

COPY

SUPERIOR COURT OF THE STATE OF CALIFORNIA  
FOR THE COUNTY OF LOS ANGELES

DEPARTMENT NO. 104

HON. CHARLES H. OLDER, JUDGE

THE PEOPLE OF THE STATE OF CALIFORNIA,  
Plaintiff,

vs.

CHARLES MANSON, SUSAN ATKINS,  
LESLIE VAN HOUTEN, PATRICIA KRENWINKEL,  
Defendants.

124  
No. A253156

REPORTERS' DAILY TRANSCRIPT  
Tuesday, October 13, 1970  
P. M. SESSION

APPEARANCES:

For the People:	DONALD A. MUSICH, STEPHEN RUSSELL KAY, <del>JOSEPH B. HOLLOMBE</del> and VINCENT T. BUGLIOSI, DEPUTY DISTRICT ATTORNEYS
For Deft. Manson:	I. A. KANAREK, Esq.
For Deft. Atkins:	DAYE SHINN, Esq.
For Deft. Van Houten:	<del>JOSEPH B. HOLLOMBE</del> RONALD HUGHES, Esq.
For Deft. Krenwinkel:	PAUL FITZGERALD, Esq.

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JOSEPH B. HOLLOMBE, CSR.,  
MURRAY MEHLMAN, CSR.,  
Official Reporters

I N D E X

PEOPLE'S WITNESSES: DIRECT CROSS REDIRECT RECROSS

GRAHAM, Virginia Kathleen	13625 S		
	13634 K		
		13673	13677 S
HOWARD, Roni	13690	13701 S	

LOS ANGELES, CALIFORNIA, TUESDAY, OCTOBER 13, 1970

2:03 P.M.

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(The following proceedings occur in open court.  
All counsel present. Jurors and defendants absent.)

THE COURT: All counsel are present. The jury is not  
absent.

You may proceed, Mr. Shinn.

MR. SHINN: Thank you, your Honor.

VIRGINIA KATHLEEN GRAHAM,  
the witness on the stand at the time of the noon recess,  
resumed the stand and testified further as follows:

CROSS-EXAMINATION (CONTINUING)

BY MR. SHINN:

Q Did you finish reading the page I asked you to  
read before recess?

A Yes.

Q But may I look at it one more time? There has  
been a short lapse.

MR. SHINN: Sure.

I believe, your Honor, it is Page 9 -- 8, 9  
and 10, your Honor.

(Mr. Shinn shows a loose-leaf notebook with  
documents to the witness.)

1 MR. SHINN: Read this, this and this.

2 THE WITNESS: Down to the bottom here?

3 MR. SHINN: Yes.

4 THE WITNESS: You just said one page before.

5 MR. SHINN: Read to the middle of the page here.

6 Page 8, 9 and 10, Mr. Bugliosi.

7 (Pause while the witness reads.)

8 MR. SHINN: Q Did you read that?

9 A Yes.

10 Q Now, does it say in those paragraphs or those  
11 pages that you read that Susan Atkins stated, "I killed  
12 Sharon Tate"?

13 A It does not say that in this statement here.

14 Q Yes.

15 Now, do you know where in your statement it  
16 states Susan Atkins stated, "I killed Sharon Tate"?

17 A I do not see it in this, in the pages you have  
18 shown me.

19 MR. BUGLIOSI: Page 42, Mr. Shinn.

20 MR. SHINN: All right. Page 42.

21 Will you read Page 42, the bottom of Page 42,  
22 the last paragraph.

23 (Pause while the witness reads.)

24 THE WITNESS: Yes?

7

- 1 Q Now, do you recall that answer?
- 2 A Which page, sir?
- 3 Q Oh, 42, the last paragraph.
- 4 A Do I recall making the answer?
- 5 Q Yes, when you were talking to Sergeant Nielsen.
- 6 A Yes.
- 7 Q Back in November.
- 8 A November.
- 9 Q November 26, 1969.
- 10 A That's right.
- 11 Q Do you recall giving that answer?
- 12 A I do recall an answer of the sort, yes.
- 13 Q Isn't that clear in your mind?
- 14 A It has been 11 months ago.
- 15 Q In other words, when you refer to "She told me
- 16 like when she killed Sharon Tate, you know," you were
- 17 referring back to Page 10.
- 18 A I don't know what I was referring back to.
- 19 I just know she told me she killed her.
- 20 Q But it is not in the statement you made to
- 21 Sergeant Nielsen.
- 22 THE COURT: Is that a question?
- 23 MR. SHINN: I beg your pardon?
- 24 THE COURT: Is that a question?
- 25 MR. SHINN: Yes.
- 26 Q BY MR. SHINN: Is it any place where you made

1 the statement to Sergeant Nielsen?

2 A It's not on Page 9, 10 or 11, no.

3 MR. SHINN: Your Honor, may she glance through the  
4 transcript, your Honor?

5 THE COURT: For what purpose?

6 MR. SHINN: To find --

7 THE COURT: She read the parts you mentioned.

8 MR. SHINN: What?

9 THE COURT: She has read the part you asked her to  
10 read.

11 MR. SHINN: She says she cannot find it in those two  
12 pages. Maybe they are in other pages.

13 THE COURT: Just put the questions, Mr. Shinn.

14 MR. SHINN: What?

15 THE COURT: Put the questions to her.

16 MR. SHINN: Yes.

17 Q BY MR. SHINN: Do you recall any time during  
18 your conversation with Sergeant Nielsen in 1969, November,  
19 that you told Sergeant Nielsen that Susan Atkins told you  
20 and said, "I killed Sharon Tate"?

21 A I thought I had said that to him.

22 Q You thought?

23 A Yes, it's not in here on the pages that you  
24 mentioned, but in the latter part here it substantiates  
25 what I said.

26 Q Do you recall when in your conversation with

1 Sergeant Nielsen you stated to him that Susan Atkins told  
2 you that she killed Sharon Tate?

3 A As I just said, I thought I said to him that  
4 she told me that she killed Sharon Tate.

5 Q You thought that?

6 A Yes, I thought I told him that.

7 Q Is it possible maybe you did not tell him that?

8 A Conceivably.

9 Q In other words, it is possible, is it not, that  
10 you said, "They killed Sharon Tate," or "We killed Sharon  
11 Tate."

12 A It is possible that I said it at that time.

13 Q But you are not sure right now as you sit  
14 there if you said to Sergeant Nielsen that Susan Atkins  
15 said, "I killed Sharon Tate"?

16 A I just said I thought, I believed that I told  
17 Sergeant Nielsen that she said to me, "I killed Sharon  
18 Tate."

19 I explained before I was nervous, Mr. Shinn,  
20 when I spoke with him, so how can I be completely specific  
21 as to what I said to him 11 months ago?

22 Q Are you nervous now?

23 A I would say a little bit,

24 Q More or less than when you talked to Sergeant  
25 Nielsen?

26 A It's a different kind of nervousness.

1 Q What is the different kind of nervousness?

2 A Simply I am sitting here and I am talking in  
3 front of quite few people and I almost feel like I'm on  
4 trial, whereas when I sat there and spoke with him I was  
5 nervous because I was talking to authority, to a policeman.

6 Q Does making you nervous sometimes mean you  
7 forget things?

8 A I would say quite definitely.

9 Q It makes you forget things?

10 A I would think so. Then I would also say it  
11 would to most people.

12 Q Did you talk to Mr. Bugliosi before testifying  
13 in court?

14 A Yes.

15 Q Mr. Bugliosi?

16 A Yes.

17 Q And did he discuss your testimony in court?

18 A We went over some of it, yes.

19 Q And did he -- what did he say to you about your  
20 testimony in court?

21 A To tell the truth,

22 THE COURT: What is the purpose of this, Mr. Shinn?  
23 This seems to be beyond the --

24 MR. SHINN: I did not want to say that in front of  
25 the jury, your Honor, until I found out what her answer  
26 was going to be.



1 THE COURT: All right, go ahead.

2 MR. BUGLIOSI: This is not a discovery proceeding,  
3 your Honor.

4 THE COURT: Go ahead, Mr. Shinn.

5 MR. SHINN: I believe I asked her the question  
6 already.

7 THE WITNESS: My answer to that was he told me to do  
8 the best that I could to remember, and to tell the truth.

9 Q BY MR. SHINN: Did he say anything about "we"  
10 and "I" and "they"?

11 A He did call to my attention certain things  
12 about we and I and they but nothing in relation to Miss  
13 Tate.

14 Q I mean not what Miss Tate, according to your  
15 testimony in court, did he say anything about we, they, I,  
16 them?

17 A Yes, to tell me I could not use we, they, and I.

18 Q What else did he say, in what sense did he say  
19 that?

20 A That there were certain things in my statement  
21 that I had given that I was not going to be permitted to  
22 say in court because it might jeopardize the other clients  
23 in reference to the we and they.

24 Q And so did that make you now focus your  
25 attention on Miss Atkins with I and she?

26 A Not particularly, no.

1 Q To a certain extent?

2 A I have to just be very careful not to say we  
3 and they.

4 Q You cannot use we and they. What were you  
5 supposed to do?

6 A Only tell the truth as to what she told me she  
7 did.

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1 MR. SHINN: I have nothing further, your Honor.

2 THE COURT: Mr. Kanarek?

3 MR. KANAREK: Yes, your Honor.

4 I have got a motion, which is this, your  
5 Honor:

6 I make a motion that Mr. Bugliosi turn over  
7 to us his original notes that he took with Susan Atkins,  
8 which he represented to the Court previously, which is  
9 most important here, in view of the fact that at the Grand  
10 Jury Susan Atkins stated that she did not kill --

11 THE COURT: We had a number of discovery motions,  
12 Mr. Kanarek, and I think you have received everything that  
13 Mr. Bugliosi had, as far as I know.

14 MR. KANAREK: Yes, your Honor, but, as I say, at  
15 the Grand Jury hearing, Susan Atkins said that Tex Watson  
16 killed Sharon Tate, and did not say what this lady stated  
17 she said.

18 I think it is important, your Honor --

19 THE COURT: You can take up this matter at some  
20 other time. We are not going to have a discovery proceed-  
21 ing at this time.

22 Do you wish to cross-examine?

23 MR. KANAREK: Yes, your Honor, if I may.

24 THE COURT: All right. Proceed.  
25  
26

## CROSS-EXAMINATION

1  
2 BY MR. KANAREK:

3 Q Miss Graham, would you say -- and what we are  
4 asking you to do in this courtroom is an impossible task --  
5 insofar as your state of mind is concerned, in view of  
6 the fact that you are asked to relate what Sharon Tate  
7 told you she personally --

8 A Sharon Tate?

9 Q Pardon me. That Susan Atkins -- you were  
10 asked to relate what Susan Atkins told you that she  
11 personally did, in circumstances wherein she may not have  
12 said what she personally did.

13 MR. BUGLIOSI: Irrelevant and compound.

14 THE COURT: Sustained.

15 Now, Mr. Kanarek, this examination is for a  
16 limited purpose. Confine your examination to those limits.

17 MR. KANAREK: Very well, your Honor.

18 Q Is it a fair statement, Miss Graham, that  
19 what you have uttered in court as words that you have  
20 attributed to Susan Atkins are words that she did not  
21 utter?

22 A Are you inferring, then, that she did not  
23 tell me what I am saying she said?

24 Q I am asking for a specific answer to that  
25 question. If it isn't clear, I am sure Judge Older will  
26 read it -- will have it read over to you, and if it is

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1 still not clear, I will try to rephrase it.

2 Is the question clear?

3 You answered almost before I had the words  
4 out. Would you please listen to the question.

5 A I did listen to it, but I didn't understand  
6 it.

7 Q You didn't understand the question?

8 A No, sir.

9 Q Now, would you listen carefully.

10 A Yes.

11 Q Is it a fair statement that the words that  
12 you have uttered here, that you have attributed, that you  
13 have said that Susan Atkins uttered, she, in fact, did not  
14 utter to you?

15 A It is not a fair statement at all.

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Q All right.

2 Then, would you tell me how it was possible  
3 for you to follow Mr. Bugliosi's suggestion when he said  
4 "we," "they," and so forth? How can you possibly do that  
5 and attribute "I," "me," and so forth, those pronouns,  
6 to Miss Atkins?

7 MR. BUGLIOSI: That assumes a fact not in evidence.

8 THE COURT: The objection is sustained.

9 BY MR. KANAREK:

10 Q Well, then --

11 THE COURT: You are getting beyond the limited  
12 scope of this voir dire examination, Mr. Kanarek.

13 Now, either confine yourself to the limits  
14 that have been set or we will have to terminate the  
15 examination.

16 MR. KANAREK: Very well, your Honor.

17 Q Certainly, Miss Graham -- is it a fair state-  
18 ment that you have attributed words to Miss Atkins that  
19 you did not hear her say?

20 A You just asked me that.

21 Q What is your answer?

22 A My answer is that what I have testified to  
23 was completely true that Miss Atkins said.

24 Q If you will listen to the question, Miss  
25 Graham. I am not asking you to judge your own testimony.  
26 I am asking now, for instance, if I say to you, right now,

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1 "I walked down the street," the exact words that I  
2 uttered would be "I walked down the street." Now, sometime  
3 later, you may say that "He said that he walked down the  
4 street."

5 A I see.

6 THE COURT: Mr. Kanarek, you are getting beyond the  
7 scope again. I will sustain an objection to it.

8 MR. KANAREK: May I have an answer?

9 THE COURT: You are going to have an opportunity,  
10 sir, to cross-examine when this witness testifies again  
11 before the jury.

12 You are apparently trying to do that now,  
13 and that is not the purpose of this proceeding.

14 MR. KANAREK: Well, then, may I ask this question?

15 Q Is it a fair statement, Miss Graham, that the  
16 exact words uttered --

17 THE COURT: That is the same question, Mr. Kanarek.

18 I will have to terminate your examination.

19 MR. KANAREK: Very well, your Honor.

20 THE COURT: You seem to be unable to confine yourself  
21 to the limits.

22 Do you have any questions, Mr. Hughes?

23 MR. HUGHES: No questions, your Honor. Thank you.

24 THE COURT: You may step down.

25 MR. SHINN: Your Honor, may I make a motion?

26 THE COURT: You may.

1 MR. SHINN: Your Honor, I make a motion to strike  
2 the part of her testimony in which she states that Susan  
3 Atkins told her that "I killed Sharon Tate."

4 According to the testimony of the witness,  
5 your Honor, she doesn't seem to know whether or not she  
6 actually said those words, and the pages that she read --  
7 I believe it was page 9 and 10 -- say "we killed Sharon  
8 Tate."

9 THE COURT: If you look at pages 42 and 43, Mr.  
10 Shinn, it is quite apparent what she is saying there.

11 MR. SHINN: But there, your Honor, I believe that  
12 she is now referring back to page 10, your Honor, because  
13 you can't use "we" on pages 42 and 43.

14 THE COURT: I know what I see in the transcript,  
15 Mr. Shinn.

16 MR. SHINN: Motion denied, then?

17 THE COURT: The motion is denied.

18 MR. KANAREK: Your Honor, may I just have a ruling  
19 on my motion that Mr. Bugliosi furnish us with the hand-  
20 written copy of the notes? May I just have a ruling on  
21 that?

22 THE COURT: I am not going to get into it at this  
23 time, Mr. Kanarek.

24 MR. BUGLIOSI: I want the record to reflect that  
25 Mr. Kanarek was given a photostatic copy of my original  
26 notes per my conversation with Susan Atkins.



1 MR. KANAREK: I cannot accept that, your Honor.

2 We made discovery --

3 THE COURT: That will be enough, Mr. Kanarek. If  
4 you want to raise this in a separate motion, you will  
5 have to do it at some other time. We are not going to  
6 interrupt this witness's testimony now.

7 Is there any reason why the jury should not  
8 now be brought back?

9 Bring in the jury, please.

9 file.

1 (The following proceedings were had in open  
2 court in the presence and hearing of the jury:)

3 MR. SHINN: Your Honor, may we approach the bench?

4 THE COURT: All counsel and jurors are present.

5 Will counsel approach the bench, please.

6 (The following proceedings were had at the  
7 bench out of the hearing of the jury:)

8 THE COURT: Yes, Mr. Shinn.

9 MR. SHINN: Yes, your Honor, can I ask some of the  
10 questions that I asked in the absence of the jury now?  
11 What questions can I not ask and what questions can I ask?

12 THE COURT: The reason I asked the questions I did  
13 was because I wanted to find out for the benefit of all  
14 parties whether or not everything this witness testified to  
15 as having been told by Susan Atkins, she was also exposed  
16 to by some other source, either before or after those  
17 conversations, but in any event before she testified in  
18 this trial.

19 Her answers indicated that there were several  
20 things that she learned in her conversations with Susan  
21 Atkins that she did not learn from any other source.

22 Now, one of those things, of course, was this  
23 matter that Susan Atkins allegedly told her about these  
24 other movie stars that have no connection with this case.

25 MR. SHINN: I am not going into that, your Honor.

26 THE COURT: I am just reviewing what this witness'

1 testimony was in the voir dire.

2 Certainly you can go into the fact that she  
3 was exposed to various sources of information other than  
4 the conversation she had with Susan Atkins. That is a  
5 perfectly legitimate area of inquiry.

6 The danger is in going into specifics and having  
7 the witness inadvertently blurt out something that could be  
8 damaging to the other defendants; that you certainly have  
9 the right to go into the fact that she was exposed to this  
10 information.

11 MR. SHINN: If I feel that she may say something that  
12 may mention the other defendants, I am not going to ask  
13 her the questions because your Honor has warned me.

14 THE COURT: I am not telling you how to conduct your  
15 examination, but one way it could be done would be to go  
16 back in her transcript of her direct testimony and point  
17 out to her some specific questions and answers:

18 "You testified to so-and-so-and-so on  
19 direct examination by Mr. Bugliosi. Now, did  
20 you also learn of this fact from a newspaper  
21 that you read or from television or from some  
22 other source?"

23 MR. BUGLIOSI: I would recommend that.

24 THE COURT: As long as you don't go beyond the scope  
25 of that particular direct, you will have covered everything  
26 that she testified to.

1 MR. BUGLIOSI: If he doesn't do that I will have to do  
2 it on redirect examination, go over every single point,  
3 so you might as well do it on cross-examination; go over  
4 every point, as the Court says, whether she read this some-  
5 where else.

6 MR. SHINN: I want to impeach her as to the statement  
7 she gave to the police officers and Mr. Bugliosi.

8 Now, I will just ask her -- I asked her where her  
9 original statement to Sergeant Nielsen -- where Susan said,  
10 "I killed Sharon Tate," I could not find that.

11 THE COURT: I cannot agree with you. I would refer  
12 you to Pages 42 and 43, that is exactly what she said.

13 MR. SHINN: It referred back --

14 THE COURT: Even if it referred back, she is phrasing  
15 it in such a way that it is unmistakable about what she is  
16 saying.

17 Anyway, what is your point?

18 MR. SHINN: I want to impeach her.

19 THE COURT: How?

20 MR. SHINN: The fact that in the original transcript  
21 they use a majority of the pronouns and nouns, which were  
22 used, are "they" and "we" and now she's got it narrowed  
23 down to "I."

24 THE COURT: What do you want to do, Mr. Shinn? I'm  
25 trying to understand what you are saying.

26 MR. SHINN: I am trying to take the weight off her,

1 your Honor.

2 THE COURT: How?

3 MR. SHINN: I want to show the jury there were other  
4 people there present.

5 MR. BUGLIOSI: You cannot do that. You cannot  
6 deliberately inject Aranda error.

7 MR. SHINN: Wait, you mean --

8 MR. BUGLIOSI: We could not do it.

9 MR. SHINN: Can I ask her the question whether or not  
10 she killed all five persons herself?

11 THE COURT: This witness?

12 MR. SHINN: Ask her if Susan said that to her.

13 MR. KANAREK: That is not even within the scope of  
14 the direct examination.

15 THE COURT: That is beyond the scope of the direct  
16 examination.

17 MR. FITZGERALD: Well, there hasn't been any  
18 admonishment to the jury that this refers to a particular  
19 count.

20 THE COURT: Well, they have been admonished that it  
21 refers only to Susan Atkins and not to any of the other  
22 defendants for any purpose.

23 MR. FITZGERALD: He wants to exculpate her on the counts  
24 in which she is not charged.

25 Here is the problem.

26 MR. BUGLIOSI: How exculpate her? You mean abetting,

1 the fact she did not kill Voityek Frykowski does not excul-  
2 pate her.

3 MR. FITZGERALD: Who knows why juries give death  
4 penalties ---

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1 MR. BUGLIOSI: I know, but the Court cannot  
2 instruct the jury just because she did not kill a certain  
3 party she is not responsible for the party's murder.

4 MR. FITZGERALD: If the Court doesn't, then he is  
5 entitled to ask her questions.

6 THE COURT: He is not entitled to ask those ques-  
7 tions.

8 MR. FITZGERALD: Why can't he exculpate her as to  
9 Frykowski and as to Sebring and Abigail Folger?

10 THE COURT: She did not testify she killed Frykowski,  
11 Folger or Sebring; what she said on her direct testimony  
12 was she killed Sharon Tate.

13 MR. FITZGERALD: On the evening of August 8th, 1969,  
14 at a time and place where four other people were killed?

15 THE COURT: That's right. This is the same ques-  
16 tion we have covered day after day after day.

17 Because it appears that more than one person  
18 was involved in the commission of the offense we cannot  
19 bring in a Bruton-Aranda statement. That simply is not  
20 true.

21 MR. SHINN: I cannot ask her those questions, your  
22 Honor?

23 THE COURT: I don't know what you mean. I don't  
24 want to be misunderstood, Mr. Shinn, I cannot rule on  
25 questions you have not asked.

26 We are just talking about areas of examination.



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1 I am not foreclosing you from asking any  
2 questions. I am saying that you'd better tread very  
3 lightly and stay within the scope of the direct examina-  
4 tion or I will have to sustain objections.

5 MR. KANAREK: Yes, your Honor, any reference to any  
6 of the other defendants would be -- that is the whole  
7 purpose, that is the whole purported purpose of the  
8 editing.

9 THE COURT: That's right. That is exactly right.

10 MR. SHINN: Your Honor, the way the testimony of this  
11 witness is going, your Honor, it may force Susan Atkins  
12 to take the stand.

13 THE COURT: I don't subscribe to that, Mr. Shinn.  
14 If she takes the stand, of course, that is something you  
15 and she will have to determine, but she's already, by  
16 this witness's testimony, confessed to being present,  
17 and confessed to having directly participated in the  
18 killing of Sharon Tate and Sebring and having stabbed some  
19 other man who went by.

20 MR. SHINN: If your Honor wants me to stay away from  
21 that area I will stay away from that area.

22 Mr. Fitzgerald brought up a good point, your  
23 Honor.

24 Are you saying I cannot ask a question for  
25 the record, or could I ask a question and you will  
26 sustain the objection?



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1 THE COURT: Mr. Shinn, I am not saying you cannot  
2 ask any questions.

3 MR. SHINN: Oh, I see, I thought you are foreclosing  
4 me.

5 THE COURT: I am not making any blanket ruling.

6 What we have been talking about is what we have  
7 been talking about for the last several days, and the  
8 purpose of the editing of the statements.

9 MR. SHINN: Okay.

10 (The following proceedings were had in open  
11 court in the presence and hearing of the jury:)

12 THE COURT: You may proceed, Mr. Shinn.

13 MR. SHINN: Thank you, your Honor.

14 Q Mrs. Graham, on your direct examination Mr.  
15 Bugliosi asked you about your occupation at the present  
16 time?

17 A Yes, sir.

18 Q And I believe your answer was -- what was your  
19 occupation at the present time?

20 A Clerical. I am working in a law office.

21 Q You are working in a law office?

22 A Yes, sir.

23 Q When did you start?

24 MR. BUGLIOSI: That is irrelevant, your Honor.

25 MR. SHINN: Your Honor, I will make an offer of  
26 proof, your Honor.

1 THE COURT: The objection is sustained.

2 BY MR. SHINN:

3 Q How long have you been working there?

4 MR. BUGLIOSI: Same objection.

5 THE COURT: Sustained.

6 BY MR. SHINN:

7 Q What is your job there, what do you do?

8 MR. BUGLIOSI: That is irrelevant.

9 THE COURT: Sustained.

10 BY MR. SHINN:

11 Q How much a week do you make?

12 MR. BUGLIOSI: That is irrelevant.

13 THE COURT: Mr. Shinn --

14 MR. SHINN: Your Honor, I offered to make an offer  
15 of proof, your Honor.

16 Mr. Bugliosi brought this up on direct.

17 THE COURT: It is not necessary to make an offer of  
18 proof. This is cross-examination.

19 The objection is sustained.

20 BY MR. SHINN:

21 Q You had many conversations with Miss Atkins?

22 A Yes.

23 Q Approximately how many?

24 A I met her, as I mentioned, about the 2nd of  
25 November, and I spoke with her clear through until about  
26 the 12th of November.

1 I would just say many.

2 I could not be specific if it were 20 or 30,  
3 but we were in contact with one another every single day,  
4 we sat next to each other, as I mentioned before, which  
5 we talked from approximately 7:30 in the morning until  
6 3:00 to 3:30 in the afternoon.

7 Q And then you talked about many many subjects,  
8 is that correct?

9b fls9 A Surely.

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1 Q Not only about the Tate event?  
2 A Of course not.  
3 Q You talked about your life, her life?  
4 A Yes.  
5 Q What you were in for and what she was in for?  
6 A Yes.  
7 Q What you did in the past, what she did in the  
8 past?  
9 A Yes.  
10 Q And in fact you did talk about drugs?  
11 A Yes, we did.  
12 Q And you talked about the Tate residence, the  
13 Tate house.  
14 A Yes.  
15 Q In fact you told her that you knew the house?  
16 A Yes.  
17 Q You had been there before?  
18 A Yes.  
19 Q That you were going to buy it at one time?  
20 A No.  
21 Q Rent it at one time?  
22 A Yes.  
23 Q And I believe the rent was about what, \$3,000 a  
24 month at that time?  
25 MR. BUGLIOSI: That's irrelevant.  
26 MR. SHINN: This is a conversation she had with  
Susan Atkins, your Honor.

1 THE COURT: Overruled. You may answer.

2 THE WITNESS: Would you repeat that, sir?

3 MR. SHINN: May it be read back, your Honor?

4 THE COURT: Well, the question is ambiguous,  
5 Mr. Shinn. Reframe it.

6 MR. SHINN: I believe I asked her what the rent was  
7 at that time.

8 THE WITNESS: I'm not positive. It's been many years  
9 ago. I think it was somewhere about a thousand -- eleven  
10 hundred dollars a month.

11 Q BY MR. SHINN: The house was worth at that time  
12 around three hundred thousand dollars?

13 A I wouldn't know the price of property or the  
14 value.

15 Q In fact you told Miss Atkins that you knew what  
16 the colors were in the house, inside the house, isn't that  
17 correct?

18 A I did not tell her that I knew what colors were  
19 inside the house.

20 Q You asked her whether it was white and gold?

21 A Yes.

22 Q And you knew the color of the rugs?

23 A No, I did not.

24 Q You told Miss Atkins you knew the color of the  
25 rugs, did you not?

26 A Repeat that again.

1 Q Did you tell Miss Atkins you knew the color of  
2 the rug, of the furniture?

3 A No.

4 Q Did you tell her you knew what the color of the  
5 inside of the house was?

6 A I don't recall.

7 Q You don't recall?

8 A No, I don't recall.

9 Q And you stated you was going to rent this house  
10 at one time, correct?

11 A I said that I'd been up to the house. I looked  
12 at it from outside and I had thought of it, of renting it.

13 Q And you told Miss Atkins that you lived in the  
14 neighborhood for years up in Beverly Hills?

15 A Yes, that's true.

16 Q And then she said to you, "Where did you get all  
17 the money?"

18 A No, she did not.

19 Q You forgot that portion?

20 A I did not forget it because she did not ask it.

21 Q Did she ask you --

22 MR. BUGLIOSI: Your Honor, this is irrelevant, the  
23 line of questions is calling for hearsay. It has no  
24 relevance to the charges in this case.

25 I suggest an offer of proof, your Honor.

26 THE COURT: The answer is in. Ask your next

1 question.

2 MR. SHINN: Am I being foreclosed from going into --

3 THE COURT: Ask your next question.

4 Q BY MR. SHINN: You talked about LSD?

5 A Yes, we did.

6 Q You told her that you took about 100 trips?

7 A I told her that I took one trip.

8 Q When was this one trip you had taken?

9 A October 1st, 1969.

10 Q Where?

11 A With some friends in Los Angeles.

12 Q That is the only time you took LSD?

13 A Yes, it is.

14 Q What other drugs were you talking about with  
15 Susan Atkins?

16 A Will you please be specific of what other drugs  
17 we talked about?

18 Q What do you recall talking with her about --  
19 drugs?

20 A I recall talking about LSD.

21 Q And what else?

22 A I think she started discussing with me  
23 Methedrine, which I knew nothing about, and other drugs.

10-1

1 Q Did you tell her the effects of LSD?

2 A You mean the effects that it had on me that  
3 time?

4 Q On anyone.

5 A I could only speak about what happened to me.

6 Q What happened to you?

7 MR. BUGLIOSI: Irrelevant.

8 THE COURT: Sustained.

9 BY MR. SHINN:

10 Q Did you tell her that you were making lots of  
11 money in Hollywood in those days?

12 A I don't recall.

13 Q Did you tell her that you were a hundred  
14 dollar a day prostitute?

15 MR. BUGLIOSI: Objection, your Honor. The question  
16 calls for testimony which would be totally irrelevant.

17 MR. SHINN: Your Honor, this is conversation that  
18 she had with Susan Atkins, your Honor.

19 THE COURT: The objection is sustained.

20 MR. SHINN: Your Honor, may I approach the bench,  
21 your Honor?

22 THE COURT: No. Ask your next question.

23 BY MR. SHINN:

24 Q You discussed with Miss Atkins about Jay  
25 Sebring, did you?

26 A I believe I mentioned that I had known him



1 vaguely.

2 Q That you met him at the Luau?

3 A I had met him at the Luau, that is correct.

4 Q Do you remember one of your girl friends was --

5 A Pardon me?

6 Q One of your girl friends was a good friend of  
7 Jay Sebring's?

8 A Yes, that is true, but I don't recall telling  
9 her that.

10 Q You don't recall that?

11 A I don't recall telling Miss Atkins that I had  
12 a girl friend that was a good friend of his.

13 Q Do you recall telling Sergeant Nielsen?

14 A Yes, I do believe that I told Sergeant Nielsen  
15 that a girl friend was a manicurist at one time for him.

16 Q And what else did you tell Sergeant Nielsen  
17 about Jay Sebring and his friends?

18 A What else did I tell him?

19 Q Yes.

20 A I believe I told Sergeant Nielsen that I  
21 knew him vaguely, that I had met him through a mutual  
22 friend. I had seen him in and around Beverly Hills. That  
23 we had never dated, or there was no contact other than  
24 just a very, very casual acquaintance.

25 Q And while talking to Miss Atkins about this  
26 Tate incident, did she say she was alone?

1 MR. KANAREK: Your Honor, I will object to that.

2 MR. BUGLIOSI: Your Honor, People vs. Aranda. I  
3 will object on that ground.

4 THE COURT: Sustained.

5 BY MR. SHINN:

6 Q Did she say anything about killing the other  
7 victims?

8 MR. BUGLIOSI: I object again, your Honor. People  
9 vs. Aranda.

10 MR. KANAREK: Objection, your Honor.

11 THE COURT: Approach the bench.

12 (Whereupon all counsel approach the bench and  
13 the following proceedings occur at the bench outside of  
14 the hearing of the jury:)

15 THE COURT: Read the last question.

16 (The question was read by the reporter.)

17 THE COURT: Do you have something to say?

18 MR. FITZGERALD: No. I didn't ask the question.

19 THE COURT: What is the purpose of that question,  
20 Mr. Shinn?

21 MR. SHINN: Well, I think the jury may think that  
22 Miss Atkins killed the other victims.

23 There is no mention of other people in her  
24 testimony. The jury might think that she had something to  
25 do with killing the other four people, your Honor.

JA-1

1 THE COURT: I think that the simplest way to handle  
2 this is for counsel to approach the witness and confer with  
3 her on this problem. It is a question that can be answered  
4 yes or no. She either said something or she didn't. The  
5 answer -- at least according to her testimony so far --  
6 would be "no."

7 I just don't want to have her inadvertently --  
8 because witnesses are not always responsive -- I don't want  
9 to have her inadvertently mention something that might be  
10 prejudicial to the other defendants. She can simply say  
11 "no," if that is her answer.

12 MR. KANAREK: Your Honor, I will object to this  
13 question on the grounds of denial of a fair trial, the  
14 denial to confront, the Sixth Amendment right to effective  
15 counsel, and Due Process under the Fourteenth Amendment.

16 THE COURT: What does all that mean, Mr. Kanarek?

17 MR. KANAREK: The point is that I object to the  
18 question and ask your Honor to admonish the jury not to  
19 consider the question for any purpose, and I object to  
20 the answer.

21 THE COURT: There is nothing prejudicial about the  
22 question nor will there be about the answer, as long as she  
23 is responsive to it. That is the thing that I want to be  
24 sure of.

25 MR. KANAREK: I can only ask the Court for certain  
26 relief.

1 MR. BUGLIOSI: On redirect, I would want to ask her:  
2 Did she say she did not kill Abigail Folger? The answer will  
3 be no.

4 The point is that Susan never told her about  
5 stabbing anyone else. She did not tell her that she did not  
6 stab anyone else.

7 Again, your Honor, we are talking only about  
8 yes or no answers.

9 I think the Court's suggestion is a good one,  
10 to go up to her and tell her she can't mention what any  
11 other person did.

12 THE COURT: Mr. Shinn, you asked a question, previous  
13 to that, about whether or not anyone else was present, I  
14 believe.

15 MR. SHINN: Yes. She can answer yes or no.

16 THE COURT: I consider that to be a direct ignoring  
17 of all that has gone on in the last several days, Mr. Shinn.

18 Are you trying to sabotage this whole trial?

19 MR. SHINN: No, your Honor. That is why I came to the  
20 bench, for guidance from the Court.

21 THE COURT: You are not unintelligent, Mr. Shinn.  
22 When you ask a question like that, after what has been going  
23 on for the last four days, a discussion of this problem,  
24 I have a serious question as to what your motive is.

25 I mean that.

26 MR. SHINN: Your Honor, I asked to approach the bench

1 for guidance from the Court as to the way to ask the  
2 question.

3 THE COURT: You didn't ask for guidance before you  
4 asked that. Your purpose seemed to be obvious.

5 MR. SHINN: She can answer yes or no.

6 THE COURT: All right.

7 Now, I suggest that we go on. Be very, very  
8 careful, Mr. Shinn. I warn you that if you violate my  
9 instructions in this matter, I am going to do something about  
10 it.

11 I am not going to foreclose your examination on  
12 legitimate subjects that you can go into on cross-  
13 examination, but I think that you, at least up until this  
14 moment, have been attempting to go beyond that.

10b-1

1 MR. SHINN: I have no intention of going beyond that,  
2 if that is the Court's opinion.

3 MR. BUGLIOSI: Should you and I approach the witness?

4 MR. SHINN: You can.

5 THE COURT: No. Both of you.

6 MR. KANAREK: Will your Honor admonish the jury  
7 again that all of this is only as against Susan Atkins?  
8 I think that is in order at this point.

9 THE COURT: I will do that at the close of her  
10 testimony if you will ask me then.

11 MR. KANAREK: I am asking your Honor to do it now,  
12 but if your Honor won't, I will welcome your Honor doing  
13 it, as a second choice, that way.

14 THE COURT: Let's proceed, gentlemen.

15 (Whereupon all counsel return to their respec-  
16 tive places at counsel table and the following proceeding  
17 occur in open court within the presence and hearing of  
18 the jury:)

19 (Mr. Shinn and Mr. Bugliosi confer with the  
20 witness.)

21 MR. SHINN: Your Honor, may the last question be  
22 read back, your Honor?

23 THE COURT: Reframe it, Mr. Shinn. We are way  
24 beyond it now.

25 MR. SHINN: I have forgotten the last question, so  
26 I will withdraw the last question.

1 THE COURT: Reframe your question.

2 BY MR. SHINN:

3 Q Miss Graham, before talking to Miss Atkins at  
4 Sybil Brand, you had acquired information about the Tate  
5 events; is that correct?

6 A What do you mean by "acquired"?

7 Q Well, you watched -- I mean, you knew that  
8 there were two bodies outside on the lawn?

9 A Yes.

10 Q And you knew that one of the victims was  
11 a female?

12 A Yes.

13 Q And one of the victims out on the lawn was a  
14 male?

15 A Yes, I did.

16 Q And you also knew that one of the bodies was  
17 in an automobile outside in a driveway near the gate?

18 A Yes.

19 Q And you knew that he was shot?

20 A Yes. I do recall reading something like that.

21 Q This is all before you talked to Miss Atkins;  
22 correct?

23 A Yes.

24 Q And you knew there was a rope involved?

25 A Yes.

26 Q And a gun?

1 A Well, they said "shot," so I would assume a  
2 gun.

3 Q You didn't see the picture of the gun on TV?

4 A No, I didn't see the picture of a gun.

5 Q And you knew there was writing on the wall  
6 of the door?

7 A Yes, I had read that.

8 Q And you knew where the Tate residence was  
9 located?

10 A Yes.

11 Q You had been there before?

12 A Yes.

13 Q And you knew the color of the carpets?

14 A No, sir, I did not. I was never inside the  
15 house.

16 Q Did you not tell Miss Atkins at Sybil Brand  
17 that the color scheme inside the Tate house was black  
18 and gold, or white and gold?

19 A I don't recall.

20 Q You did tell Miss Atkins the color of the Tate  
21 residence inside the house, did you not?

22 A I don't recall.

23 Q You may have but you have forgotten?

24 A It is possible, but I did not see it inside  
25 the house, so I really wouldn't know what color it was.

26 Q I am asking you: Did you tell Miss Atkins in



1 your conversation with her at Sybil Brand?

2 A I don't recall.

3 Q Did you tell her the color of the furniture  
4 inside?

5 MR. BUGLIOSI: Asked and answered.

6 THE COURT: Overruled.

7 You may answer.

8 THE WITNESS: No, I did not.

9 BY MR. SHINN:

10 Q And you told Miss Atkins, I believe, that you  
11 lived in Beverly Hills for years?

12 A I could very well have. I did.

13 Q You knew the area very well?

14 A Yes.

15 Q At least you knew, and all this information  
16 you had, before talking to Miss Atkins at Sybil Brand;  
17 correct?

18 A Yes.

19 MR. SHINN: May I approach the witness, your Honor?

20 THE COURT: Yes, you may.

21 MR. SHINN: Your Honor, I have here People's Exhibit  
22 No. 243, your Honor.

23 May I hand it to the witness, your Honor?

24 THE COURT: Very well.

25 MR. SHINN: Would you try those on?

26 THE WITNESS: Me?

(The witness tries on the exhibit eyeglasses.)

MR. SHINN: Your Honor, may she take the exhibit tag off?

THE WITNESS: How about if I fold the tag up?

I am afraid I can't see you at all.

10c fls.

1 Q Can you see me, Miss Graham?

2 A No, I cannot see you.

3 Q Can you see the microphone?

4 A Yes. With difficulty.

5 Q Can you see Mr. Bugliosi?

6 A I see outlines, colors.

7 Q You never saw those glasses before?

8 A No, I didn't.

9 May I take them off?

10 MR. SHINN: yes.

11 THE WITNESS: Thank you.

12 THE COURT: May I see those?

13 THE WITNESS: (The witness passes the eye glasses to  
14 the Court.)

15 MR. SHINN: Q Miss Graham, will you tell us why  
16 you are testifying in court today?

17 MR. KANAREK: Your Honor, I must object to that  
18 question.

19 THE COURT: The question is ambiguous, Mr. Shinn.

20 MR. SHINN: Q Are you testifying in court because of  
21 the \$25,000 reward?

22 A Absolutely not, sir.

23 Q In other words, if they gave you the \$25,000,  
24 you wouldn't take it; is that correct?

25 A If they gave me \$25,000?

26 Q Yes.

1 A Yes, of course.

2 Q You would take it?

3 A Why not? Yes.

4 Q I mean, concerning this case.

5 A Yes.

6 Q In other words, that has nothing to do with you  
7 testifying in court today?

8 A Absolutely not.

9 Q Have you hired anyone to pursue this \$25,000  
10 reward for you?

11 A Yes, I did.

12 Q Attorneys?

13 A An attorney. Not the attorney present.

14 Q To file a civil suit trying to recover the  
15 \$25,000 reward?

16 A No, there was no civil suit or anything else  
17 filed, to my knowledge.

18 I think a letter had just been written to some  
19 other attorneys, obviously, that was handling it, and I  
20 haven't heard anything for months, and I don't really even  
21 know anything about it at the moment.

22 Q When was this letter sent to you?

23 A I am not quite sure, but I believe it was  
24 probably last January or December.

25 My ex-attorney would probably be able to  
26 clarify that, Mr. Hindling.

1 Q Are you also testifying because you are a good  
2 citizen?

3 A Yes, I am.

4 Q What is your definition of a good citizen?

5 A I think that I have a moral obligation not only  
6 to myself but to society to make sure that crimes like  
7 this don't occur any more and people aren't murdered like  
8 this.

9 Q Do you think a good citizen should commit  
10 felonies?

11 A No, and I was a very poor citizen for quite a  
12 long time.

13 Q And now you have decided to turn into a good  
14 citizen; is that correct?

15 A Yes, I did, believe it or not.

16 Q Does the \$25,000 have anything to do with your  
17 turning into a good citizen?

18 A No, it didn't, because, you see, I didn't know  
19 about the \$25,000 when I turned into a good citizen.

20 Q You stated that you know a Roni Howard?

21 A Yes, I do.

22 Q What other names do you know her by?

23 A Sheldon Conley.

24 Q What else?

25 A Veronica Hughes, which I believe is her real  
26 name -- or Shelley Nadell.

1 That is all I can think of.

2 Q Is she an ex-con, too?

3 A Yes, she is.

4 Q In other words, she served time in State prison,  
5 in Federal prisons?

6 A I know about State prison. I think she did in  
7 Federal prison, too.

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1 Q And you met Roni Howard in Sybil Brand, is that  
2 correct?

3 A Are you referring to for the first time?

4 Q No, with Susan Atkins -- while you were in  
5 Sybil Brand with Susan Atkins.

6 A Yes, I ran into Roni again.

7 Q When you left for State Prison you told Roni  
8 how to pump Susan Atkins to get more information, is that  
9 correct?

10 A I told Roni if she cared to talk to Susan  
11 Atkins about it that it was entirely up to her.

12 Q Did you tell her to get some more information  
13 so "we can use it later"?

14 A No, I didn't tell her in those words at all,  
15 Mr. Shinn. They are your words.

16 Q What was your state of mind at that time when  
17 you left for State Prison and were trying to gather more  
18 information?

19 A At the time when I left and I had heard all  
20 this, frankly I did not know whether to come forward or --  
21 as my husband told me -- to just forget about the whole  
22 thing and keep quiet.

23 I was fearful because I felt if this was  
24 true I certainly did not want to get murdered.

25 Not only that, where I was in Corona you just  
26 don't go around telling things. You become a snitch then,

1 and I did not feel my life would be worth too much.

2 Q When did you decide to turn into a snitch then?

3 A I decided to turn into a snitch about two days  
4 after I got to Corona because my conscience could not  
5 possibly let me keep this quiet.

6 Q You said your conscience?

7 A I certainly did.

8 Q Now, did you notify Roni Howard -- did you  
9 notify Roni Howard's parole officer that she was giving out  
10 information, selling a story, something like that?

11 A Did I -- when are you referring to, while I  
12 was in Corona?

13 Q In Corona or while you were out?

14 A I spoke to Miss Bartlett who was Miss Howard's  
15 parole agent. I was very concerned about that book,  
16 "Five to Die" that was written because I had nothing  
17 whatsoever to do with it and I could not understand how  
18 it got out, when here up until that time I had tried to be  
19 relatively careful about what I said.

20 Q So you snitched on Roni Howard, didn't you?

21 A Well, if you care to call it that word, yes.

22 Q What do you call it?

23 A I was trying to find out some information.

24 Q For what purpose?

25 A Well, I think it's obvious.

26 In other words, if she would be permitted to



1 discuss certain things and I am not, it just doesn't make  
2 very much sense.

3 Q In other words, you wanted to protect your  
4 \$25,000 reward, did you not?

5 A No, I was not trying to protect it at all.

6 THE COURT: We will take our afternoon recess at  
7 this time, Mr. Shinn.

8 Ladies and gentlemen, do not converse with  
9 anyone or form or express an opinion regarding the case  
10 until it is finally submitted to you.

11 The court will recess for 15 minutes.

12 (Recess.)  
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11a file.

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1 THE COURT: All counsel and jurors are present.  
2 You may continue, Mr. Shinn.

3 MR. SHINN: Thank you, your Honor.

4 Q BY MR. SHINN: Miss Graham, you stated on  
5 direct examination that you were convicted of two felonies.

6 A Yes, sir.

7 Q What was the first one?

8 A Forgery.

9 Q The first one was forgery?

10 A Yes.

11 Q Or petty theft with a prior?

12 A That was the second one, sir.

13 Q What was the first one, 1967, 1965?

14 A '65, yes, June 4th, 1965.

15 Q And you went to State prison for that one?  
16 Or were you on probation?

17 A I was on probation, sir, for 13 months.

18 Q And then you violated your probation?

19 A Yes, I did.

20 Q And they put you in state prison for that?

21 A Violation of probation and the petty with a  
22 prior.

23 Q And when was the other one?

24 A What other one?

25 Q The felony.

26 A I just explained that, I had a forgery first in

11a2  
1 in 1965, and 1966 I had the petty with the prior.

2 MR. SHINN: I have nothing further, your Honor.

3 THE COURT: Any questions, Mr. Kanarek?

4 MR. KANAREK: No, your Honor.

5 Your Honor, I gathered, is instructing the jury  
6 that all of this purported testimony is only against  
7 Susan Atkins, is that correct, all of it?

8 THE COURT: Yes, the jury was so admonished at the out-  
9 set of this witness' testimony.

10 MR. KANAREK: In view of that, your Honor, I have no  
11 questions since all of this is coming in only against Susan  
12 Atkins.

13 THE COURT: Any questions, Mr. Hughes?

14 MR. HUGHES: Thank you, no questions, your Honor.

15 THE COURT: Redirect?

16 MR. BUGLIOSI: Just a very few, your Honor.

17  
18 REDIRECT EXAMINATION

19 BY MR. BUGLIOSI:

20 Q Mrs. Castro, is it your state of mind that  
21 in order for you to collect any portion of the \$25,000 you  
22 must testify at this trial?

23 A I am aware that I do not have to testify here  
24 in order to receive the money.

25 I am testifying because I want to testify.

26 Q You knew Jay Sebring as an internationally-famous

1 hair stylist?

2 A Oh, yes.

3 Q Directing your attention to Volume 122, Page  
4 13,529, would you please read Lines 1 through 12 to your-  
5 self.

6 (Witness complies.)

7 Have you read those lines to yourself?

8 A Yes, I have.

9 Q To these questions did you give these  
10 answers:

11 "Q And you had conversations with  
12 other inmates regarding this Tate case?

13 "A I don't recall discussing it  
14 with anybody.

15 "Q Well, how long did you stay  
16 there?

17 "A I went in the 20th of October  
18 and left November 12th.

19 "Q And you don't recall --

20 "I mean besides Susan Atkins you  
21 don't recall discussing this Tate event with  
22 anyone?

23 "A No, I really don't.

24 I would not be positive and say  
25 that I did not, but to my recollection it did not  
26 arise, no."

1 Did you give those answers to those questions?

2 A Yes, sir.

3 Q Did you, in fact, discuss what Susan Atkins  
4 told you with Roni Howard?

5 A Oh, yes, I certainly did.

6 Q So you were not referring to Roni Howard when  
7 you gave those answers to those questions?

8 A I was not referring to Roni.

9 Q Now, you say two days after you arrived at  
10 Corona, you decided to contact the authorities with respect  
11 to what Susan had told you?

12 A Yes, sir.

13 Q And you arrived at Corona when?

14 A The 12th of November.

15 Q So on or about the 14th of November, 1969 you  
16 decided to relate to other people what Susan had told you?

17 A Yes, I did.

18 Q And what did you do on November 14th to  
19 effectuate that intent of yours?

20 A In Corona in order for an inmate to talk with  
21 a staff member you have to fill out what they call a blue  
22 slip.

23 This is a request for an interview.

24 I took a blue slip and I filled it out and I  
25 sent it to the psychologist there, a Dr. Vera Dreiser, and  
26 all I put on it was, "Dr. Dreiser, it is very important that

1 I speak with you."

2 I did this on the 14th. I wanted to talk to  
3 Dr. Dreiser about this because I trusted her.

4 Q Did you in fact/<sup>talk</sup>to Dr. Dreiser?

5 A I did, sir, at a later date.

6 Q On what date?

7 A I would say -- oh, in December sometime.

8 Q But your initial request was on or about  
9 November 14th, 1969?

10 A Yes, sir.

11 Q And you did not speak to Dr. Dreiser immediately  
12 after that request?

13 A No, I did not.

14 Q Did you withdraw the request?

15 A No, I did not.

16 A blue slip was sent back to me from Dr. Dreiser  
17 and it indicated for me to put in another blue slip to  
18 speak with Dr. Owens, who was the administrator in the unit  
19 that she was in.

20 Q Would it have been necessary for you to speak  
21 to Dr. Dreiser to fill out that blue slip or could you have  
22 just walked to her door, knocked on it and spoken to her?

23 A Oh, no, we were in a completely segregated  
24 area. We were in the receiving-guidance center. There was  
25 no way possible I could have spoken to Dr. Dreiser or any  
26 member in authority without putting in a blue slip.

1 MR. BUGLIOSI: Thank you. No further questions.

2 THE COURT: Anything further?

3 MR. FITZGERALD: No questions, your Honor.

4 THE COURT: Mr. Shinn?

5 MR. SHINN: Yes.

6  
7 RECROSS-EXAMINATION

8 BY MR. SHINN:

9 Q Did you say you knew Jay Sebring pretty well?

10 A No, I did not say I knew him well. I said I  
11 knew him vaguely, sir.

12 Q Vaguely?

13 A Yes.

14 Q How many times did you meet him?

15 A I was introduced to him one time. I had one  
16 conversation with him.

17 I saw him in and around the area I was living in  
18 on various occasions.

19 Q You don't know him socially?

20 A No, I didn't. Like I said, I met him one time.

21 Q Now, you talked to Sergeant Nielsen on November  
22 26, 1969?

23 A That's right.

24 Q And then after talking to him you were paroled  
25 shortly after that, is that correct?

26 A No, it is not correct.

1 Q When were you paroled?

2 A I was not paroled, sir, until April, the end  
3 of April.

4 Q That's only around what, about four or five  
5 months; that's pretty short.

6 A Quite possibly to you, but it was not to me.  
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12-1

1 MR. SHINN: I have nothing further.

2 THE COURT: Anything further, gentlemen?

3 MR. KANAREK: No, your Honor.

4 MR. HUGHES: No, your Honor.

5 THE COURT: You may step down.

6 MR. BUGLIOSI: May we approach the bench, your  
7 Honor, with respect to the next witness?

8 THE COURT: Yes, you may.

9 (Whereupon all counsel approach the bench  
10 and the following proceedings occur at the bench outside  
11 of the hearing of the jury:)

12 MR. BUGLIOSI: I have got a problem with respect to  
13 the next witness, your Honor.

14 She is outside, but to be blunt about it,  
15 your Honor, she is not the most accurate person in the  
16 world; she is not the most reliable person in the world.

17 It is Roni Howard. She has a tendency to want  
18 to tell the whole story, to use the "we's" and the  
19 "they's" and "Charlie" and "Tex."

20 I keep telling her that she cannot do this,  
21 and she says: Okay.

22 She says: Will you please check on the law  
23 and see if there is some way that I can tell the whole  
24 story?

25 I had no problem at all with Virginia  
26 Graham.

12-2

1 Now, the only reason that I am bringing this up  
2 is that I should talk to her again before I put her on the  
3 stand and go over exactly what she is permitted to testify  
4 to.

5 She is apt to blurt something out.

6 MR. KANAREK: Then I think the Court can exercise  
7 its discretion. How much cumulative evidence do you need,  
8 your Honor?

9 He has got one felon, a twice-convicted felon,  
10 and this lady is obviously a friend of hers.

11 What I am saying, your Honor, is that the  
12 cumulative evidence --

13 THE COURT: What part of the evidence do you think is  
14 cumulative? The fact that she is a felon or that she  
15 testified?

16 MR. KANAREK: She is going to repeat it.

17 I mean, since we are all agreed that we don't  
18 wish to -- our purpose here is to have Mr. Manson leave  
19 this courtroom a free man, not to inject error or have  
20 error injected.

21 I think the Court can exercise its discretion  
22 and not call her.

23 THE COURT: I agree, there is a problem that Mr.  
24 Bugliosi is faced with.

25 MR. KANAREK: We are all faced with it, though, your  
26 Honor.

12-3

1 THE COURT: Of course, of course.

2 MR. KANAREK: I think there is no need for this  
3 witness.

4 How many times do you have to say the same  
5 thing?

6 THE COURT: I would not exclude the testimony on the  
7 ground that it is cumulative.

8 MR. BUGLIOSI: In the first place, your Honor, some  
9 of her testimony will be different.

10 THE COURT: But I do point out to Mr. Bugliosi that  
11 he has a very serious problem if the witness is unreliable  
12 in the sense that she can't be responsive or responsible.

12a fls. 12

12a-1

1 MR. BUGLIOSI: Well, she was supposed to come in this  
2 morning to see me.

3 THE COURT: You know her better than anyone else.

4 MR. BUGLIOSI: She was supposed to come in here this  
5 morning to see me. It wasn't her fault that she didn't.  
6 The police didn't bring her in on time.

7 THE COURT: In any event, you are asking for more  
8 time?

9 MR. BUGLIOSI: Yes.

10 I hate to take up the Court's time.

11 THE COURT: Do you have any other witness you can  
12 put on?

13 MR. BUGLIOSI: No.

14 I might be able to talk to her for 15 minutes,  
15 and that might do the trick.

16 Her testimony will be very short.

17 She was supposed to come in at noontime, or  
18 this morning, and she did not come in.

19 If I had spoken to her this morning or at  
20 noontime, it would have been different.

21 MR. SHINN: Like Virginia Graham.

22 MR. KANAREK: Your Honor, not much, if anything, will  
23 be lost, if we don't permit this witness to testify.  
24 We are going to jeopardize this matter.

25 I think you can look at her statement, your  
26 Honor, and exercise your discretion, your Honor, and see

1 to it that she doesn't take the witness stand.

2 MR. BUGLIOSI: She does not say that she will  
3 refuse to follow my instructions, but she wants to tell  
4 the story, and she says: Can't you check on the law?  
5 Maybe there are cases that say I can use the words  
6 "we" and "they". But she doesn't say "I refuse to follow  
7 your instructions." She has never told me that.

8 My only point is that before I put her on the  
9 stand, I want to talk to her again.

10 I wanted to talk to her at noontime and this  
11 morning, but she didn't show up.

12 THE COURT: At one time, it was suggested by someone--  
13 perhaps I was the one, I don't recall now -- that the  
14 testimony of these two witnesses be taken in full outside  
15 of the presence of the jury. Perhaps this would be an  
16 appropriate procedure with respect to this witness to  
17 prevent an inadvertent response.

18 MR. BUGLIOSI: And then we would read the testimony  
19 to the jury afterwards?

20 THE COURT: I don't think that would be necessary.  
21 She could simply be asked the same questions that she was  
22 asked during the course of the out-of-the-presence-of-the-  
23 jury proceedings. Presumably she would give the same  
24 response.

25 MR. BUGLIOSI: Well, I am confident that if I can  
26 talk to her just before I put her on the stand, that I could

1 instruct her to --

2 THE COURT: This is a matter about which there can't  
3 be any second guesses or second thoughts. If the damage  
4 is done, Mr. Bugliosi, the damage is done.

5 I think you have to give very, very serious  
6 consideration to whether putting her on without being  
7 certain of what she is going to say is worth the risk.

8 Now, one way to obviate that would be, as  
9 someone suggested -- I think it was Mr. Shinn --

2b fls.

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12b-1

1 MR. SHINN: No. Mr. Hughes did. I don't want to  
2 take the credit.

3 THE COURT: In any event, that suggestion would seem  
4 to have a great deal of merit with respect to this witness,  
5 in view of what you say.

6 MR. BUGLIOSI: It is 3:30 now. Could I talk to her  
7 for five or six or seven minutes? You could excuse the jury  
8 right now, and then we will have the testimony outside of  
9 the presence of the jury. Then we can call her to the  
10 stand in the presence of the jury.

11 THE COURT: Will you be ready to proceed without the  
12 jury today with this witness?

13 MR. BUGLIOSI: I think if I talked to her for ten  
14 minutes, yes, because her testimony is going to be brief.

15 Very briefly, I think it is just one page,  
16 isn't it, that I gave you?

17 MR. KANAREK: That is the point, your Honor.

18 The reason that I mention about the felon that  
19 if this witness were a witness who hadn't been convicted of  
20 a felony, then Mr. Bugliosi might say, "I have a witness  
21 that I need." But this witness is in the same status as  
22 Virginia Graham, really. They have talked together. He is  
23 not enhancing the People's case.

24 THE COURT: It is not cumulative, Mr. Kanarek. They  
25 are not talking about the same conversation. They are  
26 talking about different conversations. To that extent, it

1 isn't cumulative.

2 In other words, if they had all been a party  
3 to the same conversation, your point would have some merit.

4 MR. KANAREK: But with the interchange of conver-  
5 sation between these people, it is de facto cumulative.

6 THE COURT: I will excuse the jury at this time.

7 Now, is that procedure agreeable with all of  
8 you?

9 MR. SHINN: Do we have a choice, your Honor?

10 MR. HUGHES: Let me see if I understand it, although it  
11 is credited to me.

12 I believe my suggestion was that we proceed by  
13 deposition. So, I don't think that this was particularly  
14 my suggestion.

15 We are going to examine this witness outside  
16 of the presence of the jury. Then, if her answers conform  
17 to Aranda and Bruton, she will be asked the same  
18 questions in the presence of the jury?

19 THE COURT: Yes, essentially.

20 MR. SHINN: I thought Mr. Bugliosi said that he  
21 would put her on in the absence of the jury and try to  
22 delete her testimony.

23 MR. BUGLIOSI: No.

24 MR. HUGHES: No, I don't think that is what he said.  
25  
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120

1 THE COURT: You are going to ask her the same  
2 questions that you would ask her in front of the jury.

3 MR. BUGLIOSI: Right.

4 THE COURT: But this is just to obviate any non-  
5 responsive answers.

6 MR. HUGHES: If she is non-responsive to certain  
7 questions, then those will not be asked, or some other  
8 disposition will be made?

9 MR. BUGLIOSI: No. We can just coach her to make sure  
10 that she doesn't respond in the same fashion in front of the  
11 jury.

12 MR. SHINN: How about under cross-examination?  
13 You can't predict what she is going to say. It is going to  
14 be dangerous.

15 MR. BUGLIOSI: Especially dangerous, Daye, if you  
16 ask questions like you did of Virginia Graham, soliciting  
17 her to talk about other people.

18 MR. SHINN: I didn't purposely try to make her say  
19 "we" or "they."

20 MR. BUGLIOSI: You asked: Did she say anyone was  
21 with her?

22 THE COURT: The problem on cross-examination is not  
23 as dangerous because objections can be interposed either  
24 by the Court or by counsel before she answers.

25 MR. HUGHES: I have no objection to proceeding in  
26 this manner.

1 THE COURT: Do you have any objection, Mr. Kanarek?

2 MR. KANAREK: There is a fundamental objection on the  
3 Sixth Amendment right to confront. I don't want to appear  
4 to be waiving that. The right to effective counsel and  
5 the right to the Fourteenth Amendment, the right to Due  
6 Process.

7 THE COURT: This has nothing to do with that.

8 MR. FITZGERALD: This is a trial run outside the  
9 presence of the jury.

10 MR. KANAREK: Oh, no, I have no objection to a trial  
11 run. No, I have no objection to deposing her.

12 MR. FITZGERALD: Right. That is all that is at  
13 issue.

14 I don't have any objection.

15 MR. KANAREK: I have no objection to taking her  
16 statement under oath. I'd prefer that to extrajudicial  
17 utterances, right.

18 THE COURT: It will have to get before the jury at  
19 some time, of course. So, I would anticipate the same  
20 questions would be put to her in front of the jury, and if  
21 her answers have been responsive, whatever they may be,  
22 presumably she would answer the same way that she did  
23 in the hearing outside of the presence of the jury.

24 MR. KANAREK: Without waiving the other rights, of  
25 course, I have no objection to conducting this sort of  
26 voir dire hearing, no.

1 MR. FITZGERALD: You are not waiving any objections  
2 to her testimony.

3 THE COURT: No. Counsel are not waiving any  
4 objections.

5 All right. Then the jury will be excused at  
6 this time.

7 MR. HUGHES: Thank you, your Honor.

8 (Whereupon, all counsel return to their  
9 respective places at counsel table and the following  
10 proceedings occur in open court within the presence and  
11 hearing of the jury:)

12 THE COURT: Ladies and gentlemen, I am going to excuse the  
13 jury at this time until tomorrow morning at 9:45.

14 Again, I remind you do not converse with anyone  
15 or form or express any opinion regarding the case until it  
16 is finally submitted to you.

17 You will be excused at this time.

18 The Court will recess.

19 How much time will you need?

20 MR. BUGLIOSI: Ten minutes, your Honor.

21 THE COURT: The court will recess for ten minutes.

22 (Recess.)  
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13-1

(The following proceedings were had in open court in the absence of the jury:)

THE COURT: All counsel are present. The jury is not present.

You may proceed, Mr. Bugliosi.

MR. BUGLIOSI: People call Roni Howard.

THE CLERK: Draw the microphone back, please.  
Would you state your name.

THE WITNESS: Roni Howard.

THE CLERK: You are still under oath.

RONI HOWARD,  
having been previously duly sworn, resumed the stand and testified further as follows:

DIRECT EXAMINATION

BY MR. BUGLIOSI:

Q Is it Miss or Mrs. Howard?

A Miss.

Q Okay.

Miss Howard, you have been incarcerated at Sybil Brand in East Los Angeles?

A Yes.

Q And during what period of time?

A From the middle of August to the middle of February.

13-2

1 Q From the middle of August, '69, to the middle  
2 of February, 1970?

3 A Yes.

4 Q In Dormitory 8000?

5 A Yes.

6 Q And did you know Susan Atkins there?

7 A Yes.

8 Q You knew her as Sadie Glutz?

9 A Yes.

10 Q Was she living with you in the same dormitory,  
11 No. 8000?

12 A Yes.

13 Q Where was her bed in relation to your bed?

14 A Right next door to me.

15 Q During what period of time was her bed next  
16 to yours?

17 A I believe Sadie came in -- it was either the  
18 middle of October or the last of October -- about the middle  
19 of October.

20 Q 1969?

21 A Yes.

22 Q You say next door to yourself; there were no  
23 partitions separating her bed from yours?

24 A No.

25 Q In other words, her bed was right next to  
26 yours?

13-3

1 A Yes.

2 Q Did Sadie say anything with respect to the  
3 fact that her bed was next to yours?

4 A Yes, she felt that we were next to each other  
5 for a reason; that she was put next to me for a reason,  
6 and I told her I thought so too.

7 I did not know why at the time.

8 Q When did she say this to you, when you first  
9 met her?

10 A Yes.

11 Q Which would be around mid-October, 1969?

12 A Yes.

13 Q Did you ever talk to Sadie about the Tate  
14 murders?

15 A Yes.

16 Q Did you talk to her more than once?

17 A Yes.

18 Q About how many times?

19 A Approximately four times about the Tate  
20 murders, uh-huh.

21 Q When was the first time you had a conversation  
22 with Sadie with respect to the Tate murders?

23 A Approximately the first of November.

24 Q 1969?

25 A Yes.

26 Q At Sybil Brand?

1 A Yes.

2 Q And referring to this first conversation,  
3 what time of the day did it take place?

4 A In the evening after dinner while we were  
5 both sitting on our beds.

6 Q And how did you start talking about the Tate  
7 murders?

8 A We were talking about acid trips.

9 Q LSD?

10 A Yes.

11 Q What did you say and what did she say?

12 A Well, we were discussing different trips on  
13 acid, and Sadie told me that she had done just about  
14 everything there is to do, and nothing shocks her anymore.

15 I told her, well, nothing shocked me either.

16 And she told me "I'll bet I can tell you  
17 something that will blow your mind."

18 And I said, "Well, I don't think so."

19 And that is when she started talking to me --

20 Q -- about the Tate murders?

21 A Yes.

22 Q What did she say?

23 A She told me, "Well, you know the Tate deal."

24 And I said, "Yes."

25 And Sadie told me that she was there -- that  
26 she was there.



1 Q All right, did she say anything about Sharon  
2 Tate?

3 A Yes.

4 Q During this first conversation?

5 A Yes.

6 Q What did she say to you about Sharon Tate?

7 A She told me Sharon was -- Sharon Tate was in  
8 the bedroom, in the second bedroom, and there was a man  
9 sitting on the bed talking to her and Sadie walked by and  
10 they didn't see her, and when the people were brought out  
11 of the room --

12 Do you want me to go on?

13 Q Yes.

14 A When the people were brought out of the room,  
15 and after everything happened in regards to the --

16 Sadie told me that Sharon could not believe  
17 what was happening. She said she had a look on her face  
18 that was -- she just couldn't believe it.

19 And she just begged, she said "Please, just  
20 let me have my baby."

21 And Sadie said "I have no feelings for you,  
22 bitch, you're going to die," and proceeded to stab her.

23 And I asked her where did you stab her, in  
24 the stomach?

25 And Sadie said, "No, I stabbed her in the  
26 chest."



1 Q Did you ask her anything about the baby?

2 A Yes, I asked her "What happened to the baby?"

3 She said she wanted to take it with them.

4 I asked her "How would you have done that?"

5 She said, "I would have had to cut it out of  
6 her body."

7 Q She said that she would have to cut the baby  
8 out of her body?

13a file. 9 A Out of her body, yes.

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13a-1

1 Q Did she say whether or not she did cut the  
2 baby out of the body?

3 A No, she said they didn't.

4 MR. KANAREK: Your Honor, I object to "they."

5 THE WITNESS: She said she.

6 Q BY MR. BUGLIOSI: She said she did not cut the  
7 baby out of the body?

8 A No, she did not.

9 Q Did Sadie say anything about how it felt to stab  
10 a person?

11 A Yes, she said it feels like going into air,  
12 like into nothing.

13 She said, "When you stab a person it's better  
14 than having a climax."

15 She said, "Actually, it's a form of sexual  
16 release anyway to stab a person because the whole world is  
17 one big intercourse anyway, whether it's smoking, eating or  
18 anything that goes in and out, so it's a form of sexual  
19 release."

20 And I asked her, I said, "You mean it's like a  
21 drug habit?"

22 She said, "That's right, the more you do it the  
23 better you like it."

24 Q Did Sadie say whether or not Sharon screamed?

25 A Yes.

26 Q What did she say?

1 A She told me, she said when she screamed it kind  
2 of did something to her and it sent kind of a rush through  
3 her, and whenever she screamed she said she would stab her.

4 She told me, she said, "I just kept stabbing her  
5 until she stopped screaming."

6 Q Did Sadie say anything about -- strike that.

7 When she was telling you about killing Sharoh  
8 Tate what was her demeanor, what was the manner in which  
9 she told you this?

10 A What do you mean, what was the manner?

11 Q When she spoke to you did she seem to be  
12 excited or blase or what?

13 A Oh, no, she enjoyed telling me, no, Sadie was  
14 very excited.

15 Q When she spoke to you about it?

16 A That is how I knew she was telling me the truth,  
17 she was very excited. She enjoyed telling me.

18 Q Did Sadie say anything about acting crazy?

19 A You mean --

20 Q At any time. Did she tell you anything about  
21 acting crazy?

22 A She told me in the District Attorney's Office  
23 they were going to send a psychiatrist to see her.

24 She said, "I'll really make him think I'm  
25 crazy."

26 I told her all she had to do was talk normal

1 and they would think she was crazy anyway.

2 Q When did she tell you she intended to act crazy?

3 A Oh, when <sup>we</sup> were first talking about the Hinman  
4 deal, before that she told me about the Tate deal.

5 Q And you say you had a few other conversations  
6 with Sadie concerning the Tate murders?

7 A Yes.

8 Q During those other conversations did she relate  
9 essentially the same thing to you?

10 A Yes, we just went into more details.

11 Q And these other conversations also took place  
12 in Dormitory 8000 at Sybil Brand?

13 A Yes, the same place, yes.

14 Q I understand you eventually reported this matter  
15 to the police, is that correct?

16 A Yes.

17 Q What date?

18 A I think it was approximately November 17th.

19 Q 1969?

20 A Yes.

21 Q And how did you report the matter to the police?

22 A Well, I had tried several times before then to  
23 get a phone call but I wasn't able to.

24 Everything was against me, so I had to wait  
25 until luckily I was going to court one day and that is the  
26 only way I got a phone call and I called the Hollywood

1 Homicide Department.

2 Q The Hollywood Division of the Los Angeles  
3 Police Department?

4 A Yes.

5 Q And you reported to them what Sadie had told  
6 you?

7 A Yes.

8 Q Did you ever receive a letter from Sadie?

9 A Yes.

10 Q While you were at Sybil Brand?

11 A Yes.

12 Q Approximately when did you receive the letter?

13 A After I told the police, which was about  
14 ten days after -- about ten days after it broke in the  
15 papers.

16 Q In other words, the first or second week of  
17 December, 1969?

18 A Yes.

19 Q At Sybil Brand?

20 A Yes.

21 Q And you received this letter from Sadie?

22 A Yes.

23 MR. BUGLIOSI: I am not going to mark it at this  
24 time, your Honor, I do want to show her this letter.

25 Q BY MR. BUGLIOSI: I show you what appears to  
26 be two handwritten sheets of paper with writing on both sides.

1 Will you look at these sheets of paper and  
2 indicate whether this is the letter you received from Sadie?

3 A Yes, that is Sadie's letter.

4 Q This is the letter you received from Sadie?

5 A Yes.

6 Q Did you have any conversation with Sadie with  
7 respect to this letter?

8 A Yes.

9 Q When?

10 A She asked me if I got the letter.

11 Q When did she ask you if you had gotten the  
12 letter?

13 A Maybe an hour later.

14 Q An hour after you got the letter you saw Sadie?

15 A At the most -- I did not see her, no, I hollered  
16 to her because we were both in isolation, we were both  
17 separated but we could still talk to each other.

14-1

1 Q What did you say to her?

2 A I told her, "Yes, I got the letter."

3 Q She asked you?

4 A She asked me if I had the letter, and I told  
5 her, "Yes, I did, uh-huh."

6 MR. BUGLIOSI: No further questions at this time,  
7 your Honor.

8 MR. FITZGERALD: I have no questions, your Honor.  
9 Thank you.

10 THE COURT: Any questions, Mr. Shinn?

11 MR. SHINN: Yes, your Honor.

12  
13 CROSS-EXAMINATION

14 BY MR. SHINN:

15 Q Miss -- is your name Roni Howard or Shelley  
16 Nadell?

17 A Howard.

18 Q You said you received this letter from some-  
19 body; right?

20 A From Sadie, yes.

21 MR. SHINN: May I approach the witness, your Honor?

22 THE COURT: Yes, you may.

23 MR. SHINN: Q Is there anywhere in that letter  
24 where Sadie or Susan Atkins signed her name?

25 Would you look at it, please?

26 A No.



14-2

1 Q There is no place where she signs her name  
2 "Sadie" or "Susan Atkins"; correct?

3 A No, it doesn't show in the letter, no.

4 Q Now, this is the first letter that you received  
5 from Susan Atkins; is that correct?

6 A Yes. I think that was the first one, uh-huh.

7 Q And you don't know for a fact whether or not  
8 this is Susan Atkins' letter or handwriting, do you?

9 A Yes, I do.

10 Q How do you know her handwriting?

11 A Because I have seen other things Sadie has  
12 written.

13 Q When was this, before receiving this letter?

14 A Before I even told the police. Before I even  
15 told the police.

16 Q I am talking about before you received this  
17 particular letter here.

18 A Yes.

19 Q Did you receive any letter from Susan Atkins?

20 A No, I never received any before this, no,  
21 huh-uh.

22 Q When was the last time that you saw her hand-  
23 writing before receiving this letter?

24 A Maybe about some time in the middle -- about a  
25 month before.

26 Q And where did you see this handwriting before



14-3

1 from Susan Atkins?

2 A Where?

3 Q Yes.

4 A I saw another letter that she wrote to some-  
5 body.

6 Q In other words, when Miss Atkins was writing  
7 a letter, did you look over her shoulder and look at her  
8 handwriting?

9 A No. I didn't have to. Sadie showed me the  
10 letter herself.

11 Q How long did you look at this letter?

12 A Just a few minutes.

13 Q From that few minutes, you can tell her hand-  
14 writing?

15 A I don't have to be able to tell her hand-  
16 writing. Sadie asked me certain things in regard to this  
17 letter after she wrote it to me.

18 Q When was this?

19 A After she wrote me the letter, she asked me  
20 certain things regarding the letter.

21 Q When and where?

22 A After it broke in the papers, after I got the  
23 letter, Sadie asked me certain things regarding the letter.

24 Q Approximately what month was this?

25 A This was about the middle of December.

26 Q You were still at County Jail?

A Yes.

14a fls.

14a-1

1 Q And where did you see Miss Atkins at that  
2 time?

3 A When did I see her?

4 Q Where?

5 A Well, we were both in isolation. So, I only  
6 saw her coming and going to see her attorney. That is all.

7 Q When you are in isolation, you can't talk to her;  
8 is that correct?

9 A You are not supposed to, yes.

10 Q You are not supposed to. You can't talk, it is  
11 very difficult to talk to her; isn't that correct?

12 A Unless you shout across the cell block, yes.

13 Q So, you didn't get any information as to this  
14 letter while you were in isolation, did you?

15 A Yes.

16 Q You were shouting?

17 A Yes.

18 Q How far was she away from your cell?

19 A There is a cell block, and I think there are  
20 six or eight cells on each side. Sadie was on one side and  
21 I was on the other. All we would have to do is shout to  
22 each other and we could hear each other.

23 Q And did you show her this letter?

24 A Did I show Sadie the letter?

25 Q Yes.

26 A No, I didn't have to. She sent it to me.

1 No, I didn't show it to her. She asked me  
2 certain things about it, and I answered her.

3 We asked each other, you know. We mentioned  
4 certain things regarding the letter.

5 Q Well, by looking at this letter now before you,  
6 you cannot tell for sure whether or not that was Susan  
7 Atkins' handwriting at that time; is that correct?

8 A I can tell the letter came from Sadie.

9 Q How?

10 A I know Sadie, and I know what she wrote in  
11 there and what she asked me about afterwards, certain  
12 things she asked me about afterwards.

13 Q What is so peculiar about her handwriting that  
14 you could identify the handwriting?

15 A I am not talking about the handwriting. But  
16 no one except the person that wrote the letter would know  
17 what to ask me in regards to the letter. Only the person that  
18 wrote it would know what to ask me in regards to the letter.

19 Q Is it possible that Miss Atkins could have  
20 told the same story to someone else and someone else could  
21 have written the letter?

22 A It is possible but very unlikely.

23 Q Why do you say very unlikely?

24 A Because I know Sadie.

25 Q You know Sadie?

26 A Yes.

1 Q How long have you known her?

2 A Long enough.

3 Q How long?

4 A Since approximately sometime in October.

5 Q You met her in October?

6 A Yes.

7 Q And that was when you were in 8000?

8 A Yes, uh-huh.

9 Q When were you removed from 8000?

10 A It was towards the -- I believe it was approxi-  
11 mately the last of November. After I talked to the police,  
12 they moved me out.

13 Q Was Sadie in 8000 all this time?

14 A Yes.

15 MR. SHINN: Your Honor, in view of the fact that  
16 she cannot identify Susan Atkins' handwriting, and the  
17 fact that Miss Atkins didn't sign this letter, I am going  
18 to object to the introduction of this letter, your Honor.

19 MR. BUGLIOSI: We are just going to mark it as an  
20 exhibit, your Honor. We are not going to introduce it at  
21 this time.

22 We intend to offer the testimony of a handwriting  
23 expert with respect to that letter.

24 MR. SHINN: In view of that, your Honor, I will  
25 withdraw the objection.

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1 THE COURT: Any questions, Mr. Kanarek?

2 MR. SHINN: Your Honor, is this just for a limited  
3 purpose of what she is going to testify on direct examina-  
4 tion, your Honor, or will it be in order to cross-examine  
5 her fully now?

6 THE COURT: You may if you like.

7 No, this is not for any limited purpose, to  
8 answer your question, Mr. Shinn. You may cross-examine  
9 fully.

10 MR. SHINN: I may ask the same questions in front  
11 of the jury; is that correct?

12 THE COURT: Yes.

13 MR. SHINN: Thank you.

14 Q Now, before testifying in court today, you had  
15 a conversation with Mr. Bugliosi; is that correct?

16 A Yes.

17 Q And did that conversation have to do with you  
18 testifying in court today?

19 A Yes.

20 Q What did Mr. Bugliosi say?

21 A He just told me more or less what I was  
22 going to be asked.

23 Q Did he say anything about the "they's" and  
24 the "we's" and the "I's"?

25 A Yes.

26 I am not supposed to say "they" and "we." I

14b-2

1 understand.

2 Q In other words, where you want to use the  
3 word "they," you are supposed to use "I" or "he" or "she,"  
4 or something like that?

5 A That is what I was wondering about. Can I just  
6 say "blank"? "Blank did it," or something?

7 It is kind of hard to eliminate.

8 I am supposed to testify exactly what was told  
9 to me, and if I was told "we" or "they," maybe I can just  
10 say "blank did it."

11 Would that be all right?

12 Q Well, in your mind, now, when you come to a  
13 "they," when you think it is a "they" or "we," what are  
14 you doing?

15 A I guess I am just supposed to leave it out  
16 altogether.

17 Q When are you supposed to put the "I," then,  
18 or "me"?

19 A Only when she said "I," and then leave out when  
20 she said "we" or "they."

21 Q You mean, leave out the complete sentence if  
22 there was a "we" or "they"?

23 A That is the way I understand it.

24 Q Now, when you first had this conversation with  
25 Susan Atkins at Sybil Brand --

26 A Yes.

1 Q -- is it a fair statement that in most of the  
2 conversation she stated "we," "they" and "us"?

3 A Yes.

4 Q Is that correct?

5 THE COURT: I think you will have to be specific,  
6 Mr. Shinn.

7 THE WITNESS: On different things, yes.

8 THE COURT: "Most" is a very general word. It  
9 doesn't mean very much.

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1 MR. SHINN: I mean, throughout her conversation that  
2 she had with Susan Atkins regarding the Tate incident.

3 THE COURT: You have copies of these statements. I  
4 think you have to be more specific if you are going to  
5 ask the question of this witness.

6 MR. SHINN: Very well, your Honor.

7 May I approach the witness?

8 THE COURT: Yes.

9 BY MR. SHINN:

10 Q I am referring to the statement you made to  
11 Sergeant McGann and Sergeant Patchett on November the 25th,  
12 1969, in Sybil Brand.

13 You had a conversation with those two officers;  
14 correct?

15 A Yes.

16 Q And it was tape recorded?

17 A Yes. I didn't know it.

18 Q This is a transcription of that now.

19 I am directing your attention to page 16,  
20 to the middle of page 16.

21 Will you read that?

22 (Pause while the witness reads.)

23 BY MR. SHINN:

24 Q Have you read that portion, page 16 and 17?

25 A Yes.

26 Q Now, isn't it fair to state that when she told



1 you about this Tate residence, the Tate event, that she was  
2 using "we" and "they" most of the time?

3 A Most of the time, but not all the time.

4 Q And I believe on page 17 you state that Susan  
5 Atkins was stating to you when Sharon Tate asked her: "Well,  
6 why are you doing this? Don't kill me. Let me live. Let  
7 me live for my baby."

8 And Sadie said: "I have got no feeling for you,  
9 bitch. We are doing you a favor. We are releasing you  
10 from this earth."

11 Is that correct?

12 A No, it is not correct.

13 I know that it is in the transcript, but evi-  
14 dently some of the things in that transcript aren't correct,  
15 because evidently they are relating my thoughts, which came  
16 later.

17 You see, I had already talked to the police  
18 prior to this.

19 Q Oh, you had talked to the police prior?

20 A Prior to this.

21 Q What date did you talk to the police prior to  
22 this date?

23 A I believe it was the 17th of November.

24 Q And --

25 A And that is why I didn't see any sense in  
26 relating anything that I had told the police prior to this.

1 But a lot of those are my thoughts in there, and  
2 they have it down as though I quoted it. But they were  
3 just my thoughts.

4 Q And would you say that your statements that  
5 day were substantially all wrong?

6 A No. They are not all wrong.

7 Q But substantially wrong, not correct?

8 A Just a few of them. A few of them are my  
9 thoughts. They are not really quotations from Sadie, but  
10 it is put down like it was quotations, and they weren't.  
11 They were just my thoughts.

14d fls.

1 Q In other words, you were characterizing Susan  
2 Atkins' thoughts; is that correct?

3 A No.

4 What she told me, but at a later date.

5 Since I had already talked to the police prior,  
6 before that transcript came in, I didn't see any reason  
7 in relating the same thing again. I was just trying to  
8 tell them the basic facts.

9 THE COURT: It is almost 4:20, Mr. Shinn.

10 We will adjourn at this time until 9:45 tomorrow  
11 morning.

12 MR. KANAREK: Your Honor, I have one request.

13 May we approach the bench on it?

14 THE COURT: You may.

15 (The jury leaves the courtroom.)

16 (Whereupon all counsel come to the bench and  
17 the following proceedings occur at the bench.)

18 MR. KANAREK: Your Honor, as your Honor may know,  
19 there are some people at the Temple and Broadway inter-  
20 section -- this courthouse is at Temple and Broadway --  
21 in the City of Los Angeles, State of California, and I would  
22 ask your Honor, if it is possible, and I do move the Court,  
23 to order that the bus carrying the jury not go by Temple  
24 and Broadway, that it avoid Temple and Broadway and go  
25 down Spring Street, because there are some -- I just ask  
26 that that be done because there are some things that occur

1 at that corner.

2 THE COURT: What?

3 MR. KANAREK: Well, there are some people out there  
4 who are exercising their right of free speech.

5 MR. FITZGERALD: If you are going to put it on the  
6 record, let's put it on the record.

7 There are four young ladies who I know to be  
8 Lynette Fromme, Katherine Gilles, Ruthanne Morehouse, and  
9 Sandra Good. These people are all female Caucasians,  
10 approximately age 18 through approximately age 25. They  
11 have X's on their foreheads that resemble the X's scratched  
12 on the forehead of Charles Manson, Leslie Van Houten,  
13 Patricia Krenwinkel and Susan Atkins.

14 The evidence in this case has shown, and from  
15 my own personal knowledge, they were closely and intimately  
16 associated with all the defendants.

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1 : They are located on the northeast  
2 corner of Temple and Broadway.

3 THE COURT: The jury doesn't know who these young  
4 ladies are; they might think they are anybody.

5 MR. KANAREK: Actually some of these people are  
6 under subpoena by the prosecution, your Honor.

7 THE COURT: What does that have to do with the  
8 jury?

9 MR. KANAREK: The jury goes by there.

10 THE COURT: Assume the jury goes by and sees four  
11 young ladies standing on the corner with X's on their  
12 forehead.

13 What does that mean?

14 MR. KANAREK: Within the context of what is happening  
15 in this courtroom, it is my position -- actually, these  
16 young ladies are exercising their rights of free speech.  
17 It is a form of expression where they are exercising their  
18 unhappiness.

19 THE COURT: It might be anyone.

20 MR. KANAREK: The jury sees them and might see the  
21 inference of the relationship.

22 I ask your Honor that the bus go down Spring  
23 Street.

24 MR. HUGHES: I imagine the inference has already been  
25 made since the jury bus has gone by on several occasions,  
26 seeing Mr. Shinn and I talking to the girls.

1 THE COURT: The jury sees hippy types all over town.  
2 They might draw the inference that here were four hippy  
3 types who were sympathetic with Mr. Manson and the  
4 defendants. I suppose that is possible.

5 That can hardly come as news in view of the  
6 fact that there are so many hippy types around.

7 MR. KANAREK: I understand, your Honor --

8 THE COURT: They are not carrying signs; they are not  
9 wearing placards.

10 This jury has no idea who these people are.

11 MR. KANAREK: When they see these people and  
12 they finally come to court --

13 THE COURT: The jury has to use the freeway sometimes  
14 in their going, that is one of the routes to the freeway,  
15 I don't see the connection, Mr. Kanarek.

16 MR. KANAREK: Some of those people are under subpoena  
17 by the prosecution.

18 THE COURT: What does that have to do with it?  
19 They are not displaying their subpoenas.

20 MR. KANAREK: If they are brought to this courtroom  
21 the inference is going to be made -- anyway, your Honor, I  
22 make the motion that the jury be kept away from Temple and  
23 Broadway at all times. That is my motion.

24 And I also move that the jury be voir dired  
25 as to whether they have seen these people and what effect  
26 it had on their state of mind.

1 MR. HUGHES: Join in the motion.

2 MR. SHINN: Join in the motion.

3 THE COURT: The motion will be denied.

4 MR. KANAREK: Your Honor is not going to order the  
5 bus to take a different route?

6 MR. BUGLIOSI: The motion was denied, Mr. Kanarek.

7 THE COURT: 9:45 tomorrow morning.

8 (Whereupon, an adjournment was taken to  
9 reconvene at 9:45 a.m., Wednesday, October 14, 1970.)  
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