

THE STATE OF TEXAS

§

SEARCH WARRANT

COUNTY OF HARRIS

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PZ

TO THE SHERIFF OR ANY PEACE OFFICER OF HARRIS COUNTY, TEXAS

GREETINGS:

WHEREAS, I am a District Court Judge in and for Harris County, Texas, and WHEREAS, E.G. Chance, a peace officer employed by the Houston Police Department Narcotics Division, hereafter called Affiant, came before me this day with a sworn affidavit (which is attached hereto and is specifically incorporated by reference for all purposes along with the sworn affidavit of LAPD Officer Orlando Martinez), requesting a search warrant; and WHEREAS I have made inquiry of the basis of said beliefs of the Affiant and find that; the affidavit sets forth substantial facts establishing that probable cause does exist for the issuance of a search warrant, that the person, place or thing to be searched and seized is not one which is prohibited nor beyond the authorization of this magistrate, and that the search is requested upon proper grounds.

THEREFORE, YOU ARE COMMANDED to search a self storage unit at 2100 W. 18th Street, Unit #337, in Houston, Harris County, Texas, and search for, seize and examine all items including but not limited to, billing records, medication orders, transport receipts, billing receipts, medical records and computerized medical records, for implements and instruments used in the commission of a crime and for property or items constituting evidence of the offense of manslaughter that tend to show that Dr. Conrad Murray committed the said criminal offense.

It is Ordered that any items recovered may be removed from Harris County, where it was seized to any county in the State of California;

HEREIN FAIL NOT, as the peace officer to whom this warrant is delivered, you shall execute it without delay and within three whole days and due return make by faithfully completing the form attached hereto designated for said purpose.

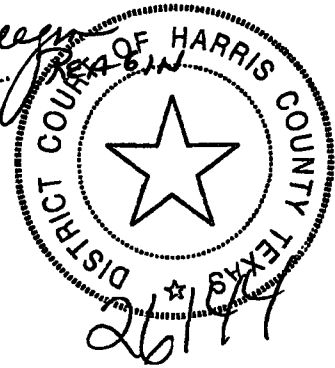
SIGNED, ENTERED and ORDERED this the 22nd day of July, 2009, at 3:05'clock p.m., to attest to which I subscribe my name.

BY *[Signature]*
SERIAL CUSTOMER SERVICE

2009 JUL 23 PM 2:47

[Signature]
Hon. Judge *[Signature]*
District Court
Harris County, Texas

RECORDER'S MEMORANDUM
This instrument is of poor quality
at the time of imaging



STATE OF TEXAS

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S/W RETURN AND INVENTORY

COUNTY OF HARRIS

§

The undersigned affiant, being a peace officer under the laws of the State of Texas and being duly sworn on oath certifies that the foregoing warrant came to hand on the 22nd day of July, 2009, and that it was executed on the 22nd day of July, 2009, by making the search directed therein and pursuant thereto seizing the following evidence:

- Assorted documents from Acres Home Heart and Vascular Institute (30)
- Documents United Health Care (3)
- Documents regarding incomplete charts from Doctors Hospital (2)
- Notices from Internal Revenue Service
- Texas Department of Public Safety controlled substance registration (1)
- Document from Texas Comptroller Public Records (1)
- Suspension Notice Doctors Hospital (1)
- Documents from Twelve Oaks Medical Center (4)
- Amalgamated Account Receivable Notice (1)
- CD's (7)
- Medical Board Certificate expired August 31, 2008 (1)
- Important contact list (1)
- Computer Hard Drive (Samsung) model #HD16055/P serial # SODF51H1524331 (1)
- Computer Hard Drive (Samsung) model #HD16055/P serial # SODF51H1524332 (1)
- Correspondence addressed to Stacey Howe (1)



HPD OFFICER
E. Glen Chance

26144

PET

THE STATE OF TEXAS

§

SEARCH WARRANT AFFIDAVIT

COUNTY OF HARRIS

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AFFIDAVIT FOR SEARCH WARRANT

I, E.G. Chance, a peace officer and employed by the Houston Police Department, do solemnly swear that I have reason to believe and do believe that evidence of the crime of manslaughter is located at a "Self Storage" facility at **2100 W. 18th Street, Unit #337, in Houston, Harris County, Texas**, including but not limited to, billing records, medication orders, transport receipts, billing receipts, medical records and computerized medical records, said items being implements and instruments used in the commission of a crime and property or items constituting evidence of the offense of manslaughter that tend to show that Dr. Conrad Murray committed the said criminal offense. It is believed that said location is under the care, custody and control of Sue Lyon.

MY BELIEF IS BASED UPON THE FOLLOWING FACTS:

Your affiant spoke to Officer Orlando Martinez of the Los Angeles Police Department (whose sworn affidavit is attached and incorporated for all purposes to this affidavit) who told your affiant that on June 25, 2009, an ambulance picked up Michael Jackson from 100 North Carolwood Drive in Los Angeles and took him to UCLA Medical Center where he was pronounced dead. Martinez told your affiant that he later interviewed Dr. Conrad Murray who stated that he was Michael Jackson's personal physician and that he administered several drugs to Jackson in the early morning hours of June 25, 2009, and at approximately eleven in the morning, Jackson stopped breathing. Murray stated that he administered CPR and then accompanied Jackson to UCLA Medical Center. Martinez told your affiant that he spoke to Dr. Sathyavagiswaran, the Chief Coroner for Los Angeles County, California who stated that according to the autopsy performed on Jackson, the Coroner's Office determined that, at the time of his death, toxicology analysis showed that Michael Jackson had lethal levels of PROPOFOL in his blood.

Your affiant examined a Physician's Desk Reference "PDR" and learned that PROPOFOL, also known as "Diprivan" is a short-acting, intravenous, nonbarbiturate sedative agent used for the induction of general anesthesia for adults and children, maintenance of general anesthesia, and sedation in medical contexts, such as intensive care unit sedation for intubated, mechanically ventilated adults, and in procedures such as colonoscopy and endoscopy, as well as in dental surgery.

Officer Martinez told your affiant that Dr. Conrad Murray admitted to him that he had administered 25 mg. of PROPOFOL along with Lidocaine to Jackson intravenously in the early morning hours of June 25, 2009. Martinez stated he also spoke to Drug Enforcement Administration (DEA) Special Agent Spencer Shelton who stated that according to DEA records, Dr. Conrad Murray never ordered, purchased nor received any PROPOFOL. Martinez stated that on June 25,

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2009, he went to the location of 100 North Carolwood Drive in Los Angeles and observed approximately eight bottles of PROPOFOL in the house along with numerous other vials and pills. The bottles of PROPOFOL each had a lot number affixed to the container.

Officer Martinez also gave your affiant his affidavit for a related search warrant in California, incorporated herein, which outlines probable cause for various searches in the State of California as well as giving the various nicknames used by Michael Jackson for procuring various drugs including PROPOFOL. Officer Martinez also told your affiant that Dr. Murray told him that he has been practicing medicine for approximately twenty years as a cardiologist in Las Vegas and in Houston, Texas.

Your affiant spoke to DEA Special Agent Michael Dellacorte who told your affiant that according to DEA records, Dr. Conrad Murray practices medicine out of 6826 West Montgomery Road in Harris County, Texas. Your affiant spoke to HPD Officer Genni Ruzzi who told your affiant that on July 17, 2009, she went in to 6826 West Montgomery Road and stated to the receptionist that she was looking for Dr. Murray's medical files pertaining to her mother. The receptionist said that Dr. Addo-Quaye was handling Dr. Murray's patients and his nurse would call her. Later in the day Officer Ruzzi stated she received a call from a person identifying herself as a nurse who told her that Dr. Murray's patient's files were at the 6826 West Montgomery Road by stating, "all records are in this office".

On July 22, 2009, your affiant executed a search warrant at 6826 West Montgomery Road and met with Regina Hubbard who stated that she was filling in at Dr. Conrad Murray's office for Quisha Middleton, the regular nurse who was on vacation. Hubbard identified Dr. Murray's files for your affiant while stating that some of Dr. Murray's other files are in storage. During the search of the Dr. Murray's office on West Montgomery, your affiant found a rental contract agreement dated April 1, 2009, for a self-storage unit known as W. 18th Self Storage located at 2100 W. 18th Street, unit 337, Houston, Harris County, Texas. Your affiant also located an "automatic credit card debit authorization" showing that Conrad Murray's visa card was used to automatically pay the monthly storage unit bill. On July 22, 2009, your affiant spoke to Charles Lyon who told your affiant that he works at W. 18th Street Self Storage and that the aforementioned billing was current and the unit #337 is currently leased to Conrad Murray. Your affiant was walked to unit #337 and observed it to be a locked, north facing unit with a roll-up metal door facing north on the third floor of 2100 W. 18th Street with the number "337" affixed in red above the door.

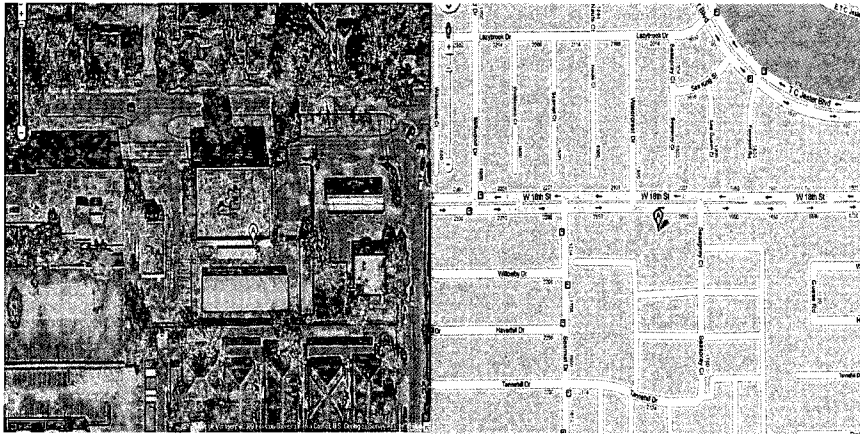
From experience, your affiant knows that billing records, medication orders, transport receipts, billing receipts and medical records are kept in both written and electronic form and that the records may be located in file cabinets and ledgers as well as computer electronic storage devices capable of receiving or storing electrical data, including, without limitation, magnetic tapes and disks, hard drive data storage disks, tape recordings, audio tapes, video tapes, and the hardware necessary to retrieve such data, including, without limitation, central processing units (CPU's), viewing screens, disk or tape drives, printers, monitors and software at any location chosen by the health care provider.

Your affiant personally observed the location at **2100 W. 18th Street, Unit #337**, in, Houston Harris County, Texas and more particularly describes said location to be a three-story, free standing building constructed of a lower red metal section with white stucco and trimmed in red metal.

The building has a large sign facing east that says:
“Self Storage Climate Controlled 713 802-2700”

With a smaller sign reading:
“Self Storage Climate Controlled Office Hours Mon-Fri 9a-6p, Sat 8am-noon 713 802-2700”

and a third large sign at ground level at the entrance saying: “2100”. Said building being located south side of W. 18th Street between Seaspray Court and Seamist Drive as depicted in the below photograph and map.



WHEREFORE, PREMISES CONSIDERED, your affiant respectfully requests that a warrant issue directing any peace officer of Harris County, Texas, to go to **2100 W. 18th Street Unit #337, Houston, Harris County, Texas** and search for, seize, and examine any instruments and implements used in the commission of a crime and all property or items constituting evidence tending to show that a particular person committed the offense of manslaughter.

E. M. Chance
AFFIANT

Sworn to and Subscribed before me on this the 22 day of July, 2009.

BY *J. L. [Signature]*
CRIMINAL CUSTOMER SERVICE
2009 JUL 23 PM 2:48

Shawna L. Reagin
Hon. Judge SHAWNA L. REAGIN
176 District Court
Harris County, Texas

STATE of CALIFORNIA, COUNTY of LOS ANGELES, SEARCH WARRANT and AFFIDAVIT (AFFIDAVIT)

Peace Officer Orlando Martinez, swears under oath that the facts expressed by him/her in the attached and incorporated Affidavit are true and that based thereon he/she has probable cause to believe and does believe that the articles, property, and persons described below are lawfully seizable pursuant to Penal Code Section 1524 et seq., as indicated below, and are now located at the locations set forth below. Wherefore, Affiant requests that this Search Warrant be issued.

[Signature] #31124
(Signature of Affiant)

HOBBS SEALING REQUESTED: YES NO
NIGHT SEARCH REQUESTED: YES NO

(SEARCH WARRANT)

THE PEOPLE OF THE STATE OF CALIFORNIA TO ANY PEACE OFFICER IN THE COUNTY OF LOS ANGELES: proof by affidavit, having been this day made before me by Peace Officer Orlando Martinez that there is probable cause to believe that the property or person described herein may be found at the location(s) set forth herein and that it is lawfully seizable pursuant to Penal Code Section 1524 et seq., as indicated below by "" (s) in that:

- property was stolen or embezzled;
- property or things were used as the means of committing a felony;
- property or things are in the possession of any person with the intent to use them as means of committing a public offense, or in the possession of another to whom he or she may have delivered them for the purpose of concealing them or preventing their being discovered;
- property or things to be seized consist of any item or constitute any evidence that tends to show a felony has been committed, or tends to show that a particular person has committed a felony;
- property or things to be seized consist of evidence that tends to show that sexual exploitation of a child, in violation of Section 311.3, or possession of matter depicting sexual conduct of a person under the age of 18 years, in violation of Section 311.11, has occurred or is occurring;
- there is a warrant to arrest a person;
- a provider of electronic communication service or remote computing service has records or evidence, as specified in Section 1524.3, showing that property was stolen or embezzled constituting a misdemeanor, or that property or things are in the possession of any person with the intent to use them as a means of committing a misdemeanor public offense, or in the possession of another to whom he or she may have delivered them for the purpose of concealing them or preventing their discovery;
- property or things to be seized include an item or any evidence that tends to show a violation of Section 3700.5 of the Labor Code, or tends to show that a particular person has violated Section 3700.5 of the Labor Code;

You are Therefore **COMMANDED** to SEARCH: (premises, vehicles, persons)
See Pages 2-11.

For the **FOLLOWING PROPERTY, THING(S) OR PERSON(S)**:
See Pages 12-15.

AND TO SEIZE IT / THEM IF FOUND and bring it / them forthwith before me, or this court, at the courthouse of this court. This Search Warrant and Affidavit and attached and incorporated Affidavit were sworn to as true and subscribed before me on this _____ day of _____, _____ at _____ A.M. / P.M. Wherefore, I find probable cause for the issuance of his Search Warrant and do issue it.

HOBBS SEALING APPROVED: YES NO
NIGHT SEARCH APPROVED: YES NO

(Signature of Magistrate)
Judge of the Superior Court of California, County of Los Angeles, _____, Dept. _____

SEARCH WARRANT AND AFFIDAVIT**STATEMENT OF PROBABLE CAUSE**

Affiant declares under penalty of perjury that the following facts are true and that there is probable cause to believe, and Affiant does believe, that the designated articles, property, and persons are now in the described locations, including all rooms, buildings, and structures used in connection with the premises and buildings adjoining them, the vehicles and the persons:

Your affiant, Detective Orlando Martinez, Serial No. 31124, has been a sworn police officer for the Los Angeles Police Department for fifteen years and is currently assigned to Robbery-Homicide Division. Your affiant has worked in Homicide for eight years investigating murders committed during the commission of robberies, gang related murders, narcotic related murders, domestic dispute murders, murders for hire and other types of felony murders. Your affiant has been assigned and investigated homicides in the Devonshire and Mission Areas of the Los Angeles Police Department. At Robbery-Homicide Division, your affiant has city-wide homicide investigative responsibilities. In addition, your affiant has served in a Detective capacity since 1998 and attained the rank of Detective in March of 2001. Your affiant's investigative assignments have included violent crimes against persons, including assault with a deadly weapon and attempted murder, auto theft and domestic violence. Prior to that, your affiant worked uniformed field investigation as well as specialized units. These specialized units included the Foothill Area gang suppression unit (CRASH), Narcotics Division Field Enforcement Section (FES), Operations Valley Bureau auto theft task force (CECAT), Devonshire Area bicycle detail and the Devonshire Area Special Problems Unit. Your affiant is a member in good standing of the California Homicide Investigator's Association, and the International Homicide Investigator's Association. He has attended training seminars and has received training materials offered by this and other professional organizations relating to homicide investigations, basic detectives skills, telephone technology, wiretaps, computer crimes, interviewing techniques and other types of criminal investigations. Your affiant currently holds Basic and Intermediate certificates awarded by the California Commission of Police Officers Standards and Training (POST). Your affiant has personally prepared in excess of 50 search warrants and/or court orders. He has assisted in the execution of over 55 search warrants. Your affiant

SEARCH WARRANT AND AFFIDAVIT

1 has received advice, training and information related to the use, handling, prescribing, information
2 systems, and records kept by doctors and pharmacies, and the properties of the medication PROPOFOL
3 (DIPRIVAN) from the Drug Enforcement Administration, California Department of Justice, Bureau of
4 Narcotics Enforcement and the Los Angeles County Medical Examiner's Offices.

5 On June 25, 2009, at approximately 1222 hours, Los Angeles Fire Department (LAFD) Rescue
6 Ambulance (RA) 71 responded to an emergency call at 100 North Carolwood Drive, in the city of Los
7 Angeles. The comments of the call stated a 50 year old male was not breathing, and cardiopulmonary
8 resuscitation (CPR) was in progress. Upon their arrival, they were met by Dr. CONRAD MURRAY, who
9 identified himself as the patient's personal physician. MURRAY informed the paramedics that the
10 patient, later identified as MICHAEL JOSEPH JACKSON, had stopped breathing and MURRAY had
11 continuously administered CPR until the RA's arrival. MURRAY told the LAFD paramedics he had
12 given JACKSON LORAZEPAM (ATIVAN) before he stopped breathing. The paramedics began caring
13 for JACKSON and transported both MURRAY and JACKSON to UCLA Medical Center. Upon arrival,
14 MURRAY met with Dr. R. COOPER, the physician in charge of the emergency department. MURRAY
15 told COOPER he had given JACKSON two separate 2mg doses of LORAZEPAM (ATIVAN), during the
16 course of the night. COOPER and her team attempted to revive JACKSON with negative results.
17 COOPER pronounced JACKSON's death at 1426 hours. MURRAY refused to sign the death certificate,
18 and the Los Angeles Coroner's Office was summoned to the hospital. Los Angeles Police Department
19 (LAPD) Robbery Homicide Division (RHD) Detectives Smith, Serial No. 25301, and your affiant were
20 assigned to assist the Coroner's office conduct a death investigation. Upon arrival at UCLA Medical
21 Center, neither the coroner's investigators nor detectives could locate MURRAY to re-interview him.
22 Repeated attempts at contacting and locating MURRAY were unsuccessful.

23 Coroner's investigators and RHD Detectives responded to 100 North Carolwood Drive to further
24 their investigation. A search of the residence, specifically JACKSON's bedside, revealed numerous
25 bottles of medications prescribed by DR. MURRAY to JACKSON, including DIAZEPAM (VALIUM),
26 TAMSULOSIN (FLOMAX), LORAZEPAM (ATIVAN) and TEMAZEPAM (RESTORIL). Prescription

SEARCH WARRANT AND AFFIDAVIT

1 pill bottles of CLONAZEPAM (KLONOPIN) and TRAZODONE (DESYRL), prescribed to JACKSON
2 by DR. METZGER and a prescription pill bottle of TIZANIDINE (ZANAFLEX), prescribed to
3 JACKSON by DR. KLEIN were also found at JACKSON's bedside. According to the Physician's Desk
4 Reference (PDR), most of these drugs have an indicated or off label use in the treatment of insomnia.

5 On June 27, 2009, Detective Smith and your affiant met with MURRAY and his attorneys for an
6 interview. MURRAY stated that he was JACKSON's personal physician. MURRAY had been treating
7 JACKSON for insomnia for approximately the past six weeks. He had been giving JACKSON 50 mg of
8 PROPOFOL (DIPRIVAN), diluted with LIDOCAINE (XYLOCAINE), every night via intravenous drip
9 (IV) to assist JACKSON in sleeping.

10 MURRAY felt that JACKSON may have been forming an addiction to PROPOFOL (DIPRIVAN),
11 and tried to wean JACKSON off of the drug. On June 22, 2009, two days prior to his death, he gave
12 JACKSON 25 mg PROPOFOL (DIPRIVAN), along with LORAZEPAM (ATIVAN), and MIDAZOLAM
13 (VERSED). JACKSON was able to sleep with this mixture of medications. On June 23, 2009, he gave
14 JACKSON LORAZEPAM (ATIVAN) and MIDAZOLAM (VERSED) only, withholding any
15 PROPOFOL (DIPRIVAN), and JACKSON was able to sleep. On June 25, 2009, at approximately 0130
16 hours, he again tried to induce sleep without the PROPOFOL (DIPRIVAN) and gave JACKSON a 10mg
17 tab of VALIUM. JACKSON was unable to sleep and at approximately 0200 hours, MURRAY injected
18 JACKSON with 2mg LORAZEPAM (ATIVAN) after dilution, pushed slowly into his IV. JACKSON
19 was still unable to sleep. At approximately 0300 hours, MURRAY then administered 2mg
20 MIDAZOLAM (VERSED) to JACKSON after dilution, also pushed slowly into his IV. JACKSON
21 remained awake and at approximately 0500 hours, MURRAY administered another 2mg LORAZEPAM
22 (ATIVAN), after dilution, pushed slowly into his IV. JACKSON remained awake and at approximately
23 0730 hours, MURRAY administered another 2mg of MIDAZOLAM (VERSED), after dilution, into his
24 IV. MURRAY stated he was continuously at JACKSON's bedside and was monitoring him with a pulse
25 oximeter. According to DR. MURRAY, the pulse oximeter was connected to JACKSON's finger and
26 measured his pulse and oxygen statistics.

SEARCH WARRANT AND AFFIDAVIT

1 JACKSON remained awake and at approximately 1040 hours, MURRAY finally administered 25mg
2 of PROPOFOL (DIPRIVAN), diluted with LIDOCAINE (XYLOCAINE), via IV drip to keep JACKSON
3 sedated, after repeated demands/requests from JACKSON. JACKSON finally went to sleep and
4 MURRAY stated that he remained monitoring him. After approximately 10 minutes, MURRAY stated he
5 left JACKSON's side to go to the restroom and relieve himself. MURRAY stated he was out of the room
6 for about 2 minutes maximum. Upon his return, MURRAY noticed that JACKSON was no longer
7 breathing. MURRAY began single man cardiopulmonary resuscitation (CPR) at once. MURRAY also
8 administered .2mg of FLUMANEZIL (ANEXATE) to JACKSON and called JACKSON's personal
9 assistant, MICHAEL AMIR WILLIAMS, with his cellular telephone for help. MURRAY reached
10 WILLIAMS and requested that he send security upstairs for an emergency. MURRAY continued CPR
11 and after a few minutes without the security detail's response, he left JACKSON and ran out to the hall
12 and downstairs to the kitchen. MURRAY asked the chef to send up PRINCE JACKSON, the eldest son,
13 and returned to continue CPR. P. JACKSON responded upstairs and summoned the security detail.
14 ALBERTO ALVAREZ went to the aid of MURRAY and called 911 via his cellular telephone.
15 MURRAY waited for the ambulance's arrival while conducting CPR, assumed care from the paramedics
16 and accompanied them to the hospital. MURRAY observed the treatment to JACKSON at UCLA
17 Medical Center and assisted in notifying the family after JACKSON's death was pronounced. MURRAY
18 left the hospital after a while because he did not know that he was needed. MURRAY added that his
19 doctor's bag was still at the residence and directed your affiant to its exact location inside of JACKSON's
20 residence.

21 MURRAY told your affiant that he was not the first doctor to introduce JACKSON to PROPOFOL
22 (DIPRIVAN). MURRAY stated that JACKSON was very familiar with the drug and referred to it as his
23 "milk." PROPOFOL (DIPRIVAN) has a milk appearance. JACKSON would also refer to the
24 LIDOCAINE (XYLOCAINE) as "anti-burn." According to the Physician's Desk Reference (PDR),
25 PROPOFOL (DIPRIVAN) creates a burning sensation at the injection site and LIDOCAINE
26 (XYLOCAINE) can be used to relieve the discomfort. MURRAY stated that he had repeatedly asked

SEARCH WARRANT AND AFFIDAVIT

1 JACKSON what other physicians were treating him and what was being prescribed to him, but JACKSON
2 would not tell him. JACKSON did mention that Doctor ARNOLD KLEIN and Doctor ALAN
3 METZGER had given him medicine and that it was not working. JACKSON told MURRAY about two
4 unknown doctors in Germany whom gave him the PROPOFOL (DIPRIVAN). At one time MURRAY
5 noticed and inquired about injection marks on JACKSON's hands and feet. JACKSON stated that Doctor
6 CHERILYN LEE had been giving him a "cocktail" to help him. MURRAY believed the cocktail to be a
7 PROPOFOL (DIPRIVAN) mix. MURRAY also recounted how sometime between March and April of
8 this year, JACKSON called him in Las Vegas and asked him to call Doctor DAVID ADAMS and arrange
9 for Doctor ADAMS to give JACKSON PROPOFOL (DIPRIVAN). MURRAY did as JACKSON asked
10 and arranged for Doctor ADAMS to treat JACKSON. MURRAY was present at a third party
11 cosmetologist's office where Doctor ADAMS sedated JACKSON with PROPOFOL (DIPRIVAN).
12 MURRAY stated this was around the time that JACKSON requested him to be his personal physician on
13 the European tour.

14 Your affiant obtained MURRAY's cellular telephone records for the early morning hours of June 25,
15 2009. In his statement, MURRAY estimated the time that he noticed JACKSON was not breathing to be
16 at approximately 1100 hours. MURRAY's cellular telephone records show MURRAY on the telephone,
17 with three separate callers for approximately 47 minutes starting at 1118 hours, until 1205 hours.
18 MURRAY did not mention this to the interviewing detectives.

19 Your affiant authored a search warrant for the doctor's bag and supplies and on June 29, 2009, the
20 honorable Judge C. OLMEDO issued the search warrant for JACKSON's residence at 100 N. Carolwood
21 Drive. Investigators served the warrant and recovered multiple bottles/vials of LIDOCAINE
22 (XYLOCAINE), several bottles/vials of PROPOFOL (DIPRIVAN), bottles/vials of LORAZEPAM
23 (ATIVAN), bottles/vials of MIDAZOLAM (VERSED), and bottles/vials of FLUMAZENIL
24 (ANEXATE). None of these items were labeled as prescribed to any patient.

25 Detectives contacted the Drug Enforcement Administration (DEA) to assist in tracking the
26 medications found at JACKSON's residence. DEA agents informed your affiant PROPOFOL is difficult

SEARCH WARRANT AND AFFIDAVIT

1 to track because the lot numbers are created in large amounts and shipped from manufacturer to
2 distributor, distributor to surgery center, hospital, etc. The hospital or surgery center records would be
3 needed to examine how many units were received and how they are accounted for. DEA advised that all
4 doctors or nurse practitioners who prescribe medicines in California are required to obtain a "DEA"
5 number under which they are identified during their drug orders. DEA also checked all available
6 computer systems to determine whether DR. MURRAY had prescribed PROPOFOL (DIPRIVAN) to
7 JACKSON and how much of the drug he had purchased and/or ordered. DEA was unable to find a record
8 of DR. MURRAY purchasing, ordered or obtaining any PROPOFOL (DIPRIVAN) under his medical
9 license or DEA number.

10 The attorney for the JACKSON family members, Blair Berk, contacted your affiant and gave him the
11 name of Dr. RANDY ROSEN. JACKSON's relatives stated that JACKSON had told them ROSEN had
12 been treating him. JACKSON's family and news reports have documented that JACKSON has used the
13 aliases of JACK LONDON, MIKE JACKSON, MICK JACKSON, FRANK TYSON, and MIC
14 JACKSON. They also mention that JACKSON would have prescriptions written in the name of members
15 of his entourage. Through interviews of JACKSON's staff, employees and family, investigators
16 determined that at the time of his death, JACKSON's closest circle of associates included MICHAEL
17 AMIR WILLIAMS MUHAMMAD, JIMMY NICHOLAS, BLANCA NICHOLAS, ROSELYN
18 MUHAMMAD, PRINCE JACKSON, FAHEEM MUHAMMAD, AND KAI CHASE. On July 17, 2009,
19 detectives received a call from an unknown female caller who stated that she had information on the
20 aliases used by JACKSON when he would visit DR. KLEIN. She provided the names, OMAR ARNOLD,
21 FERNAND DIAZ, PETER MADONIE, and JOSEPHINE BAKER as names JACKSON would use when
22 seeing DR. KLEIN. Detectives recovered a prescription at JACKSON's residence in the name of OMAR
23 ARNOLD prescribed by DR. KLEIN.

24 Los Angeles County Coroner's Investigator Fleak subpoenaed medical records from DR. CONRAD
25 MURRAY, DR. ARNOLD KLEIN, DR. ALLAN METZGER, DR. DAVID ADAMS, DR. MARK
26 TADRISSE, whom DR. ADAMS stated stored his medical records, DR. DAVID SLAVIT, who completed

SEARCH WARRANT AND AFFIDAVIT

1 an independent medical examination of JACKSON for Anshuntz Entertainment Group (AEG), DR.
2 RANDY ROSEN and nurse practitioner CHERILYN LEE.

3 Some doctors provided copies to the Coroner's office. DR. MURRAY's office provided records
4 dating back to January 11, 2006, stating JACKSON used the alias of OMAR ARNOLD, PAUL
5 FARANCE and PAUL FARNCE. DR. KLEIN's office only provided records dating back to March 2009,
6 stating JACKSON used the alias OMAR ARNOLD, and indicated, "*In furtherance of our telephonic*
7 *discussions, we are submitting documents pertinent to Dr. Klein's recent treatment of Mr. Jackson.*" DR.
8 TADRISSI provided medical records where JACKSON used the alias BRYAN SINGLETON and MIKE
9 JACKSON. DR. TADRISSI's records also mention that he used DR. ADAMS per JACKSON's request
10 and that JACKSON was given conscious sedation per his own request. At the time of this warrant, DR.
11 LEE and Dr. METZGER'S medical records have not been received by the Los Angeles County Coroner's
12 Office.

13 Detectives Smith and Myers interviewed CHERILYN LEE. LEE first met JACKSON in January
14 2009 when she was asked to come and look at JACKSON's three children, Prince, Paris and Blanket, who
15 were suffering from colds. She conducted a routine examination on all 3 children.

16 LEE stated that JACKSON was complaining of a low energy level. She returned the next day and
17 completed a full blood screening. Two days later the blood came back normal-low blood sugar. LEE
18 stated that she put JACKSON on a good food diet with a protein drink.

19 On Easter Sunday, JACKSON complained to LEE that he had problems sleeping. JACKSON
20 mentioned the drug PROPOFOL (DIPRIVAN). LEE stated that she was not familiar with the drug.
21 JACKSON told her that his Doctor told him that it was safe. He did not mention what Doctor told him
22 this. LEE researched the drug and learned that PROPOFOL (DIPRIVAN) was commonly used by
23 anesthesiologists during surgery. She stated that the drug was not good for him and that he should not
24 take it. LEE stated that JACKSON asked her if she could get PROPOFOL (DIPRIVAN) or if she knew
25 someone that could. He stated he would pay her or another Doctor whatever they wanted for it. LEE
26

SEARCH WARRANT AND AFFIDAVIT

1 stated that she could not and would not get it for him. LEE stated that this was the last time she ever saw
2 JACKSON.

3 On Father's Day of this year, LEE stated that she received a call from FAHEEM MUHAMMAD,
4 JACKSON's personal body guard, stating that JACKSON was sick. LEE stated that she heard JACKSON
5 in the background saying, "one side of my body is hot and the other side is cold." When asked what this
6 meant to her, she stated that something had been introduced into his Central Nervous System. LEE stated
7 she told Faheem to take JACKSON to the hospital.

8 Detectives interviewed GRACE RWARAMBA, JACKSON's children's nanny. OWANDA stated
9 that JACKSON was currently being treated by DR. KLEIN and the last physician to treat JACKSON was
10 DR. LARRY KOPLIN.

11 The Los Angeles Chief Medical Examiner-Coroner, Dr. SATHYAVAGISWARAN, indicated that he
12 had reviewed the preliminary toxicology results and his preliminary assessment of JACKSON's cause of
13 death was due to lethal levels of PROPOFOL (DIPRIVAN).

14 Investigators interviewed the responding paramedics and UCLA Medical staff regarding the
15 statements made by DR. MURRAY on the 25th of June at the residence and hospital. UCLA doctors and
16 the LAFD paramedics stated that DR. MURRAY had only disclosed that he had given the medication
17 LORAZEPAM (ATIVAN) to JACKSON prior to his medical emergency. DR. MURRAY also admitted
18 to giving JACKSON the medication FLUMAZENIL (ANEXATE), to counteract the LORAZEPAM
19 (ATIVAN), to UCLA doctors.

20 During the course of the investigation it was revealed that DR. MURRAY is a cardiologist, DR.
21 KLEIN is a dermatologist, DR. METZGER is a general practitioner, DR. ADAMS is an anesthesiologist,
22 DR. ROSEN is an anesthesiologist, DR. KOPLIN is a plastic surgeon and LEE is a nurse practitioner.
23 Nurse Practitioners have the ability to prescribe medications and obtain controlled substances.

24 Your affiant is respectfully requesting that the Court issue search warrants for all of JACKSON's
25 prior/current physicians' medical records regarding his treatment. Detectives are tasked with investigating
26 the death of JACKSON and believe that the miscellaneous prescriptions, from multiple doctors, in

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1 violation of California Business and Professions (CBP) Code section 725, Excessive Prescribing, CBP
2 Code section 2241(d), Prescribing to Addicts, CBP Code section 725, Excess Treatment or Prescribing,
3 CBP Code section 2234, Unprofessional Conduct and CBP Code section 2241, Prescribing To or Treating
4 an Addict, could have contributed to his death. Detectives also are investigating as to how DR.

5 MURRAY obtained and came into possession of the controlled substance PROPOFOL, and whether he
6 was assisted by any aiders or abettors. Investigators believe that due to the high profile nature of this case,
7 a subpoena of the medical records would prove insufficient guarantee of the disclosure of all pertinent
8 medical records. For instance, DR. KLEIN's office has already ignored the Coroner's office subpoena for
9 all medical records. Detectives need additional documents including but not limited to billing records,
10 medication orders, transport receipts, delivery receipts, etc. in order to track the PROPOFOL found at
11 JACKSON's residence. Inasmuch that it cannot be determined whether the cause of death is due to the
12 actions of a single night and/or a single doctor, or the grossly negligent treatment of several doctors over
13 an extended period of time, your affiant believes these medical records are germane to the ongoing death
14 investigation. DR. MURRAY's and DR. ADAMS' offices and residences are out of state and not covered
15 by the jurisdiction of this court.

16 Per Business and Professions Code Section 2266, physicians are required to maintain adequate and
17 accurate records relating to the provision of services to their patients. Doctors commonly keep medical
18 records in their office and in their homes. Records regarding the care provided to patients are often kept
19 in medical charts or on a computer or are stored in both places. While a doctor is currently seeing a
20 patient, the doctor will keep records on the patient from the time of the first appointment until the present,
21 a time period which could cover many years. Per Health and Safety Code Section 123145, Hospitals must
22 keep medical records for seven years after discharging a patient. Though there is no specific statute
23 governing the length of time a physician must keep records after a patient is discharged from their
24 practice, doctors commonly keep their records for seven years, and some doctors will keep patient records
25 indefinitely. When transporting records from their home or office, doctors frequently use their personal
26 vehicle. I have reasonable cause to believe there is evidence that DR. MURRAY, DR. KLEIN, DR.

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1 METZGER, DR. ADAMS, DR. ROSEN, DR. KOPLIN and nurse practitioner LEE keep JACKSON's
2 records both in their home and office or in their personal vehicles.

3 Medical records typically have information relating to the conditions that a doctor is treating the
4 patient for, medical histories, physical exam information, and information about medications the patient is
5 receiving. Other records that doctors keep which reveal details of treatments and prescriptions to patients
6 are sign-in sheets and appointment calendars which show the date that a patient was seen at a doctor's
7 office, and billing records, which shows the dates and types of procedures billed for. Letters, notes, and
8 pictures of patients are frequently kept by doctors as well. These notes, letters or pictures may reveal
9 dates of appointments, reasons for treatments or show the physical condition a patient was in at the time of
10 treatment. Personal letters, pictures, correspondence, including e-mails, that the listed doctors may have
11 had with their patients, would be important in determining their level of familiarity with JACKSON,
12 especially their knowledge of drug seeking behavior.

13 DR. KLEIN has a medical office at 435 North Roxbury Drive, suite number 204, in the city of
14 Beverly Hills, which is listed as his address of record with the Medical Board of California and a home
15 address of 553 South Windsor Boulevard, in the city of Los Angeles.

16 DR. METZGER, has a medical office at 8737 Beverly Boulevard, suite number 203, in the city of
17 Beverly Hills, which is listed as his address of record with the Medical Board of California and a home
18 address of 3649 Crownridge Drive, in the city of Sherman Oaks, California.

19 DR. ROSEN has a medical office at 120 South Spaulding Drive, suite number 301, in the city of
20 Beverly Hills, and a home address of 24 Oakmont Drive, in the city of Los Angeles, California.

21 LEE has a medical office at 323 South Prairie Avenue, suite number 434, in the city of Inglewood
22 and a home address of 8306 Wilshire Boulevard, suite number 451, in the city of Beverly Hills,
23 California.

24 DR. KOPLIN has a medical office at 465 North Roxbury Drive, suite number 800, in the city of
25 Beverly Hills, California and a home address of 341 South McCarty Drive, in the city of Beverly Hills,
26 California.

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1 DR. MURRAY has medical offices at 2110 E. Flamingo Road, suite number 301, in the city of Las
2 Vegas, Nevada and 6826 West Montgomery, in the city of Houston, Texas, and a home address of 2426
3 Grassy Spring Place, in the city of Las Vegas, Nevada. These addresses are out of the jurisdiction of this
4 court.

5 DR. ADAMS, indicated to the Los Angeles Coroner's Office that he stores his medical records at the
6 offices of DR. MARK TADRISSO, 7720 West Sahara Avenue, suite number 107, in the city of Las
7 Vegas, Nevada and has a home address of 8830 Big Bluff Avenue, in the city of Las Vegas, Nevada.
8 These addresses are out of the jurisdiction of this court.

9 Your affiant verified all of the above mentioned doctor's offices and residence addresses via
10 Department, Department of Motor Vehicles, California Medical Board, DEA and Bureau of Narcotics
11 Enforcement resources.

12 Based on the aforementioned information and investigation, your affiant believes ground for issuance
13 of a search warrant exists as set forth in Penal Code section 1524 because the items sought constitute
14 evidence which tend to show that a felony has been committed, and that a particular person has committed
15 a felony. Your affiant hereby prays that a search warrant be issued for the seizure of said property or any
16 part thereof, from said locations at any time of the day, good cause being shown, therefore, and the same
17 be brought before this magistrate or retained subject to the order of the court.

18 Your affiant requests the items seized pursuant to this search warrant be permitted for use by the
19 Medical Board of California, Drug Enforcement Administration and the California Department of Justice,
20 Bureau of Narcotics Enforcement in any possible administrative action taken to modify the subjects'
21 license status.

22 Your affiant is alerting the court to the possibility that locations 1- 10 could be in possession of
23 material that may be subject to limited privileges relating to the Doctor/Patient privilege. This privilege is
24 not absolute however. For example, documents might relate to the Doctor/Patient relationship but may
25 not be privilege because they further the investigation of the aforementioned crimes. Your affiant,
26 therefore, also requests an order appointing a Special Master(s) to accompany searching officers during

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1 the service of this warrant, pursuant to Penal Code Section 1524. **Specifically, however, it is your**
2 **affiant's position that the cost of any special master shall be incurred by the Court, consistent with**
3 ***People v. Laff*, (2001) 25 Cal. 4th. 703, 737-744.**

4 The special master shall seize any material that relates to a privilege, but is otherwise approved for
5 seizure by this warrant. The material shall be placed in a container and sealed, to be held and inspected by
6 the special master, pending further order of the special master and/or the court issuing this search warrant.
7 If the data is in electronic form, the special master shall issue specific instructions for the search of the
8 storage medium, at the special master's discretion.

9 Your affiant recognizes that Locations 1-5 are functioning companies with several employees, and
10 that a seizure of the businesses' computers and computer networks may have the unintended and
11 undesired effect of limiting the companies' ability to provide service to its legitimate customers. In
12 response to these concerns, the investigators who execute the search will take an incremental approach to
13 minimize the inconvenience to their legitimate customers and to minimize the need to seize equipment
14 and data. This incremental approach, which will be explained to all of the investigators on the search
15 team before the search is executed, will proceed as follows:

16 A. Upon securing the premises, the law enforcement personnel executing the search warrant will, to the
17 extent possible without requiring the use of special training in searching and seizing digital data, seek
18 to determine if any digital device contains data falling within the scope of the items to be seized in the
19 warrant. If they can make this determination without jeopardizing the integrity of the digital data and
20 a digital device contains data falling within the scope of the items to be seized in the warrant, that
21 digital device will be seized. If they cannot make this determination, or they believe they cannot make
22 this determination, without jeopardizing the integrity of the digital data, law enforcement personnel
23 trained in searching and seizing digital data (the "computer personnel") will be consulted (either on-
24 site or off-site) to determine whether the digital device can be searched on-site in a reasonable amount
25 of time and without jeopardizing the ability to preserve data contained on the digital device. The
26 computer personnel will also make a forensically sound image of the data contained on the digital

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1 device (a "data image") during the execution of this search and shall seize the data image rather than
2 the digital device itself.

3 B. If the digital device can be searched on-site in a reasonable amount of time and without jeopardizing
4 the ability to preserve data, it will be searched on-site and seized only if the search reveals it to contain
5 any data that falls within the list of items to be seized set forth herein. The computer personnel will
6 also make a forensically sound image of the data contained on the digital device (a "data image")
7 during the execution of this search and shall seize the data image rather than the digital device itself.

8 C. If the digital device cannot be searched on-site in a reasonable amount of time and without
9 jeopardizing the ability to preserve data, then the computer personnel will determine whether it is
10 practical to create a forensically sound image of the data contained on the digital device during the
11 execution of the search in a reasonable amount of time without jeopardizing the ability to preserve that
12 data. If it is practical, and the digital device cannot be searched on site in a reasonable amount of time
13 and without jeopardizing the ability to preserve data, the computer personnel will make a forensically
14 sound image of the data contained on the digital device (a "data image") during the execution of this
15 search and shall seize the data image rather than the digital device itself.

16 D. If the computer personnel determine it is not practical to perform an on-site search of the digital device
17 or make an on-site data image within a reasonable period of time and without jeopardizing the ability
18 to preserve data, then the digital device will be seized and transported to an appropriate law
19 enforcement laboratory for review. The digital devices will be reviewed by appropriately trained
20 personnel in order to extract and seize any data that falls within the list of items to be seized set forth
21 herein.

22 E. In searching the digital device or data image, the computer personnel may examine all of the data
23 contained in the digital device or data image to view their precise contents and determine whether the
24 data falls within the items to be seized as set forth herein. In addition, the computer personnel may
25 search for and attempt to recover "deleted," "hidden" or encrypted data to determine whether the data
26 falls within the list of items to be seized as set forth herein.

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1 F. If the computer personnel seize the digital device and make a data image, the computer personnel will
2 initially search the digital device or data image within a reasonable amount of time not to exceed 60
3 days from the date of execution of the warrant. If, after conducting such an initial search, the case
4 agents determine that the digital device or data image contains any data falling within the list of items
5 to be seized pursuant to this warrant, the government will either (1) return the digital device, keeping a
6 data image for further analysis, provided that, prior to such return, the owner and user(s) of the digital
7 device stipulate individually and in writing to the authenticity and accuracy of the data image or (2)
8 seek an order of the Court allowing the government to retain the original digital device for further
9 analysis. If the digital device or data image does not contain any data falling within the list of the
10 items to be seized pursuant to this warrant, the government will return the digital device or delete the
11 data image. If the government needs additional time to determine whether the digital device or data
12 image contains any data falling within the list of items to be seized pursuant to this warrant, it may
13 seek an extension of the time period from the Court within the original sixty day period from the date
14 of execution of the warrant.

15 In order to search for data that is capable of being read or interpreted by a digital device, law
16 enforcement personnel will need to seize and search the following items, subject to the procedures set
17 forth above:

- 18 i. Any digital device capable of being used to commit, further or store evidence of the offense listed
19 above;
- 20 ii. Any equipment used to facilitate the transmission, creation, display, encoding or storage of digital
21 data, including word processing equipment, modems, docking stations, monitors, printers, plotters,
22 encryption devices and optical scanners;
- 23 iii. Any magnetic, electronic or optical storage device capable of storing data, such as floppy disks, hard
24 disks, tapes, CD ROMs, CD-R, CD-RWs, DVDs, optical disks, printer or memory buffers, smart
25 cards, PC cards, memory calculators, electronic dialers, electronic notebooks, cellular telephones and
26 personal digital assistants;

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- 1 iv. Any documentation, operating logs and reference manuals regarding the operation of the digital device
2 or software used in the digital device;
- 3 v. Any applications, utility programs, compilers, interpreters and other software used to facilitate direct
4 or indirect communication with the digital device;
- 5 vi. Any physical keys, encryption devices, dongles and similar physical items that are necessary to gain
6 access to the digital device or data stored on the digital device; and
- 7 vii. Any passwords, password files, test keys, encryption codes or other information necessary to access
8 the digital device or data stored on the digital device.

9 Based upon your affiant's training and experience and information related to me by agents and others
10 involved in the forensic examination of digital devices, I know that data in digital form can be stored on a
11 variety of systems and storage devices including hard disk drives, floppy disks, compact disks, magnetic
12 tapes and memory chips. I also know that during the search of the premises it is not always possible to
13 search digital devices for data for a number of reasons, including the following:

- 14 a. Searching digital devices can be a highly technical process that requires specific expertise and
15 specialized equipment. There are so many types of digital devices and software in use today
16 that it is impossible to bring to the search site all of the necessary technical manuals and
17 specialized equipment necessary to conduct a thorough search. In addition, it may also be
18 necessary to consult with specially trained personnel who have specific expertise in the type of
19 digital device, software application or operating system that is being searched.
- 20 b. Searching digital devices can require the use of precise, scientific procedures that are designed
21 to maintain the integrity of the evidence and to recover "hidden," erased, compressed,
22 encrypted or password-protected data. Digital devices may contain "booby traps" that destroy
23 or alter data if certain procedures are not scrupulously followed. Since digital data is
24 particularly vulnerable to inadvertent or intentional modification or destruction, a controlled
25 environment, such as a law enforcement laboratory, is essential to conducting a complete and
26 accurate analysis of the digital devices from which the data will be extracted.

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- 1 c. The volume of data stored on many digital devices will typically be so large that it will be
2 highly impractical to search for data during the execution of the physical search of the
3 premises. A single megabyte of storage space is the equivalent of 500 double-spaced pages of
4 text. A single gigabyte of storage space, or 1,000 megabytes, is the equivalent of 500,000
5 double-spaced pages of text. Storage devices capable of storing 500 gigabytes (GB) of data are
6 now commonplace in desktop computers. Consequently, each non-networked, desktop
7 computer found during a search can easily contain the equivalent of 240 million pages of data,
8 that, if printed out, would completely fill three 35' x 35' x 10' rooms to the ceiling. Further, a
9 500 GB drive could contain as many as approximately 450 full run movies or 450,000 songs.
- 10 d. Digital device users can attempt to conceal data within digital devices through a number of
11 methods, including the use of innocuous or misleading filenames and extensions. For example,
12 files with the extension “.jpg” often are image files; however, a user can easily change the
13 extension to “.txt” to conceal the image and make it appear that the file contains text. Digital
14 device users can also attempt to conceal data by using encryption, which means that a
15 password or device, such as a “dongle” or “keycard,” is necessary to decrypt the data into
16 readable form. In addition, digital device users can conceal data within another seemingly
17 unrelated and innocuous file in a process called “steganography.” For example, by using
18 steganography a digital device user can conceal text in an image file that cannot be viewed
19 when the image file is opened. Therefore, a substantial amount of time is necessary to extract
20 and sort through data that is concealed or encrypted to determine whether it is evidence,
21 contraband or instrumentalities of a crime.

22 The Drug Enforcement Administration, Diversion Group, (hereafter DEA) is a federal agency
23 comprised of federal agents. Some members of the agency are not considered “peace officers” for the
24 purposes of serving a state-issued warrant in California. As provided for under California Penal Code
25 section 1530, your affiant will need the assistance of the DEA to serve this warrant. Your affiant is
26

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1 requesting that the court authorize members of the DEA to accompany those peace officers executing this
2 warrant for the purpose of assisting in the service of this warrant.

3 Pursuant to California Evidence Code Sections 1040 to 1042, and to protect the identity of any
4 official information, pursuant to the Supreme court decision in *People v. Hobbs*, (1994) 7 Cal. 4th 948,
5 your affiant also respectfully requests that this search warrant, affidavit and all documents relating to this
6 search warrant be sealed to maintain the integrity of the investigation. Your affiant also requests that they
7 remain sealed and in the custody of the clerk of the court until order of this court or other competent court
8 having jurisdiction over this matter. Disclosure of these documents would compromise the ongoing
9 investigation into the death of JACKSON and would jeopardize the integrity of the investigation and give
10 the targets opportunity to hide, destroy and/or alter other material evidence.