

# The Oklahoma City Bombing Trial Transcripts

**Friday, April 25, 1997 (morning)**

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF COLORADO

Criminal Action No. 96-CR-68

UNITED STATES OF AMERICA,

Plaintiff,

vs.

TIMOTHY JAMES McVEIGH,

Defendant.

REPORTER'S TRANSCRIPT

(Trial to Jury - Volume 62)

Proceedings before the HONORABLE RICHARD P. MATSCH,  
Judge, United States District Court for the District of  
Colorado, commencing at 9:00 a.m., on the 25th day of April,  
1997, in Courtroom C-204, United States Courthouse, Denver,  
Colorado.

Proceeding Recorded by Mechanical Stenography, Transcription  
Produced via Computer by Paul Zuckerman, 1929 Stout Street,  
P.O. Box 3563, Denver, Colorado, 80294, (303) 629-9285

APPEARANCES

PATRICK M. RYAN, United States Attorney for the  
Western District of Oklahoma, 210 West Park Avenue, Suite 400,  
Oklahoma City, Oklahoma, 73102, appearing for the plaintiff.

JOSEPH H. HARTZLER, SEAN CONNELLY, LARRY A. MACKEY,  
BETH WILKINSON, SCOTT MENDELOFF, JAMIE ORENSTEIN, AITAN  
GOELMAN, and VICKI BEHENNA, Special Attorneys to the U.S.  
Attorney General, 1961 Stout Street, Suite 1200, Denver,  
Colorado, 80294, appearing for the plaintiff.

STEPHEN JONES, ROBERT NIGH, JR., MICHAEL ROBERTS,  
RICHARD BURR, RANDALL COYNE, and ROBERT WARREN, Attorneys at  
Law, Jones, Wyatt & Roberts, 999 18th Street, Suite 2460,  
Denver, Colorado, 80202; JERALYN MERRITT, 303 East 17th  
Avenue,  
Suite 400, Denver, Colorado, 80203; CHERYL A. RAMSEY, Attorney  
at Law, Szlichta and Ramsey, 8 Main Place, Post Office Box  
1206, Stillwater, Oklahoma, 74076; CHRISTOPHER L. TRITICO,  
Attorney at Law, Essmyer, Tritico & Clary, 4300 Scotland,  
Houston, Texas, 77007, appearing for Defendant McVeigh.

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PROCEEDINGS

(In open court at 9:00 a.m.)

THE COURT: Morning.

MR. HARTZLER: Morning, your Honor.

THE COURT: Are we ready for the jury?

MR. HARTZLER: We are.

THE COURT: Then we'll bring them in.

(Jury in at 9:01 a.m.)

THE COURT: Members of the jury, good morning.

ALL: Good morning.

THE COURT: Before we proceed with the calling of the first witness, I just want to have a little understanding with you about the possibility -- and it always is a possibility because of the amount of publicity that has been given and will continue to be given, I'm sure, to the trial. In the event that any of you should come across anything inadvertently or accidentally or somebody should attempt to talk with you or in front of you about anything connected with the trial, I want to tell you how to handle that. The thing to do is just write a note about it. Don't talk to any other jurors about it, of course. Just write a note with respect to whatever it is that happened and give it to the staff, who will give it to me; and then we can deal with it.

You're not sequestered. You're not living in a vacuum. You're living in the real world; and obviously there are always, no matter how hard -- attempt to avoid any of the publicity or comments about the case. It could happen.

So I just wanted to let you know how to handle it if it does happen. So anytime that something like that has occurred, you just write a little note -- it doesn't have to be

a little note, it can be a big note, an adequate note -- that deals with whatever occurred, give it to me, and we'll look into it, take care of it. So that's just another precaution.

Now, having heard from the lawyers on both sides with the opening statement as to what you could expect to hear, we begin now to actually hearing the evidence and call for the Government's first witness.

MR. HARTZLER: Your Honor, the Government calls Cynthia Lou Klaver, and she will be questioned by Mr. Ryan.

THE COURT: Thank you.

Please come in and raise your right hand to be sworn by the clerk here .

(Cynthia Lou Klaver affirmed.)

COURTROOM DEPUTY: Thank you. Would you have a seat, please.

Would you state your full name for the record and spell your last name, please.

THE WITNESS: My name is Cynthia Lou Klaver, K-L-A-V-E-R.

COURTROOM DEPUTY: Thank you.

THE COURT: Mr. Ryan?

MR. RYAN: Thank you, your Honor.

#### DIRECT EXAMINATION

BY MR. RYAN:

Q. Good morning.

A. Good morning.

Cynthia Lou Klaver - Direct

Q. Would you tell the members of the jury where you live.

A. Well, I live in Oklahoma City, 2219 Dawn Marie; middle of Oklahoma City.

Q. And do you have a family?

A. I do. I have a son that's almost one year old and a sister

that lives with me in Oklahoma City.

Q. How long have you lived in Oklahoma?

A. 11 years.

Q. Would you tell the jury what you do for a living in Oklahoma.

A. Well, in -- I am an attorney -- I have been an attorney for

the Oklahoma Water Resources Board up until last year when I took a promotion as assistant division chief, so I've served as

an attorney most of the time I've been in Oklahoma.

Q. And not everybody may know what the Water Resources Board is, so would you take a moment and just explain the functions and purpose of the Water Resources Board.

A. Well, the Water Resources Board is a state agency in

Oklahoma, and it's responsible for overseeing all the water use

in Oklahoma; sets the water quality standards; oversees the

dams, floodplain development program; has a low interest rate

financial program available for water infrastructure; and we do

technical studies. But planning, that's what the water board

does in Oklahoma.

Q. Where were you born and raised?

Cynthia Lou Klaver - Direct

A. I was born and raised in Hutchinson, Kansas.

Q. And where did you go to high school?

A. Hutchinson High School.

Q. Graduating in?

A. 1974.

Q. Where did you -- what did you do after high school?

A. Went to college at Kansas State University and graduated in

1979 from Kansas State, Manhattan, Kansas.

Q. With a degree in?

A. English, B.A. in English.

Q. Now, did you go to law school after that?

A. I worked for awhile, and then I went back to law school;

and I went to Washburn University School of Law in Topeka,

Kansas, and graduated from law school in 1985.

Q. Have you continuously practiced law from 1986 until today?

A. For the -- for the water board, uh-huh.

Q. Your entire employment has been with the Water Resources Board?

A. As an attorney, uh-huh, yes.

Q. Now, would you tell the ladies and gentlemen where the Water Resources Board is located.

A. The Water Resources Board, its address is 600 North

Harvey;

and it's located at the intersection of 5th Street and Harvey,  
across the street from the Murrah Building.

Q. All right. Now, on the desk there with you is a folder

Cynthia Lou Klaver - Direct

with some exhibits in it. You should have -- and tell me if  
you do -- a picture on the screen below you.

A. I don't have a picture, just a blank, blue screen.

Q. All right. Now, would you turn to Exhibit No. 958.

A. Okay.

Q. Could you identify that for the jury, please.

A. It's an aerial photo of downtown Oklahoma City, color  
Xerox  
copy.

Q. Is it a true and accurate photograph of an aerial view of  
Oklahoma City?

A. It looks to be a true and accurate photograph.

MR. RYAN: Your Honor, the Government would offer  
Exhibit 958.

THE COURT: Any objection?

MS. RAMSEY: No, your Honor.

THE COURT: Received.

BY MR. RYAN:

Q. Is it on your screen now?

A. No.

Q. Okay. Well, we'll move forward.

MR. RYAN: Would you turn on the computer.

Thank you, Miss Hasfjord.

BY MR. RYAN:

Q. Is it on your screen now, Miss Klaver? Is it on your screen now?

Cynthia Lou Klaver - Direct

A. Yes, it is. I'm sorry.

THE COURT: We've got -- I'll explain to the jury that we're using some technology here that may require a little experimentation before we get the rhythm of it, but we seem to be -- do you have it in front of you, I take it, members of the jury?

ALL: Yes.

THE COURT: All right.

BY MR. RYAN:

Q. All right. Looking at Exhibit 958, which is on the video here -- do you see the pen that you have at the desk there?

A. Yes.

Q. Could you show the jury -- why don't you start by circling where the Murrah Building is located.

A. The Murrah Building is right here.

Q. Okay. Now, would you circle for the jury the location of the Water Resources Board.

A. The Water Resources Board is this little, smaller building



here.

Q. All right. And so what is its proximity to the Murrah Building?

A. It's just across the street, so it's probably -- it's less than a hundred feet.

MR. RYAN: Your Honor, may I approach the bench to put an exhibit on the easel?

Cynthia Lou Klaver - Direct

THE COURT: All right.

BY MR. RYAN:

Q. Before I do that, would you look at Exhibit 940 on your -- in front of you there. Could you identify that for the jury.

A. Exhibit 940 is a copy or a diagram of the buildings downtown around the Murrah Building and the Water Board.

Q. Does it accurately depict the downtown area?

A. Yes, it does.

Q. And the location of the buildings relative to one another?

A. Yes, it does.

THE COURT: Are you going to offer this 940?

MR. RYAN: I'm sorry. Yes, I would offer Government's Exhibit 940.

MS. RAMSEY: No objection.

THE COURT: All right, 940 is received.

BY MR. RYAN:

Q. Do you have a -- is there a view pointer? Could you show the jury on that diagram the location of the Murrah Building.

THE COURT: I'm not sure the people in the back row on

the jury can see it.

Can you? We can just change --

Will you change the angle of that just a little.

How's that? Can you see it?

MR. RYAN: Thank you, your Honor.

THE COURT: Okay.

Cynthia Lou Klaver - Direct

BY MR. RYAN:

Q. Could you, by use of the pointer there, show the jury where

the Murrah Building is located.

A. This is where the Murrah Building is on 5th Street.

Q. All right. Now show the jury where the Water Resources Board is located.

A. Right across the street a little bit at an angle is the Water Board.

Q. All right. Thank you. Now, let's turn to April 19th, 1995. And I would like for you just to tell the jury in your own words what happened that morning when you got up and what you did.

A. On the morning -- it was a regular -- just a regular day. I got up like I usually do, a little bit after 6:00 in the

morning, and fixed my coffee and had a bowl of cereal and fed my dog and got ready for work while I was watching the news and got to work -- drove down to work and got there about 7:30 -- and got to my office and sat down at my computer and started working about 7:30 that morning.

Q. What kind of work were you doing that morning?

A. Well, I was preparing -- I was drafting up what we call findings of fact, conclusions of law on a proposed board order on a water rights proceeding that I had been a hearing examiner in a little bit earlier that month.

Q. And what are -- you -- what takes place in an

Cynthia Lou Klaver - Direct

administrative hearing?

A. One of my roles as an attorney is sometimes I serve as a hearing examiner over water rights proceedings to get a permit.

An applicant comes to the Water Board, gives notice by publication in a newspaper and certified mail to all the -- his neighbors; and those neighbors that are concerned or object to their -- the water use protest, and so we have a hearing.

And basically I serve in the role of a judge, very informal hearing where we let the applicant tell me why the application -- why he should get a permit; and the protestants come and say why their neighbor shouldn't use water that way.

And then I draft up these -- from that hearing and all the testimony and evidence presented, I draft up findings of fact out of there and propose a recommendation that our board actually votes and decides whether to approve the water right or not. So those are the kind of proceedings I work with.

Q. So this is the Water Board's manner in which you afford due

process to the parties who are interested in the water right involved?

A. Yeah, because water rights has -- as a property right, we afford due process and notice.

Q. Did you have any matter scheduled for that morning, later that morning?

A. We had a hearing set for 9:00 that morning at the board room at the Oklahoma Water Resources Board.

Cynthia Lou Klaver - Direct

Q. Where is your office located in the Water Resources Board?

A. My office actually was on the third floor on the north side

of the building. It's away from the Murrah Building, is where my office --

Q. About how many people work there in the Water Resources building?

A. At that time, there were around 80 working at the Water Board.

Q. Your office is on the third floor, you've told us.

A. Uh-huh

11. On Jan.

Q. Where is the board room where you hold these administrative

hearings you've told the jury about?

A. When they're in Oklahoma City, we hold them on the first floor. And the board room was an interior room about halfway in the middle of the building on the first floor.

Q. All right. Would you briefly tell the jury what matter you

had on for hearing that morning at 9:00.

A. We had scheduled a ground water application hearing on a farmer from around the Ardmore area, Ardmore, Oklahoma, wanted to use his ground water under his land to sell and operate a bottled water company. And some of his neighbors around the area were real concerned about depleting the basin for commercial sale of bottled water and had come wanting to protest that application, and we were getting ready to hold that and open it up at 9 that morning.

Cynthia Lou Klaver - Direct

Q. What persons were given notice of this hearing and an -- excuse me -- an opportunity to attend it?

A. Roy Weikel was the farmer who wanted to start the bottled operation, and he published in the newspaper and then he notified his neighbors that were 1320 feet around his proposed well locations. And so his neighbors, basically Mr. Sampson and Mr. Grice, were concerned about the ground water basin and wanted to protest the application; and the applicant came

with -- I think there were about four or five people came with the applicant, his family. So we had eight people at the hearing as well as myself and our recording secretary.

Q. So there were about ten people there in the room with you, as I understand it?

A. Yes, that's correct.

Q. All right. Now, what record is kept at these proceedings?

I mean, today we have a lady who is a court reporter in front of Judge Matsch who's taking down everything that I say and you

say to create a permanent record. What is done in that regard with respect to the administrative hearing you were going to conduct that day?

A. We would like to have a court reporter, but we do not have the funds for that; so we have a little tape recorder that we record every hearing. The people at the hearing have an opportunity to appeal to district court any decision that the board makes, and so we keep a record; and if it's appealed,

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then we can transcribe off the tape. So we keep a tape of every proceeding, and then I keep extensive notes as a hearing examiner.

Q. Now, if you would tell the jury what happened at 9:00.

A. Well, I -- I came down to the board room and we opened up the hearing. I have a recording secretary with me, and she

started the tape going; and I opened up the hearing, and we had

just gotten underway. I was trying to explain and put them at ease about being an informal proceeding and how we would go about holding the hearing, and we had just gotten started when --

Q. Now, you have looked, have you not, and listen to Government Exhibit 942, which is an audiotape?

A. Yes, I have.

Q. Is that the audiotape that your secretary was maintaining for the administrative hearing that started at 9:00 on April 19th?

A. Yes, it is.

Q. I take it that is the standard procedure as you've described to the jury.

A. Yes.

Q. And is it the customary and ordinary practice of the board to make a tape recording of all of these hearings?

A. Yes, it is.

MR. RYAN: Your Honor, we would offer Government's

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Exhibit 942.

MS. RAMSEY: No objection, your Honor.

THE COURT: 942 is received.

BY MR. RYAN:

Q. It's a true and accurate recording of what occurred that

day?

A. Yes, it is.

Q. Do you know what time -- precisely what time the hearing started that morning?

A. It started at 9:00.

MR. RYAN: Your Honor, I would ask permission to publish the tape.

THE COURT: You may do so.

(Exhibit 942 played.)

BY MR. RYAN:

Q. Mrs. Klaver, what length of time span from the time you started the meeting at 9:00 until we hear the explosion?

A. About two minutes.

Q. What time was the explosion?

A. 9:02.

Q. Now, we heard some voices on that tape, someone saying, "Let's get out of here." Whose voice is that?

A. That's mine.

Q. Tell us, if you would, in your own words what happened after the explosion.

Cynthia Lou Klaver - Direct

A. Well, I thought the whole building was coming down on us. I didn't see any way we were going to make it out; but basically, the building shook and the whole ceiling fell down in on us. And lights continued to fall even after the original



cave-in on us. And there was debris, lights, wires, lines hanging down all over. Electricity was still running, but -- so the lights were on, and everyone was very bewildered.

And we had some elderly people in the audience that were there for the hearing, so the recording secretary and I --  
-  
Connie Siegel Goober and I -- then tried to get everybody out, out the -- at the door and at the exit; and I was yelling at them to get out of the building, to get out of the building because I really -- I thought the whole thing was coming down on us.

I didn't realize that it wasn't just our room. When you walk out, you couldn't go out the front door. There was rubble piled so you couldn't get out the front door. So everyone moved to try to go over the back and climbed over all the debris that was in the hall and forced the door open and got out the back door; so we got everybody out, and it was kind  
of difficult.

Q. Who was the last one out?

A. I was the last one out. We were trying to get everybody out and out of the building as quick as we could so that they wouldn't get hurt.

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Q. About how long did it take for you to get out of the building?

A. I think it was about five minutes to get outside.

Q. And that was because?

A. It was -- we were all disoriented and couldn't get out the front door -- the debris in the hall -- and had to change direction and climb over all kinds of masonry and ceiling tiles

and things in the hall that were barricading our way to the back door. It was very --

Q. Excuse me?

A. That's all right. I just say it seemed like a long time trying to get out of there.

Q. Would you please turn to Exhibit 944 before you; 945, 946, and 1003. Do you have those?

A. 944?

Q. 945, 946, and 1003.

A. Yes.

Q. Would you tell his Honor what those exhibits are.

A. Exhibit 944 is a copy of a picture of 5th Street looking eastward towards the Murrah Building, and it shows me walking down the sidewalk.

Q. Just in a real general way, are these the four photographs -- are these pictures that you saw when you exited the Water Resources Board?

A. This is what I saw when I came out and walked around the

building.

MR. RYAN: Your Honor, we would offer Government's Exhibits 944, 945, 946 and 1003.

THE COURT: Any objection?

MS. RAMSEY: No, Your Honor.

THE COURT: They are received.

MR. RYAN: May I publish these to the jury?

THE COURT: You may.

BY MR. RYAN:

Q. Would you tell the members of the jury what they're looking

at with Exhibit 945.

A. This is a picture of -- you're looking eastward down 5th Street, which on the left-hand side of the photograph shows the

edge of the Water Board and on the right-hand side shows what's

left of the Murrah Building and the -- all the debris that was laying there when we walked out, some of the people standing around.

Q. And where is the -- point out, if you would, with your marker there where the Murrah Building is.

A. This is the Murrah Building there.

Q. And where is the building that you came out of?

A. This is the Water Board -- the front -- I did -- the front

entrance of the Water Board. Here's their door right here.

Q. All right.

MR. RYAN: Now, would you erase those marks.

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BY MR. RYAN:

Q. And Exhibit 946 again: Orient us on where we are here.

A. Okay, this is -- this, I think, right here is the post office. The Water Board's right behind it on the left-hand side of the picture and shows the intersection of 5th and Harvey. And that's the Murrah Building with the smoke around it, what's left of the Murrah Building.

Q. Now, using your pointer there that you have, would you turn

to the diagram behind you and show the jury where you are at this point so we'll have a better sense of a vantage point.

A. I actually exited the building right here and came around; and in this picture, I'm standing back here.

Q. And so you are looking at the Murrah Building from the west?

A. Yeah, I'm standing to the west and looking east.

Q. All right. Now, may I ask you to look at Exhibit 944.

Now, can you see Exhibit 944 on the screen?

A. Yes.

Q. And where are you?

A. I'm -- let me just -- I'm right here, this -- that's me walking down the sidewalk right there.

Q. And what are you doing right there?

A. I'm walking westward, away from the Water Board and the Murrah Building. I was going down this direction to see if I could find any Water Board employees. We weren't yet sure what

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had happened and who was where, so I was trying to find my co-workers.

Q. What are you -- you see the streets there beside you on left?

A. Yes.

Q. What are we looking at on the ground there?

A. There was twisted -- twisted metal everywhere, glass all over, debris. It looked like a war zone to me when I stepped out. The ground was littered, covered.

Q. We'll next turn to Exhibit 1003. And again, if you would, describe for the jury what we're looking at in this exhibit.

A. We're, once again, looking down 5th Street eastward. On the left side is the Water Board, and at the main -- on the right hand here is what I saw what the Murrah Building looked like right after 9:02 that morning.

Q. As you're standing out there at the intersection of 5th and

Harvey, you said that your boss had asked you to try to account

for everyone?

A. I ran into my boss, Dee Couch, who was saying, "Find -- find Kim," our secretary. We couldn't find her; and so I basically turned, and that's when I started walking down 5th Street, walking west. We park our cars next to that St. Joseph

Rectory.

Q. Why don't you use the pointer, if you would.

A. A lot of us -- some of us parked here; but a lot of us

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parked right -- there was a parking lot right here. And I thought -- so I went down this way, thinking that when we left the building and this was such a -- I thought most everybody would go this way; so I turned this way to look for Water Board people down here around the car parking lot.

Q. All right. What did you find?

A. I found a few. There were some people sitting on curbs cut

up. It seemed very desolate and quiet and smoke everywhere, and there were -- I found a few Water Board people; but there was still a lot unaccounted for that morning when I was there.

Q. All right. Now, did you run into Mr. Mathis?

A. I did; down where the cars were, I ran into co-worker Mike Mathis; and he had a deep gash in his forehead. And he was going to drive himself in his pickup down to the south clinic, Southside Clinic in Oklahoma City. And I was aware that head gashes are probably not a good idea to drive; so I then drove his pickup out of that parking lot and took him to the Southside Clinic, where he got stitches when a doctor examined him.

Q. What did you do after that?

A. I called my sister and had her come get me down at that

A. I called my sister and had her come get me down at that clinic.

Q. And how did you spend the afternoon?

A. We all, at the Water Board, began calling each other back and forth to see who we'd seen, who we hadn't seen, who was

Cynthia Lou Klaver - Direct

missing, who was identified; so we were in constant contact calling back and forth to see if anybody seen the people that we hadn't found. So that's what we did that afternoon.

Q. And was everyone accounted for?

A. No. We were missing one employee, Trudy Rigney -- no one had seen. So we didn't know where she was. We weren't sure where she was.

Q. Did you ever see her alive again?

A. I did not ever see her again.

Q. What about Mr. Chipman?

A. He was rushed to the hospital, and he died a few days later

from massive head injuries from the glass that was blown into his head. He died.

Q. And these were both employees working within the Water Resources Board?

A. Yes.

Q. All right. Now, did you ever have an opportunity to go back to the Water Resources Board building?

A. I was on the first cleanup crew that they allowed in.

There was some disaster recovery team there that was cleaning up the Water Board, trying to salvage our records and documents and our computers, things like that, that we could. So they didn't really know the business of the Water Board, so a few of us had to go back in to direct them about, Well, this is so-and-so's office and this goes where. And I was one of a few

Cynthia Lou Klaver - Direct

that got to go in, I guess it was about a week after April 19th. So we went in to direct, and that's when I first went back into the building.

Q. Would you tell the jury what you observed when you went into the building?

A. The building was virtually destroyed. Inside everything was hanging down, twisted. It was sometimes even hard to recognize where you were in the building because the walls were down.

I went to my office, and I couldn't go in my door. I went through a back wall that was now an opening instead of a doorway. And my office -- everything was -- walls were down, the ceiling was down, the windows were out. Everything was wet, ruined. My computer had glass shards embedded all over it. My law books were ruined. Everything was ruined in my office. It was hardly recognizable. I would -- except I knew



the floor plan.

Q. Did you retrieve anything from the Water Resources Board building when you returned a week later?

A. I did not.

Q. Excuse me?

A. I didn't, no.

Q. Would you tell us how the tape that we've marked as Exhibit 942 got to be here with us today.

A. The Friday -- the bomb happened April 19th, which is a

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Wednesday. And then the following Friday, a few of us, the director and the division chiefs and the attorneys, got together at the capitol and we discussed how we were going to get started again, what we were going to do, where we were going to get together, what to do. And that's when I mentioned

that, Well, when I had been making -- I had had a hearing that we had a tape going. So our -- who is now our director -- he was assistant director then -- Duane Smith -- he and the FBI went to the building and got the tape out of the board room. And the FBI recovered it, it was on that -- I think that Friday, the next Friday.

Q. When you returned to the building, did you have a clock in your office or a clock in the board room?

A. Outside the -- Dean Couch, the general counsel for the Water Board -- outside his office -- we had one of those school

water Board -- outside his office, we had one of those school  
clocks, and it had stopped. It had fallen off the wall and  
stopped at 9:02 exactly.

Q. Now, would you please turn to Exhibit No. 947. Yes. I  
realize that's an aerial view, and I realize you weren't up in  
the air; but can you identify that as a scene, picture from the

Murrah Building that captures the Water Resources Board  
building as well?

A. Yes, this -- this looks like the Water Board and the  
Murrah

Building area after the bombing.

Q. Is it an accurate depiction of those buildings?

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A. Yes, it is.

MR. RYAN: Your Honor, we would move the admission  
of  
Government's Exhibit 947.

MS. RAMSEY: No objection, your Honor.

THE COURT: 947 is received. You may publish it.

MR. RYAN: Thank you, your Honor.

BY MR. RYAN:

Q. Now, the Murrah Building is rather obvious in this  
photograph; but if you would, would you circle the Water  
Resources Board building.

A. This is the Water Board right here.

Q. Have you ever been able to return to that building?

A. No, we haven't.

Q. Where has the Water Resources Board been required to perform its functions or work since April 19th, 1995?

A. We were first relocated in temporary quarters and working out of boxes at the state insurance building, and then we permanently moved last February on -- in our new offices on Classen Boulevard, which is not downtown.

MR. RYAN: Thank you, Mrs. Klaver.

Would you please turn the computer off.

THE COURT: Did we turn off the -- oh, you did.  
Thank  
you.

Miss Ramsey, you have questions?

MS. RAMSEY: No, your Honor, we do not.

THE COURT: All right. Are you excusing this  
witness,  
then?

MR. RYAN: Yes, your Honor.

THE COURT: Very well. You may step down. You are  
excused.

THE WITNESS: Thank you, your Honor.

MR. HARTZLER: Your Honor, the Government calls

Michael Norfleet; and Mr. Ryan will question him.

THE COURT: Thank you.

COURTROOM DEPUTY: Would you raise your right hand,  
please.

(Michael Norfleet affirmed.)

COURTROOM DEPUTY: Have a seat, please.

Would you state your full name for the record and spell your last name, please.

THE WITNESS: Michael Rand Norfleet, N-O-R-F-L-E-E-T.

COURTROOM DEPUTY: Thank you.

THE COURT: Proceed.

DIRECT EXAMINATION

BY MR. RYAN:

Q. Good morning, Mr. Norfleet.

A. Good morning, Pat.

Q. Where do you live?

A. I live in Allen, Texas.

Q. Where is that located?

Michael Norfleet - Direct

A. It's just north of Plano, in north Dallas.

Q. Are you married?

A. Yes, sir.

Q. Do you have children?

A. I have three children, ages 7, 4, and 2.

Q. What is your occupation, sir?

A. I sell digital test equipment now.

Q. And do you sell that in the Dallas, Texas, area?

A. Yes, and Oklahoma, also.

Q. All right. Now, you have a prior employment in the United States Marine Corps. Is that true?

A. That's correct.

Q. Prior to joining the United States Marines, where did you grow up?

A. Well, I was born in Oklahoma; and I really grew up worldwide. My parents were missionaries; so I spent a good majority of my childhood in Taiwan, with the Chinese people, as a missionary kid.

Q. Where did you go to high school?

A. I went there for the first two years, and then I came back to the United States for my junior and senior year of high school and then went to Oklahoma Baptist University.

Q. And graduated there when?

A. 1987, in computer science.

Q. Now, after graduating from Oklahoma Baptist University,

Michael Norfleet - Direct

where did you -- what did you do with your life?

A. My junior year of college, I signed up with the United States Marine Corps, platoon leader class, on a guaranteed aviation contract and went to officer cad. school during my junior and senior year, the summer during my junior and senior years; and after graduation I reported to the basic school in Quantico, Virginia.

Q. All right. After you completed your basic school in Quantico, what did you do?

A. My next duty station was Pensacola, Florida, where I attended flight school. I graduated flight school in '89 and

attended flight school. I graduated flight school in '85 and then reported to Cherry Point, North Carolina, for duty in Desert Storm.

Q. And did you have involvement in the Desert Shield /Desert Storm engagement?

A. Yes. In fact, immediately after graduating from all of my flight training, my squadron was already deployed in Desert Shield; and so after graduating, I went to Manama, Bahrain, where we were stationed and participated both in Desert Shield and Desert Storm, flew about 35 combat missions there.

Our squadron flew, you know, various noncombative evacuations in Somalia and stuff while we were there.

Q. Now, I don't want to go into the detail, but were you decorated for your involvement?

A. Yeah.

Michael Norfleet - Direct

Q. In Desert Shield and Desert Storm?

A. Yes. My wife got the regular service ribbons, and then I was also awarded the Air Medal for my combat flights.

Q. All right. Now, when you returned from Desert Shield and Desert Storm, where did you go?

A. I went back to my squadron, flew some NATO exercises, flew some antidrug interdiction missions in South America.

And then after that, my wife came to me and she says,

"Randy, you're flying around and gone so much and in so much

danger, can you give me a payback tour -- you know, can you give something back to your family? You've given so much to the Marine Corps. I'd like a piece of your time. I'm afraid you're going to get shot, you're going to get hurt in combat in all the dangerous places that you've had your duty in." So I decided to give my wife a payback tour and picked up an officer selection billet in Oklahoma.

Q. What does that mean, an officer selection billet?

A. Well, essentially, I was a Marine Corps recruiter, but I recruited the officers and worked with college students; so I, you know, would go to Oklahoma State University, OU, the surrounding colleges, and talk to college students about a career in the Marine Corps.

Q. Where were you physically located most of the time when you weren't out on the road recruiting?

A. I worked in Stillwater, Oklahoma, on the campus of Oklahoma

Michael Norfleet - Direct

State University; and it was about an hour, hour-and-15-minute drive from Oklahoma City.

Q. To Stillwater?

A. Yes, sir.

Q. Now, were there Marine -- were there other Marine facilities in Oklahoma?

A. Our command had various facilities all over the state, you know. You go into any small town and you'll find a Marine Corps recruiter there. That would be considered a facility; but our headquarters were stationed in Oklahoma City, at the federal building.

Q. When you say "the federal building," do you know the name of the building?

A. Yeah, the Murrah Building.

Q. And would you tell the members of the jury who was it with the Marine Corps that offices in the Murrah Building in downtown Oklahoma City?

A. Well, our command headquarters was there, and our commanding officer was Major Donald Geving; and then our sergeant major was Felipe Ilaio, and our executive officer was there, Captain Randy Guzman, as well as our operations officer, Captain Cooper.

We had other sergeants and gunnery sergeants there: Gunnery Sergeant Bussell; Sergeant Snyder; Sergeant Benjamin Davis; Gunny Cooper; and then our administrative secretary

Michael Norfleet - Direct

there, Barb.

Q. All right. Now, how often did you get to go to the Murrah

Building in the course of the year?

A. I tried to avoid seeing my boss too much, so I'd probably show up about once every month or so. You know, if I was in



show up about once every month or so, you know, if I was in the

area, since I traveled so much. And I travel the state of Oklahoma and the state of Kansas. If I was in the vicinity, I

would go by to see my boss just to --

Q. How long had you been there stationed in Stillwater as a recruiting officer for the Marine Corps prior to April 19th, 1995?

A. Well, I had been there about -- I had been there about three years, and I was just completing my tour.

Q. All right. So how many times total do you think that you had been in the Murrah Building prior to April 19th, '95?

A. I don't know. Maybe 25, 30 times.

Q. All right. Now, I want to turn your attention to April 19, 1995.

A. All right.

Q. And I want you to tell us what you did that day when you got up, what you did after you got up, and where you went.

A. Well, I had been invited to a leadership prayer breakfast by some business friends of mine in Oklahoma City, and we were to attend this breakfast at 6:30 in the Myriad Convention Center. So I got up about -- I don't know -- about 4:30 that

Michael Norfleet - Direct

morning, prepared, drove down to Oklahoma City, and met my friends at the Myriad Convention Center.

We had breakfast. There was several dignitaries there or state officials that were there and spoke at the breakfast; and about 8:30 that morning -- and then afterwards I -- I sat and talked with -- with some friends in the parking lot in there in the Myriad Convention Center.

Q. I'm going to show you an exhibit that's already been admitted into evidence, Exhibit -- Government Exhibit 958. Is it on your screen?

A. No.

Q. Now is it on your screen?

A. No.

There we go.

MR. RYAN: Okay. Miss Hasfjord, is it turned on for the --

COURTROOM DEPUTY: Yes, it is.

MR. RYAN: Thank you.

BY MR. RYAN:

Q. Now, if you would, Captain Norfleet, would you show us where the Myriad Convention Center is, approximately. And I realize it's not a very good -- it may not be the best photograph to do it; but can you show us approximately where that convention center is located.

A. Sure. I'd say the convention center is right about that

Michael Norfleet - Direct

red dot.

Q. All right. And after you left the convention center that morning, would you use the marker there and basically show the jury the route of travel that you took that morning before you went to the Murrah Building.

A. Sure. Well, as I came out of the Murrah Building (sic)  
--

Q. Myriad?

A. I'm sorry, the Myriad Convention Center -- I drove down the street here; and actually the street I came up is not -- not completely on this picture.

Q. All right.

A. But I came back and drove my truck down this road here, being a one-way street, and stopped at that stoplight there.

Q. All right. And when you did that, what did you observe?

A. Well, while I was sitting in my truck, I had -- there was, you know, very little traffic in front of the Murrah Building; and I saw a yellow Ryder truck sitting in front of the building. And I thought it was kind of odd because, you know, usually the loading -- the loading docks -- people would go underneath the building to the parking lot in back.

And I thought it was, you know, a young sergeant checking into one of the commands there; and he had just parked his truck there in front of the building, so I didn't pay any attention about it. I just thought it was some Marine coming from Camp Pendleton or Paris Island or somewhere and was

checking in.

Q. All right. What did you do after you stopped at the light?

A. Well, after the light changed, I drove up and I thought, man, this is my lucky day because the -- all the parking spots were open. So I pulled in the first available parking spot in front of the Ryder truck and got out of my truck, and I walked to the -- to the entrance of the federal building.

Q. Let's stop right there.

A. Okay.

Q. About what time is it? I mean, you probably weren't looking at your watch, but approximately what time was it when you pulled your truck up in front of the Murrah Building?

A. It seemed like it was, you know, a couple of minutes before

9.

Q. Okay. Now, we're going to zoom in here to see if we can't

get a little bit closer picture of the Murrah Building; and I would like for you to take your marker pen and place the location where you think the -- where you believe the Ryder truck was located at around 9:00 on April 19th.

A. Well, the Ryder truck was positioned right here in front -

-  
if you can see that R, right in front of the building.

Q. Okay. Now, would you show -- why don't you leave the R up there.

having trouble seeing --

Michael Norfleet - Direct

COURTROOM DEPUTY: I don't have a number.

MR. RYAN: I'm sorry. We're at 958.

COURTROOM DEPUTY: Another 958?

MR. RYAN: Yes, the zoom picture.

THE COURT: Do you have it now?

MR. RYAN: Thank you, your Honor.

THE COURT: Please speak up any time we have that problem because I can't see your monitor. Thank you.

BY MR. RYAN:

Q. Now, you've placed an R there on the photograph that the jury's looking at, and I think you've previously stated R is the approximate location where you saw the Ryder truck that morning.

A. That's correct. Well, there's kind of an indentation, a loading zone that's there in the middle of the building, and it was parked there in the middle of that loading zone.

Q. Is that directly in front of the door?

A. Yes, that's correct, in front of the doors.

Q. And this indentation spot, about how deep does it go -- does it dig into the sidewalk there?

A. I would say, you know, it's about a car length off, enough so that traffic passing by won't hit the cars.

Q. All right. And where was the front door of the Murrah

Building in relationship to the yellow Ryder truck?

A. It was directly in front of the front door.

Michael Norfleet - Direct

Q. Now, would you again take your pen there and show the jury where the -- where your car was parked.

A. Okay. I parked my truck right -- well, this pen's not working for me too well, but I guess where those arrows are.

Q. Okay.

A. Let me see if I can't erase this. Right there.

Q. All right. And the T standing for truck?

A. For my truck.

Q. Because what kind of vehicle were you driving that morning?

A. Yeah. That morning I was driving a -- my Ford -- Ford Ranger. It was a 1992 black Ford Ranger.

Q. And about how far did you park your truck from the front entrance of the Murrah Building?

A. I -- I would say, you know, maybe 30 to 40 feet.

Q. All right. Now, when you got out of your truck, what did you do?

A. Well, I got out of my truck and, you know, paid the meter there and probably walked by the Ryder truck, probably about an arm's length; and going in I noticed that -- you know, one, maybe two people on the side sitting in front of the Social Security office there.

And I walked into the building, and I came to the elevators; and the elevator, you know, like a lot of elevators are preprogrammed to do, it was sitting there with the door open. So I just walked right into the door and punched the

Michael Norfleet - Direct

sixth floor -- and punched the sixth floor where my command headquarters was.

Q. What did you do as you got to the command headquarters?

A. As I came in, I went into our operations section; and one of my secondary agendas in coming on this trip was not only to see my boss, but it was a big day for Sergeant Benjamin Davis. As -- my duty as a sergeant selection officer was to put together promotion packages for sergeants to become officers.

And Sergeant Davis today -- the day prior the board had met for

the officer -- for the promotion board, and Sergeant Davis had

wanted me to call headquarters Marine Corps to find out if he had been selected to become an officer.

Q. And did you do that?

A. Yeah. So I sat down at the officer's desk in our operations room, which is right at the very front of the building, and I placed a call to headquarters Marine Corps.

But the phone was busy, so I hung up the phone; and I looked at

Sergeant Davis and I said, "I'll be back in five minutes."

and

AND

then --

Q. Tell us what you did.

A. And then I walked over to the next office over and started talking to two of my supply chiefs.

Q. Did you ever see Sergeant Davis alive again?

A. No, I did not.

Q. Tell us what happened when you went over to the other side

Michael Norfleet - Direct

of the floor.

A. Well, I went over to the other side of the floor and I began talking to Gunnery Sergeant Bussell and to Sergeant Snyder, our two supply sergeants; and just about the time I got hello and good morning out of my mouth, the bomb hit.

Q. Now, about what length of time was it from the time you saw

the Ryder truck at the intersection until the time that you got

up there on the floor and the bomb hit?

A. I don't know. A couple of minutes. It wasn't that -- it wasn't that long.

Q. Now, tell us in your own words what you heard, what you saw, what happened after the bomb hit.

A. Well, I was facing the front of the building, so I was facing the glass; and in my right hand I was carrying my bag, and my left hand was free. And as the bomb hit, I remember -- I remember Sergeant Snyder saying, "Well, holy shit, there's



a -- you know, a gas explosion." And then -- and then, at the

same time, I threw up my left arm to protect myself, and that saved shrapnel from entering my left eye.

But I took a piece of glass from the top of my head, and it flayed open my right eye; and it essentially just expunged and bust the whole eye; and in the process, it cut an artery in my forehead. It cut an artery here in my cheek; and at the same time, it cut an artery on my wrist.

And the explosion and the force of the blast, from my

Michael Norfleet - Direct

understanding, threw me into the west wall, breaking my nose, fracturing my skull, and leaving me lying there on the ground for a couple of minutes until I recovered.

Q. Are you blind in your right eye?

A. Yes.

Q. All right. After you say you were lying there for a couple

of minutes on the floor, tell the jury what happened next.

A. Well, after a couple of minutes, I really don't -- I don't know if it was 10 seconds, I don't know if it was a minute, a minute and a half; it could have been 5 minutes. I don't know.

But I got up, and the two sergeants that I was talking to had been sitting in high-back chairs with their back to the wall;

and so they had minor shrapnel wounds, but they were relatively

unhurt.

And so I turned to Sergeant Snyder, who was a good friend of mine, and I said, "How bad am I hurt?" Because I really -- I couldn't see out of my left -- my right eye, and I had blood streaming all over my face and I could barely see out of my left eye because of the blood.

And the sergeant looked at me and he says, "Sir, you look really bad." But I knew I was in good hands because Sergeant Snyder had been a Desert Storm infantry Marine and he had gone across the trenches. So he immediately went -- went into his combat mode and started taking care of me.

So what he did is he laid me on a table and he started

Michael Norfleet - Direct

to look for bandages to administer first aid to me; and while I was laying on that table, I could feel the life ebb out of my veins. I just knew that I was losing strength and that if I stayed in the building, that I would die.

And so I got up off the table and I told the sergeant

to give me his shirt so I could put it on my head and bandage my head and stop the bleeding. And then I got up off the table

and with his help; and with Gunnery Sergeant Bussell's help --

they guided me to the back of the building, climbing over the waist-high rubble to the back stairs of the federal building; and then I walked down the six flights of the federal building.

And what I remember as I went down the six flights of stairs is I was amazed, first, that the stairs were even there because the building was gone, and the only thing I could see, because of my limited vision, was following a blood trail of somebody that had gone down the steps before me. And that just kind of, you know, was like the yarn leading me out of the maze, was that blood trail, and I followed it out the building.

As I came out of the building, an Oklahoma Highway Patrol officer came running up to me; and he directed me over to the southwest corner of the building of where the ambulances were, and I got into the ambulance. While I was in the ambulance, I was there with a -- what I believed to be an Army sergeant who had a broken leg, and he was screaming in pain. And then as I got in there, I felt myself losing consciousness;

Michael Norfleet - Direct

and I regurgitated there in the ambulance because I was -- I was almost completely in shock at this time.

And so the med. tech there in the ambulance put some oxygen on me which allowed me to keep my consciousness, and the

----

ambulance rode me to Saint Anthony's that was about a mile away.

Once I got into Saint Anthony's, I immediately went into surgery; and after the surgery, the doctors came back and told me that I had lost 40 to 50 percent of my blood in about 10 minutes and that about another 5 minutes I would have bled to death. In another 2 to 3 minutes, I probably would have been in a coma.

Q. Well, I'm not going to go into the details of your hospitalization, but you had multiple surgeries?

A. That's correct.

Q. How many stitches did you have to take to your face?

A. I took about 250 stitches in my head.

Q. Did you ever see your truck again?

A. I saw it months later in a wreckage yard somewhere.

Q. Okay.

MR. RYAN: Mrs. Hasfjord, can you fix it so I can just show it to him and the Judge and the defense without coming to the jury?

MS. RAMSEY: Could we have a copy of the drawing that he's using?

Michael Norfleet - Direct

MR. RYAN: Excuse me?

MS. RAMSEY: Could we have a copy of the drawing

that

he's made?

COURTROOM DEPUTY: Do you want a copy?

THE COURT: Yeah. Print this.

MR. RYAN: Okay.

BY MR. RYAN:

Q. Now, I realize that you didn't see this scene, and we'll have other witnesses follow you that will identify this photograph; but is that -- does that photograph accurately depict your vehicle as you saw it in the salvage yard months later?

A. Yes. Yes, it does.

MR. RYAN: Your Honor, we would offer Exhibit -- this

is Exhibit 4 -- excuse me, 761. We would offer Exhibit -- Government's Exhibit 761.

MS. RAMSEY: No objection, your Honor.

THE COURT: 761 is received.

Now you can publish it, if you wish.

MR. RYAN: Thank you, your Honor.

BY MR. RYAN:

Q. Now, let's, if you would, take your marker there and circle

where your vehicle is located relative to the Murrah Building.

A. This is my truck right here.

Q. All right. We're going to zoom in a little bit more so we

can see it more clearly. Now, there's a red tag on the front of that pickup truck that you can barely see behind the grille.

Do you see what I'm talking about?

A. Yes, I do, sir.

Q. What is that?

A. That was kind of my pride and joy. That's a red tag that had my gold aviator wing on it. Since I was the only pilot in our command, I -- I had that on my truck; so the red background was for Marine and the gold was for pilot.

Q. Do you fly anymore?

A. Well, you know, that's -- one of the -- the rather large changes that I've had in my life is that, you know, I had grown

up wanting to be a pilot, I had pursued a pilot's career in the

Marine Corps; but now being blind in one eye, I'm not eligible not only for the Marine Corps or for any military flying, but I'm not eligible for civilian flying either.

Q. Were you required to leave the Marine Corps following this accident?

A. Yes, the Marine Corps discharged me with 50 percent disability.

THE COURT: Miss Ramsey, do you have questions?

MS. RAMSEY: Yes, your Honor.

THE COURT: All right.

CROSS-EXAMINATION

BY MS. RAMSEY:

Michael Rand Norfleet - Cross

Q. Good morning.

A. Morning.

Q. Mr. Norfleet, do you still have that picture of your vehicle in front of you?

A. Yes, ma'am.

Q. Is that where you parked it that morning?

A. Not really. I think it was blown -- that was not where I

parked it. It was closer in.

Q. Is the parking in front -- or was the parking in front of the Murrah Building angled parking or parallel parking?

A. Parallel.

Q. And did you see Timothy McVeigh in Oklahoma City that morning?

A. No, I did not.

MS. RAMSEY: I have no further questions, your Honor.

THE COURT: Witness excused now?

MR. RYAN: Yes, your Honor.

THE COURT: All right. You may step down. You're excused from further attendance. Thank you.

Next witness.

MR. HARTZLER: Your Honor, the Government calls Mr. Phil Monahan, and he will be questioned by Miss Behenna.

THE COURT: I think the description on Exhibit 761 that I have is in error, if you want to check with that and

deal with it later, but --

COURTROOM DEPUTY: Would you raise your right hand.

THE COURT: Go ahead.

(Phil Monahan affirmed.)

COURTROOM DEPUTY: Thank you.

MR. RYAN: I may have misspoken, your Honor. The exhibit that shows the building from some distance with the truck in it should have been by my other Government's Exhibit 761.

THE COURT: Yes. And the description that I have from 761 is different from the list. It's something that can be taken care of later, but I didn't want to mess with it.

MR. HARTZLER: I think the photograph depicts two things is the reason. You have the description of one.

THE COURT: Go ahead.

DIRECT EXAMINATION

BY MS. BEHENNA:

Q. I'm not certain if you stated your name for the record.

A. Phil Monahan.

Q. And spell your last name.

A. M-O-N-A-H-A-N.

Q. Where do you live, Mr. Monahan?

A. I live in Edmond, Oklahoma.

Q. Are you employed?

A. Yes, I am.

Q. How are you employed?



Phil Monahan - Direct

A. I'm a photojournalist for KOCO Television in Oklahoma.

Q. What affiliate?

A. ABC.

Q. ABC affiliate in Oklahoma City?

A. Yes.

Q. How long have you been a photojournalist?

A. 17 years.

Q. All for Channel 5 in Oklahoma City?

A. No, ma'am. I've been there 13 years now.

Q. 13 years with Channel 5?

A. Yes.

Q. You were a photojournalist I guess with Channel 5 on  
April 19th, 1995?

A. Yes.

Q. Do you remember the morning of April 19th?

A. Yes, I do.

Q. Can you tell the jury what you were doing that morning.

A. I was in our morning editorial meeting in a conference  
room

off the newsroom at Channel 5 in Oklahoma.

Q. And what were you doing?

A. Deciding what we were going to do for our newscast for the  
day. First thing we do in the morning is get together and  
talk

about what's going on that day.

Q. And what's the next thing that you remember?

A. Very sharp explosion. It rattled the windows and brought

A. very sharp explosion. It rattled the windows and brought

Phil Monahan - Direct

everybody in the room to their feet, and we turned and ran out of the room and ran through the newsroom out into the parking lot. I turned to my left and looked towards the downtown skyline and saw the pillar of smoke rising above downtown.

Q. And just so the jury understands, how far is the Channel 5 news station from downtown Oklahoma City?

A. Roughly 10 miles.

Q. Okay. And so you run outside and you see a pillar of black smoke?

A. Yes.

Q. Rising over downtown?

A. Yes. Turned and ran back kind of upstream with all the people that were coming out of the building. I was the first one out the door screaming, "I need a reporter," and grabbed the first reporter that I saw in the line, which was Rhonda Chapman, and got in my truck and headed downtown as fast as I could.

Q. Down Broadway Extension?

A. Yes.

Q. About what time did you get to downtown Oklahoma City?

A. A little before a quarter after 9.

Q. And you headed down on Broadway?

A. I went down Broadway. I exited on North 6th Street and

turned to the right towards downtown and parked at the corner of 6th and Broadway and got my equipment out of the back of the

Phil Monahan - Direct

truck and started walking to the west on 6th Street.

Q. Let me stop you there; and just so we can orient the jury so they can follow your movements as you're walking downtown -

I believe in front of you you should have a pen, and if you press it, it will -- no, there's a laser pen that looks something like -- or a light pen that looks something like this.

And on Government's Exhibit 940, can you show the jury where it is that you parked.

A. I parked at this corner and started walking down 6th Street that direction.

Q. Can you tell the jury what you observed as you walked west on N.W. 6th Street.

A. The first thing I noticed was all the glass on the north side of 6th Street was out, and I even saw an overhead garage door that was pushed several feet back into the building that it had served; and then I started seeing people with blood on their faces and running down their backs.

Q. Do you see debris in the street?

A. Yeah. There was a lot of broken glass and some bricks and

debris laying in 6th Street there.

Q. Had the smoke cleared out of downtown or was it still fairly smokey?

A. It was still smoking from south of me down -- down Robinson

towards the building where we had learned all the cars were

Phil Monahan - Direct

still on fire in the parking lot across the street.

Q. As you walked west on 6th Street, were you filming?

A. Yes, I was. I was stopping and shooting pictures of things

I saw as I went west.

Q. Did you make it to the corner of 6th and Robinson Street?

A. Yes.

Q. And again, for the jury, so they can follow us, can you just point where you were.

A. Right there.

Q. What did you observe when you reached the corner of 6th and

Robinson?

A. A lot of injured people being taken care of, getting initial care. The whole intersection was full of people; and at that point, we --

Q. Was there a triage?

A. Yeah, it was the main triage center for people that they brought to the north side of the building. There were ambulances, lots of EMT's and people giving primary care to

the

people that were injured there.

Q. And I suppose you filmed that.

A. Yes, I did.

Q. Did you realize as you were standing on the corner of 6th and Robinson where the explosion had occurred?

A. No. It actually took me probably about 5 minutes at that corner before it dawned on me that this was not where the event

Phil Monahan - Direct

had occurred. There was just so much there that it took a little while for me to work out that I wasn't in the right spot, so I turned and started south down Robinson.

Q. And again, just so the jury can follow your movements, that

would have been --

A. Down this way.

Q. You started walking that way.

Is that the first time that you saw the Murrah Building?

A. Yes. As I continued south on Robinson, the building came out from behind the corner of the Journal Record Building, and that's when I saw the front of the Murrah Building for the first time.

Q. Did you begin filming the events that were occurring?

A. Yes, I did.

Q. At that location as well?

Q. The exact location as well.

A. Yes. I set up a tripod there and started shooting pictures

of the building and the burning cars and injured people moving up and down Robinson.

Q. Were you approached by anybody as you stood on Robinson?

A. A little later I was, yes.

Q. Can you tell the jury what happened.

A. I was standing back -- a little further back up Robinson closer to the corner, right about there; and I had a tap on the

shoulder and turned around, and there was a young lady standing

Phil Monahan - Direct

there.

Q. What did she say to you?

A. She said, "My baby is in the day care. Can you help me?"

Q. What did you do?

A. I thought I knew what to tell her. I thought I heard an officer telling family members to go to 5th and Broadway, so I told her, "You need to go around the block to 5th and Broadway and somebody could help you."

She told me that she had just been there and they sent

her over to our location; so I thought I could help her by letting her use the cell phone. So I walked back to where my truck was parked to let her and her husband use the cell phone,

and it didn't work by that point.

Q. Did you have any other interaction with that woman that morning?

A. Yes. It was a very cold morning, and both her and her husband were kind of huddling very cold; so I gave them some jackets that I had in the truck.

Q. And that was the last contact that you had with them?

A. Yeah. I haven't spoken with them since.

Q. Do you have any idea who it was?

A. Yes. Their last name was Gottshall, I believe; and their  
6

month old was killed in the day care.

Q. You've learned that since then?

A. I've learned that since then, yeah, by seeing pictures of

Phil Monahan - Direct

them and finding out who they are.

Q. How many other photojournalists from Channel 5 were in the downtown area that morning?

A. As I left Channel 5, Kyle Ham and Chris Lead went right behind me. Richard Jackson had been in the downtown area and was down by the YMCA.

Q. And for the jury again -- I hate to interrupt you -- can you just show them where the YMCA is located.

A. Richard was right in this area.

Q. All right.

A. Charles Shephard and Dave Wind were also downtown.

Q. When did you leave downtown Oklahoma City?

A. It was after the second bomb scare came out, which I believe was about 90 minutes after the explosion; and we got moved back across the railroad tracks, back this way.

Q. Okay. And it was sometime in the morning that you left downtown?

A. Yes.

Q. After a bomb scare?

A. Yes. Approximately 10:30.

Q. What did you do after you left downtown?

A. I went back to the television station and began going through the tape I shot, getting it ready to put on the air.

Q. And you reviewed your tape?

A. Yes, I did. I started right away going through it and

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editing it to put it on TV right away.

Q. Your camera worked that morning?

A. Yes, it did.

Q. And it recorded the images that you viewed when you were in

the downtown area?

A. Yes, it did.

Q. Did you also review film taken by the other photojournalist

of Channel 5?

A. Yes. I had the opportunity to edit quite a bit of their



tape, also.

Q. Their cameras -- their cameras were working as well?

A. Everything worked fine.

Q. And they recorded the images that you saw down there as well?

A. Yes.

Q. Did you provide a tape of the footage Channel 5 had taken of Oklahoma City on April 19th to the Government?

A. Yes, I did.

Q. Pursuant to a subpoena?

A. Yes, I did.

Q. And did that tape contain the images that you and your other photojournalists took?

A. Yes, it did.

Q. You have in front of you Government's Exhibit No. 1380, it should -- can you just tell me what it is.

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A. Yeah. It's a videotape.

Q. Have you had an opportunity to review that edited version of the videotape?

A. Yes, I have.

Q. You reviewed it once in my office in Oklahoma City?

A. Yes.

Q. And just a couple of weeks ago here in Denver?

A. Yes.

Q. And it's an accurate depiction of what you and the other photojournalist of Channel 5 took the morning of April 19 --

A. Yes, it is.

Q. -- 1995?

MS. BEHENNA: At this time, I would move for Government admission of 1380.

MS. RAMSEY: No objection.

THE COURT: 1308 is received.

MS. BEHENNA: With the assist --

THE COURT: What is the running time on this?

MS. BEHENNA: Just a few minutes.

THE COURT: I take it you want to publish it.

MS. BEHENNA: And I believe we're going to need the auxiliary video because we're going to be on the laser disk.

Is that right?

We have a malfunction.

THE COURT: Well, we'll take the morning recess and

Phil Monahan - Direct

work out these technologies.

MS. BEHENNA: Thank you, your Honor.

THE COURT: You can step down now, and we'll have you

back in about 20 minutes.

THE WITNESS: Thank you, sir.

THE COURT: Members of the jury, we'll take our morning recess -- it's about time anyway -- before viewing the

exhibit. And of course, you know, like I said, every time you  
recess, I've got to tell you: Don't talk about this case  
among  
yourselves or with anybody else.

You're excused now; 20 minutes.

(Jury out at 10:15 a.m.)

THE COURT: Recess.

(Recess at 10:16 a.m.)

(Reconvened at 10:35 a.m.)

THE COURT: Be seated, please.

Ready? Did we get the glitches worked out?

MS. BEHENNA: Yes, sir. I believe so.

THE COURT: Good. We'll bring in the jury.

(Jury in at 10:35 a.m.)

THE COURT: Please resume the stand. We're about to  
publish Exhibit 1380.

MS. BEHENNA: Thank you, your Honor.

(Exhibit 1380 played.)

MS. BEHENNA: That's all I have, your Honor.

Phil Monahan - Direct

THE COURT: All right. Any cross-examination?

MS. RAMSEY: No, your Honor.

THE COURT: Is the witness excused?

MS. BEHENNA: Yes, your Honor.

THE COURT: Thank you. You may step down. You're

THE COURT: Thank you. You may step down. You're now excused.

Next witness, please.

MR. HARTZLER: The Government calls Mr. Richard Williams.

Mr. Ryan will do the questioning.

THE COURT: Thank you.

Mr. Williams.

(Richard Williams affirmed.)

THE COURTROOM DEPUTY: Have a seat, please.

Would you state your full name for the record and spell your last name.

THE WITNESS: Richard E. Williams, W-I-L-L-I-A-M-S.

THE COURTROOM DEPUTY: Thank you.

THE COURT: Mr. Ryan.

MR. RYAN: Thank you, your Honor.

#### DIRECT EXAMINATION

BY MR. RYAN:

Q. Please state your full name.

A. Richard E. Williams.

Q. Your address, sir?

Richard Williams - Direct

A. 8012 South Westminster.

Q. Where are you employed, Mr. Williams?

A. Work for the General Services Administration.

Q. What is General Services Administration?

A. We are the facility -- we maintain the facilities for the Government, federal buildings.

Q. Is it a federal agency?

A. Yes, sir, it is.

Q. All right. And what is your age?

A. I'm 51.

Q. Are you married?

A. Yes, sir, I am.

Q. Children?

A. I have two children.

Q. Where were you born and raised?

A. I was born in Chickasha, Oklahoma; raised in Seminole, Oklahoma.

Q. Where did you go to high school?

A. Went to high school in Seminole, Oklahoma.

Q. Graduating in?

A. 1964.

Q. What did you do after your graduation from Seminole High School?

A. Went to college on a football scholarship to Connors Junior

College and went to East Central College, and then I joined the

Richard Williams - Direct

Air Force in 1966.

Q. Tell us about your duties in the Air Force, briefly.

A. I was stationed in Miami, Florida. I spent a year in Vietnam and then a year in -- year and a half in northern Montana and got out of the service in 1970.

Q. After you were discharged from the Air Force in 1970, what did you do?

A. I went to work in the oil field for a while, went to California and worked in a factory and then came back and went to work at Bone and Joint Hospital in Oklahoma City and in 1976

went to work for the General Services Administration in August.

Q. And would you tell us something of your career with General

Services Administration over the past 21 years.

A. Yes, sir. I started with GSA in August of 1976 as a maintenance mechanic, just a few months before the Murrah Building opened, and helped take care of the federal building courthouse and the old post office building, as they were building the Murrah Building. When the Murrah Building opened in April of 1977, I became the mechanic that took care of that building for about eight years.

Q. What are the kind of things that you would do as a mechanic

within the Murrah Building?

A. Air-conditioning, heating, control energy management systems, electrical repairs, plumbing repairs, just general maintenance; but mostly air-conditioning and heating.

Richard Williams - Direct

Q. We're not talking about a white collar sitting in an office, are we?

A. No, sir.

Q. We're talking about down there with tools and the equipment?

A. Walking the buildings every day, meeting the people, working with them, taking care of the system itself.

Q. How long did you actually physically take care of the machinery and the other equipment there within the Murrah Building?

A. Directly for eight years. Then I was promoted to the maintenance foreman, which was responsibility for the entire complex; so I oversaw the downtown federal complex, which still involved being responsible for the Murrah Building itself. Then I was promoted to assistant building manager in 1984, and that responsibility involved taking -- not only being responsible for those buildings but also leased facilities. And in 1987, we expanded and consolidated with eastern Oklahoma, so our field office was responsible for the entire state of Oklahoma, all the federal buildings and leases in the state of Oklahoma.

Q. What is your job today?

A. Today, I'm the manager for the Oklahoma Customer Service Center, which manages all the federal buildings and leases in the state of Oklahoma.

Richard Williams - Direct

Q. All right. Now you do have a white-collar job?

A. Yes, sir, I do.

Q. And you supervise the other GSA employees in the state of Oklahoma?

A. We have under our auspices -- there are 33 GSA employees that are responsible for federal buildings that are under my direction.

Q. All right. Now, let's talk about April, 1995, and tell us what your position was on that date.

A. On April 19, '95, I was assistant building manager. We were housed on the west end of the Murrah Building -- on the west end, Room 108; and I would come to work as I did normally about 6:30 every morning.

Q. Let's wait -- I don't want to talk about what happened on April 19 yet. I want -- what I'd like to do is have you talk about the building, and we've prepared a video presentation for

the jury that does that. Is that correct?

A. Yes, sir.

Q. You've reviewed that video presentation, which is Exhibit 949.

A. Yes, sir, I have.

Q. And do all the contents on 949 accurately depict the building and the floors of that building?

A. Yes, it does.

Q. All right. Now, the building was constructed, you said,



in

Richard Williams - Direct

what, 1976?

A. 1977, April of 1977, when we moved the first tenants in, yes, sir.

Q. I want you to put modesty aside for a moment. Okay? Can you do that?

A. Yes, sir.

Q. Is there anyone who knows more about the Murrah Building, the inner workings of the Murrah Building, the equipment of the

Murrah Building, the floors of the Murrah Building, than you?

A. No, sir. I think I have a good knowledge of that simply from the years of experience I have in the building.

MR. RYAN: Now, your Honor, I would move the admission

of Exhibit 949.

MR. TRITICO: Your Honor, I don't have any objection to it; but I don't know from reading the description if we're discussing the same exhibit that Mr. Ryan was talking about.

MR. RYAN: What this exhibit is is a brief introduction by showing the state: It goes to the city, goes to the downtown area, helps the jury orient on the building. Then we'll talk about the specific floors.

MR. TRITICO: I have no objection.

THE COURT: All right. 949 is received, and you may

publish.

MR. RYAN: Thank you, your Honor.

Are we on whatever it is that's the right mode?

Richard Williams - Direct

THE COURTROOM DEPUTY: You're on it.

MR. RYAN: Okay.

BY MR. RYAN:

Q. That's a map of the United States that shows where Oklahoma

is. We're going to move to Oklahoma City.

All right. Now, would you describe what we're seeing

here on the video.

A. Yes, sir. What we're seeing is an example of the streetscape for Oklahoma City, with the interstates and intersections. The red line would be Interstate 40, which runs east and west through Oklahoma City. The brown would be Interstate 35. It runs north and south. The purple would be Interstate 44, which is a loop around the city, with a branch of I-235, which is to the east of downtown Oklahoma City.

Q. Now, how far is the Murrah Building from these interstate highways that you mentioned?

A. From Interstate 40, it would be -- where Northwest 5th would be, approximately six blocks. Interstate -- I-235 would be approximately six blocks, also.

Q. All right. Now tell the members of the jury what they're

looking at on this exhibit.

A. This would be a downtown streetscape again of the streets surrounding the Murrah Building site. The Murrah Building is located obviously at 5th Street. 4th Street would be the street directly to the south behind the plaza. 6th Street was

Richard Williams - Direct

one way going west to the north of the Murrah Building. 5th Street was one way going east right directly in front of the Murrah Building, and 4th Street to the south was a two-way street.

Robinson and Harvey bordered the east and west boundaries of the building. Robinson was southbound one way, and Harvey was northbound one way.

Q. Let's take a little closer look.

Now, this, of course, is not a map. This is a diagram. Correct?

A. Yes, sir.

Q. And it's identical except for the colors to what's behind you there as Exhibit 940?

A. Yes, sir.

Q. Is that correct?

A. Yes, sir.

Q. All right. Now, what I want to do for the next 2 or 3 minutes is acquaint the jury with the neighborhood that surrounds the Murrah Building; so we're going to go from each

building that surrounds the Murrah Building. And I'd like for you to identify that for the jury as we go to each. Okay?

A. Okay.

Q. All right. Now, we have a building there in yellow.

A. This is the Journal Record Building that was bordered by 6th Street directly north of the Murrah Building, separated by

Richard Williams - Direct

a parking lot. Journal Record Building housed a newspaper, housed the board of regents and several other independent agencies, one, I think -- a couple maybe being lawyers' offices.

Q. All right. Now, there is a small yellow line just below the Journal Record Building.

A. This is what we call the Athenian Building. I think it was named after the Athenian Restaurant moved into it a few years back and was housed in the basement of the building. And on the second floor, I believe there was a Job Corps office.

Q. Now, the jury has already heard some testimony this morning about this next building; but identify it for us, please.

A. This is the Water Resources Board building.

Q. This is where Ms. Klaver worked?

A. Yes, sir.

This is the Center City post office building. It was a branch facility for the post office that was built, I

believe, around 1984, 1985. I'm not sure of the year exactly; but part of the reason for this building was we moved the old -- the postal facility out of the old post office building and into the post office building. This was the facility that was built for that purpose.

Q. All right. Was it damaged in the explosion?

A. From the pictures that I've seen, yes, sir.

This is St. Joseph's Cathedral Catholic Church,

Richard Williams - Direct

directly west of the Murrah Building plaza on the corner of 4th

and Harvey.

Q. What is just north of the Saint Joseph's Cathedral?

A. At that time, prior to April 19, there was a rectory that was in that space. I understand it was damaged and was razed.

Q. What is a rectory?

A. I believe that the priest lived there. There may have been

a Catholic -- the office for the church may have been there. I

used to stand out on the dock out to the west of the Murrah Building and watch people, transients come to those doors and get sandwiches. They would knock on the door and people would bring sandwiches to them.

This is the federal building courthouse directly south

of the Murrah Building site. It is the federal courthouse for

the Western District of Oklahoma.

Q. It's a court just like the court we're in today, only instead of being in Denver, it's the federal court for Oklahoma

City?

A. Yes, sir, that's correct.

Q. All right.

A. This is the First United Methodist Church directly to the east of the plaza. Directly to the north of that was a parking lot area. I understand this church has been there since about 1904.

This was the YMCA building directly to the northeast

Richard Williams - Direct

of the Murrah Building. They had a workout facility in this building. There was a day-care in there on the west end. They had a restaurant, and I believe there were some housing on the upper floors.

Q. Where people would stay overnight?

A. Yes, sir.

This is the Alfred P. Murrah Building, which is centered between Robinson and Harvey on Northwest 5th. It was adjacent to and in conjunction with the Murrah Building plaza, which encompassed the entire block, the entire site.

This is a picture of the Murrah Building looking from

the northeast to the southwest. You can see to the left would be the plaza area. To the direct south would be the federal building courthouse.

This would have been the roof just to the east of the tower portion -- was a roof over the first floor Social Security area; and the north entrance was 5th Street.

Q. Now, the glass, the long glass wall that we see there to the right side of the picture: What side of the building is that?

A. That is the north side, what we call the "curtain wall" side because of the glass.

Q. Is this where the pickup and delivery vehicles had an indentation there in the sidewalk that they could pull up and drive in front of the Murrah Building?

Richard Williams - Direct

A. Yes, sir. There was an area between the parking meters that was an indented area where you could pull in and let people out to the building or make deliveries.

MR. RYAN: Could we turn over to the computer?

Thank you.

BY MR. RYAN:

Q. Now, you have some exhibits there before you, Mr. Williams.

If you would turn to Exhibit No. 958. Do you have it there?

A. Yes, sir.

MR. RYAN: This is already admitted in evidence?

And your Honor, I would ask permission to publish it again.

THE COURT: Yes.

BY MR. RYAN:

Q. And again, orient us just a bit with this photograph.

THE COURT: We don't have it.

There it is.

MR. RYAN: Excuse me.

THE WITNESS: This was the Murrah Building. This is the Regency Tower. This was the rectory.

This would have been the Water Resources Building, the Athenian Building. Let me get these off of here -- excuse me. And this would be the Journal Record Building to the north.

This is the federal building courthouse. Excuse me --  
to the south. This was the plaza area directly to the south of

Richard Williams - Direct

the building, back behind -- it extended the full block behind the building to the south and to the east and west.

BY MR. RYAN:

Q. Thank you.

A. I'm sorry.

Q. Who was the owner of the Alfred P. Murrah Building?

A. The United States Government through the General Services



Administration.

Q. Would you please turn to Government's Exhibit No. 950 in front of you. Do you have that?

A. Yes, sir.

Q. Would you please identify that for the court and jury?

A. Yes, sir. This is the deed for the federal building courthouse -- I mean the Alfred P. Murrah Federal Building.

Excuse me.

MR. RYAN: Your Honor, we would move the admission of Exhibit 950.

MR. TRITICO: No objection.

THE COURT: 950 received.

MR. RYAN: Request permission to publish.

THE COURT: All right.

BY MR. RYAN:

Q. This is a little difficult to read, and we'll zoom in on a portion of it in a moment. But describe generally what this -  
-  
what we're looking at here on the screen.

Richard Williams - Direct

A. This is a quitclaim deed, whereby the Government, through financing for the federal building projects, would deed the property to a financing corporation; and then, I assume once this would be paid off, it would be deeded to the Government.

Q. And this is page 1?

A. Yes, sir.

Q. We're now looking at page 2.

A. Yes, sir.

Q. And page 3.

A. Yes, sir.

Q. Now, we're going to zoom in on a portion of page 1.

Would

you please read that?

A. "In consideration of \$10 and other goods and valuable consideration in hand paid, the receipt of which is hereby acknowledged, does hereby quitclaim, grant, bargain, sell, and convey without representation, warranty, or recourse whatsoever

unto the United States of America, acting by and through the Administrator of the General Services Administration, having an

address in care of the Chief Financial Officer of the U.S.

General Services Administration, 18th and F Streets N.W.,

Washington, D.C."

Q. Thank you.

Now, if you would, sir, turn to the next exhibit before you, which is Government's Exhibit 952.

A. I have that.

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Q. And would you please identify what that is.

A. This is a floor plan of the first floor of the Alfred P. Murrah Federal Building, identifying the agencies located on

that floor.

Q. All right. Now, there should be eight other pages behind that first page.

A. Yes, sir.

Q. Do you recognize the exhibit itself is all nine pages?

A. Yes, sir.

Q. Can you identify for us what those nine pages consist of?

A. They consist of the nine floors of the Alfred P. Murrah Federal Building.

Q. They're floor plans?

A. Of each floor, yes, sir.

Q. And do those floor plans accurately and correctly depict the floor plan of each of the nine floors of the Murrah Building as they existed prior to 9:02 on April 19, 1995?

A. Yes, sir, they do.

MR. RYAN: Your Honor, we move the admission of Government's Exhibit 952.

MR. TRITICO: Your Honor, my 952 has 18 pages.

THE COURT: Some explanation?

MR. RYAN: Well, there is probably some of the individual sections of the floor contained within the exhibit, but . . .

Richard Williams - Direct

MR. TRITICO: May we approach briefly?

THE COURT: No. If there is a problem with it, ask

voir dire.

MR. TRITICO: May I voir dire the witness?

THE COURT: Yes.

VOIR DIRE EXAMINATION

BY MR. TRITICO:

Q. Good morning.

The nine pages that you're looking at: Is it --  
each

page has one floor on it?

A. Yes, sir; that's correct.

Q. And are there any red lines drawn on the nine pages that  
you're looking at?

A. Any red lines?

Q. Yes, sir.

A. No, sir.

Q. So you've got one page each for each floor?

A. Yes, sir, with color codes for each area of organization  
on

that floor.

MR. TRITICO: Thank you. No further questions.

THE COURT: Do you have any objection?

MR. TRITICO: No, sir.

THE COURT: It's received. You may publish, 952.

MR. RYAN: Thank you, your Honor.

DIRECT EXAMINATION CONTINUED

BY MR. RYAN:

Q. Mr. Williams, what I'd like to do with you now is to introduce the floor plans and the setup of each floor to the jury. And I'm going to go through a series of photographs that are all contained within the Exhibit 953; and I would like for you to tell the jury very briefly what it is they're looking at. Okay?

A. Okay.

THE COURT: Well, I'm confused. I thought we were on 952.

MR. RYAN: 953, your Honor, is -- excuse me. Let me -- you're absolutely correct, your Honor.

THE COURT: All right.

BY MR. RYAN:

Q. Do you have -- have you looked at the videotape recording that we've made that we refer to as Government's Exhibit 953?

A. Yes, sir.

Q. And does that exhibit contain the floor plans identical to the ones that you have before you?

A. Yes, sir.

Q. All right. But it's in a video format to present to the jury?

A. That's correct.

MR. RYAN: Your Honor, we'd move the admission of Exhibit 953.

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MR. TRITICO: No objection.

THE COURT: All right. 953 is received, and you may proceed.

MR. RYAN: Thank you, your Honor.

Back to video. Thank you.

BY MR. RYAN:

Q. What are we looking at here?

A. This would be a floor plan of the first floor from looking down. The north side is on the bottom and the south to the plaza entrance would be on the top.

Q. Now, the ground floor would be and the first floor -- that's the ground floor, as I understand it?

A. Yes, sir, that is the ground floor.

Q. On the north side?

A. Yes.

Q. But on the south side, the ground floor is what?

A. You'd enter from the south side on plaza level entrance, which was the second floor.

Q. How many agencies occupy this first floor of the federal building?

A. There were two agencies on the first floor: My agency, the

General Services Administration, and the Social Security Administration.

Q. All right. Are you looking at your monitor?

A. Yes, sir.

Richard Williams - Direct

Q. Tell us what we're looking at here.

A. This is a space breakdown of the General Services Administration space showing the conference room and the offices and the area directly to the south of our space by the hallway, which was our break room.

This depicts the east half of the first floor with the

Social Security waiting room, Social Security entrance to their

work area, and the Social Security space.

Q. All right. Would you take your pen and mark where the waiting room is located?

A. Yes, sir. This is the waiting room.

Q. At 9:00 in the morning, what goes on in the waiting room of

that building?

A. The waiting room opened at 8:00 and allowed people to come in early before they were received into the reception area and would either take a number or wait until their name was called in anticipation. This opened at 8:00; and at 9:00, then they would be received by the Social Security Administration.

This is the second floor. This was the child care facility. On either side of the facility were mechanical rooms

to the east and west. This facility was completed shortly before the bombing with an expansion space.

Q. What were the hours of the day-care center?

A. The day-care center was open from 6:30 a.m. to 6 p.m.

This is the third floor with the spaces identified by

Richard Williams - Direct

color coding that delineated different space agencies -- agency

spaces. This was DIS space, which was in the northeast corner of the third floor.

Q. How many people worked for Defense Investigative Service, if you know?

A. There were approximately six to eight.

Q. In this Murrah Building?

A. Yes, sir.

This was a small Army space down on the third floor, sort of expansion area from their above floor areas between DHHS -- or HHS and GAO office.

Q. Did members of the United States Army occupy this space?

A. Yes, sir, they did.

Q. Do you know how many people occupied this portion of the Army space on the third floor?

A. I believe there were approximately three people in this space.

This is a small HHS space, an individual area office that was an expansion space of the people on the east end. I believe this was HHS. The other area was DHHS. This was a small one- or two-person office.



Q. What does HHS stand for?

A. Health and Human Services.

This was the other HHS space on the southeast corner, southeast half of the third floor. There were approximately, I

Richard Williams - Direct

think, probably ten people in this space.

The area outlined in blue that we can see was the space belonging to the federal employees credit union. That was made up of their loan/teller area, the teller area to the south adjacent to the hallway, the area to the left, which would have been this space. This was the CEO's office; and this was the area for, I think -- this was a conference room here, and this was a VISA center. This was the area for loan processing, and this was the teller area.

Q. This was the office that the people in the Murrah Building knew best?

A. Probably so.

Q. Because everybody went to the credit union?

A. Everybody went to the credit union.

Q. All right. Now, it says a Federal Employees Credit Union; but is that a federal agency?

A. No, sir, it's not.

Q. Are the people that work within that agency federal employees?

A. No, sir, they're not.

Q. Did you know the women that worked in the Federal Credit Union?

A. Yes, sir, I did. I knew most of the people that worked in the credit union.

The area outlined in blue to the right is the General

Richard Williams - Direct

Accounting Office. I believe they had -- I don't know the numbers on that space. I have a listing with me, if I need that. We had moved them up here, and I believe about five years ago.

Q. Go now to the fourth floor.

A. This is the fourth floor, which represented the Federal Highway Administration and a branch of their office.

This is the southwest and northwest corners of the building, which house the Army recruiting branch.

Q. How many members of the United States Army worked in this facility?

A. Mr. Ryan, if I might, I have that note in my pocket. I don't have the exact numbers in my head, if that's okay.

Q. I think that would be all right.

A. U.S. Army total numbers were 40, which would include the space that we showed on the third floor a while ago.

Q. Fifth floor.

A. This is a representation of the floor plan for the fifth

floor, which showed the Department of Agriculture. This was the DOL, Department of Labor, space, which was a one-person office.

Department of Agriculture, or APHIS, as we knew it, took the entire east half primarily plus the store room, which you see a little bit to the right of.

Q. How many worked for the Department of Agriculture in the

Richard Williams - Direct

Murrah Building?

A. Department of Agriculture, 15.

This is the VA space adjacent to the DOL.

Q. Standing for Veterans Administration?

A. Veterans Administration, yes, sir.

Q. How many people worked in the VA space?

A. They also had 15 employees.

This was the U.S. Customs, which was in the direct center of the building on the north face. And I believe they had six people working in their office.

This was the store room that I mentioned earlier belonging to the APHIS.

This was a small area between APHIS and U.S. Customs, where HUD had applied a storage room; and the area that identifies as "HUD" is a space for HUD OIG office.

Q. What does HUD OIG?

Q. What does HUD OIG?

A. Office of Investigations, I believe.

Q. Let's go to the sixth floor.

A. All right, sir. The sixth floor was vacant at the time.

This is the U.S Marines' office, which spanned the entire western half beyond the stairwell center portion of the building; and the east half, beginning from that line, was vacant space.

Q. All right. And how many members of the United States Marine Corps were officed in this space on the sixth floor?

Richard Williams - Direct

A. The Marines had four employees.

The seventh floor area with the exception of a small area to the right was entirely HUD. This was an area which was a space for the DEA in the southeast corner of the seventh floor.

Q. Let me go back to the seventh floor again, because with the exception of that small space that we just looked at with DEA, the rest of the entire floor is all HUD?

A. Yes, sir, that's correct.

Q. Okay. Eighth floor?

A. The eighth floor housed HUD in its entirety.

Q. Do you know how many members -- how many people employed by

HUD worked in the Murrah Building?

A. HUD had 124 employees.

Q. So it was by far the largest agency in the building?

A. Yes, sir.

Q. Let's turn to the ninth floor.

A. This was the Secret Service area, which was in the center portion of the building on the north side. The Secret Service employed, I believe, 13 people.

Q. And they all faced the north window onto 5th Street?

A. Yes, sir.

Q. All right.

A. This is the northeast corner of the ninth floor, which housed the DEA, Drug Enforcement Administration.

Richard Williams - Direct

This was another branch of their office on the west portion of the building.

Q. And how many employees of the Drug Enforcement Agency worked in the Murrah Building?

A. I believe there were 24.

This is the southeast portion of the ninth floor, which housed the Alcohol, Tobacco and Firearms group.

Q. And how many people employed by the ATF worked in the Murrah Building?

A. I believe there were 13.

This was another branch of the ATF. I believe this was ATF Compliance -- was the name of their branch office; but

they were also on the ninth floor.

MR. RYAN: All right. Thank you.

Thank you, Kathy.

Your Honor, may I approach the easel?

THE COURT: Yes.

BY MR. RYAN:

Q. Now, what we've placed on the easel, Mr. Williams is one of the pages of Exhibit 952, the floor plans?

A. Yes, sir. That's the first floor.

Q. What I'd like to do is for you to tell us a little bit more

about the GSA space and the number of employees that worked within that space --

A. All right, sir.

Richard Williams - Direct

Q. -- in April of '95?

A. Okay. If I may point to it.

Q. Sure?

A. This was the GSA space outlined in yellow. We had 13 employees that worked in the Murrah Building for us in the office space on April 19. One of our employees was not there that day, but there was another employee who was in the office that day making some copies.

Q. Who was that?

A. That was Randy Ledger.

Q. All right. Now, who were the 13 people present from your

agency, the GSA, that were there on the morning of April 19?

A. Don Rogers, who was my manager on April 19, was in this corner office. My office was directly east of his.

Q. Try to speak up a little bit, since you're away from the microphone?

A. I'm sorry.

My office was directly to the east of Mr. Rogers' office.

The small office directly to the south of his office was Sherman Catalone's office. The office to the south of his was Tom Grufman's. There was a work station in that southwest corner which belonged to Kathy Brady.

Directly outside my door was a work station for Hutchison.

Richard Williams - Direct

Directly to the east of hers in that open area was the office or a work station for Pam Briggs.

Directly to the south of that of the front entrance to the office was an area, where Melissa McCully worked.

Along the north face of the window side of the office going sequentially was Dot Hill, Sandy Schultz, Steve Curry, Tom Hall, and Mike Loudenslager.

Q. All right. Now, let's turn to the day, April 19. And I

want you to tell the jury in your own words what you did when you got up, where you went, and what happened.

THE COURT: Excuse me just a moment. Can we cut this monitor off? It's a little distracting.

MR. RYAN: It is, your Honor.

Thank you.

THE COURT: Thank you.

Go ahead.

THE WITNESS: On the morning of April 19, for me was a typical workday. I would get up early, normally 5:15, 5:00, 5:15. I would arrive at work between 6:15 and 6:30 every morning. I would come into my office. I would take care of the previous day's mail or paperwork. I would sit at my desk with the lights on, obviously, to the north side; and we'd begin a typical day waiting for everyone to arrive between 7 and 7:30.

BY MR. RYAN:

Richard Williams - Direct

Q. Did you have a meeting scheduled that morning?

A. Yes, sir. We had a meeting scheduled that morning in Mr. Rogers' office with myself, Sherman Catalone; Tom Hall, our planner/estimator; and Robert Dennis, the Clerk of Court for the Western District of Oklahoma.

Q. Mr. Dennis was not an employee that worked in the Murrah



Building?

A. No, sir. He worked in the federal building courthouse across the street.

Q. He was the clerk of the court?

A. That's correct.

Q. And how long did this meeting last?

A. We adjourned the meeting about 8:55. Mr. Dennis and Mr. Rogers left the office to go to the elevator lobby together, and Mr. Catalone went back to his office. Myself and

Tom Hall walked into my office and were standing there talking.

Q. Tell us what happened.

A. That's the last thing that I remember.

Q. All right. What's the next thing that you remember?

A. Excuse me.

Q. There is a glass of water there. There is a pitcher there

with some water, Mr. Williams, if you'd care to get some.

A. Next thing I remember, I came to lying in a fetal position,

sort of on my left side. And this is the only remembrance I -

I see my arm sticking out to the left, and I'm laying like

Richard Williams - Direct

this. And I can see my arm, and I can see the shirt sleeve, which -- I had a pink shirt on that day. I had no idea what

had gone on. I didn't feel anything, I didn't hear anything.

As I began to try to focus on where I was, not knowing if this

was a dream or not, I began to hear voices.

I could hear someone yelling. I don't know who that was still today. I just know they were fairly close to me.

I remember hearing a voice come by me or come up sort

of close to me and say, "Hang on, I'll be back"; and the next thing I remember is being able to visualize this gray torso of a body, what turned out later to be an Oklahoma City policeman who carried several of us out of our office. I did not know it

at the time.

The next thing that I remember from hearing that voice

was being lifted up and carried out what was left of the windows or what was -- the window mullions in Mr. Rogers' office. Mr. Yeakey asked me if I could walk; and I tried and could not; so he literally picked me up and carried me out of the building down to what I believe was the center of Harvey and 5th Street to a waiting ambulance.

Q. Were you placed in that ambulance?

A. Yes, sir. I was laid on a backboard. They began working me immediately. The next thing I remember was them saying we need to get him in the ambulance and get him to the hospital. I found out later that Mr. Hall, who was in my office with me

that was also injured, was placed in the ambulance with me.  
On

the way to the hospital, I could hear him yelling, because he  
had a badly fractured leg, injured leg; and every time we hit  
a  
bump, he would scream.

The next thing I remember from that point was coming  
to on the hospital triage table; and I remember it vividly  
because of the -- excuse me -- because of the cold saline  
solution they were pouring on my back on the wounds. I still  
had no idea what had happened, I had no idea where I was, why  
I  
was there. I just remember that vividly.

Q. Can you briefly tell us what your injuries were?

A. Yes, sir. I had many, many shrapnel wounds from the glass  
and debris. I had in excess of 150 stitches. I had a  
fractured cheek. I had a fractured hand. I had staples in my  
head. I had something impaled in the back of my right leg,  
which I still don't know what it was, that day, which created  
a  
large open wound in the back of my right knee.

Q. Were you able to return to work?

A. Yes, sir. I came back to work at the command center after  
about 43 days.

Q. All right. Now, you should have in the folder there  
before

you the names of Mr. Curry and Mr. Loudenslager. Do you see  
those?

A. Yes, sir.

Q. With the Court's permission, I'd like you to leave the

Richard Williams - Direct

witness box and place those name tags on the first floor exhibit there in the location of where those men officed.

A. Yes, sir.

THE COURT: Does this diagram have an exhibit number?

MR. RYAN: Yes, your Honor. It's part of -- it's 952.

THE COURT: Thank you.

BY MR. RYAN:

Q. Would you turn those names to where they're --

A. Yes, sir.

MR. RYAN: Your Honor, may I inquire of the jury whether I've got the chart placed in a location where everyone can see it?

THE COURT: I'm sure they can't in the back row.

MR. TRITICO: Your Honor, the jury --

THE COURT: Yes. A lot of them can't see it.

Are you expecting them to read names?

MR. RYAN: No. I'm just doing the best we can, your Honor.

THE COURT: All right.

Is that better for all of you?

Good. Thank you.

MR. RYAN: Thank you, Kathy.

BY MR. RYAN:

Q. Would you please tell us what Mr. Mike Loudenslager did for

the GSA?

Richard Williams - Direct

A. Mike Loudenslager was a planner/estimator for the General Services Administration. Do you want to --

Q. What did Mr. Steven Curry do?

A. Steve Curry first came to work for GSA as an electrician but was a maintenance work inspector. He inspected construction and alterations work for our office.

MR. RYAN: Your Honor, may I approach the easel?

THE COURT: Yes.

BY MR. RYAN:

Q. Prior to coming here today, did you have an opportunity to review Exhibit 1126 with the photographs of Mr. Curry and Mr. Loudenslager?

A. Yes, sir, I did.

Q. Do those photographs accurately portray those individuals prior to their death?

A. Yes, sir, they do.

Q. Can you --

MR. RYAN: May I approach again, your Honor.

THE COURT: Well, we can give you some help here.

MR. RYAN: I just need to place that, if the marshal will be kind enough to place that exhibit on the stand.

Your Honor, we offer Government's Exhibit 1126.

MR. TRITICO: No objection.

THE COURT: All right. 1126 received and is being shown to the jury.

Richard Williams - Direct

BY MR. RYAN:

Q. When was the next time after you were in the hospital that you were able to go to the Murrah Building?

A. About three weeks after I got out of the hospital, when I could walk. My wife took me down after a doctor's appointment,

and I was available -- I was allowed to go over to the site and

go to the area or the shell where they had cleaned out our offices.

Q. Prior to that time, had you attended the funeral of these two men?

A. Yes, sir, I did. I attended Mike's and Steve's, along with

others that were killed.

Q. Now, would you please turn to Exhibit No. 951. And can you

identify that exhibit?

A. Yes, sir. That looks like it is an overhead shot looking down into the Murrah Building from the -- looking to the north face.

Q. And can you attest that it's a true and accurate photograph

of the downtown seen surrounding the Murrah Building?

A. Yes, sir, I can.

MR. RYAN: Your Honor, we would offer Exhibit 951 and ask to publish.

MR. TRITICO: May I have just a moment, Judge?

I have no objection.

THE COURT: All right. 951 is received, may be

Richard Williams - Direct

published.

MR. RYAN: Are we on the computer?

BY MR. RYAN:

Q. Is it on your screen now?

A. Yes, sir, it is.

Q. Would you describe for the jury the extent of the damage to

the Murrah Building?

A. The building was totally destroyed such that it was -- could not be repaired and had to be imploded for that reason.

Q. I just have a few more questions for you and one more exhibit.

Now, what were the hours of operation for the Murrah Building during the week?

A. Murrah Building was open to the general public from 6 a.m. to 6 p.m.

Q. And what about for the people who actually worked there in the building? Did they have extended hours?

A. The people who worked in the building, if they parked in the garage, had access through the garage 24 hours a day, or they could get special access if they had special working conditions, like Social Security would work on a weekend maybe or HUD.

Q. Now, I'd like for you to take a moment and think about this

before you answer. And I would like for you to tell the jury, of all the times of the day during the week, during the work

Richard Williams - Direct

week, what time of day was the most business conducted in that building, the most people in the building, and the busiest time of day?

A. I think probably -- I think 9 a.m., because the Social Security waiting room would open with all those folks that had been there waiting to get their numbers to go in and be received. The credit union would open their doors at 9 a.m. on Tuesday, Wednesday and Thursday. They opened at 8:00 on the other days, but certainly 9:00 was a busy time.

The other agencies, the majority of their people would have already been in place ready to do business, the Veterans Administration, HUD, the GSA.

Q. All right. Now, prior to coming here today, did have you



an opportunity to view some video footage of the north side or the front of the Murrah Building?

A. Yes, sir, I did.

Q. And we have marked that video footage as Exhibit 1010. And

you observed that footage, did you not?

A. Yes, sir, I did. Yes, sir.

Q. And does it accurately portray how the building looked, north side of the building looked, prior to the explosion of April 19?

A. Yes, sir, it does.

MR. RYAN: Your Honor, we would offer the video footage Exhibit 11 -- excuse me -- Exhibit 1010.

Richard Williams - Direct

MR. TRITICO: No objection.

THE COURT: 1010 is received and may be shown.

MR. RYAN: Thank you, your Honor.

BY MR. RYAN:

Q. I'm going to stop it right here. Tell me about the windows

of the Murrah Building.

A. The curtain wall, the north face of the building, extended not only from the third floor through the ninth floors, where you see the transfer people in this area -- this would be the transfer people -- but also was fully windowed on the first and

second floors. This was the first floor. This would be the

SECOND FLOOR. THIS WAS THE FIRST FLOOR. THIS WOULD BE THE second floor.

This area in here inset back off the sidewalk jutted -- the third floor through the ninth floor jutted out over those two floors.

Q. If a person is standing in front of the Murrah Building, parked a car in front of the building, got out of the car, stood in front of the Murrah Building, what could they see looking at the building?

A. You could see inside the offices. You could see people at their work stations. You could, you know, because of the full window, the full glass -- you could see anyone in their spaces.

Probably up through easily -- up through the third floor.

Q. And were these windows that you're describing -- are they floor to ceiling windows?

Richard Williams - Direct

A. Yes, sir, they are. They're --

Q. There is not a wainscot in between?

A. No, sir, full 9 feet height.

Q. If someone were on the second floor of the Murrah Building next to the window, what portions of their body are you able to

see standing out in front of the Murrah Building?

A. You could see a full person with ease, because there was only a small window mullion at the bottom, which was a cap for the windows.

Q. Have you looked -- have you stood there on occasions when the Murrah Building was standing, stood there on the sidewalk in front of the building and looked up at the building?

A. Yes, sir, many times.

Q. And what could you see on the second floor from outside the building?

A. You could see the children. You could see on the windows from time to time, there would be certain occasions, Christmas, Halloween -- there would be things placed on the window. You could see the cribs to the -- on the east end in the infant area. You could see the children running around. You could see them playing. You could see them putting their hands against the windows.

Q. If you are standing in front of the Murrah Building and right as you're entering the building and the second floor is just above you --

Richard Williams - Direct

A. Yes, sir.

Q. -- and you reach out your hand, how far is that second floor window where the day-care center was?

A. About 7 feet from me. I'm 6 feet tall. I could reach -- it's a 13-foot structure from first floor to second floor.

Q. Now, would you please -- and I said one more exhibit, and this is the last exhibit. Would you please turn to Exhibit

901.

A. Yes, sir. I have that.

Q. And can you identify that exhibit for us, please.

A. Yes, sir. This was the east exit to the north entrance to the first floor. If you came into the building from the north side, you entered on the right or the west side. That was the entrance side and you exited on the right on the -- to the east

side. So this depicts the foyer between -- in the front entrance with the glass doors.

Q. And it's an accurate depiction?

A. Yes, sir, it is.

MR. RYAN: Your Honor, we would move to offer Exhibit

901.

MR. TRITICO: Your Honor, we don't seem to have a copy of it. May I take a moment to look at it? I probably don't have an objection.

THE COURT: Yes. You may approach Mr. Ryan and look at his copy, if that's all right, Mr. Ryan.

Richard Williams - Direct

MR. TRITICO: No objection.

THE COURT: All right. 901 is received and may be published.

MR. RYAN: Are we on the computer?

THE COURTROOM DEPUTY: Okay. You are now

THE COURTROOM DEPUTY: Okay. You are now.

MR. RYAN: Thank you.

BY MR. RYAN:

Q. All right. Now, would you tell the jury what they're looking at when they're looking at Exhibit 901.

A. Yes, sir. This is the -- an east half of the first floor entrance. Again, this is the exit side to the east of the foyer. The wall just to the side, which would have been this area here -- this was the wall that was directly bordering the Social Security waiting room.

Q. That's where the visitors would wait until 9:00.

A. Yes, sir, that's correct.

Q. All right. And then what about through the end of the picture where we see daylight? What are we looking at?

A. You came down -- this was a street level. This would have been 5th Street. This was the area with the indentation that extended beyond where I'm drawing it; and you came down this set of steps, or you walked up a set of steps, or you came down

and entered to this level and walked into what would have been the entrance to the left.

Q. So not only can people see in, but if you're in the

Richard Williams - Direct

building, you can see out through these windows?

A. Yes, sir, that's correct.

MR. RYAN: No further questions, your Honor.

THE COURT: Mr. Tritico . . .

MR. TRITICO: Yes, your Honor. Thank you.

Your Honor, may I request the marshal to put Exhibit  
940 back on the easel.

THE COURT: Yes.

MR. TRITICO: It's right there beside him.

THE COURT: This one right here.

MR. TRITICO: The map.

THE COURT: Yeah.

Are we turned on?

All right. It's up there.

CROSS-EXAMINATION

BY MR. TRITICO:

Q. Good morning, Mr. Williams?

A. Good morning, sir.

Q. My name is Christopher Tritico, and I represent Timothy  
McVeigh. You and I have never met before, have we?

A. No, sir.

Q. I've never had the privilege of sitting down and  
discussing

with you the facts and circumstances surrounding your actions  
and the things that you saw on April 19; is that correct?

A. No, sir.

Richard Williams - Cross

Q. You mentioned earlier --

THE COURT: I think that came out wrong. It is

correct.

THE WITNESS: That is correct. I'm sorry.

BY MR. TRITICO:

Q. You mentioned earlier that you usually go to work about

6:40 -- did I get that correct -- in the morning?

A. I normally got to work about 6:30 in the morning.

Q. 6:30. And is that every day?

A. Normally, yes, sir.

Q. That would be roughly the same on April 17?

A. Yes, sir, it would.

Q. The 18?

A. Yes, sir.

Q. The 19th?

A. Yes.

Q. Looking at Exhibit 940, which I think is turned wrong --

thank you -- when you came to work in the morning, which  
street

did you take to the Murrah Building?

A. As I came in, I would get off of Interstate 235, come up  
6th Street, down Robinson, and enter to the Murrah Building on  
the east entrance to the Murrah garage.

Q. Taking -- can you show us -- oh, 6th Street is up at the  
top?

A. Yes, sir, 6th street is to the north of the building.

That's correct. That's the one-way street going west.

Q. And Robinson would run one way south?

A. West. Excuse me. Robinson south. I'm sorry.

Q. As you arrived at work on the 16th, you noticed nothing

unusual; is that correct -- I'm sorry. On the 17th -- noticed nothing unusual, did you?

A. No, sir.

Q. Didn't see any brown or tan Mercury Marquis anywhere around?

A. No, sir.

Q. Didn't see a blue pickup with a white camper shell anywhere

around, did you?

A. No, sir.

Q. Didn't see any Ryder trucks around; correct?

A. No, sir.

Q. How about the 17th, when you came? Did you see a tan Mercury Marquis anywhere around?

A. No, sir.

Q. Did you see a blue pickup with a white camper shell anywhere around?

A. No, sir.

Q. Or a Ryder truck?

A. No, sir.

Q. And on the 19th, did you see a tan marquee?

A. No, sir.



Richard Williams - Cross

Q. No? Did you see a blue pickup with a white camper shell?

A. No, I did not.

Q. Ryder truck?

A. No, sir.

Q. When you left for lunch -- did you leave for lunch, or did you say in the building usually?

A. It varied.

Q. Do you recall, sir, did you leave for lunch on the 17th?

A. No, sir, I do not remember.

Q. Okay. How about the 18th?

A. I don't remember, either.

Q. Did -- what time did you usually leave in the evening?

A. That varied from sometime between 3 and 6:00, depending on what was going on in the office.

Q. When you left on the 17th, do you recall seeing the tan marquee?

A. No, sir.

Q. Blue pickup with a white camper shell?

A. No, sir.

Q. Ryder truck?

A. No.

Q. How about on the 18th? See any of those?

A. No, sir, I do not remember.

Q. And you didn't see Tim McVeigh at any time on the 17th, 18th, or 19th in or around the Murrah Building; isn't that

Richard Williams - Cross

correct?

A. No, sir, I did not.

Q. Didn't see -- strike that.

Now, the GSA purchased at some point some large blue plastic trash cans to be used as recycling bins; is that correct?

A. Yes, sir, that's correct.

Q. How many did you purchase? Do you recall?

A. Approximately 80.

Q. And they were placed throughout the Murrah Building; is that correct?

A. They were placed throughout the building for pickup during the week. That's correct.

Q. And there was also a storage room in the Murrah Building where some -- I don't know how many -- but some large blue plastic trash cans were stored; that is correct?

A. There were two to three stored either in the store room down by the restroom or out on the dock.

Q. And they were in the building, strewn around the building on April 19 prior to 9:00 in the morning; isn't that correct?

A. That's correct, yes, sir.

MR. TRITICO: Thank you very much, sir. I have no further questions.

THE COURT: Do you have any redirect, Mr. Ryan?

MR. RYAN: Just a moment, please, your Honor.

Richard Williams - Cross

No further questions, your Honor.

THE COURT: May Mr. Williams be excused?

MR. RYAN: Yes, your Honor.

MR. TRITICO: Yes, your Honor.

THE COURT: You may step down and are excused.

Thank

you, sir.

Next, please.

MR. HARTZLER: The Government calls Susan Hunt, your Honor. Mr. Ryan will do the questioning.

THE COURT: Thank you. Susan Hunt.

Come in and be sworn by the clerk, please.

(Susan Gail Hunt affirmed.)

THE COURTROOM DEPUTY: Thank you. Would you have a seat, please.

Would you state your full name for the record and spell your last name, please.

THE WITNESS: Susan Gail Hunt, H-U-N-T.

THE COURTROOM DEPUTY: Thank you.

MR. RYAN: May I hand this forward to the witness?

THE COURT: Sure.

DIRECT EXAMINATION

BY MR. RYAN:

Q. Good morning.

A. Good morning.

Q. Would you please state your full name.

SUSAN GAIL HUNT - Direct

A. Susan Gail Hunt.

Q. I'm not supposed to ask anyone this question, but how old are you?

A. 49.

Q. All right. Where do you live, ma'am?

A. I live in Mustang, Oklahoma, a suburb of Oklahoma City.

Q. And are you employed?

A. I'm employed by the U.S. Department of Housing and Urban Development.

Q. What is your position with that department?

A. Currently, I'm a housing specialist for the Single Family Housing Division.

Q. All right. Are you married?

A. I'm married. I've been married 30 years.

Q. Do you have children?

A. Yes, ma'am. Two sons.

Q. You can't possibly have a grandchild.

A. I have one grandchild and a beautiful daughter-in-law and an almost second daughter-in-law.

Q. Where did you grow up?

A. I grew up in Texas, in Wichita Falls, Texas.

Q. Graduated from high school?

A. Yes, sir. Graduated from high school from Rider High

School there.

Q. What did you do after your high school days?

SUSAN GAIL HUNT - Direct

A. I attended Midwestern University briefly. My husband and I

married in the first semester that I was there. Then we moved to Oklahoma, and I attended school while trying to raise kids, and having kids at a young age, attended college at OSU Tech then.

Q. In April of 1995, were you enrolled in school?

A. I was enrolled at Oklahoma City University.

Q. Did you ever finish those classes?

A. No, sir. I had to withdraw after the bombing.

Q. All right. Now, I want to talk about your work with HUD; but prior to that, would you tell the jury what you did?

A. I was -- I worked as a banker. I started as a front desk person in a bank; and at the time I left my banking career, I was an assistant vice president in loans, and I dealt with real

estate and other commercial and noncommercial loans.

Q. All right. And how long were you in that business?

A. I was in that business 12 years.

Q. All right. And then from there, did you go to work for HUD, the United States Government?

A. Yes. I was hired by HUD in September of 1989.

Q. All right. And what were your initial duties with HUD?

A. Initially, I worked in the REO Department, or the Real Estate Owned Department; and we readied the houses that you would know has HUD homes to be resold.

Q. And how long were you in that position?

SUSAN GAIL HUNT - Direct

A. I was there approximately a year and a half, and then I was

promoted to administrative officer of the agency.

Q. All right. Now, what does an administrative officer of the

agency do?

A. An admin. officer is more or less mother. I would be called, probably in -- out of government, I'd be called an office manager. I took care of everything from personnel issues to pencils and paper, to where they sat, the desks they used, health insurance, dealt with GSA a lot on environmental.

Q. All right. How many men and women worked for HUD in April of 1995 in the Murrah Building?

A. 124 were assigned to HUD on that day.

Q. And where were they located?

A. HUD had the whole eighth floor, the entire eighth floor, most of the seventh floor, and a small office on the fifth floor.

Q. All right. We're going to turn to an exhibit that's already in, which is the fifth floor. Do you see that?

A. Yes, sir.

Q. Now would you show the jury where it was that HUD -- what

Q. Now, would you show the jury where it was that HUD -- what location HUD occupied on this floor and how many people with HUD officed there?

A. There was only one person in that office.

Q. And who was that one person?

A. Paul Broxterman. He was our OIG, Office of Inspector

SUSAN GAIL HUNT - Direct

General, assigned to HUD. He was a law enforcement person.

Q. How long had he been there?

A. He had only been in the Oklahoma City office for a few days. He had come probably about two weeks prior to the bombing to establish or to find a home for his family.

Q. Now, let's turn to the seventh floor. As I understand it, you occupy all this floor with the exception of this little section over there at the top right-hand corner?

A. Yes, sir.

Q. About how many people officed on the seventh floor?

A. We'd like to have said we were split in half, but the seventh floor was really more significantly occupied. We probably had 80 of our 124 people on that floor.

Q. All right. And then finally, the eighth -- excuse me -- the eighth floor -- excuse me.

Now, this is the floor that you were located on, your office?

A. Yes, sir.

Q. Would you make some type of mark where your office was located?

A. The admin. office took up the whole southwest area; but my office was in the corner. Actually, the whole admin. area was this.

Q. But your office was that far -- would have been the southwest corner of the Murrah Building?

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A. Yes, sir.

Q. You were the furthest you could get away from the north face of the building?

A. Yes, sir.

Q. Now, what I would like for you to do is to step back in time and turn to April 19 and tell us about your day.

A. I got up that morning about 6:45. I'm one of those that it

takes me about 15 minutes to put a face on and do my hair; so I

quickly did that, threw my clothes on, and went in the kitchen,

drank a cup of coffee over a newspaper, and chatted with my husband for a few minutes. I left home.

Living in Mustang, I'm about 20 minutes from downtown

Oklahoma City; and I arrived at the Alfred P. Murrah Building some -- just a few minutes after 7:30.

Q. What did you do after you got there?



A. After I got there, I had a staff of two people, Tom Ward and Freida Bean. I chatted with my staff for a few minutes, and then I went in my office for a few minutes. And as was my custom, I went through the paperwork that I had left over from the day before. Administrative officers normally never get their job done completely.

Q. All right. After you did your administrative work, what did you do next?

A. I went out to get a cup of coffee; and when I got even with

the coffee pot, I saw Paul Broxterman standing at the

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storeroom. We usually opened the storeroom; and it was open, but Tom had stepped away from his desk. So I went in with him to try to assist him to get supplies. He had only been there a few days, so we hadn't -- we hadn't had a chance to really coordinate everything he needed to do his job.

He was getting ready for a case and didn't have paper

or pencils and some index cards he needed, so I assisted him.

Q. And he told you that was because he had a trial that was coming up and he needed to get prepared?

A. Yes, sir.

Q. Now, did you ever see Paul Broxterman again alive?

A. No, I didn't.

Q. All right. Then what happened after you talked with Paul?

A. After I talked to Paul, I got the coffee pot. Freida had diligently made my coffee, as she always did; but the coffee grounds had gone down in the coffee. So I walked from my end of the building -- the ladies' restroom was the only source of water that I had. So I walked from my end of the building to the north -- still on the south side of the building, but the north end of the building to the ladies' rest room, got coffee water, went through the security door, and walked back through HUD space.

That was kind of my thing, because being custodian, I usually kind of checked things as I walked through.

I turned the corner, and the first person I saw was

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Tony Reyes. Tony Reyes was a neat guy; and he told me, "Would you like some candy for breakfast," because I was notorious for not eating breakfast -- and on his desk. I declined. His phone rang. He picked the phone up.

Q. Where was Tony Reyes when you talked to him?

A. Tony was approximately -- I have a hard time controlling the pen -- but approximately his desk was about right there. And the walkway that we came -- if I came in the security door,

which I missed here, I would have been like right here.

Q. All right.

A. And there was just like -- we were open space offices.

A. And there was just like we were open space offices,  
like

a lot of government agencies are; and so just with little  
partitions and being tall, I could see over most partitions;  
but in their case, the opening of all the areas was usually  
not  
blocked off.

Q. All right. After you talked to Mr. Reyes, what did you do  
next?

A. I kept walking towards the Administrative Office. I  
glanced over to the south. Ruth Hill from ONAP was the next  
employee I saw. I was about right here.

When I got to this place about right here, I saw  
Lanny

Scroggins. Lanny Scroggins was -- worked for ONAP. He and  
Don

Burns were chatting about the day's business. They were  
working on a construction file; and I spoke, said good morning  
to both of them.

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Q. Then you left?

A. Yes.

Q. Did you ever see Don Burns or Lanny Scroggins alive again?

A. No, I did not.

Q. What did you do after you left them?

A. After I left them, I'm still heading to the admin. office.  
Part of my job was being Miss Congeniality, I guess; and so I  
walked towards the admin. door. When I had gotten with the

rest of the ONAP staff, George Howard, who was a brand new employee to us, who was seated somewhere -- I may have missed exactly where -- but called me over to his desk. He was -- had

only been with HUD Oklahoma City office for a short period of time. We were still in the process of converting his insurance

from a California insurance base to an Oklahoma; so we chatted about his health insurance for a few minutes.

Q. Then you left him?

A. Then I left him and I went back to the admin. office.

Q. Did you ever see George Howard alive again?

A. No, I did not.

Q. All right. What did you do after you went back to --

A. Wait, I take that back. I did see George Howard again alive.

Q. When was that?

A. Later in the day, I walked -- or say 20 minutes later -- I

had walked back to the front of the building to try to find

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someone to listen for the security door; and when I returned to

my office after that trip to the front, George and I chatted again.

Q. But you didn't talk to him after that?

A. No.

Q. All right. Now, did you see -- did you walk later that morning down to the area where the lawyers officed?

A. Yes, I did. After taking some phone calls, it dawned on me

that at 9:00, around 9:00, we were trying to expand our space.

HUD had a significant amount of employees crammed in a small area, and so I anticipated someone that I was dealing with on that expansion to come in; but the security bell could only be heard from that end. I called down there. No one answered the phone. We were -- didn't have a receptionist because of cutbacks in the government of not allowing us to rehire.

So I walked down, from my office through the HUD space; and when I got about right here, I voiced out, "Would someone listen for the bell? I'm anticipating someone coming."

I could see Mike Weaver, one of our attorneys, standing at the coffee pot. Usually, they got in right at -- right around 8, a little bit after. I really, by that time -- I don't know, the concept of time is difficult. And Susan Ferrell walked by me, evidently coming from the front door and went back towards Mike, and they were talking.

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Q. Did you ever see Mike Weaver or Susan Ferrell alive again?

A. No, I did not.

Q. What did you do after you spoke to them?

Q. What did you do after you spoke to them?

A. Kim Clark and Lee Sells -- I was standing behind a partition that gave them some sense of privacy; but we -- I didn't see them, but I talked to them through the partition. Lee said she'd listen for the phone. She was the secretary for the legal department.

And Kim Clark -- I was doing her flowers for her wedding, and she asked me if I had got the flowers yet; and I told her no, that I would get it that weekend and --

Q. Did you ever hear the voices of Lee Sells or Kim Clark again?

A. No, I did not.

Q. All right. What did you next do?

A. I turned to go back to admin., and when I turned, I was right in front of FH&EO, or Fair Housing and Equal Opportunity, one of our divisions. Tony Reyes was standing in the doorway of Peter Avillanoza. Peter Avillanoza was the director of FH&EO, and they appeared to be talking business. And I just said good morning and kept walking.

Q. Did you ever see Tony or Peter Avillanoza alive again?

A. No, I did not.

Q. Did you next see David Burkett?

A. Yes. I went down to -- towards admin. George Howard

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called me back to his desk to chat. Dave Burkett was set just

right on the other side of a partition. At that time he was there and had pictures of a trip; and he showed me them quickly

and --

Q. And you left?

A. I left.

Q. Did you ever see David Burkett alive again?

A. No, sir, I did not.

Q. All right. What did you do after you left Mr. Burkett?

A. Once I left, I was talking to George Howard. And Freida Bean, my secretary or administrative assistant, called me back to my office to take a phone call and told me that I had two employees waiting to visit with me. I took a brief phone call.

I chatted with Larry Cook, who was a chief of single family housing. I talked to Rita Cruz. Rita worked also for single family housing.

At that time, I know it was 9:00, because I glanced at the clock. Because Freida, my assistant, was dealing with a travel problem -- and we always these, and I told them to quit harassing her; it was her smoke time. She smoked. And at 9:00, she would normally go to break; and her break partner was sitting there waiting.

And I was standing in front of Freida's desk talking to her, when the explosion happened.

Q. All right. Did you hear it?

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A. No. I did not hear the blast. I heard what I thought was the floors falling; but I did not hear the explosion itself, just the debris hitting us.

Q. Would you place an X on the same floor exhibit in front of

you as to where you were standing with Freida when the bomb went off?

A. About right there.

Q. All right.

A. I was standing with my back to the windows. The southwest windows that face the plaza were behind me, and I was facing Freida's desk that was right in front of me.

Q. All right. In your own words, tell us what happened.

A. Well, the -- we didn't know what happened except everything

fell on us. I was knocked to the ground. There was debris in

the area. We heard people screaming.

The last face I remember seeing was Freida's face as she fell. I think maybe we were knocked unconscious for a short period of time. I don't know. But when I regained my senses, I got up. And we all were just yelling at each other: Are we all right? What happened?

I unhooked Marla Hornberger, one of my -- one of the secretaries from ONAP that was in my office talking to Freida about travel issues -- I unhooked the wiring that had fallen from the ceiling from her earrings; and Tom, my mail room



clerk, was yelling that we need to get out of the building.

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Dianne McDonald, an employee of ONAP, was laying in the floor, and we helped her up.

Q. What had happened to the windows of the building?

A. The windows behind -- it was really odd, because we were pelted with glass and debris from the front and from above; and

then the glass in the windows behind us hit us in the back. It

succeeded the glass back in, which we believe now was probably good, because it would have blown us out the windows.

Q. What was the condition -- what was Freida's condition, the lady you were speaking to?

A. Freida was knocked under -- I was very concerned about Freida. Freida had been ill, had a problem with her leg. And she had been thrown under her desk. The wall behind her appeared to have just broken out or blown out and was laying over her, and a filing cabinet was trapping her under her desk.

I know I couldn't have done it by myself, but Freida obviously had to help me, because I pushed the filing cabinet off of the desk and pulled her up over the desk and helped her to her feet.

We helped each other. The copy machine -- we had a big, a huge copy machine in my office that had blown over; and our -- we tried to get out of the door, but we had to climb

over the copy machine and the other debris that was there.

Q. What was the condition of Freida's face?

A. Freida had glass sticking in her face. And I reached up

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and just pulled it out. I mean, I don't think that was the right thing to do now, but we were -- we couldn't see. It was

so -- so much debris in the air, and all I could see was this big thing sticking out of her face. So I pulled the glass out

of her face and --

Q. Did you eventually get to the doorway?

A. Yes. Tom, bless his heart, you know, had five of us girls to help out of there. We were all trying to help each other get out of the building, not really knowing at that point what had happened. I turned to go back to the north side of the building, because I had just seen these people, and I was going

after them. And after all, my job was to take care of them, so

I was going to take care of them.

But Tom grabbed my arm, and I couldn't get past the debris anyway; but that's when I realized that it was a lot worse than even we thought, because I could see sky to the north through the smoke.

Tom grabbed my arm. GSA had done a diligent job through the eight years that had worked for HUD and the few

years that I had been admin. officer of having fire drills, so we knew by braille how to get to the -- how to get to the stairwell.

So all of us made our way to the stairwell, which was behind our office.

Q. Tell us about going down the stairwell.

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A. All the windows had been blown out of the stairwell. There

were windows on every -- it was a typical government building, in that it wasn't particularly pretty but very functional. And

it had windows on every floor. The doors and the windows had been -- the windows had been sucked in and the doors had been blown in, so there was a lot of debris that had fallen on the stairs and glass, and so we helped each other down.

By the time I got to the 7th floor, a person that I knew to be Regina -- we kind of knew everybody by first name in the Murrah Building. We were -- Regina from DEA --

Q. Regina Bonney?

A. Yeah. Regina Bonney was holding up one of our employees, Larry Cook. Larry Cook was the man that had been in the office and was standing at the security door trying to key in the number when the blast hit.

Larry had a significant gash across his forehead and

appeared to have had a bad laceration on his arm. And his foot

was broken. And Regina is a little person; and although she was pretty mighty that day, I felt that being 6-foot tall and Larry about my height that I would better serve the purpose of helping him out of the building.

So I took him from her; and Regina said, "I'm going to go back in and see if I can find anyone else that's hurt that needs help." And I started down the stairs.

Larry was totally disoriented; and so I counted the

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stairs, not the stairs themselves but the floors as we went down. And as we reached each floor, people like us with blood on them in varying degrees of injury were coming out of the floor doors into the stairwell.

The stairwell at that point appeared to be the only exit route to -- for us.

So I counted the floors all the way down; and unfortunately, I missed the second floor, which is the plaza, and just kept going to the basement. And so with Larry in such poor condition, I had to backtrack back up to second floor.

When we got there, the door was kind of ajar; and a man came in and asked me where the day-care was.

At that point, I told him it was on the second floor.

And I helped Larry out into the curb over the plaza down the stairs and to the curb that bordered the building at Harvey.

MR. RYAN: Your Honor, this as good breaking point, if you wish, or I'll go on.

THE COURT: No. Let's take the recess now. And you may step down now.

And members of the jury, we will as usual take our recess -- what's going to be usual. You only had one experience with it before, yesterday; but we'll take an hour-and-a-half lunch recess. So you're excused now, again with the cautions of please do not discuss anything about the case among yourselves or with anyone else during this time period.

You're excused.

(Jury out at 12:10 p.m.)

MR. JONES: Your Honor, I believe this has been covered before; but perhaps I should do it formally. I move the rule of sequestration be invoked.

THE COURT: Yes. Well, I assumed that we were following the rule of sequestration. I trust you've already advised your witnesses, have you -- the Government counsel?

MR. RYAN: Yes, your Honor, we have.

THE COURT: All right.

Thank you for the reminder; and of course, I'll rely on counsel to give the appropriate instructions to all witnesses to avoid discussion of their testimony with other witnesses.

We'll be in recess for an hour and a half.

(Recess at 12:12 p.m.)

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PLAINTIFF'S EXHIBITS

Exhibit	Offered	Received	Refused	Reserved	Withdrawn
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901	4956	4957			
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REPORTER'S CERTIFICATE

I certify that the foregoing is a correct transcript from the record of proceedings in the above-entitled matter. Dated at Denver, Colorado, this 25th day of April, 1997.

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Paul Zuckerman

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Pam Andasola

