





1 false statements to a medical technician engaged in life saving activity.

2 10. The truth was that he had administered not only Lorazepam (Ativan) to Michael Jackson, but  
3 also a lethal dose of Propofol (Diprivan), a fast-acting hypnotic drug used for general anesthesia and  
4 surgical procedures in a hospital setting. Altogether, defendant had administered a total of nine (9)  
5 different drugs to Michael Jackson: Propofol (Diprivan), Lidocaine (Xylocaine), Diazepam (Valium),  
6 Nordiazepam (Calmday), Lorazepam (Ativan), Midazolam (Versed), Ephedrine (Ephedra), Flumazenil  
7 (Romazicon), and Flomax (Tamsulosin Hydrochloride). Defendant's statements to the paramedics, who  
8 were relying upon him to attempt to save Michael Jackson's life, demonstrated a reckless disregard and  
9 endangerment of Michael Jackson's life which impaired their rescue efforts.

10 **3. The Paramedics' rescue efforts.**

11 11. At 12:29 p.m., the paramedics began their resuscitation. Michael Jackson had no pulse, blood  
12 pressure, respirations, or oxygen saturation reading, and his heart was in PEA (pulseless electrical activity)  
13 with no contractions. Michael Jackson's condition remained unchanged throughout the resuscitation  
14 except that at 12:34 p.m., the PEA had ceased and his heart was in asystole (no heart beat).

15 12. The paramedics administered several cardiac stimulating drugs without effect. At 12:50 p.m.,  
16 the paramedics contacted UCLA Medical Center, and described the absence of any life signs from Michael  
17 Jackson. Dr. Richelle Cooper, who was head of the UCLA Emergency Department, told the paramedics to  
18 consider terminating their resuscitation efforts.

19 13. Defendant Murray stated to the Paramedics that he would be responsible for further  
20 resuscitation efforts. The Paramedics then placed Michael Jackson in the ambulance at 13:07 hours or 1:07  
21 p.m., and the Paramedics again attempted resuscitation without success. The ambulance arrived at UCLA  
22 Medical Center at 13:13 or 1:13 p.m. Throughout the entire resuscitation effort, defendant concealed the  
23 drugs he had administered to Michael Jackson in violation of Penal Code section 148(a)(1).

24 **B. Defendant's Misrepresentations to and Concealment from UCLA Doctors.**

25 **1. Defendant's false statements to Dr. Cooper.**

26 14. On June 25, 2009, at 13:15 hours or 1:15 p.m., the paramedics brought Michael Jackson into  
27 the UCLA emergency room. Defendant Murray was present, and in his presence Michael Jackson was  
28 identified to UCLA personnel under the false name Soule Shaun. The attendants noted that while there was

1 a cardiologist at the scene, he provided no medical history. Such conduct was an extreme violation of the  
2 standard of care.

3 15. Michael Jackson had no pulse, blood pressure, spontaneous respirations, or heart beat. He was  
4 given several drugs including dopamine, epinephrine, atropine, vasopressin, and sodium bicarbonate, and  
5 he his breathing was assisted by bagging with oxygen. He was not alert, his pupils were fixed and dilated,  
6 and he had no response to pain.

7 16. Dr. Richelle Cooper, the head of the UCLA Medical Center Emergency Department, spoke to  
8 defendant. Defendant told Dr. Cooper he had felt a pulse for Michael Jackson when he had discovered him  
9 not breathing. He stated he had only administered Lorazepam (Ativan), Diazepam (Valium), and Flomax.

10 17. Defendant said nothing about Propofol and nothing about Flumazenil (Romazicon), or the other  
11 drugs found in Michael Jackson's body at his autopsy. Defendant's conduct was an extreme departure  
12 from the standard of care. Defendant demonstrated a reckless disregard for Michael Jackson's life by  
13 concealing the Propofol and the "polypharmacy" Michael Jackson had received for months.

14 18. Dr. Richelle Cooper's written report dated June 26, 2009, stated:

15 "The initial limited history was provided by Dr. Murray, during the resuscitation of the  
16 patient, and is noted in brief on the medical record. By report of Dr. Murray the patient had been  
17 working long hours but **had not been ill**. There was no reported trauma or seizure activity  
18 preceding the arrest. **The only reported medications reported for the patient were valium and**  
19 **flomax. There is no history of drug use by the patient as reported by Dr. Murray.** The events  
20 surrounding the arrest, reported by Dr. Murray was that he had placed an I.V. and given the patient  
21 2 mg of lorazepam IV. Sometime earlier in the day Dr. Murray then administered a second 2mg  
22 I.V. dose of lorazepam and reports witnessing the patient arrest." (Emphasis added).

23 19. Defendant's statements to Dr. Cooper were outrageous. Defendant's statements were false and  
24 misled emergency personnel. Michael Jackson had also been ill. The statements demonstrated a high  
25 degree of recklessness that shocks the conscience and were an extreme departure from the standard of care.

26 **2. Defendant's statements to Dr. Cooper contradicted his police statement**

27 20. Defendant told police on June 27, 2009, two (2) days later, he was afraid Michael Jackson was  
28 addicted to Propofol. He had a long history of addiction, and defendant was trying to wean him off the

1 drugs. Yet, he told Dr. Cooper two (2) days earlier that Michael Jackson had no drug use history.

2 21. Defendant's history of prescriptions to Michael Jackson went back to December, 2008, and  
3 likely earlier. When police searched Michael Jackson's home following his death, they seized dozens of  
4 drug vials showing Michael Jackson's exorbitant drug use. Some of the vials showed that on December 22,  
5 2008, defendant prescribed Temazepam (Restoril) to Michael Jackson. On April 28, 2009, he prescribed  
6 Lorazepam (Ativan) to Michael Jackson. On May 14, 2009, he prescribed Lidocaine (Xylocaine) to  
7 Michael Jackson. Yet, defendant told Dr. Cooper, Michael Jackson had no history of drug use.

8 22. Defendant told Dr. Cooper that Michael Jackson had not been ill. However, aside from  
9 Michael Jackson's polypharmacy addiction illness, as discussed below regarding the Coroner's Autopsy  
10 findings, Michael Jackson was suffering at the time of his death from co-morbidities, including anemia,  
11 chronic pneumonia, chronic bronchitis, and brain swelling. Defendant's statements to Dr. Cooper were a  
12 blatant fabrication designed to conceal his wanton reckless conduct.

### 13 **3. The emergency room's resuscitation efforts.**

14 23. At 13:21 hours or 1:21 p.m., the nurses and physicians at UCLA detected a weak femoral pulse  
15 and cardiac activity for Michael Jackson. At 13:22 hours he showed cardiac activity. At 13:33 he showed  
16 a weak ventricular rhythm (contracting of the lower heart chambers). Dr. Cooper reported that when  
17 Michael Jackson was intubated with an endotracheal tube he had good breath sounds and "The initial  
18 cardiac rhythm appeared to be wide and slow in the 40s." At 13:52 or 1:52 p.m. he had a pulse of 53 beats  
19 per minute, with a MAE complex (major arrhythmic event).

20 24. At 14:05 the physicians inserted an intra aortic balloon pump (mechanical device placed in the  
21 aorta to assist blood flow) to attempt resuscitation and obtain circulation with a spontaneous heart-beat.  
22 The pump was placed in the aorta just above the heart, and his diastolic blood pressure (blood pressure  
23 between heart beats) went from 20 to approximately 40 at times and sometimes to 60 mmHg. Despite these  
24 efforts, Michael Jackson did not regain a spontaneous pulse or heart-beat. Following failure of the balloon  
25 pump to restore circulation, and the lack of a heart-beat, pulse, or spontaneous respirations, Michael  
26 Jackson was pronounced dead at 14:26 hours or 2:26 p.m. on June 25, 2009.

### 27 **C. Defendant's False concealment of information from Police at UCLA**

28 25. Defendant met with police investigators at the UCLA Medical Center on June 25, 2009, during

1 Michael Jackson’s resuscitation. He gave them the same summary of the events. He concealed from police  
2 his administration of Propofol and the numerous other drugs he gave to Michael Jackson. He concealed  
3 from the police, in the same manner he concealed from paramedics and the emergency room doctors, the  
4 “polypharmacy” which police subsequently seized at Michael Jackson’s home.

5 26. On June 26, 2009, the police searched the Carolwood house and seized eight (8) used bottles of  
6 Propofol (Diprivan), and later another three (3). They seized medication at Michael Jackson’s bedside,  
7 including Clonazepam (Klonopin), Benoquin (Monobenzone), Flomax (Tamsulosin Hydrochloride),  
8 Hydroquinone, Lidocaine (Xylocaine), Temazepam (Restoril), Tizanidine (Zanaflex), Trazodone  
9 (Desyrel), Flumazenil (Romazicon), Ephedrine (Ephedra), Prednisone, Amoxicillin, Azrithomycin,  
10 BQ/KA/RA (beniquin, kojic acid, retinoic acid); Lorazepam (Ativan), Midazolam (Versed) and Diazepam  
11 (Valium). Police also found several baggies of marijuana, Lantaprost Flush Solution, which is used to  
12 control glaucoma, a box of Nystatin, an antifungal drug used to treat yeast infections, and Triamcinolone,  
13 which is a topical steroid used to treat skin inflammation. The Clonazepam (Klonopin) and Trazodone  
14 (Desyrel) were prescribed to by Dr. Metzger. The Tizanidine (Zanaflex) was prescribed by Dr. Klein.

15 27. Defendant disclosed none of these dugs to the paramedics, except Ativan. He disclosed none  
16 of these drugs to the doctors, except Valium, Ativan, and Flomax. He concealed his reckless and deadly  
17 use of Propofol for the purpose of protecting himself from the his improper use of medications for Michael  
18 Jackson when the life of his patient, Michael Jackson, was in jeopardy.

19 28. Three (3) times defendant falsely stated the nature of the drugs used by and which he  
20 administered to Michael Jackson. Three (3) times he mislead authorities concerning his unlawful activities.  
21 He engaged in an absurd reckless pattern of not only treating Michael Jackson with total disregard for his  
22 safety, but also making false statements about his treatments over and over again to authorities.

23 **D. Defendant’s Story Told to the Police on June 27, 2009.**

24 29. On June 27, 2009, which was two (2) days following Michael Jackson’s death, defendant  
25 Murray, his attorneys, and advisors met with Los Angeles Police Detectives. Defendant appeared pursuant  
26 to Police Detectives’ request. Defendant had consulted with his attorneys prior to making his statement, yet  
27 afterward claimed his statement was incorrect.

28 30. Defendant told police he gave 50 mg of Propofol diluted with an unspecified amount of

1 Lidocaine (Xylocaine) by intravenous (I.V.) drip to Michael Jackson each night for six (6) weeks. He said  
2 he had been treating Michael Jackson for insomnia. The Propofol helped Michael Jackson sleep.

3 31. Defendant claimed he felt Michael Jackson may have been forming an addiction and therefore  
4 attempted to “wean” Michael Jackson off the drugs. His “weaning” process involved giving Michael  
5 Jackson on June 22, 2009, three (3) days before his death, 25 mg of Propofol, along with an unknown  
6 amount of Lorazepam (Ativan) and Midazolam (Versed). Defendant claimed Michael Jackson was able to  
7 sleep with these mixtures. On June 23, 2009, defendant claimed he gave Michael Jackson Lorazepam  
8 (Ativan) and Midazolam (Versed) without any Propofol.

9 32. On June 25, 2009, the date of Michael Jackson’s death, defendant claimed he arrived at the  
10 Carolwood house at 1:00 a.m. Michael Jackson had been rehearsing at the Staples Center in downtown Los  
11 Angeles until after midnight. Before Michael Jackson left rehearsals defendant received a telephone call  
12 from Michael Jackson’s associates requesting he go to the Carolwood house to attend to Michael Jackson.

13 33. Defendant told police Michael Jackson complained of not feeling well, dehydration, and not  
14 being able to sleep. He said that at 1:30 a.m. he attempted to induce sleep by giving Michael Jackson a 10  
15 mg tablet of Diazepam (Valium). Thirty (30) minutes later at 2:00 a.m. when Michael Jackson had not  
16 gone to sleep, defendant injected Michael Jackson with 2 mg Lorazepam (Ativan) after dilution with an  
17 unknown substance, and administered the drugs by I.V. At 3:00 a.m. defendant Murray administered 2 mg  
18 of Midazolam (Versed) I.V. after dilution with an unknown substance At 5:00 a.m. Michael Jackson  
19 remained awake, and defendant Murray stated he administered another 2 mg of Lorazepam (Ativan) I.V.  
20 after dilution with an unknown substance.

21 34. Defendant claimed Michael Jackson remained awake for the next two and a half (2 ½) hours.  
22 At 7:30 a.m. defendant Murray administered another 2 mg of Midazolam (Versed) I.V. after dilution with  
23 an unknown substance. Defendant claimed he was continuously at Michael Jackson’s bedside and was  
24 monitoring him with a pulse oximeter. However, when police searched the house, they found the pulse  
25 oximeter in the closet in the next room.

26 35. At 10:40 a.m. defendant claimed he administered 25 mg of Propofol (Diprivan) diluted with  
27 Lidocaine (Xylocaine), through an I.V. drip. Defendant said Michael Jackson finally went to sleep. After  
28 approximately 10 minutes, defendant Murray stated he left Michael Jackson’s bedside to go to the restroom

1 to relieve himself. He claimed he was out of the room for approximately two (2) minutes until 10:52 a.m.

2 36. At approximately 10:52 a.m., defendant claimed he returned to Michael Jackson's bedside and  
3 noticed Michael Jackson was no longer breathing. Defendant claimed he started cardiopulmonary  
4 resuscitation (CPR). Defendant said he administered 0.2 mg of Flumazenil (Romazicon) to Michael  
5 Jackson, which is an anti-overdose medication for benzodiazepines, but which has no effect on Propofol.  
6 The dose given was inadequate for Lorazepam (Ativan). It was improperly administered. Defendant did  
7 not know how to use the drug. It was an extreme deviation from the standard of care, grossly negligent,  
8 and reckless for him not to have called the paramedics immediately.

9 37. Defendant stated he called for assistance on his cellular telephone to Michael Amir Williams, a  
10 security guard at the Carolwood house. Defendant said that while he spoke to Williams and told him the  
11 nature of the emergency, Williams did not respond by coming to his aid. Defendant said he continued his  
12 CPR while waiting for Williams.

13 38. After a few minutes defendant claimed he went downstairs to the kitchen where he asked the  
14 chef, Kai Chase, to send Michael Jackson's son, Prince Jackson, to his father's bedside. Defendant Murray  
15 then returned to Michael Jackson's bedside. Defendant Murray claimed he continued his CPR on the bed  
16 in which he had found Michael Jackson. Defendant Murray's conduct of CPR on the bed instead of a hard  
17 surface was below the standard of medical care for physicians.

18 39. Prince Jackson responded to defendant's call and summoned security assistance at the house.  
19 Alberto Alvarez, a security guard, went to defendant's aid and saw Michael Jackson on the bed lifeless.  
20 Defendant claimed that after only a few minutes Alvarez called 911 on his cellular telephone for help.

21 40. Alberto Alvarez told police that before he called 911 defendant instructed him to conceal  
22 bottles of Propofol and place them in a bag. In an outrageous departure from the standard of care,  
23 defendant stopped giving Michael Jackson CPR and cleaned up the room so the medications would not be  
24 discovered. Defendant placed the previously unused wires of a pulse oximeter on Michael Jackson's  
25 fingers. Alberto Alvarez told police defendant asked him to call 911 only after the drugs were concealed.

26 41. The Los Angeles Fire Department recorded the 911 telephone call at 12:22 p.m., which  
27 was approximately one (1) hour and thirty (30) minutes from the time defendant Murray claimed he found  
28 Michael Jackson not breathing at 10:52 a.m. Defendant Murray told the Detectives several times that it

1 was around 11:00 a.m. that he found Michael Jackson not breathing. Defendant Murray’s statement was  
2 specific and made in the calm of an interview with his attorneys present.

3 42. Under defendant’s original version, more than one (1) hour and thirty (30) minutes elapsed  
4 between discovering Michael Jackson not breathing and the 911 telephone call. In that time defendant  
5 made three (3) telephone calls, which he concealed from police, to other individuals consuming 47 minutes  
6 of talk time according to his telephone records. Defendant concealed evidence of his unlawful drug  
7 administration. His conduct was inhuman. It was an extreme violation of the standard of care.

8 **E. Defendant’s Revised Version of Events.**

9 43. When defendant discovered there were telephone and other records which exposed his  
10 outrageous actions, defendant claimed that despite his interview by Los Angeles Police on June 27, 2009,  
11 he got his story wrong. He then changed his story in an attempt to comport his claims to the telephone  
12 records the police obtained. The reason defendant felt he could change his story was because he kept no  
13 medical records documenting his treatment as required by Business & Professions Code section 2266.

14 44. The Search Warrant Affidavit of LA Detective Daniel Myers dated November 13, 2009, stated:  
15 “The searches of DR. MURRAY’S residence and business failed to yield any notes, patient  
16 profiles, treatment history, records, and charts regarding the treatment for MICHAEL JOSEPH  
17 JACKSON at his residence at 100 North Carolwood Drive.”

18 45. Defendant’s new version meant that his old version was yet a fourth (4<sup>th</sup>) time he created a false  
19 version of events. Defendant’s new version was a 5<sup>th</sup> time he falsely stated what had happened. However,  
20 the new version again concealed his reckless administration of life threatening drugs to Michael Jackson.

21 46. Defendant Murray claimed in his new version of the events that he discovered Michael Jackson  
22 was not breathing while he was talking on the telephone with his girlfriend at 12:05 p.m. The story  
23 changed from going to the bathroom for two minutes (2) after ten (10) minutes of observing Michael  
24 Jackson at 10:40 a.m., to talking on the phone with several people from 11:18 a.m. to 12:05 p.m. for 47  
25 minutes. Defendant eliminated his careful observations of Michael Jackson and substituted telephone  
26 conversations with others where he didn’t notice that Michael Jackson had stopped breathing.

27 47. Defendant’s conduct under this new version of the story was more ominous and reckless than  
28 the first. The administration of Propofol requires a measured infusion using a mechanical pump which

1 is constantly monitored because of unpredictable changes in the patient's blood pressure. Instead, he  
2 infused the drug by I.V. drip and syringe, without monitoring or resuscitation equipment, rendering it  
3 inherently dangerous. He recklessly endangered Michael Jackson's life by talking on the telephone outside  
4 of Michael Jackson's immediate presence for 47 minutes while a Propofol "drip" infusion took place, and  
5 he did not notice that Michael Jackson had stopped breathing. There was no evidence of standard of care  
6 monitoring which would be required when Propofol is administered.

7 **F. Defendant Recklessly Concealed his Conduct and the Dangers Involved.**

8 **1. Defendant concealed the dangers from Michael Jackson**

9 48. On June 25, 2009, prior to treating Michael Jackson, defendant was at a "strip club" called  
10 "Sam's Hofbrau" in Los Angeles where he had been "drinking." It was reckless for him to "drink" prior to  
11 administering anesthesia to Michael Jackson. He concealed his conduct from Michael Jackson.

12 49. Defendant failed to explain to Michael Jackson the risks and benefits regarding Propofol or to  
13 obtain Michael Jackson's informed consent. Defendant acted with an extreme departure from the standard  
14 of care in administering drugs to an addicted individual and concealing from Michael Jackson the dangers  
15 to his life. Defendant's concealment constituted inherently dangerous conduct which placed Michael  
16 Jackson's life in jeopardy and displayed a callous and reckless disregard for human life.

17 50. Defendant Murray recklessly endangered Michael Jackson's life by concealing from him that  
18 instead of monitoring him, defendant would speak on the telephone for 47 minutes while administering him  
19 dangerous drugs. The concealment of the dangers constituted a reckless disregard for Michael Jackson's  
20 life. It not only violated all standards of care, but also deceived Michael Jackson.

21 **2. Defendant concealed his purchases of Propofol.**

22 51. Defendant Murray did not utilize a US Drug Enforcement Administration number or other  
23 traceable number to acquire the Propofol or other drugs he administered to Michael Jackson. He purchased  
24 the drugs from Applied Pharmacy in Las Vegas, Nevada, without utilizing Michael Jackson's name and had  
25 them shipped to his girlfriend's address in Santa Monica, California. Defendant sought to conceal his  
26 conduct in order to prevent law enforcement, other Michael Jackson physicians, and family members from  
27 discovering his conduct. Defendant obtained the drugs through "secret" means without authorities knowing  
28 of his conduct for his own personal gain under conditions that threatened Michael Jackson's life.

1                                   **3. Defendant Recklessly Concealed Dangerous Drug Interactions**

2                   52. Defendant administered drugs to Michael Jackson with reckless disregard for the life  
3 threatening drug interactions they presented. Defendant administered Propofol to Michael Jackson  
4 knowing the drug had adverse interactions with Diazepam (Valium), Lorazepam (Ativan), Midazolam  
5 (Versed), which he had administered to Michael Jackson. Propofol interacts adversely with Ephedrine,  
6 which keeps a patient awake, and Nordiazepam (Calmday), both of which the Coroner’s toxicology screen  
7 found in Michael Jackson’s system. Defendant knew Michael Jackson was taking other drugs which were  
8 contraindicated with the administration of the drugs defendant administered.

9                   53. Defendant concealed the inherently dangerous drug interactions. His conduct was an extreme  
10 departure from the standard of care. Defendant acted with reckless disregard for Michael Jackson’s life.

11                   **G. The Coroner’s Autopsy Findings.**

12                                   **1. Michael Jackson died from acute Propofol intoxication and Benzodiazepine Effect.**

13                   54. The Coroner’s Office conducted an autopsy of Michael Jackson on June 26, 2009, and reached  
14 conclusions on September 18, 2009. The Report concluded Michael Jackson died from acute Propofol  
15 intoxication contributed to by the “Benzodiazepine Effect.” Michael Jackson had a “polypharmacy” of  
16 drugs in his system. Seven (7) of them were detected in the toxicology screen. Two (2) of the drugs,  
17 Flumazenil (Romazicon), which was detected in the I.V., and Flomax (Tamsulosin Hydrochloride),  
18 defendant said he administered. One of them, Propofol (Diprivan), showed lethal levels in Michael  
19 Jackson’s body.

20                   55. Defendant claimed he only administered 25 mg of Propofol to Michael Jackson on June 25,  
21 2009. However, the Coroner’s Toxicology Report showed lethal amounts in his system where  
22 administration had to exceed more than five (5) times that amount. The presence of lethal levels of  
23 Propofol in Michael Jackson’s body exposed yet another of defendant’s reckless fabrications which not  
24 only endangered Michael Jackson’s life, but also brought it to an end.

25                   56. The toxicology report from the Coroner’s Office showed Michael Jackson had Propofol in the  
26 vitreous humor of his eye (the clear gel that fills the globe of the eye between the lense and retina). The  
27 presence of the drug in the vitreous demonstrated it was administered several hours prior to his death.  
28 Defendant’s story was a fabrication.



1 improper use and distribution of benzodiazepines). Defendant violated California law as follows:

2 Penal Code § 148(a)(1) (giving false information to emergency personnel);

3 Business & Professions Code § 725 (excessive treatment or prescribing medications);

4 Business & Professions Code § 2234(b), ©, (d) & (e) (gross negligence, repeated negligence,  
5 incompetence, and acts involving dishonesty);

6 Business & Professions Code § 2240(a)(failure to report procedure conducted outside of acute care  
7 hospital that resulted in death)

8 Business & Professions Code § 2241(b) & (d)(prescribing & treating an addict prohibited by Health  
9 & Safety § 11215 et. seq.)

10 Business & Professions Code § 2242(a) (prescribing & furnishing dangerous drugs without medical  
11 indication)

12 Business & Professions Code § 2266 (failure to maintain patient records)

13 Health & Safety Code § 11000 et. seq.(failure to keep records substances in Comprehensive Drug  
14 Abuse Prevention & Control Act of 1970, 21 U.S.C. § 801 et. seq. (benzodiazepines);

15 Health & Safety Code § 11156(a)(prescribing controlled substances to an addict).

16 62. As a proximate and legal result of defendant's conduct, Mr. Jackson has been injured in an  
17 amount not presently ascertained. Such damages include loss of support, loss of comfort, companionship,  
18 and care, economic damages, future earnings, loss of services, loss of affection, costs, expenses, pain,  
19 suffering, and general damages in an amount not presently ascertained.

20 63. The address and telephone number for contact for Joseph Jackson is c/o Brian Oxman, [REDACTED]  
21 [REDACTED] Mr. Jackson requests he be contacted  
22 at this number to discuss resolution of these claims.

23 DATED: March 27, 2010

BRIAN OXMAN

24 MAUREEN JAROSCAK

25  
26 By: \_\_\_\_\_

27 Brian Oxman  
28 Attorneys for Mr. Joseph Jackson