

**JONES, WYATT & ROBERTS**  
CONFIDENTIAL AND PRIVILEGED MEMORANDUM  
**ATTORNEY WORK PRODUCT AND**  
**ATTORNEY/CLIENT COMMUNICATIONS**

**TO:** STEPHEN JONES, ROB NIGH & CHERYL RAMSEY

**FROM:** AMBER McLAUGHLIN

**SUBJECT:** DEFENSE WITNESSES:  
ELLIOTT'S BODY SHOP;  
DREAMLAND;  
GEARY LAKE;  
JUNCTION CITY AND  
KANSAS TO OKLAHOMA CITY

**DATE:** APRIL 2, 1997

The following are the possible defense witnesses we need to subpoena as well as the point we need to make with their testimony:

ELLIOTT'S BODY SHOP

1. Todd Bunting - looks like JD#2. Address \_\_\_\_\_.
2. Michael Hertig - Rented a truck from Elliott's on 04/18/95, along with Todd Bunting. Bldg. 7224. Ft Riley 66442 (913) 784-6632. Address \_\_\_\_\_.
3. Tom Kessinger - saw another man with Kling at Elliott's. Address \_\_\_\_\_.

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4. SA James D. Kiely - the seizure of a coin telephone at Fort Riley re call to Elliott's. Address \_\_\_\_\_.
5. SA Seth R. Pollack (U.S. Army CID - Fort Hood, TX 76544) - the seizure of a coin telephone at Fort Riley re call to Elliott's. Address \_\_\_\_\_.
6. Fernando Ramos - two individuals, one resembling JD#1, arrived at Elliott's during the week of April 17, 1995. Address \_\_\_\_\_.
7. SA Thomas D. Williams - the seizure of a coin telephone at Fort Riley re call to Elliott's.

Address \_\_\_\_\_

8. ??? - to testify to applicants of the \$2 million reward.
9. ??? - to testify to the authenticity of the McDonald's video tape.
10. ??? - Lab Report 48 - fingerprints lifted from Elliott's were negative for McVeigh;
11. ??? - Lab Report 10 - that fingerprints on the Ryder rental agreement were negative for McVeigh;

DREAMLAND

12. Monica Bailes - (Boyd's wife) - saw Ryder truck and occupant of room 25 at Dreamland Motel on April 16, 1995. 1704 Martin Luther King Dr., Elms Grove Trailer Park, #174, Killeen, Texas; (817) 699-4968.

13. Bruce Blakesley - re call allegedly placed to his home with Bridges calling card on 4/11/95.

Address \_\_\_\_\_

14. Shane Boyd - saw Ryder truck at Dreamland week before the bombing, as well as old yellow car/Ryder/occupant of room #25 on April 15<sup>th</sup>. 1704 Martin Luther King Dr., Elms Grove Trailer Park, #174, Killee Texas; (817) 699-4968.

15. Jeanne Boylan - drew composite of individual as described by Jeff Davis who delivered food from Hunam. Last address incorrect re David's report; SS#521-74-8630; ex-husb's phone #s (541) 3301-9092 - (541) 389-6860.

16. Denise Bromwell - saw car closely resembling McVeigh's parked in front of room 25 of Dreamland Monday, April 17<sup>th</sup> at 5:30 p.m.; 701 East First, Hutchinson, KS; (316) 653-7671; wks Hoisington Substation, Hoisington, KS.

17. Teresa DeLeon - saw occupant of room 25 at Dreamland. Address 333 West 12th, #3 (in back), Junction City, KS; now has unlisted phone; may need to run address update; worked at Valley Vista Nursing Home in J.C., KS as of 5/10/96 re Reed/Sparks memo of 5/11/96.

18. Jeff Davis - delivered food from Hunam to individual at room 25 of Dreamland on April 15, 1995; address was 926 Mulberry, J.C., KS (grandparents John J. Davis); phone (913) 238-4420. May need to re-check.

19. SA Scott Gray - call allegedly placed to Bruce Blakesley's home number with Bridges calling card on April 11, 1995.

20. Trooper Charles D. Hanger - arrest of Timothy McVeigh. Serve through OK State Hwy. Patrol Hdq. OKC or home address is 840 N. Birch Street, Ponca City, OK 74601; hm pho (405) 762-1804.

21. Kathy Henderson - said two unknown males who entered Gracie's salon April 18, 1995, were not US#1 and US#2. Address \_\_\_\_\_
22. Connie Hood - saw JD#2 at room 23 at Dreamland April 15, 1995; Saw JD#2, two other males and Ryder truck at Dreamland on April 17, 1995 at 3:00 p.m. Address was 821 N. Jackson, J.C., KS; has no phone listing at present time.
23. Donald Hood - saw Ryder truck at Dreamland on April 17, 1995 at 3:00 p.m. driven by someone other than US#1. Address was 821 N. Jackson, J.C., KS; has no phone listing at present time.
24. David King - saw Ryder truck at Dreamland on Easter Sunday around 12:30 p.m.; Address \_\_\_\_\_
25. Herta King - saw Ryder truck at Dreamland on Easter Sunday at 12:30 p.m.; Address \_\_\_\_\_
26. Eric McGown - saw occupant of room 25 of Dreamland driving the Ryder truck on Sunday afternoon around 4:00 p.m.; Dreamland Motel 520 E. Flinthills Blvd., Grandview Plaza, KS; phone (913)238-1108.
27. Kathleen McGown - saw occupant of room 25; Address Dreamland Motel 520 Flinthills Blvd., Grandview Plaza, KS; phone (913) 238-1108.
28. Lea McGown - saw occupant of room 25; First saw the Ryder truck on Easter Sunday around 5:00 p.m.; Dreamland Motel, 520 Flinthills Blvd., Grandview Plaza, KS; phone (913) 238-1108.
29. Paul Prettyman - saw McVeigh's car at the Dreamland on April 17th or April 18th; saw McVeigh at the Dreamland on April 18th, either during noon or after work. 402 First Street, Alma, Nebraska 68920; no phone; SS# [REDACTED]
30. LaDonna Sader - saw a Ryder truck at Dreamland on Easter Sunday between 9:30 and 10:00 a.m.; 514 South 9th St., #1, Salina, KS, 67401; (913) 827-7957; SS# [REDACTED]
31. Hilda Sostra - Saw Ryder truck at Dreamland on April 17, 1997 at 9:35 a.m.; saw man walking toward the Ryder truck who looked like composite drawing of US#2; Address \_\_\_\_\_
32. Renda Truong - observed Ryder truck at Dreamland on April 16, 1995, after lunch; address Scholfiel Barracks, Hawaii; phone (808) 655-8496.
33. Custodians of several motels at which Tim stayed to prove that Tim never used the Michigan address  
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GEARY LAKE

34. Robin Beeton - saw Ryder truck at Geary Lake on 4-15-95 or 4-16-95 before noon.  
Address \_\_\_\_\_
35. Terry Canaday - saw Ryder truck with two occupants near at Geary Lake on 4-18-95 at 1:15 p.m.; truck gone between 4:15 to 5:00 p.m.; 314 Stockholm, White City, KS 66872; phone listed under D.R. Rapp (913) 349-2683.
36. Terrance Dockter - saw large yellow moving truck at Geary Lake on 4-18-95 at 2 p.m.  
Address 510 Garfield Street, Clay Center, KS 67432; phone (913) 632-3190.
37. Al Faltermacir - observed Ryder truck at GL on 4-7-95 at 4:00 p.m.; Address 6518 Bradshaw, Shawnee, KS, 66216; SS# [REDACTED].
38. Charles Farley - saw Ryder truck/stake bed truck loaded with fertilizer, along with two other vehicles/four white males at Geary Lake on 4-18-95 between 5:30 and 6:30 p.m.; Address 101 East 8th, Milford, KS phone (913) 463-5357.
39. Richard Franz - saw no Ryder truck at Geary Lake on 4-18-95 between 8 and 8:30 a.m.; however, saw one parked along side Hwy 77 six miles south of Geary Lake between 11:15 and 11:30 am. on the 18th; address #12 Frontier, Rose Hill, KS; phone (316) 776-0761; works for Hujoca Corp., Wichita, KS;.
40. Brady Lee Fox - saw Ryder truck at Geary Lake on 4-16-95 at 4:30 a.m.; address \_\_\_\_\_
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41. Steve Geri - observed **WHITE** moving truck, along with two other vehicles and three or four individuals; address *WAS 208 West Main St., Herington, KS 67449; now has no phone listing; possibly works for S & S Roofing; Cell # (913) 366- 6713.*
42. Rick Glessner - saw Ryder truck and older style car at Geary Lake on 4-16-95 between 10:30 and 11:00 a.m., which were gone by 4 or 5 p.m. that afternoon; Address 602 Clifton, Onaga, KS, 66521; phone (913) 889-4604.
43. Kellie Gulker - saw Ryder truck at Geary Lake on 4-17-95 at 4:30 p.m.; address RR1, Box 119, Milford, KS, 66514; phone (913) 762-2428.
44. Dan Harris - architect for Geary Lake and Dreamland models; Address 1609 Vinita Avenue, Enid, OK, 73703; phone (405) 233-4452 or 233-4695.
45. Robert Jaynes and wife - saw Ryder truck at Geary Lake on 4-15-95 between 2 and 4 p.m.; 314 S. Broadway, Herington, KS, 67449; phone (913) 258-2243.

46. John Michael Johnson - saw Ryder truck at Geary Lake on either 4-17 or 4-18-95 at 3 p.m.; Address 407 N. Broadway, Herington, KS; phone (913) 258-3755 (listed as 'Michael').
47. Roberta Kramer - saw Ryder truck and older, dark colored pickup at GL on 4-17-95 at 1:15 p.m.; Address Route 2, Box 132-A, Herington, KS, 67449; phone (913) 257-3579.
48. Keith D. Longabaugh - saw Ryder truck at Juan de Padilla Historical Marker on Hwy 77 on 4-18-95 at 9:30 a.m.; Address 815 North 'B' St., Herington, KS, 67449; phone (913) 258-3102.
49. Don Perkins - saw Ryder truck leaving Geary Lake on 4-18-95 between 8 and 9 a.m. Address 208 South 'C' St., Herington, KS, 67449; phone (913)-258-3093.
50. Kenneth Pigorsch - saw a Ryder truck at Juan de Padilla Historical Marker on Hwy 77 on 4-18-95 at 9:30 a.m. while playing golf. Address 522 North 'E' St., Herington, KS, 67449; phone (913) 258-3368.
51. Elwin L. Roberts - saw Ryder truck and brown pickup at Geary Lake on Monday, 4-17-95 between 10:30 and 11:00 a.m.; address 1640 'D' Avenue, Dwight, KS; phone (913) 482-2583; currently residing at Comfort Inn, Hutchinson, KS; works for BG Consultants, Manhattan, KS.
52. Georgia Rucker - saw Ryder truck at Geary Lake on 4-12-95, 4-13-95, 4-18-95 (twice) and possibly 4-11-95. Address 509 North 'D' Street, Herington, KS; phone (913) 258-2481; has Rucker Real Estate in Herington.
53. Sargent Sargent - observed Ryder truck at Geary Lake on 4-10-95 at 2 p.m.; later joined by two other vehicles; saw Ryder at lake on 4/11/95 through 4/13/95 at same location; Address 405 North 'D' St., Herington, KS 67449; phone (913) 258-3931.
54. Kenneth Schiffner - saw Ryder truck at Geary Lake on 4-18-95 between 8:15 and 8:30 p.m.; address 1219 W. Hwy K-157, Junction City, KS; phone (913) 257-3455; home is ½ mile south of Geary Lake & west of #77 on #K-157.
55. Terri Schuster - saw no Ryder truck at Geary Lake on 4-18-95 at 10:30 a.m.; address 604 North 'D' St., Herington, KS, 67449; phone (913) 258-2557.
56. Floyd Robert 'Bob' Scoggins - saw Ryder truck and other vehicle Geary Lake on Monday, 4-17-95 between 6:30 and 6:45 a.m.; 1407 McKenzie, White City, KS; also RR#2, 66872; phone (913) 349-2966.
57. Richard Settle - saw **WHITE** Ryder truck and driver of same at Geary Lake on 4-18-95 between 2:30 and 3:30 p.m.; address 6145 South Simpson Rd., Assaria, KS; 67416; phone (913) 667-6531; elevator repairman for Montgomery & Kone (913) 825-7766.
58. Ray Siek - saw Ryder truck and dark colored pickup at Geary Lake on 4-17-95 at 4:30 p.m.; saw

same pickup later at the Herington gas company and was told it was Terry Nichols'; address 927 Leavenworth Rd., Manhattan, KS, 66502; (913) 537-8601.

59. Mary Stone - saw Ryder truck at Geary Lake on 4-18-95 between 1 and 1:30 p.m.

Address \_\_\_\_\_

60. Joseph 'Joe' Vinduska - saw Ryder truck and other vehicle at Geary Lake on 4-17-95 between 6:45 and 7:00 p.m.; also saw different Ryder exiting Geary Lake on 4-18-95 between 12:30 and 1:00 p.m.; address P.O. Box 211, Lincolnville, KS; phone (316) 924-5286; has Pilsen Automotive, RR 3, Box 176-A, Marion, KS, 66861; phone (316) 924-5728.

61. Heinz Wallace - saw Ryder truck and one other vehicle at Geary Lake on 4-18-95 at 10:30 a.m. and again between 11 and 11:15 a.m.; second sighting revealed another vehicle and four white males had joined the other two; address 625 North Calhoun, Junction City, KS, 66441; phone (913) 238-5728.1

#### JUNCTION CITY

62. Max Albin - observed a TMc look-alike in Dwight, Kansas on April 7, 1995, who told him to look for something big to happen on April 19th; address 1700 South Hwy, Dwight, KS, 66849; phone (913) 482-3840.

63. Melody Anderson - observed TMc look-alike, driving older, full-sized car, in NAPA Auto Parts Store in St. Marys, Kansas on Monday, April 17<sup>th</sup> between 9:30 and 10:30 a.m.; address 100 East Washington, St. Marys, KS, 67756; phone (913) 332-2138.

64. Jack Angoski - observed McVeigh, JD#2, Ryder truck and McVeigh's vehicle parked along I-35 four or five miles south of Salina, KS on Friday, April 14, 1995 at approximately 5 p.m.; address \_\_\_\_\_

65. Liesel Bacolor - observed McV and another individual at the Texaco in Junction City on April 17<sup>th</sup> between 12 and 1 p.m.; address 1135 West 20th 'C', Junction City, KS, 66441; phone (913) 238-8692. (Listed as Rosalio Bacolor)

66. Nancy Kindle - saw McVeigh and two others in the Denny's in Junction City on April 16, 1995 after pm.; saw same three men inside the Texaco Station at 4:30 p.m.; address 917 Dreiling, Junction City, KS, 66441; (913) 223-5996.

67. Joyce Kurtz - saw Ryder truck and yellow car in parking lot of Viking Motel and Pizza Hut in Lindsborg, KS on April 17<sup>th</sup> after 1pm.; address \_\_\_\_\_

68. Jack Lloyd - observed McV and JD#2 in the Subway Sandwich Shop in Junction City on April 16, 1995 between 7:30 and 8 p.m.; address 1513 West Ash Street, Junction City, KS, 66441; phone (913) 762-5910.

69. Toni Riffle - observed McVeigh, with tattoo, and US#2 at Cardy's Convenience Store in Herington

April 17<sup>th</sup> at 9:00 p.m.; saw them depart rusty brown pickup; address \_\_\_\_\_.

70. Debra Skiles - observed McVeigh look-alike purchase anti-freeze in NAPA Auto Parts Store in St. Marys, Kansas on Monday, April 17<sup>th</sup> between 9:30 and 10:30 a.m.; address \_\_\_\_\_.

71. Joanne Sowder - believes she observed McV and another individual at the Texaco in Junction City on April 17<sup>th</sup> between 12 and 1 p.m.; address \_\_\_\_\_.

72. Pamela Swenson - said McVeigh entered her business on 4-10-95 re one-way rental for Ryder truck to Michigan; two days later, McVeigh and two others returned re rental of a 20-foot Ryder truck one-way quote from Junction City to OK City; address \_\_\_\_\_.

73. Tracey Warmbier - said McVeigh and three others were in the Hollywood Supper Club in Junction City "one week prior to the bombing"; address 840 West 8th St., Junction City, KS; phone (913) 762-1826; listed as Daniel and is only Warmbier in J.C.

74. Ms. Ollie Willis - observed Ryder truck, US#1, US#2 and two others at the KWIK Shop in Junction City on Monday, April 17<sup>th</sup> between 8:30 and 11:00 a.m.; address 1215 Caroline, Junction City, KS, 66441; listed as O.W. and is only 'O' Willis in J.C.; phone (913) 238-5930.

#### KANSAS TO OKLAHOMA CITY

75. Lori Edwards - observed a Ryder truck that smelled of diesel in parking lot of Best Western Motel in Stillwater on April 18<sup>th</sup> between 10:30 and 11 a.m. She picked TN's from a photo lineup; address \_\_\_\_\_.

76. William Hayes - observed McV, whom he knew as Dewitt, and three others in a Ryder truck with two other vehicles near Emporia, KS on April 18<sup>th</sup> at 7:30 a.m.; address \_\_\_\_\_.

77. Don Hochstedler - observed a yellow rental vehicle at the Cimarron Truck Plaza in Billings on 4-19-95 at 12:45 a.m.; address \_\_\_\_\_.

78. Loren Johnson - observed five individuals in a Ryder truck with 3 blue 55 gallon plastic barrels, along with two other vehicles at the Blackwell rest stop along I-35 on April 18<sup>th</sup> at 8:16 a.m.; address \_\_\_\_\_.

79. Justin Liddell - observed a Ryder truck in the parking lot of the McDonald's along I-35 in Blackwell on April 18<sup>th</sup> between 9 and 9:30 a.m.; address 1012 South 10th St., Blackwell, OK, 74631; phone (405) 363-3626.

80. & 81. Debra Reid & Steven Bechtel - saw three men, a Ryder truck, along with two other vehicles at the Dolly Madison Thrift Store in Emporia, KS on 4-18-95 at 11:10 p.m.; Debra Reid gave a similar statement. Address of Reid \_\_\_\_\_ . Bechtel's \_\_\_\_\_.

address \_\_\_\_\_

82. Dennis Shinn - observed a Ryder truck in the parking lot of the Best Western Motel in Stillwater on April 18<sup>th</sup>. Also observed Terry Nichols and James Nichols at the motel, but not necessarily all together. Address \_\_\_\_\_

83. Richard Sinnett - observed two vehicles, along with a Ryder truck, occupied by TMc and US#2, pulling a flat bed trailer with a large, upright plastic circular container filled with liquid in Kingman, Kansas on April at 2:15 a.m.; address 1307 Veach St., Kingman, KS, 67008; phone (312) 532-3231; SS# [REDACTED].

84. Estella Weigel - observed a Ryder truck, with two occupants, and a light beige 1978-80 Mercury, with no license plate and driven by US#2, traveling south on I-135 south of Salina, KS on April 18<sup>th</sup> at approx. 7:45 a.m.; address \_\_\_\_\_

85. David Widener - observed Terry Nichols in a brown or tan GMC pickup with a white camper shell and James Nichols in a Ryder truck with a passenger at the Sinclair gas station in Guthrie on April 18<sup>th</sup> between 1 and 2:30 p.m. Address \_\_\_\_\_

86. & 87. Merle & Mary Jo Young - observed a white and dull yellow Mercury Grand Marquis without a license plate and a Ryder truck at the McDonald's along I-35 and Blackwell on April 18<sup>th</sup> at 9:15 a.m. Address RR # Box 119, Tonkawa, OK, 74653; phone (405) 628-2024.