Boulder D.A.

But once he told you that and put that in writing, I believe that you should have been on clear notice that there were legitimate and serious concerns about the bogusness of these people's reports and conclusions, and those are the individuals, Mr. Hoffman, not Mr. Epstein and Mr. Ziegler, who are now Johnny-come-latelys to this lawsuit, those were the individuals who you relied upon when you filed this complaint for Chris Wolf and submitted your mandatory disclosures.

So I think there are very serious questions about their legitimacy, not just those raised by me. I haven't had the time yet and opportunity to cross-examine them, which I say I look forward to. But they were carefully studied by the Boulder District Attorney's offices, and they were soundly and wholeheartedly rejected as credible experts on the issue of handwriting.

You knew that before you used them to file this lawsuit, yet you filed it anyway, I would say without further inquiry into their legitimacy. That is a problem and an issue, and I think the record ought to reflect it, and I think I stated it accurately.

DARNAY HOFFMAN

I have to - now, naturally, since you made a record, I am  
going to

have to respond to what may be either  
mischaracterizations or just simply things that you are  
not aware of. To begin with, the letter by Michael Kane  
did not indicate what about the methodology with the  
exception of dissimilarity was suspect.

LIN WOOD

I can get the record, and we can put it into the record  
here. Why don't we do that.  
Let the letter speak for itself. I have got a copy of the  
letter.

DARNAY HOFFMAN

Well, if you would like to take a break and do that, we  
can --

LIN WOOD

We don't have to take a break, but I can have someone find  
that letter.

DARNAY HOFFMAN

That letter, fine. We will put that into the record. That  
is the first thing, from what I remember, since you are

speaking from memory, also.

LIN WOOD

I have a pretty good memory on that one. It doesn't always fail me.

DARNAY HOFFMAN

Second point is that, with respect to the similarities, we do not know who Mr. Kane had actually submitted those reports to and who he was relying upon for the questions about the legitimacy of the reports. He did not indicate in his letter who it was that he had consulted.

But, more importantly, I will say one thing, that, with respect to disguised handwriting, finding dissimilarities is less useful since the person clearly is trying to create consciously dissimilarities in the handwriting. And to the degree that the handwriting is disguised, there is, to some degree, dissimilarity to be expected and to continually belabor the point that disguised handwriting has dissimilarities is really not useful in a discussion of dissimilarities with respect to being able to put, add, or eliminate people from handwriting.

So I never thought that Mr. Kane's one methodological discussion was a particularly valid one.

Now, with respect to the district attorney's office that experts would be seeking publicity, I know that at one

time they certainly did consult with a Donald Foster, who I believe was thought to be seeking publicity at one point, but that did not prevent them from at least consulting with him at least at some time.

I know that Barry Scheck, who is a former professor of mine and was brought in as a DNA expert, I won't say he is a publicity hound, but he certainly is not media-averse.

They brought him in, and they relied upon him.

Also, I know that periodically the district attorney's office would trot out an expert. I believe there was somebody from Canada who was not an expert, or whatever, so I don't think the district attorney was averse to using media-seeking experts. And I think Michael Kane's characterization of Cina Wong and David Liebman as media experts disqualifying them inherently because of that was, in fact, anything other than just simply hypocritical on his part.

Now, as far as Mr. Kane is concerned, I don't think that, from the statements that I have heard from the Ramseys, that they particularly trust, A, his judgment, B, his motivation. I may be incorrect with respect to that. I, in turn, do not trust either his motivation or his competence. But I will point out that these handwriting reports were given to Alex Hunter's office. In the four years that they have had the reports or anything else, they not once made an attempt to contact

either myself or any of my experts to talk even in a collect telephone call. There was never any acknowledgment of receiving it, and that is despite the fact that the district attorney's office, and I believe the police department, made public appeals to individuals to please come forward, that they would listen to any sort of reasonable clue, if it came over the internet, if it came from telephone calls, or whatever, and here were handwriting reports that I had solicited, some of which I actually had to use my own money to prepare, and they were completely ignored. They weren't even acknowledged by anybody in the district attorney's office, and yet they spent an inordinate amount of money trying to track down something that was known in the press as a Santa Bear, for instance. That sort of thing --

Yes, Mr. Ramsey?

JOHN RAMSEY

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

DARNAY HOFFMAN

The only reason I am responding, and I am very sorry, is that I have to respond to your counsel's colloquy here,

and I have to make a record. I am very sorry for that.

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

LIN WOOD

I think he is trying to say, maybe, let's don't go back and forth until : or : tonight.

JOHN RAMSEY

Yeah.

DARNAY HOFFMAN

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

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

And as a result of looking at the methodology, they reached the same conclusions. I did not ask them to reach

a conclusion. I basically wanted to make sure that if, in fact, there was going to be a case made in civil court against Mr. and Mrs. Ramsey, that there was, in fact, a sufficient basis for it. I was doing my best to investigate the facts of the case before making the allegations.

The only allegation that I ever really made is that, based on the handwriting reports by people that I trust to be experts, that their conclusion that Mrs. Ramsey is the ransom note writer was the basis not only for any allegations that I may have made personally in public with respect to Mrs. Ramsey, but also forms the basis by which I filed the -- not only the action against Alex Hunter in 1997, but also the action on behalf of Chris Wolf and Linda Hoffman-Pugh.

So I have tried to do a due diligence and certainly avoid any problems with Rule . I am under a duty as an officer of the court to investigate the case and the facts. And the only reason, basically, we are here today is because I have yet to see handwriting reports from any source other than my own that, in fact, clear Mrs. Ramsey. I would love to see those reports. I don't know why I have never been offered a report. The question I have for Mr. Wood is, at the time that Mr. Wood was releasing your polygraph reports and had a very attentive national media, why did he not come forward with

written handwriting reports that could clear Mrs. Ramsey?

I think that that would have been a spectacular and an extremely important opportunity in order to clear your wife from any suspicion of being the ransom note writer.

And, yet, there has never been, despite all the money that Mr. and Mrs. Ramsey have spent, any attempt to release a written report at any time to the media similar to the written report that was released in the polygraph, and I never have been able to understand it. It is like the dog that should have barked in the night that hasn't barked in the night. My question has always been, why haven't the Ramseys released a handwriting report to shut me up, to just simply stop all the noise about the fact that there are handwriting experts that believe that Mrs. Ramsey wrote the ransom note? Why haven't, Mr. Wood, your clients been willing to produce for public consumption a handwriting report that simply, adequately, and for all time clears Mrs. Ramsey?

LIN WOOD

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

DARNAY HOFFMAN

Okay.

LIN WOOD

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

So they discovered that Don Foster was, as we say in the business, a liar for hire.

There are a lot of liars for hire in our business. You and I can debate, after I have been presented with your experts' reports and the opportunity to depose them, whether they have any legitimacy or whether they too are liars for hire or for publicity. We will resolve that another day.

Suffice it to say here that we are not going to react to your comments about handwriting experts until we get your experts, which we are entitled to get, and then I want you

to know this: You will receive handwriting expert reports from the Ramseys. Okay? So the time for that will come. It hasn't been time yet, but that will happen at the appropriate time.

But, first, we are entitled to get your reports and cross-examine your experts. Once we have done that, you will get your reports that you so desperately want. And then I am going to hold you to that; that once you get those reports, since you don't believe the four people that Alex Hunter described as top of the line that said out there in Boulder she didn't write it, since you don't believe them, I will hold you to your word.

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

DARNAY HOFFMAN

All right. Mr. Ramsey, what time do you need to be out of here. I am not going to hold it against you. Seriously, I would like to -- because I will do this according to that.

JOHN RAMSEY

What time is the band concert?

MS. RAMSEY: :.

JOHN RAMSEY

:, okay.

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

JOHN RAMSEY

No, my son is.

EVAN ALTMAN

I understand that.

DARNAY HOFFMAN

Okay. What time would you like to be able to leave here to  
be able to conveniently get there?

JOHN RAMSEY

If we left at :, we will be in good shape.

DARNAY HOFFMAN

What time do we have now?

LIN WOOD

It is :. We have got plenty of time.

DARNAY HOFFMAN

We are not going more than an hour, Mr. Ramsey, at all,  
and maybe even less than that.

JOHN RAMSEY

Okay.

DARNAY HOFFMAN

Okay.

LIN WOOD

But that's not an invitation for him and I to go for  
another two and a half hours and talking.

EVAN ALTMAN

Once again, if I could say something, if we can stick to  
what we have been here for, ask questions, answer  
questions, I think we will be fine.

LIN WOOD

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

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

EVAN ALTMAN

I think the question was, is it, in fact -- do you have knowledge of it, not so much do you agree with it.

LIN WOOD

That is the way of putting out what we believe to be potentially a very bogus conclusion accusing Patsy Ramsey of writing the note because he wants that to then be part of a public record that is either watched on television or read by someone.

And when you put that kind of information out there, the record, in order to be accurate and complete, has got to contain information that I think clearly demonstrates that there are, at a minimum, serious credibility issues with these experts, if there is not already sufficient evidence in the record to show that they are, quote/unquote, liars for hire or bogus excerpts.

I have offered to resolve at least part of this, and I will do so. If I have my office locate Mr. Kane's letter to Mr. Hoffman, we will attach it to the record. It will

speaking for itself. That is all.

DARNAY HOFFMAN

Mr. Wood, I just want to say one other thing with respect to that. You may have noticed that I have not asked Mr. Ramsey for personal information or Mrs. Ramsey. I haven't asked for their address. I haven't asked for social security numbers. I haven't asked for anything that would in any way hinder your ability to have to hold this back to at least redact those elements of it, because I am not interested in creating a record that will keep you from being able to make this public if you choose to do so at any time that you choose to do so.

I just simply want to go -- I have had an opportunity to see a lot of the tapes and transcripts of Mr. Ramsey and Mrs. Ramsey with the police interviews and whatever, and I am not interested in taking them over the same ground. I could have easily -- Mrs. Ramsey, I believe, made a statement to the media yesterday that she was surprised at how short the deposition was, that there didn't seem to be any "Where is the meat to the Whopper," but a lot of that was already provided to me by material from discovery. So consequently, I am not trying to create any kind of record. I am just trying to get answers to questions that I still have. I am required to do that.

LIN WOOD

Let's move forward. You ask questions. They have answered every one that you have asked so far, and they will continue to do so.

DARNAY HOFFMAN

Okay. All right.

DARNAY HOFFMAN

Mr. Ramsey, I am going to show you a document that I would like to have the court reporter mark as Plaintiff's Exhibit , marked for identification.

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

LIN WOOD

Is there a part of this you want him to look at?

DARNAY HOFFMAN

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

JOHN RAMSEY

No, I have not.

DARNAY HOFFMAN

Are you familiar with Charlie Brennan --

JOHN RAMSEY

Yes.

DARNAY HOFFMAN

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

JOHN RAMSEY

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

DARNAY HOFFMAN

I am going to ask you whether or not the headline in this story is substantially correct, knowing that these are not your words. Did you, in fact, have investigators tail possible suspects?

JOHN RAMSEY

I did not have investigators tail possible suspects.

DARNAY HOFFMAN

Do you know if anyone working on your behalf had suspects

tailed by investigators?

JOHN RAMSEY

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

DARNAY HOFFMAN

I would like to ask you, then, very simply, is this headline substantially correct or false as a statement of fact, in your opinion?

JOHN RAMSEY

Is it substantially --

DARNAY HOFFMAN

-- correct as a statement of fact in your opinion, the headline?

JOHN RAMSEY

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

DARNAY HOFFMAN

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

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

DARNAY HOFFMAN

There are a series of documents here. I just would like you to look at them all at one time briefly, and I will ask you about each one.

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

JOHN RAMSEY

I think it is substantially incorrect.

DARNAY HOFFMAN

In what respect?

JOHN RAMSEY

Our book did not name suspects. It addressed people that were already being discussed in books, in the media, who

had been on television and whom, had we not addressed,  
would have looked foolish.

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

DARNAY HOFFMAN

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

JOHN RAMSEY

We agreed to do a few interviews, yes.

DARNAY HOFFMAN

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

LIN WOOD

You may answer that. Reported, yes. But in fairness to Mr.  
Zettersten, I don't believe that that is what he said. If  
you look at the quote, that may be the headline that  
somebody decided to give it, but if you will look at the  
quotes, I don't think Ralph Zettersten said that before.

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

JOHN RAMSEY

And that is correct.

LIN WOOD

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

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

DARNAY HOFFMAN

Actually, I am going to withdraw my question, and I am going to ask a different question.

DARNAY HOFFMAN

Were you aware at the time this article was published that there were stories with this sort of headline circulating, that the Ramseys were naming suspects?

JOHN RAMSEY

Was I aware -- I was aware post that being out there. I wasn't aware that that was going to be said or that --

DARNAY HOFFMAN

But afterward.

JOHN RAMSEY

But that was interpreted as the matter.

DARNAY HOFFMAN

Did you make any attempt to object to any of the media with respect to this characterization? Did you make any attempt to correct that impression?

JOHN RAMSEY

What we found in dealing with the media is that it is a massive brute. I don't know how I would begin to correct that kind of thing. The book was an attempt to correct as many of the myths that we knew about.

DARNAY HOFFMAN

Mr. Ramsey, I quite agree with the characterization as the media as a massive brute.

However, did you at any time ever say in public that one of your intentions in your litigation was to change the way in which the press reported the news in a case like

yours.

LIN WOOD

You can answer that. If you want to see the statement.

Darnay, I think you are obligated --

DARNAY HOFFMAN

No, I am just saying in terms of that effect --

JOHN RAMSEY

I will tell you what my feeling is, and I have said this a number of times, that we need a law in this country that prevents the police from talking to the media about evidence in an ongoing case.

We have bypassed the constitutional provisions that have been put in place to protect people's rights when the police could disclose evidence to the media for entertainment.

It is a law in England. If some of the things that the media had done in this country and that the police had done in Boulder had been done in England, they would be in jail.

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

So, yes, I would love to see that kind of a change because I think our system is too quick to convict based on hearsay that is broadcast on the media. And that is

unfair to any citizen.

DARNAY HOFFMAN

I don't know if you are familiar with J. Edgar Hoover, who was the former head of the FBI, or whether or not you are aware that J. Edgar Hoover used to tell his agents that if you cannot solve a case, if you are having a hard time solving the case, give it to the press because people are more likely to come forward and talk to a reporter than they are to a law enforcement agent, and that that might be the reason why some law enforcement agents, in fact, have this policy of giving information to the media I just wanted to know if you were aware of that.

JOHN RAMSEY

Well, I am talking --

LIN WOOD

Do you have any source for that statement from J. Edgar Hoover? I mean, you know, Darnay --

DARNAY HOFFMAN

I don't have it, but I can produce it. I am just looking for a response here.

LIN WOOD

We could say J. Edgar Hoover could speak for himself, but,  
you know, you are putting in --

DARNAY HOFFMAN

Or herself, whatever the case may be.

LIN WOOD

Himself or herself.

DARNAY HOFFMAN

He is not somebody that I would, like, quote as a  
libertarian or a humanitarian, or an ACLU, whatever.

LIN WOOD

I will let Mr. Ramsey answer, but we are getting far  
afield, I am afraid. But go ahead.

JOHN RAMSEY

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

DARNAY HOFFMAN

Now, you said --

JOHN RAMSEY

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

I am talking about -- you know, we know for a fact that there was a deliberate and thought-out effort on the behalf of the police at the direction of the FBI to publicly assassinate our character and discredit us and bring massive pressure on Patsy and I in hopes that one of us would confess or break and turn the other one in.

That is bypassing all of the rights that have been established in our constitution to protect every citizen, and that is wrong.

DARNAY HOFFMAN

Okay. That brings me to my next question, which is, would you just express briefly your opinions of tabloid magazines, such as Globe, The Enquirer, The Examiner, the Star?

JOHN RAMSEY

I have said before, and I still believe, they are a cancer in our society.

DARNAY HOFFMAN

Which brings me to the next question which I asked Mrs. Ramsey yesterday, and I am going to ask you. Did you at any time agree to give an interview with The Enquirer, this cancer on society?

JOHN RAMSEY

Yes.

DARNAY HOFFMAN

May I ask you why you agreed to do that?

JOHN RAMSEY

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

DARNAY HOFFMAN

I just want to ask you to --

DARNAY HOFFMAN

I am going to ask the court reporter to mark this as Plaintiff's Exhibit . And I will show that to Mr. Ramsey.

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

DARNAY HOFFMAN

Mr. Ramsey, I am going to ask you if the document I just have shown you, which is marked Plaintiff's Exhibit for identification, is substantially correct in its reporting with respect to its headline?

JOHN RAMSEY

No, it is not.

DARNAY HOFFMAN

In what respects is it incorrect?

JOHN RAMSEY

We did not turn to the work of a psychic. A picture was forwarded to us that was done by a Dorothy Allison, who I believe is a psychic, by someone. I think she had done it on a television program. We forwarded it to our investigators as a matter of procedure. We did that with everything we got in the mail. And we got a lot of stuff.

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

DARNAY HOFFMAN

Were those leads and calls useful to your investigation?

JOHN RAMSEY

I don't know.

DARNAY HOFFMAN

Now, I am going to show you -- unfortunately, for some reason, I ran out without making a second copy, so I am going to ask the reporter to mark this as Plaintiff's Exhibit for identification, and then I will just show it to you after he has marked it.

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

JOHN RAMSEY

Okay.

DARNAY HOFFMAN

Mr. Ramsey, I am going to ask you if you can identify what appears in that document.

JOHN RAMSEY

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

DARNAY HOFFMAN

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

JOHN RAMSEY

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

DARNAY HOFFMAN

Do you know if the image of the man at the lower part of  
it --

JOHN RAMSEY

Uh-huh (affirmative).

DARNAY HOFFMAN

-- do you know if that image ever appeared on your  
website?

JOHN RAMSEY

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

DARNAY HOFFMAN

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

JOHN RAMSEY

I don't know.

DARNAY HOFFMAN

Was that man meant to be Chris Wolf?

JOHN RAMSEY

Not to my knowledge.

LIN WOOD

Just so the record is clear, that is the drawing of the psychic that you were earlier referring to.

DARNAY HOFFMAN

Is it? I don't know.

JOHN RAMSEY

Oh, yeah.

DARNAY HOFFMAN

I was asking Mr. Ramsey what he did or didn't know.

LIN WOOD

Just so the record is not confused here, Mr. Ramsey indicated to you that the psychic's drawing was sent to the Ramseys, that it was reviewed by the Ramsey

investigators, and that the investigators put it up on the website. And I think he said their website.

This website was utilized by the Ramsey investigators.

DARNAY HOFFMAN

I just asked Mr. Ramsey if he could identify it, if he had he ever seen those pictures, and whatever else. That is all I want to know.

JOHN RAMSEY

That is a different question than I was asked.

Had I ever seen this drawing? Yes, I have.

DARNAY HOFFMAN

You have. Oh, I see. Okay. Do you know in what context it was?

JOHN RAMSEY

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

DARNAY HOFFMAN

Had you ever seen a picture of Chris Wolf?

JOHN RAMSEY

Yes.

DARNAY HOFFMAN

In your opinion, does Chris Wolf look anything like the picture there?

JOHN RAMSEY

I wouldn't draw that conclusion, no.

DARNAY HOFFMAN

Okay. Now, I have one last question.

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

So for the purposes of this question, I am just going to ask you to read to yourself the highlighted portions.

And in fact, I am not going to even attach this as an exhibit. I am just going to simply -- just as a recollection, to reflect, refreshed. If you would look at

that, I am just going to ask you one question with respect to it.

DARNAY HOFFMAN

And, Mr. Lin, it is at the very end; it regards the, I think, the butler door, whatever it is.

LIN WOOD

Let me say this to you.

DARNAY HOFFMAN

Yes.

LIN WOOD

This is a couple of pages from, it looks like, Patsy Ramsey's April '97 interview --

DARNAY HOFFMAN

Yes, on the front, I put that on the cover.

LIN WOOD

-- six-hour interview. I don't have any problems; you can read it, you can put it into the record.

DARNAY HOFFMAN

I would just prefer --

LIN WOOD

We don't have any - I don't have any problems with that being made part of the record officially. Put it out there. We would like to see the whole police investigative file be made public so people would know the truth about this case.

DARNAY HOFFMAN

I would prefer, since this has been stamped "confidential"

--

LIN WOOD

I am the one that stamped it confidential in other litigation several months ago, if not last year, for reasons different than the issue of confidentiality in this case. I am waiving any claim for confidentiality. Put that into the record. I have no problems with you doing so.

DARNAY HOFFMAN

Well, I am not --

LIN WOOD

You could put the whole April 1997 transcript of both of their interviews into the record. I have no problems with

you doing so.

DARNAY HOFFMAN

I am not going to do that.

LIN WOOD

I have no problems with it.

DARNAY HOFFMAN

All right. Thank you very much.

LIN WOOD

Let the truth come out.

DARNAY HOFFMAN

I agree with you.

DARNAY HOFFMAN

This question involves the -- do you know where the butler kitchen was in your house?

JOHN RAMSEY

Well, yes. I know what we called the butler kitchen.

DARNAY HOFFMAN

Butler kitchen. Do you remember opening the door to the

butler kitchen at any time in the morning while you were looking through the house for JonBenet?

JOHN RAMSEY

No.

DARNAY HOFFMAN

And so is it that you have no memory of it or that you just didn't do it?

JOHN RAMSEY

I did not open it.

DARNAY HOFFMAN

So it wasn't opened by you?

JOHN RAMSEY

No.

DARNAY HOFFMAN

Thank you very much.

This is going to conclude my deposition testimony of Mr. Ramsey. And I want to thank Mr. Ramsey for being here. I want to thank Mrs. Ramsey, once again, for her deposition yesterday and for being here today, and thank counsel.

LIN WOOD

All right. Just so the record is clear, we have a number of hours under the Federal Rules of Civil Procedure remaining in which you have the right to examine Mr. Ramsey and to ask him any question factually otherwise that is proper and relevant to the claims and defenses in the lawsuit. And do you acknowledge that there are a number of hours remaining?

DARNAY HOFFMAN

Yes. Absolutely.

LIN WOOD

He answered every question today?

DARNAY HOFFMAN

Yes, he has.

EVAN ALTMAN

I think with the exception of what we had spoken about regarding the financial issues which we may take up later.

LIN WOOD

We are not going to take that up on the record, as that is something that would require a court ruling.

DARNAY HOFFMAN

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

LIN WOOD

And as you indicated, you have reviewed his April '97, June 1998, and April police interviews --

DARNAY HOFFMAN

That is correct.

LIN WOOD

-- and I think you will say, with respect to Mr. Ramsey, Mr. Hoffman, the same as you said with respect to Mrs. Ramsey yesterday, he answered every question for the police; didn't he?

DARNAY HOFFMAN

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

LIN WOOD

You can't say that he gave him the answers they wanted?

DARNAY HOFFMAN

No, I just don't know.

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

LIN WOOD

Yeah, but the point is --

DARNAY HOFFMAN

But I did receive those.

LIN WOOD

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

DARNAY HOFFMAN

No. I understand. In fact, one of the reasons why -- and I want to characterize this properly.

One of the reasons why these depositions are shorter than they might have been is because I am not asking either Mr.

Or Mrs. Ramsey to go over testimony that they have already given by the police.

The police certainly have spent a great deal of time with the Ramseys, and, quite frankly, even though there may be areas that I might have personal curiosity about, I feel it would be inappropriate for me to ask them, and so that is why these depositions aren't going the full day.

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

LIN WOOD

But you acknowledge that any question you have, curiosity or otherwise, that you believe to be relevant and properly framed in this case, you have the opportunity to ask them now.

DARNAY HOFFMAN

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

LIN WOOD

Let me briefly cover a couple of matters with you, Mr. Ramsey, by way of direct or reflect discovery.

EXAMINATION

BY-MR.WOOD:

DARNAY HOFFMAN

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

JOHN RAMSEY

Uh-huh (affirmative).

DARNAY HOFFMAN

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

Do you remember --

JOHN RAMSEY

Yes.

DARNAY HOFFMAN

-- telling Mr. Hoffman about that?

And I think you made the reference that you were addressed

"Mr. and Mrs. Ramsey."

Do you recall telling him that?

JOHN RAMSEY

Yes.

DARNAY HOFFMAN

Did you have the ransom note in front of you at the time  
you were giving that information to Mr. Hoffman?

JOHN RAMSEY

No. I had forgotten that it was only addressed to me. But  
what it was what -- what I noticed was that it was a  
formal address, and yet they fell into a familiar form  
later on.

LIN WOOD

That is all I wanted to clarify.

DARNAY HOFFMAN

Yes.

LIN WOOD

And now let me mark this as Defendant's Exhibit No. .

(Defendant's Exhibit- was marked for identification.)

LIN WOOD

Do you want to take a look at this real quick?

DARNAY HOFFMAN

Yes, please. Thank you very much.

May I make one observation about this before you read it  
into the record?

LIN WOOD

Sure.

DARNAY HOFFMAN

I would like the record to reflect that I made this document available on the internet at the time that Cina Wong, and there is a document which seems to be almost identical, that David Liebman received this. I would just like the record to reflect I made no attempt to keep this

hidden from the public.

LIN WOOD

And there has been no representation that you did make any such attempt.

DARNAY HOFFMAN

I am sorry? No. I want the record to reflect that --

LIN WOOD

But I appreciate the stipulation.

DARNAY HOFFMAN

-- that I made that available through the internet.

LIN WOOD

The stipulation was that you recognize the document, and it is actually the very material that you placed on the internet.

DARNAY HOFFMAN

That is correct.

LIN WOOD

And it was, in fact, and is, in fact, a true and correct statement of the letter that was sent to Cina Wong by

Michael Kane on behalf of Alex Hunter, the --

DARNAY HOFFMAN

Correct.

LIN WOOD

-- the Boulder district attorney.

DARNAY HOFFMAN

Uh-huh (affirmative).

LIN WOOD

January , 1999.

DARNAY HOFFMAN

Yes.

LIN WOOD

And also a true and correct verbatim statement of the letter sent by Mr. Kane on that date, January , 1999, to Mr. David Liebman; am I right?

DARNAY HOFFMAN

That is correct.

LIN WOOD

All right. So that the record is clear, in those letters which predate the filing of this lawsuit, Mr. Kane stated to Ms. Wong and Mr. Liebman in identical language that he was informing them that their request to testify before the Boulder County grand jury in the JonBenet Ramsey murder investigation was denied, and the statement was, "We have determined that your proposed testimony would not serve the interest of justice, which is the controlling standard by which to judge your request."

And I continue to quote: "The primary reason that we have reached this decision is that we believe that the methodology which you have used in reaching your conclusions does not meet the standards employed by the vast majority of forensic questioned document examiners in this country."

I continue to quote: "Most significant is your complete failure to account for or even reference any unexplained dissimilarities between the questioned and known samples. You are willing to conclude with percent certainty that a writing was authored by a particular person based on some threshold level of similarities without any mention that there may be , , or 10,0 unexplainable dissimilarities between the known and unknown writings. I know of no reputable forensic document examiner who will not agree that unexplainable dissimilarities between a person's natural writing and questioned handwriting will preclude a

positive identification.

"In fact, where the degree of unexplained dissimilarity is high, it may result in an elimination, in spite of the existence of a number of points of similarity."

And then I go down to state: "In addition to your technical deficiencies," I quote, "there are other reasons for our decision. I would note that you have engaged in a campaign of promoting your opinion in a manner that would surely open your credibility to doubt on cross-examination in a judicial proceeding.

"As an experienced trial attorney, I believe that an expert witness who has attempted to insinuate herself," or himself, "into a particular criminal investigation through a public media campaign would appear less than objective and professional to a jury."

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

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

DARNAY HOFFMAN

About how they became available to the public.

LIN WOOD

There is no -- I don't think there is any dispute about what Michael Kane has said about their methodology and their credibility. That is why this is important to be put into the record, since you have referred to them earlier today.

And I do that not only to clarify the record but also to point out that this is another one of the reasons that we filed what is now correctly identified by me as the 15<sup>th</sup> defense, going on. I earlier said the 13<sup>th</sup> defense. That instead of bringing this legal action out of a concern for some real injury to reputation, Plaintiff Wolf and his counsel bring this lawsuit as a publicity stunt. They have thus joined legions of persons who have tried to make personal profit from the brutal murder of defendants' child. Neither plaintiff Wolf nor his counsel possesses any admissible evidence that any defendant murdered JonBenet Ramsey.

That is verbatim the 15th defense.

There was some question in the litigation raised earlier in the deposition about whether that had been made in the pleadings. It is a defense to this case asserted in the 15th defense in our answer. With those clarifications to

the record, I have nothing further.

DARNAY HOFFMAN

I would just only like to point out one thing with respect to Mr. Kane's objection. The operative word there is "unexplained dissimilarities." And the fact is that Mr. Liebman and Ms. Wong felt that these dissimilarities were explained by the fact that the person in question, in their opinion, was trying to disguise their handwriting. And in disguising your handwriting, occasionally, you are going to create dissimilarities which are not unexplained. They are dissimilarities, but they are not unexplained dissimilarities. And that is the point I would like to make with that. And thank you.

LIN WOOD

I appreciate your statements about what they say. We look forward to that and the opportunity, as I am sure you would tell us to ourselves, cross-examine Mr. Wong, Mr. Liebman, Mr. Lacey, Mr. Miller, if he is going to be involved, as well as Mr. Epstein and Mr. Ziegler. We look forward to that day --

DARNAY HOFFMAN

Thank you very much.

LIN WOOD

-- when we can present them the questions and get the answers from them.

Thank you.

DARNAY HOFFMAN

All right. Thank you. Again, Mr. and Mrs. Ramsey, thank you for being here today.

JOHN RAMSEY

We have had our differences, but we are all children of God, and I respect you for that.

DARNAY HOFFMAN

Thank you very much.

VIDEOGRAPHER We are off the video record at :.

(A recess ensued.)

LIN WOOD

Just before we complete the record, I wanted to state that, on behalf of the Ramseys, and in this instance particularly John Ramsey, that we do not claim any confidentiality as to this deposition.

The Ramseys agree that this deposition of John Ramsey, just like the deposition of Patsy Ramsey, can be presented publicly with no claim of confidentiality, unlike every other witness and party in the case to date.

Every other witness, including Steve Thomas, including, in part, Mr. Wolf, and the other witnesses so far, Alex Hunter, Mark Beckner, Carey Weinheimer, have all claimed a measure of, if not entire, confidentiality.

The Ramseys want the whole truth in this case out, and they are willing for the public to see their depositions in its entirety. So we make no claim to confidentiality.

DARNAY HOFFMAN

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

LIN WOOD

I appreciate that.

On behalf of the Ramseys, we would ask you to do the same thing they are doing, that is, let the entire truth come out about Chris Wolf and not prevent the public from knowing all aspects of his life, including those that you

have chosen selectively to deem confidential.

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

(Whereupon, the deposition was concluded.)

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## DESCRIPTION OF EXHIBITS

### Plaintiff's Exhibit Description

Printout from NBC website

Article from Boulder News Ramsey Archive,

"John Ramsey's Statement"

Photocopy of ransom note

Printout from Rocky Mountain News, "Ramsey investigators  
to tail possible suspects"

Printout from Denver Post, "Parents' book will name  
suspects, publisher says"

Printout from The Daily Camera, "Ramseys turn to work of  
deceased psychic"

Printout from Ramsey Family website

Defendant's

### Exhibit Description

Photocopy of letters from Mr. Hunter to Ms. Wong and Mr.  
Liebman

STATE OF GEORGIA:

COUNTY OF FULTON:

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

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

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

ALEXANDER J. GALLO, CCR-B-1332

CAPTION

The Deposition of John Bennett Ramsey, taken in the matter, on the date, and at the time and place set out on the title page hereof.

It was requested that the deposition be taken by the reporter and that same be reduced to typewritten form. It was agreed by and between counsel and the parties that the Deponent will read and sign the transcript of said deposition.

CERTIFICATE STATE OF :

COUNTY/CITY OF :

Before me, this day, personally appeared, John Bennett Ramsey, who, being duly sworn, states that the foregoing transcript of his/her Deposition, taken in the matter, on the date, and at the time and place set out on the title page hereof, constitutes a true and accurate transcript of said deposition.

John Bennett Ramsey

SUBSCRIBED and SWORN to before me this day of , in the jurisdiction aforesaid.

My Commission Expires Notary Public

DEPOSITION ERRATA SHEET

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RE: Alexander Gallo & Associates  
File No. 1637

Case Caption: Robert Christian Wolf vs.  
John Bennett Ramsey, et al  
Deponent: John Bennett Ramsey  
Deposition Date: December ,

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To the Reporter:

I have read the entire transcript of my Deposition taken in the captioned matter or the same has been read to me. I request that the following changes be entered upon the record for the reasons indicated. I have signed my name to the Errata Sheet and the appropriate Certificate and authorize you to attach both to the original transcript.

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DEPOSITION OF JOHN BENNETT RAMSEY

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John Bennett Ramsey