

**Deposition of Thomas Manning
(presented in court Friday, May 9, 1997)**

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UNITED STATES DISTRICT COURT
3 FOR THE DISTRICT OF COLORADO

4

Chief Judge Richard P. Matsch

5

Criminal Action No. 96-CR-68-M

6

UNITED STATES OF AMERICA,)
----- Plaintiff,)

7 vs.) Case No.)

8 TIMOTHY JAMES McVEIGH and) 96-CR-68-M

9 TERRY LYNN NICHOLS,)
----- Defendants.)

10

11

12 D E P O S I T I O N

13 O F

14 THOMAS MANNING,

15

16 taken on behalf of the Government, pursuant to
17 Order of the Court, beginning at 1:30 p.m., on
18 the 7th day of November, 1996, in the offices
19 of the U.S. Federal Courthouse, 444 S.E. Quincy
20 Avenue, City of Topeka, County of Shawnee, and
21 State of Kansas, before Eleonora M. Lyon,
22 Certified Shorthand Reporter.

23

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25

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1 APPEARANCES

2 The Government appeared by and through its
3 counsel, Mr. Larry Mackey, Mr. Scott Mendeloff
4 and Mr. Aitan Goelman, Special Attorneys to the
5 U.S. Attorney General, 1961 Stout Street, Suite
6 1200, Denver, Colorado, 80294.

7 Defendant Timothy McVeigh appeared by and
8 through his counsel, Mr. Robert R. Nigh, Jr.,
9 Attorney at Law, 114 East Broadway, Suite 1010,
10 Post Office Box 472, Enid, Oklahoma,
11 73702-0472; and, Mr. Stephen Jones, Attorney
12 and Counselor at Law, 1100 Broadway Tower,
13 P.O. Box 472, Enid, Oklahoma, 73702

14 Defendant Terry Lynn Nichols appeared by
15 and through his counsel, Mr. Ronald G. Woods,
16 Attorney at Law, 5300 Memorial, Suite 1000,
17 Houston, Texas, 77007; and Mr. N. Reid
18 Neureiter, Court Appointed Counsel, 1120
19 Lincoln, Suite 1308, Denver, Colorado, 80203.

20

21 (THEREUPON, all exhibits were marked
22 by counsel either before or during the
23 deposition.)

24

25 THOMAS R. MANNING,

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1 called as a witness on behalf of the
2 Government, was sworn, and testified as
3 follows:

4

5 MR. MACKEY: Mr. Manning, before we
6 begin, let me take a moment to just make some
7 matters of record. Speaking on behalf of the
8 United States, my name is Larry Mackey, and we
9 are here pursuant to an order entered by Chief
10 District Court Judge Richard Matsch dated
11 October 28th, 1996, authorizing an evidentiary
12 deposition here in Topeka, Kansas, on this
13 date, November 7th of 1996.

14 At this time, I'd call upon counsel for
15 respective defendants to make their appearance
16 a matter of record.

17 MR. NIGH: Rob Nigh, N-I-G-H, on
18 behalf of Timothy McVeigh.

19 MR. JONES: Stephen Jones on behalf

19 MR. JONES: Stephen Jones on behalf
20 of Timothy McVeigh.
21 MR. WOODS: Ron Woods on behalf of
22 Terry Nichols.
23 MR. NEUREITER: Reid Neureiter on
24 behalf of Terry Nichols.
25 MR. MACKEY: Thank you, gentlemen.

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1

2 DIRECT-EXAMINATION

3 BY MR. MACKEY:

4 Q. Mr. Manning, let me ask you, have you been the
5 victim of a heart attack?

6 A. Yes, I have.

7 Q. And could you tell everyone when that was?

8 A. The morning of the 24th of December, 1995.

9 Q. And how severe a heart attack was it?

10 A. Severe enough I had to be shock treated three
11 to four times, brought back.

12 Q. As a result of that heart attack, did you
13 suffer damage to your heart?

14 A. Yes, I did.

15 Q. And are you under a doctor's care as a result
16 of that heart attack?

17 A. Yes, I am.

18 Q. Is your doctor aware that you might be a
19 witness in a matter of United States of America
20 versus Timothy McVeigh and Terry Nichols?

21 A. Yes.

22 Q. And has he counseled with you concerning how
23 that role as a witness might impact on your
24 health?

25 A. Yes, he did.

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6

1 Q. Has he recommended that-- if possible, that you
2 provide any testimony outside a courtroom and
3 specifically in a setting such as today?

4 A. Yes, he thought that would be better.

5 Q. Mr. Manning, are you on medication as a result
6 of your heart attack?

7 A. Yes, I am.

8 Q. And is there anything about that medication
9 that may impact on your ability to recall
10 events as early as 1995 or years before?

11 A. No.

12 Q. Mr. Manning, at any point in time, either my
13 questions or those of counsel for each
14 defendant, you would like a break, simply ask
15 us to do so, and we will provide you that
16 opportunity. Mr. Manning, tell us your age?

17 A. 46.

18 Q. And where were you born?

19 A. Indianapolis, Indiana.

20 Q. And how far did you go in school?

21 A. Twelfth grade. Never graduated, took GED,

22 passed.

23 Q. Did you have any college education, then?

24 A. No.

25 Q. Where do you currently reside?

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1 A. Junction City, Kansas.

2 Q. How far is Junction City from Topeka?

3 A. Sixty miles.

4 Q. You would know that distance, would you not,

5 because you lived in Topeka for a number of

6 years?

7 A. Approximately 16 to 17 years.

8 Q. And precisely what time period?

9 A. 1971 to 1986.

10 Q. What first brought you to Topeka, Kansas?

11 A. United States Air Force.

12 Q. And were you honorably discharged?

13 A. Yes, I was.

14 Q. Approximately when?

15 A. October 1972 discharged

15 A. October 1975, discharged.

16 Q. After leaving the military, what kind of career
17 did you take up?

18 A. Working in a service station, mechanic.

19 Q. Was that here in Topeka?

20 A. Yes.

21 Q. Eventually, did you move to the city, then, of
22 Junction City, Kansas?

23 A. Yeah, in March of 1986.

24 Q. And for what purpose?

25 A. To go to work for Firestone.

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8

1 Q. Is that the Firestone Store?

2 A. Firestone Store in Junction City, correct.

3 Q. What's the address of that store?

4 A. 128 West Eighth.

5 Q. And did you work continuously for that
6 Firestone store since March of 1986?

7 A. Yes.

8 Q. What is your current position there?

9 A. Store manager.

10 Q. And how long have you been the store manager at
11 Firestone in Junction City?

12 A. Since September of 1986.

13 Q. Could you give us all an overview of your

14 duties as the store manager for that Firestone
15 store?
16 A. Oversee the-- meet sales quota, tire quotas,
17 service objectives, manage the people, manage
18 the business, make a profit.
19 Q. Sounds like a store manager.
20 A. Yes.
21 Q. You sell tires and provide service-- repair
22 service to vehicles.
23 A. Correct.
24 Q. How many total years have you been employed in
25 the auto service industry?

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1 A. Approximately twenty-seven, 28 years.
2 Q. Now, during the last ten years living and
3 working in Junction City, have you become
4 familiar with various car dealers that operate
5 in that same city?
6 A. Yes, many.
7 Q. Do you specifically know an individual named
8 Larry Rexrode, R-E-X-R-O-D-E, and the business
9 he operates?
10 A. Yes.
11 Q. What is the name of his business?
12 A. Rex's Auto Sales.

13 Q. Over the years have you personally acquired or
14 purchased any vehicles from Rex's Auto Service?

15 A. Yes, I have.

16 Q. And when was the last such occasion?

17 A. It would have been summer, around the first
18 week of April, 1995.

19 Q. And what did you acquire from Rex's Auto?

20 A. 1977 Mercury Marquis.

21 Q. Would you tell us when and how you took
22 possession of that 1977 Mercury Marquis?

23 A. He brought it down to the store to have some
24 tires taken off of it, and the car just kind of
25 stayed there. Then somewhere around that

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1 period of time, we made a deal on it.

2 Q. All right. Let me show you some photographs
3 that have been marked for purposes of today's
4 presentation as Government Exhibits Manning No.
5 2 through No. 9. Take a moment and look at
6 each photograph.

7 A. (Complied with counsel's request).

8 Q. Mr. Manning, what do each of those exhibits,
9 No. 2 through No. 9, show?

10 A. That's the car that I sold.

11 Q. Is that the same 1977 Mercury you first
12 acquired from Rex's Auto Sales?

13 A. Yes, it is.

14 Q. In early April 1995. And do each of those
15 photographs fairly and accurately depict the
16 vehicle you owned?

17 A. Yes.

18 Q. Tell us, please, Mr. Manning, where that car
19 was on the early morning hours of April 14th, a
20 Friday, of 1995.

21 MR. NIGH: I object as leading.

22 Q. (BY MR. MACKEY) Go ahead and answer, please.

23 A. Okay. The car was sitting out behind the store
24 in the city parking lot.

25 Q. Let me hand you Government Exhibit Manning No.

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11

1 11 and ask if you can tell us what that exhibit
2 is, please?

3 A. That's an aerial view of the store and the
4 surrounding buildings.

5 Q. When you say "store," do you mean the store you
6 managed?

7 A. The Firestone Store, yes.

8 Q. And does that same photograph depict the lot
9 that the Mercury was parked in on April 14th.

9 that the Mercury was parked in on April 14th,
10 1995?

11 A. Yes, it does.

12 Q. Does that photograph accurately depict your
13 store and the surrounding buildings as they
14 appeared in April of 1995?

15 A. Yes.

16 Q. Mr. Manning, for the record, can you describe,
17 on the face of that photograph, where exactly
18 the Mercury was parked on April 14th?

19 A. It was behind the building to the north.

20 Q. And by describing for the record the photograph
21 itself, you mean the upper portion that is on
22 top of where the Firestone Store appears.

23 A. Directly behind the building in the back
24 parking lot.

25 Q. Is that property owned by Firestone?

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12

1 A. No, it's not.

2 Q. And who owns that?

3 A. That's owned by the City of Junction City.

4 MR. MACKEY: Now, gentlemen, we'll
5 offer into evidence, for the record, Exhibits 2
6 through 9 and No. 11 for the reasons recited by
7 the examination thus far.

8 Q. (BY MR. MACKEY) Mr. Manning, let me turn at
9 this time now and ask you whether you know an
10 individual named Tim McVeigh.
11 A. Yes.
12 Q. Could you tell us how you first came to know
13 Timothy McVeigh?
14 A. As a customer in the store.
15 Q. Your store in Junction City?
16 A. The Firestone Store, yes, in Junction City.
17 Q. And to the best of your recollection, when did
18 Mr. McVeigh first become a customer at your
19 store?
20 A. It was sometime in 1989.
21 Q. Do you recall the circumstances?
22 A. He was-- came in for tires, I believe.
23 Q. Let me hand you, Mr. Manning, now Government
24 Exhibit Manning No. 12. Do you recognize that
25 document?

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13

1 A. Yes, I do.
2 Q. As being what, please?
3 A. It's a credit card application.
4 Q. And is it an application in the name of a
5 specific customer?
6 A. Yes, Timothy J. McVeigh.

7 Q. Do you know who took that application; that is,
8 who filled it out on the particular date?
9 A. Yes, that was-- I'm the one that handled this
10 one here.
11 Q. You can tell by examining No. 12 that you were
12 personally involved in that transaction.
13 A. Yeah, because I've signed it.
14 Q. And what was your procedure in-- at that time
15 period for taking credit applications from any
16 interested Firestone customer?
17 A. We would take his credit card application and
18 call it in to our credit card center, and this
19 one was approved and gives the customer open
20 credit at that very moment.
21 Q. And from whom do you receive the personal
22 information about that customer?
23 A. From the customer.
24 Q. And did you follow that procedure on that
25 particular occasion?

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14

1 A. Yes.
2 Q. What is the date of Government Exhibit Manning
3 No. 12?
4 A. 9-9-1989.
5 Q. That would be September 9th of 1989?

5 Q. That would be September 9th of 1989?

6 A. Correct.

7 MR. MACKEY: We'll move the admission
8 of Government Exhibit No. 12.

9 Q. (BY MR. MACKEY) Mr. Manning, after the McVeigh
10 credit account was opened, was Mr. McVeigh a
11 customer at your store?

12 A. Yes.

13 Q. On approximately how many different occasions
14 over the following two years?

15 A. Anywhere from eight to ten times.

16 Q. And what was the nature of the business that
17 Mr. McVeigh did with your Firestone Store?

18 A. Purchasing tires, service of his car.

19 Q. And approximately when was he; that is, prior
20 to April of '95, last a customer of yours at
21 the Firestone Store?

22 A. I believe it was sometime in 1991.

23 Q. Mr. Manning, I want to turn your attention,
24 then, to-- again to Friday, April 14th, 1995.

25 Did you have occasion to see Tim McVeigh.

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15

1 MR. NIGH: I object as leading.

2 Q. (BY MR. MACKEY) Go ahead and answer, please.

3 A. Yes, I did.

4 Q. Where did you see him?

5 A. At the Firestone Store in Junction City.

6 Q. And had you, to the best of your recollection,
7 had any contact with Mr. McVeigh since he had
8 last been a customer at that store in April of
9 1995?

10 A. No.

11 Q. In the course of that morning of April 14th,
12 Mr. Manning, did you sell the 1977 Mercury
13 Marquis to Tim McVeigh?

14 A. Yes, I did.

15 Q. I want to ask you a series of specific
16 questions about that transaction, Mr. Manning.
17 Let me start with this. Do you know why Tim
18 McVeigh was at your store on April 14th?

19 A. He was having car trouble with his car.

20 Q. Were you at work that morning?

21 A. Yes, I was.

22 Q. And who opened the store, if you recall?

23 A. It would have been probably Ron and I, Ron
24 Kramer and myself.

25 Q. Is Mr. Kramer's last name spelled K-R-A-M-E-R?

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16

1 A. Yes.

2 Q. All right. And in April of 1995, approximately

3 what time of morning would you or Mr. Kramer

4 arrive to open the Firestone Store?

5 A. Sort of between 6:30 and quarter to 7.

6 Q. Who, among the Firestone employees, would have

7 been at the place of business by 9 a.m. Friday,

8 April 14th, other than yourself and Mr. Kramer,

9 if any?

10 A. Kelly Osburn, and there's a Wendy Cummings that

11 works there. I can't remember if she worked

12 that day or not, and--

13 Q. Mr. Manning, let me ask you now some general

14 questions about record-keeping at the Firestone

15 Store, if I might.

16 A. Okay.

17 Q. Could you give us an overview of what steps are

18 taken by you or other employees at your

19 direction to make and create business records

20 for customers, what happens?

21 A. Well, the first thing you do is you start

22 filling out a sales ticket with the customer's

23 name, address, telephone number, type of car,

24 the time you're writing the ticket up and a

25 general description of why they're there, what

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17

1 they're wanting to do.

2 Q. So the customer arrives at the counter; is that
3 right?

4 A. Right.

5 Q. And the information, then, is relayed from the
6 customer to you or one of the employees.

7 A. Correct.

8 Q. What kind of information beyond name and
9 address, for example, is taken at that time?

10 A. Services customer requested or symptoms of
11 trouble, what the customer is looking for. If
12 he's having a problem with the car, what he
13 wants to get looked at.

14 Q. And that's all information written down by one
15 of your staff with the customer present.

16 A. Correct.

17 Q. You mentioned that it's your practice-- or your
18 company's practice to write down the time that
19 the customer arrives and requests the service;
20 is that right?

21 A. Yeah.

22 MR. NIGH: I object, it's leading.

23 Q. (BY MR. MACKEY) And why is that important to
24 record that time?

25 A. Well, to show what time the customer got there,

1 and also we're supposed to record the time
2 promised the car to be returned.

3 Q. So some written record is routinely made as to
4 when the car is dropped off and when Firestone
5 promises to have it ready for pickup.

6 A. Correct.

7 Q. Who retains the kinds of records you've just
8 described, Mr. Manning?

9 A. The store itself.

10 Q. And were the practices that you've described
11 for us just a moment ago in place on April
12 14th, 1995?

13 A. Yes.

14 Q. Let me hand you now, Mr. Manning, what's been
15 marked Government Exhibit Manning No. 13. If
16 you'd examine that document, please?

17 A. (Complied with counsel's request).

18 Q. Do you recognize what that is?

19 A. Yes.

20 Q. What is that document?

21 A. Oh, it's a sales ticket. It was written up by
22 Kelly Osburn.

23 Q. And does that relate to Timothy McVeigh?

24 A. Yes, it has his name and an address in Michigan
25 for the '83 Pontiac, J-2000.

19

1 MR. NIGH: I'm going to object until
2 the document is admitted into evidence, then.

3 MR. MACKEY: I understand.

4 Q. (BY MR. MACKEY) Mr. Manning, to your
5 knowledge, was Exhibit No. 13 prepared in
6 accordance with the same procedures that you've
7 described generally just a moment ago?

8 A. It was started but not completed.

9 Q. Was the information as reflected on Exhibit 13
10 taken down in the routine course of operating
11 Firestone business on April 14th, 1995?

12 MR. NIGH: I object.

13 Q. (BY MR. MACKEY) Go ahead and answer.

14 A. Yes.

15 MR. MACKEY: We'll move to admit
16 Government Exhibit 13.

17 Q. (BY MR. MACKEY) Directing your attention, Mr.
18 Manning, to that document, what's the name of
19 the customer that appears there?

20 MR. NIGH: So that the record is
21 clear, I object to the admission of 13.

22 MR. MACKEY: Thank you.

23 A. Tim McVeigh.

24 Q. (BY MR. MACKEY) And what address is given?

25 A. 43616 Van Dyke, and it says Becker, Michigan.

20

1 Q. Becker with a B?

2 A. Correct.

3 Q. Is there a box on Exhibit 13 for the customer's
4 phone number?

5 A. Yes, that's marked with NP which would be no
6 phone.

7 Q. The initials NP stands for what, again?

8 A. No phone.

9 Q. Does Exhibit 13 show a time as to when that
10 customer came to Firestone on April 14th, 1995?

11 A. Yes, it does.

12 Q. And what is that time?

13 A. It's 9 o'clock.

14 Q. Can you tell by examining Exhibit 13, Mr.
15 Manning, what service was requested by that
16 customer?

17 A. No.

18 Q. Do you know, from personal observation and
19 being present on that date, what service was
20 requested?

21 A. Yes, I do.

22 Q. Describe that, please.

23 A. The customer's complaint was overheating and
24 white smoke pouring out the tailpipe.

25 Q. Now were you present when Mr. Osburn and Mr.

20 Q. Now, were you present when Mr. Osburn and Mr.

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21

1 McVeigh, per that exhibit, wrote the materials
2 down or wrote the information down on that
3 exhibit?

4 A. Yes, I was.

5 Q. And at that moment and time, Mr. Manning, did
6 you recognize the customer as the person known
7 to you as Tim McVeigh?

8 A. No, I didn't.

9 Q. When, in the course of that morning, did you
10 first recognize the individual as Timothy
11 McVeigh, a past customer?

12 A. Later on after we were starting to talk about
13 buying the car, he told me that he was Tim
14 McVeigh.

15 Q. After the person came to the counter and filled
16 out Exhibit 13, or assisted Mr. Osburn in doing
17 so, did you see the two of them leave the
18 Firestone station?

19 A. Yes, they did. They went outside.

20 Q. And did they return?

21 A. Yes.

22 Q. And did they have a conversation in your
23 presence about the vehicle?

24 A. Yes, Kelly Osburn stated that, from his
25 observations, he thought there was either a

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1 blown headgasket or a cracked head-- (reporter
2 interruption), a cracked cylinder head and gave
3 a generalized estimate of somewhere between
4 five, six, seven hundred dollars to repair it.

5 Q. Could you tell from your experience, Mr.
6 Manning, whether a customer might be willing to
7 pay as much as \$800 to repair a 1983 Pontiac
8 J-2000 station wagon?

9 A. The statement was made that he didn't have that
10 kind of money.

11 Q. And that statement was made by whom?

12 A. Tim McVeigh.

13 Q. And this, again, was in your presence at the
14 Firestone Store on the morning of April 14th?

15 A. Yes.

16 Q. After that statement was made, Mr. Manning,
17 what happened next?

18 A. Well, he mentioned-- Tim McVeigh mentioned
19 something to Kelly Osburn about trying to find
20 another car, so I invited the customer over to
21 my desk to use the phone.

22 Q. This was at your initiative?

23 A. Yes.

24 Q. And why did you take that step?

25 A. Try to help him out.

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1 Q. And what did you understand the problem to be

2 at that point in time?

3 A. That he wanted to buy an inexpensive car.

4 Q. What did you do to help the customer out?

5 A. Well, I handed him the phone, and I

6 said, "Here, I'll call a car dealer that I know

7 and see what he's got for you," so I handed the

8 customer the phone, and I dialed the number to

9 D.E.L. Motors.

10 Q. Is Del's Motors D-E-L apostrophe S?

11 A. It's D period E period L period, D.E.L. Motors.

12 Q. Okay. And that's a car dealership in Junction

13 City?

14 A. Yes, it is.

15 Q. And one with whom you've done business over the

16 years.

17 A. Yes.

18 Q. Did you hear the conversation or at least the

19 customer's end of the conversation, that

20 transpired thereafter?

21 A. Yes, I did.

21 A. Yes, I did.

22 Q. And what was said?

23 A. I heard Tim McVeigh ask for-- if he had
24 anything in the two or three hundred dollar
25 range for a car, and then, you know, they ended

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24

1 the conversation.

2 Q. When that telephone conversation ended, Mr.
3 Manning, what did you do next?

4 A. Well, the first thing I thought of was my '77
5 Mercury I had sitting out back and just the
6 right price range.

7 Q. And with that thought in mind, what did you do?

8 A. I told Tim McVeigh about the car and asked him
9 if he'd like to see it, if he was interested in
10 it.

11 Q. And how did he respond?

12 A. He wanted to look at it, so we went out back
13 and looked over the car, and--

14 Q. Well, let me ask you, who left the inside of
15 the office area at Firestone and went out back?

16 A. Myself and Tim McVeigh.

17 Q. Just the two of you?

18 A. Yes.

19 Q. And you walked to the city lot that you've

20 previously identified?

21 A. Yes.

22 Q. And what took place there?

23 A. Well, I kind of-- we kind of walked-- I showed
24 him the car and asked him if he wanted to take
25 it for a drive, and he said yes.

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1 Q. Mr. Manning, before you went for a drive, what
2 information did you give the customer about the
3 condition or the background or the history of
4 that vehicle?

5 A. I just told him it wasn't a real pretty car,
6 but it seemed to run real good. It was-- it
7 wasn't the best car in the world, but it ought
8 to get by for a while.

9 Q. Did you and Mr. McVeigh thereafter take a test
10 drive in the '77 Mercury?

11 A. Yes, we did.

12 Q. Before you did so, did you have to put any
13 plates on it?

14 A. I put our-- we have a drive-away tag with a
15 magnet on it that sticks on the back of the
16 car.

17 Q. And where did you get that?

18 A. That's at the store.

19 Q. Should we infer that there was no license
20 plate, then, on the Mercury on the morning of
21 April 14th, 1995?

22 A. That's correct.

23 Q. And that's the reason you put the drive-away
24 tags on it?

25 A. Uh-huh.

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1 Q. Did anyone, other than you and Mr. McVeigh,
2 join you on the test drive?

3 A. No.

4 Q. Who drove?

5 A. I did.

6 Q. Does that mean you started the car?

7 A. Yes.

8 Q. Did you have any trouble starting the Mercury
9 on that morning?

10 A. Not to my recollection.

11 Q. To your knowledge, when was the last time that
12 the Mercury had been started?

13 A. It could have been at least a week or so.

14 Q. Describe for us where you and Mr. McVeigh went
15 on the test drive.

16 A. We went approximately three blocks-- three to

17

17 four blocks over to a Phillips 66 station. I
18 believe I put in \$3 worth of gasoline, and I
19 took a different route back to the store, and
20 he said the car was acceptable for him.

21 Q. Was there any other conversation you recall
22 between yourself and Mr. McVeigh during the
23 course of the test drive?

24 A. Nothing that sticks in my mind.

25 Q. At the end of the test drive, did you and Mr.

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1 McVeigh have a discussion about his willingness
2 to buy that vehicle from you?

3 A. Yes, we discussed the terms of \$300 and I keep
4 his old car.

5 Q. Now, at that point in time, Mr. Manning, to the
6 best of your recollection, had you examined the
7 vehicle that he had arrived in?

8 A. Not until we got back from the test drive.

9 Q. And after you returned from the test drive, did
10 you do that?

11 A. Yes.

12 Q. And what did you do?

13 A. Oh, we just walked over to the car, and I asked
14 him for the title. I wanted to see if he had a
15 good, clean title on the car.

16 Q. Refer your attention, Mr. Manning, to
17 Government's Exhibits 10 and 11 and ask you,
18 first, as to No. 10, does that accurately
19 depict, once again, the Firestone Store and
20 surrounding buildings as they appeared in April
21 of 1995?

22 A. Yes, it does.

23 Q. Is it similar with just slight variation from
24 Exhibit No. 11.

25 A. Yes, that's--

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1 MR. WOODS: That's 10.

2 Q. (BY MR. MACKEY) Or 10, I'm sorry. Thank you.

3 A. That's a proper view of the store.

4 Q. With reference, then, to Government's Exhibit
5 No. 10, could you tell us where the McVeigh
6 vehicle was parked when the two of you returned
7 after the test drive?

8 A. We're sitting in the-- came back to the side of
9 the parking lot directly behind the service
10 bays.

11 Q. Where is-- on what side of the building is the
12 parking lot for your Firestone Store?

13 A. That would be on the west side.

14 Q. And was the vehicle that Mr. McVeigh showed you

15 parked in that parking lot?

16 A. Yes, it was.

17 Q. And describe that car.

18 A. It was a blue '83 Pontiac J-2000 station wagon.

19 Q. I show you now, Mr. Manning, Government's
20 Exhibits Manning 14, 15, 16 and 17. Take a
21 moment and look at each of those, please.

22 A. (Complied with counsel's request). Yes, that's
23 the car.

24 Q. Do each of those exhibits, 14 through 17,
25 fairly and accurately depict the vehicle that

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1 you and Mr. McVeigh examined in your parking
2 lot on the morning of April 14th?

3 A. Yes, it does.

4 MR. MACKEY: We'll move to admit
5 those same exhibits, 14 through 17.

6 Q. (BY MR. MACKEY) Mr. Manning, could you tell us
7 in more detail exactly what you and Mr. McVeigh
8 did concerning the Pontiac vehicle at that
9 point in time?

10 A. We-- I believe that's when he produced the
11 title. We agreed-- he agreed to the \$300 and
12 his car for the Mercury.

13 Q. Did you see Mr. McVeigh obtain the title from
14 the vehicle?
15 A. I believe he got it from the vehicle. I know--
16 all I know is I remember seeing the title, and
17 it-- at that time, that's when he introduced
18 himself to who he was.
19 Q. Now, as-- and I'll get to that in just a
20 moment. As part of the inspection, Mr.
21 Manning, did you walk around the Pontiac
22 vehicle?
23 A. A little bit, not very much.
24 Q. Were you able to, from your vantage point, see
25 the interior, what was inside, the vehicle on

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1 that morning?
2 A. Yes.
3 Q. What do you recall seeing?
4 A. The two things that stick in my mind that I saw
5 was I saw an OD green canvas type bag sitting
6 in the back seat and an orange plastic
7 container that reminded me of a gallon of hand
8 cleaner.
9 Q. Did you see a television set anywhere in the
10 Pontiac station wagon on April 14th?
11 A. I have no recollection of that.

12 Q. Would you remember it if you saw a TV set in
13 the back of the Pontiac?
14 A. I would think I would, but I-- (pause).
15 Q. Now, you told us that Mr. McVeigh produced the
16 title to that vehicle during this inspection.
17 A. Yes.
18 Q. I'm going to hand you now Government Exhibit
19 Manning No. 20. Would you take a look at that
20 document, please?
21 A. (Complied with counsel's request).
22 Q. Have you seen that before today?
23 A. Yes, I have.
24 Q. When did you first see it?
25 A. That's when Timothy McVeigh got the title out

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1 and signed it.
2 Q. Is Government Exhibit 20 the title that Mr.
3 McVeigh produced to you on the morning of April
4 14th, 1995?
5 A. Yes.
6 Q. And is it the title to the Pontiac vehicle that
7 you've previously identified in the
8 photographs?
9 A. Yes.
10 MR. MACKEY: We'd move to admit

11 Government Exhibit 20.

12 Q. (BY MR. MACKEY) Mr. Manning, you were telling
13 us during this conversation at the Pontiac that
14 Mr. McVeigh made a point of identifying
15 himself.

16 A. Yes, he did.

17 Q. Would you describe what happened?

18 A. He said-- he said, "You remember me, don't
19 you? I'm Tim McVeigh." He had a hooded
20 (demonstrated)-- I believe it was a hooded
21 sweat shirt on, and he pulled his hood down,
22 and then I-- at that point in time I recognized
23 him.

24 Q. Mr. Manning, approximately how many customers
25 do you see on a monthly basis?

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1 A. It could be anywhere from six to eight hundred.

2 Q. And was that true during the time period
3 between 1991 and 1995?

4 A. Yes.

5 Q. By that point in time; that is, the inspection
6 of the Pontiac, Mr. Manning, had the two of you
7 reached an agreement to sell the Mercury to Mr.
8 McVeigh?

9 A. Yes.

10 Q. And, again, what were the specific terms of
11 that agreement?

12 A. The \$300 and I took his Pontiac in on trade.

13 Q. At that point in time, Mr. Manning, was there
14 any discussion about producing a title to the
15 1977 Mercury?

16 A. Not at that time.

17 Q. Did that happen later?

18 A. Yes.

19 Q. After the inspection of the Pontiac?

20 A. It was later on down the line.

21 Q. What happened next between you and Mr. McVeigh
22 after you had done the walk-around of the
23 Pontiac?

24 A. Well, I told him that there-- I wanted to check
25 a few things out on the car and make sure it

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1 was road-worthy.

2 Q. Which car were you referring to then?

3 A. The '77 Mercury Marquis.

4 Q. And what steps did you take to do that?

5 A. It was pulled into one of the bays, and we
6 checked all the fluid levels, put a used tire
7 on the right rear, put in a couple of quarts of

8 transmission fluid for him. I believe the car
9 had a transmission leak on it, a small
10 transmission leak.

11 Q. Did you or your mechanics also check the
12 battery?

13 A. I believe they just checked the battery water
14 level.

15 Q. Incidentally, the tire that was replaced on the
16 Mercury, did it use the same wheel of the one
17 that was on at the time?

18 A. Yes.

19 Q. So would that involve taking the tire off that
20 wheel and mounting the new replacement?

21 A. Yes.

22 Q. Was that done, then, in the service bay at your
23 store?

24 A. Yes.

25 Q. As part of this road-worthiness check?

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1 A. Yes.

2 Q. Incidentally, with reference to Exhibits 10 and
3 11, Mr. Manning, on what side of the building
4 are the service bays? How do you get in there?

5 A. Well, you drive into them from the west side.

6 Q. So they serve from the same customer parking

6 Q. So they serve from the same customer parking
7 lot area that you've described before.

8 A. Yes.

9 Q. Mr. Manning, did you have any of your personal
10 property in the 1977 Mercury Marquis?

11 A. No.

12 Q. To the best of your knowledge, Mr. Manning,
13 what, if any, mechanical work had been done on
14 that Mercury between the time you first
15 acquired it and the time that it got ready for
16 sale to Mr. McVeigh?

17 A. None that I can think of, other than we--
18 there was some old stereo wires hanging down
19 underneath the dash that were clipped out, some
20 transmission fluid put in it. Nothing of any
21 major degree at all.

22 Q. After the car was pulled into the service bay,
23 what did you do?

24 A. I went back up front to the office.

25 Q. And what did you do in connection with this

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1 particular sale?

2 A. I believe I-- I think at that time I-- I can't
3 remember the sequence of some of the things,
4 but I believe I was-- I could have started

5 filling out the bill of sale at that time.

6 Q. And what document did you use to prepare a bill
7 of sale for this transaction?

8 A. I had a blank bill of sale.

9 Q. Did you, in fact, prepare one?

10 A. Yes, I did.

11 Q. Let me show you Government Exhibit Manning No.
12 18. What is that, please?

13 A. That's a bill of sale.

14 Q. Does it relate to the transaction with Mr.
15 McVeigh that you've been describing?

16 A. Yes, it does.

17 Q. Does it have handwriting on it?

18 A. Yes, it does.

19 Q. And whose handwriting are the entries?

20 A. That's all mine.

21 MR. MACKEY: We'll move to admit
22 Government Exhibit No. 18.

23 Q. (BY MR. MACKEY) Mr. Manning, there is certain
24 personal information on the bill of sale, is
25 there not? On the left hand side, for--

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1 A. Yes.

2 Q. -- example, that relates to you?

3 A. Yes.

4 Q. On the right-hand side, it relates to Mr.
5 McVeigh?
6 A. Correct.
7 Q. From whom did you get the personal information
8 under the name Timothy McVeigh?
9 A. From Tim McVeigh.
10 Q. The bill of sale also requires the
11 identification of the vehicle, does it not?
12 A. Yes, it does.
13 Q. And did you enter that number in that line?
14 A. Yes, I did.
15 Q. And what is that number?
16 A. That's the vehicle identification number.
17 Q. For the Mercury?
18 A. Yes.
19 Q. Where did you get the VIN number?
20 A. From the Mercury.
21 Q. Did that entail the need for you to go out and
22 actually examine the vehicle and write down the
23 VIN number?
24 A. Yes.
25 Q. At that point in time, Mr. Manning; that is,

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1 mid-morning nineteen-- or April 14th, 1995, did
2 you personally have a title to the 1977

2 you personally have a title to the 1977

3 Mercury?

4 A. No, I did not.

5 Q. Now, once you prepared the bill of sale with
6 the information that's set forth in Exhibit 18,
7 what did you do with the document?

8 A. I made a copy of it and gave it to McVeigh, the
9 original, and kept this (indicating) for my
10 record.

11 Q. In the course of time, Mr. Manning, did you
12 tender or produce Government Exhibit 18 to the
13 FBI?

14 A. Yes, I did.

15 Q. Was that from your records there at the
16 Firestone Store?

17 A. I had it at home.

18 Q. All right. Directing your attention, Mr.
19 Manning, to the bottom portion of the bill of
20 sale, do you see an entry concerning-- or
21 including an address in Decker, Michigan?

22 A. Yes.

23 Q. And who wrote that information?

24 A. I did.

25 Q. Could you tell us when you wrote it down?

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1 A. That was just about before the deal was all
2 completed. I asked-- I told-- I explained to
3 Tim McVeigh that I did not have the title, and
4 I needed an address to send the title to when I
5 got it, and this was the address that he gave
6 me.

7 Q. For that purpose.

8 A. Yes.

9 Q. Did you and Mr. McVeigh have a conversation
10 about his need for a title to that vehicle?

11 A. It didn't seem to be a real, real great
12 concern. He just made the comment, "All I'm
13 really worried about is getting from here to
14 Michigan."

15 Q. The vehicle, that is?

16 A. Yeah. He just needed a vehicle to get to
17 Michigan.

18 Q. On the face of Exhibit 18, what color is the
19 ink that appears at the bottom of that
20 document?

21 A. Blue.

22 Q. And is it different than the rest of the
23 content of the document?

24 A. Yes, because-- yes, the document is a copy.

25 Q. And why is it different?

1 A. Because I put this in after I had given Tim
2 McVeigh his copy.

3 Q. Did you and Mr. McVeigh have any conversation
4 about putting license plates on the Mercury if
5 it was going to be on the roads?

6 A. I had told him that there-- as long as he had
7 his registration and his proof of insurance
8 with him, he could legally run his tag off the
9 Pontiac 2000 on the Mercury with his bill of
10 sale, and if he got stopped, he would-- it
11 would be legal.

12 Q. That was the conversation you had with Mr.
13 McVeigh before the close of the transaction?

14 A. Correct.

15 Q. When you had done the walk-around of the
16 Pontiac, did you notice whether it had a
17 license plate on it?

18 A. Yes, it did.

19 Q. And what state?

20 A. It was Arizona.

21 Q. And in the conversation that you've just
22 described, did you tell Mr. McVeigh that he
23 could transfer the plates from the Pontiac to
24 the Mercury?

25 A. Yes, I did.

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1 Q. At some point, I take it, the Mercury was
2 removed from the service bay?

3 A. Yes, it was.

4 Q. And what happened at that point?

5 A. It was parked back out in the parking lot.

6 Q. And when it came back out of the service bay,
7 what happened to the car?

8 A. We finished the cash transaction.

9 Q. Before Mr. McVeigh left that morning, Mr.
10 Manning, did he execute the back side of the
11 Pontiac title, did he sign it?

12 A. Yes, he did.

13 Q. And did he sign it in your presence?

14 A. Yes.

15 Q. And examine Exhibit No. 20 one more time,
16 please.

17 A. (Complied with counsel's request).

18 Q. Do you see that signature?

19 A. Uh-huh.

20 Q. And was that paperwork done before Mr. McVeigh
21 left?

22 A. Yes.

23 Q. Now, once he was in the Mercury in the parking
24 lot, did you and Mr. McVeigh exchange monies?

25 A. Yes, he handed me three one hundred dollar

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1 bills. He made the comment that he was hoping
2 he had enough money to get back to Michigan.

3 At that time, I reached in my pocket and gave
4 him a \$50 bill back.

5 Q. And why did you do that?

6 A. Just a good gesture. Just to help out.

7 Q. Did you see Mr. McVeigh then leave your
8 premises, or the Firestone premises, that
9 morning?

10 A. I turned and walked away. I didn't-- I heard
11 him drive off, but I was walking back up to the
12 front office.

13 Q. Mr. Manning, can you estimate approximately
14 what time of morning it was that Tim McVeigh
15 drove off in the Mercury?

16 A. Somewhere between 10:15 and 10:30.

17 Q. When Mr. McVeigh was in the Mercury departing
18 Firestone, was anybody else with him?

19 A. Not that I saw.

20 Q. When you did the walk-around of the Pontiac,
21 was there any other person in the Pontiac?

22 A. No.

23 Q. At any point in time in your dealings with Tim
24 McVeigh on April 14th, 1995, did you see any

25 sign of him being in the company of a second

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1 individual?

2 A. No.

3 Q. Could you tell us, Mr. Manning, what Mr.

4 McVeigh's manner was with you on the morning of

5 April 14th?

6 A. Just pleasant, easy going.

7 Q. And how did that correspond with your memory of

8 him as a customer from years past?

9 A. Just the way I remembered him from before.

10 Q. Mr. Manning, during the course of the morning

11 between the time that Mr. McVeigh arrived with

12 the Pontiac and left with the Mercury, was he

13 gone from the Firestone Store at any point in

14 time?

15 MR. NIGH: I object unless the

16 witness has personal knowledge.

17 A. Yes, he was gone for a short period of time

18 while we were checking the car over.

19 Q. (BY MR. MACKKEY) Did you and Mr. McVeigh have a

20 conversation at that point in time when he

21 left?

22 A. I believe he said something like, "I'll be back

23 in a couple of minutes."

24 Q. And your best recollection is that took place
25 when the Mercury was pulled in to begin the

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1 road-worthiness work.

2 A. Yes.

3 Q. Do you have an estimate, Mr. Manning, as to
4 approximately how long Mr. McVeigh was gone
5 from the Firestone premises?

6 A. Approximately ten, 15 minutes.

7 Q. And during that same time period, were you
8 there at the Firestone Store throughout?

9 A. Yes.

10 Q. Do you know where Tim McVeigh went?

11 A. No, I don't.

12 Q. Mr. Manning, tell us what happened to the
13 Pontiac after the time Mr. McVeigh left in the
14 Mercury.

15 A. Well, shortly after Tim McVeigh left, I called
16 Hess Auto Salvage and determined the price,
17 what they would pay, for it. I pulled it in
18 the bay. We pulled off four tires that were
19 good, put on four old tires, and another person
20 working at the store, Joe Grimes, drove it down
21 to Hess Auto Salvage.

22 Q. Is Hess H-E-S-S?

22 Q. IS HESS & SON?

23 A. Yes, it is.

24 Q. How long after Mr. McVeigh's departure was the
25 Pontiac situated on your business premises?

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1 A. Excuse me, how long did it sit there?

2 Q. Yeah.

3 A. I really-- I really don't remember.

4 Q. But I take it, it was moved shortly after the
5 time Mr. McVeigh left.

6 MR. NIGH: I object as leading.

7 Q. (BY MR. MACKEY) Go ahead and answer.

8 A. Yes, it was moved after he left, yes.

9 Q. By way of arrangements you made with Hess & Son
10 to buy it?

11 A. Yes.

12 Q. During the time that it was at Firestone, Mr.
13 Manning, to your knowledge did you or any
14 employee put anything inside the Pontiac?

15 A. No, not that-- not that I know anything about.

16 Q. And when the Pontiac was driven to Hess & Son,
17 did it have a license plate on it?

18 A. No.

19 Q. When the Pontiac was taken over to the salvage
20 yard, what, if anything, happened to the title

21 to that same car?

22 A. The title was handed to somebody down at Hess &
23 Son's.

24 Q. Mr. Manning, when was the next time that you
25 had any conversation with anyone about the sale

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1 of your Mercury to Tim McVeigh?

2 A. It was on the Wednesday, I believe it was the
3 19th, I got a call from the Junction City
4 Police Department asking me if I had sold
5 the '77 Mercury Marquis to Timothy McVeigh, and
6 I said, "Yes, he should have a bill of sale
7 with him that I gave him."

8 Q. And do you remember whether the caller, the
9 person from the Junction City PD, was male or
10 female?

11 A. It was female.

12 Q. Did you pull any records to refresh your memory
13 about any of the events that you described to
14 the police department on that day?

15 A. No.

16 Q. You simply told them what you remembered from
17 your memory.

18 A. Yes.

19 Q. When did you next have any contact with anyone

20 about the sale of the Mercury?

21 A. I believe it was Friday, the 21st, Ron Kramer
22 that works at the store was off sick. He
23 called me and told me that he had seen one
24 of the--

25 MR. NIGH: I'm going to object as

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1 hearsay about what another person told the
2 witness.

3 MR. MACKEY: For the record, this is
4 offered, so that it would show what steps Mr.
5 Manning took after the time of this
6 conversation.

7 Q. (BY MR. MACKEY) Go ahead.

8 A. He told me he had seen the Mercury on
9 national-- on television on a news station and
10 that they had arrested Tim McVeigh for the
11 Oklahoma City bombing, and that was-- at which
12 time I called the Junction City Police
13 Department and talked to Detective Wesoloski,
14 and he told me to call in the-- the phone
15 number for the FBI up on Fort Riley.

16 Q. Did you learn, then, on April 21st, 1995, that
17 Mr. McVeigh had been arrested in the vehicle
18 you had sold him?

18 you had sold him?

19 A. Yes.

20 Q. And for that reason, you then contacted law
21 enforcement officials.

22 A. Yes, I did.

23 Q. After that time, Mr. Manning, did you take any
24 steps to process the title on that Mercury?

25 A. I called Larry Rexrode and told him, "We need

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1 to get the title work finished to get it over
2 into my name."

3 Q. For the record, let me hand you Government
4 Exhibit Manning No. 19. It's both the original
5 and copy before you, Mr. Manning. Can you
6 examine that, please?

7 A. (Complied with counsel's request).

8 Q. What is Exhibit 19?

9 A. It's the title to the '77 Mercury Marquis.

10 Q. On April 14th, 1995, did you have that document
11 on the day of the sale to Mr. McVeigh?

12 A. No, I did not.

13 Q. When did you first see Government Exhibit 19?

14 A. I think it was given to me on-- I believe it
15 was the 23rd of April.

16 Q. On the reverse side of Exhibit 19, it has a

17 number of signatures, does it not?

18 A. Yes, it does.

19 Q. Do you see your signature?

20 A. Yes, I do.

21 Q. And is that your signature?

22 A. Yes, it is.

23 Q. And did you put it on Exhibit 19?

24 A. Yes, I did.

25 Q. On approximately what date?

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1 A. That would have been when I got the title, the
2 twenty-- (reporter interruption), approximately
3 the-- I believe it was the 23rd of April.

4 Q. Mr. Manning, there's a number of entries with
5 reference to the odometer reading on that
6 vehicle on Exhibit 19. Do you see those
7 numbers?

8 A. Yes, I do.

9 Q. Did you write any of those numbers on the back
10 of that title?

11 A. No, I did not.

12 Q. Did you make a record, at the time you had the
13 Mercury in your possession, as to the reading
14 on that odometer?

15 A. No, I didn't.

16 Q. After you signed the back of Exhibit 19, Mr.
17 Manning, what did you do with it?
18 A. Turned it over to the FBI.
19 Q. Was it sometime after your meeting with Mr.
20 Rexrode where the document was prepared?
21 A. Correct.
22 Q. Are any of the writings on Exhibit 19 yours,
23 other than your signature?
24 A. None.
25 Q. Mr. Manning, while the vehicle was in your

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1 possession at Firestone in April of 1995, to
2 your knowledge was the odometer rolled back or
3 changed in any fashion?

4 A. No.

5 Q. While the Mercury was at the Firestone Store,
6 Mr. Manning, what use did you personally make
7 of it, other than the test drive you've
8 described already?

9 A. I made no use of it.

10 Q. Do you know if any of your employees did?

11 A. Yes, a gentleman who worked for me, James
12 Fulgium, was interested in the motor to put in
13 his Ford truck.

14 Q. And do you know whether he drove the vehicle?

14 Q. And do you know whether he drove the vehicle?
15 A. Yes, he did.
16 Q. Do you remember how many occasions?
17 A. Once, maybe twice.
18 Q. To your knowledge, was the Mercury always left
19 overnight at the Firestone Store or the lot
20 immediately to the north?
21 A. With the exception of the one night that James
22 Fulgium took it home with him, that I knew of
23 it.
24 Q. Mr. Manning, was the sale of the Mercury
25 Marquis to Tim McVeigh a personal transaction?

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1 A. Yes, it was.
2 Q. It was not the business of Firestone.
3 A. Correct.
4 MR. MACKEY: For the record, let me
5 move to admit, if I failed previously, into
6 admission Government Exhibit No. 10.
7 MR. NIGH: No. 10?
8 MR. MACKEY: Yes.
9 Q. (BY MR. MACKEY) I believe that is one of the
10 aerial photographs, is it not, Mr. Manning?
11 A. Yes, it is.
12 Q. Mr. Manning, do you know a person named Terry

13 Nichols?

14 A. I do not know him, no.

15 Q. Based on your review of business records of
16 your store, do you know whether Firestone has
17 done business with Terry Nichols?

18 A. Yes.

19 Q. Do you remember when that was?

20 A. Not without seeing the sales ticket again.

21 Q. Were you personally involved in that
22 transaction?

23 A. No, I was not.

24 Q. Were you at work on that day?

25 A. No, I was not.

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1 Q. Based on your previous review of the document,
2 what business did Mr. Nichols do with your
3 store?

4 A. He purchased ball joints for his GMC truck,
5 three tires and had a wheel alignment done.

6 MR. MACKEY: And, finally, just as a
7 matter of record, Mr. Jones, Mr. Nigh, in
8 accord with our previous conversations, there
9 would be a stipulation from the Defendant Tim
10 McVeigh that based upon his prior association
11 with Mr. McVeigh, Tom Manning could identify

12 Tim McVeigh in a courtroom as the person to
13 whom he sold his 1977 Mercury on Friday, April
14 14th, 1995.

15 MR. NIGH: I object to the wording of
16 the stipulation. We're prepared to stipulate
17 that Mr. Manning could identify Tim McVeigh as
18 the person he sold the car to.

19 MR. MACKEY: Thank you for the
20 completion of the record. One moment.

21 And, finally, for the record, I'd move
22 into admission Government Exhibit 19, the title
23 of the 1977 Mercury.

24 MR. NIGH: We object to that exhibit.

25 MR. MACKEY: I have no other

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1 questions of Mr. Manning.

2 MR. NIGH: Let's take about five
3 minutes--

4 MR. MACKEY: Do you want to take a
5 break?

6 MR. NIGH: -- so we can mark some
7 exhibits.

8 (THEREUPON, a short recess was had).

9 CROSS EXAMINATION

--

10 BY MR. NIGH:

11 Q. Mr. Manning, as I told you earlier, my name is
12 Rob Nigh, I'm one of the lawyers for Tim
13 McVeigh. First of all, let me ask you, Mr.
14 Manning, whether or not you've spoken to the
15 FBI or agents of the FBI on a number of
16 occasions prior to giving your deposition
17 today.

18 A. Yes, I have.

19 Q. First of all, you spoke to them on April 22nd
20 of 1995; is that right?

21 A. It was the 21st.

22 Q. You believe it was the 21st?

23 A. Friday.

24 Q. On Friday the 21st. Of April?

25 A. Correct.

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1 Q. Do you have a recollection of that?

2 A. Friday is the 21st, isn't it.

3 Q. Well, tell me what your memory is, if you
4 would.

5 A. My memory is on speaking to the FBI on Friday,
6 April 21st, when I found out that the car was
7 seen on TV.

8 Q. On that occasion, did you speak to them on the

9 phone or did you speak to them in person?

10 A. On the phone.

11 Q. Then the first time you met with them in person
12 was on April 22nd; is that right?

13 A. It should have been the next day, Saturday,
14 correct.

15 Q. And on that date you spoke to Special Agent
16 Dewald and Special Agent Rindt; is that
17 correct?

18 A. I remember Agent Rindt. I don't-- yeah,
19 Dewald, that sounds familiar. I remember Rindt
20 for sure.

21 Q. And those agents wanted to ask you detailed
22 questions about what happened when you sold the
23 Mercury Marquis; is that right?

24 A. Correct.

25 MR. MACKEY: Objection to the form of

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1 the question.

2 Q. (BY MR. MACKEY) Those agents asked you a
3 number of questions about the transaction
4 involving the Mercury Marquis.

5 A. Yes.

6 Q. And they wanted to know all the specifics about
7 the transaction.

8 A. Yes.

9 Q. And they asked you about the timing of the
10 transaction?

11 A. I don't recall all-- how specific the
12 conversation was at that time.

13 Q. You didn't tell Agent Dewald or Agent Rindt
14 that Mr. McVeigh left Firestone that morning,
15 did you?

16 A. No, I don't believe I was asked the question.

17 Q. And you didn't volunteer the information.

18 A. No.

19 Q. Then special agents from the FBI talked to you
20 again on April 23rd of 1995, the following day,
21 did they not?

22 A. That would have been a Sunday, yes.

23 Q. And again it was Agent Dewald and Agent Rindt,
24 correct?

25 A. I don't remember Agent Dewald. I remember

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1 Agent Rindt.

2 Q. On April 23rd, when you spoke to Agent Rindt,
3 again you did not tell Agent Rindt that Mr.
4 McVeigh had left the premises of Firestone,
5 correct?

6 A. Not to my knowledge.

7 Q. Then the next time you talked to agents for the
8 FBI was on April 25th of 1995; is that right?

9 A. I believe so.

10 Q. And on that occasion was Agent Rindt by
11 himself?

12 A. I don't remember.

13 Q. And on April 25th of 1995, you didn't tell
14 Agent Rindt that Mr. McVeigh had left the
15 premises of Firestone on the morning he
16 purchased the Mercury Marquis, correct?

17 A. Correct.

18 Q. Then you spoke to Agent Rindt again on April
19 28th of 1995; is that right?

20 A. I don't-- I'm not keeping track of the dates
21 that I talked to him, but I talked to him a bit
22 over several days.

23 Q. Have you had the opportunity to review
24 statements that you made to the FBI or
25 typewritten versions of the statements that you

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1 made to the FBI?

2 A. No, I have not.

3 Q. You never looked at those.

4 A. (Shakes from side to side).

5 Q. I'm sorry, please answer out loud.

6 A. No, I don't remember seeing those.

7 Q. Do you remember talking to Agent Rindt a number
8 of occasions in the weeks following April 21st
9 of 1995?

10 A. Yes.

11 Q. On any of those occasions did you tell Agent
12 Rindt that Tim McVeigh had left the premises of
13 Firestone on the morning that he purchased the
14 Mercury Marquis?

15 A. Not to my recollection.

16 Q. Did you ever tell any other agent from the FBI
17 or any other law enforcement source that Mr.
18 McVeigh had left the premises on the morning
19 that he purchased the Mercury Marquis?

20 A. Not to my recollection.

21 Q. And would it be fair to say that you've made at
22 least eight statements to the FBI prior to
23 giving this deposition today?

24 A. Pretty close, yes.

25 Q. And you've also met with the lawyers for the

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1 government in this case; is that correct?

2 A. Yes.

3 O. And given them detailed statements--

4 A. Yes.

5 Q. -- as well. Parallel to the statements that
6 you gave to the FBI.

7 A. Correct.

8 Q. When did you arrive for the deposition today?

9 A. Approximately 12:30.

10 Q. Earlier this week did you discuss your
11 testimony with the lawyers for the government?

12 A. Yes.

13 Q. And how many meetings did you have with the
14 lawyers for the government?

15 A. Phone or personal?

16 Q. Let's start with phone.

17 A. A couple.

18 Q. How long did those phone conversations last?

19 A. Twenty or twenty-five minutes, approximately.

20 Q. How many times did you meet with them in
21 person?

22 A. Since?

23 Q. Well, let's start with the past week.

24 A. Well, I think it was week before last there was
25 a-- several hours.

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1 Q. You met with them for several hours; is that

2 correct?

3 A. Yes.

4 Q. About your testimony during this deposition.

5 A. Yes.

6 Q. Was that on one day or on several days?

7 A. One day.

8 Q. Before that, had you ever met with attorneys

9 for the government to talk about your testimony

10 either in deposition or at a trial?

11 A. In person or the phone or-- (pause).

12 Q. Well, let's start with on the phone.

13 A. Okay. There's been a couple of phone calls

14 discussing it.

15 Q. How long did those phone calls last?

16 A. Fifteen, twenty minutes.

17 Q. Had you also met with the lawyers for the

18 government in person?

19 A. I think one other time.

20 Q. How long did that meeting last?

21 A. Approximately 30 minutes.

22 Q. If I recall your testimony when Mr. Mackey was

23 asking you questions, you said that this all

24 started about 9 a.m.

25 A. Correct.

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1 Q. On that day. Let me ask you this: Do you have
2 a recollection of what day the car was actually
3 sold?

4 A. It would have been the 14th of April.

5 Q. Do you remember that, or is that based upon
6 something you've learned since it happened?

7 A. Sales ticket (indicating), my bill of sale.

8 Q. So you're basing that upon those records; is
9 that correct?

10 A. Yes.

11 Q. You don't have an independent recollection that
12 it was the 14th.

13 A. Well, at the-- I don't know how to put it. I
14 mean, I got-- I know it was the 14th because
15 that's the day the sales ticket was written.

16 Q. And you're basing that upon the entries that
17 were made on the sales ticket, which-- what
18 exhibit number is that, by the way?

19 A. 13.

20 Q. Government's Exhibit No. 13?

21 A. Correct.

22 Q. Is that something that you filled out?

23 A. No, it was filled out by Kelly Osburn.

24 Q. Is there any part of that that you've filled
25 out?

1 A. No.

2 Q. You also said that this started at about 9 a.m.
3 that morning, correct?

4 A. Uh-huh.

5 Q. Let me hand you what I've marked as Exhibit TM
6 9 and ask you if you recognize that.

7 A. Yes, that's where he-- the terminal for the--
8 that sales ticket was voided-- (reporter
9 interruption). That's the ticket that was
10 generated by the computer when the sales ticket
11 was voided.

12 Q. Is that a document from your business,
13 Firestone?

14 A. Yes, it is.

15 Q. And is that a document that's kept in the
16 ordinary course of business there--

17 A. Yes, it is.

18 Q. -- there at Firestone? And does it also have a
19 date and time on it?

20 A. Yes, 4-14-95, the transaction was voided at
21 8:20.

22 Q. So that means that Mr. McVeigh had been there
23 at least since 8:20 that morning; is that
24 correct?

25 A. No. The-- we had not reset the computer from

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1 the date change-- the time change earlier in
2 the month. I went back and researched the
3 day's business, and I have other transactions
4 that confer (sic) with the clock being off
5 backward an hour.

6 Q. Meaning it was 9:40?

7 A. It was 9:20 when that document was voided.

8 Q. The ticket that is referenced in the computer
9 document, what is the number on the ticket that
10 was voided?

11 A. 460876301.

12 Q. Is that the ticket that is Government's Exhibit
13 No. 3-- No. 13?

14 A. Yes, it is.

15 Q. Now, you didn't give that document to the
16 government when they first came to see you, did
17 you, or the FBI?

18 A. Which document? This one (indicating) or this
19 one (indicating)? 13 or yours?

20 Q. Government Exhibit No. 13, the ticket itself.

21 A. Okay. I don't remember what date it was given
22 to the government.

23 Q. Did you give it to them the first time you saw
24 agents from the FBI?

25 A. No. It wasn't the first time, no.

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1 Q. Did you give it to them the second time you saw
2 agents for the FBI?

3 A. I don't recall which visit which we, you know,
4 got all the paperwork out.

5 Q. In fact, it wasn't until November 13th of 1995
6 that you gave him that ticket; is that right?

7 MR. MACKEY: Objection, asked and
8 answered, contrary to the other evidence. See
9 Defendant's Exhibit 2.

10 A. I don't recall.

11 Q. (BY MR. NIGH) Was that document, the ticket
12 that was voided, was it lost for a period of
13 time?

14 A. This (indicating), no.

15 Q. Government's Exhibit No. 13?

16 A. No, it was not lost.

17 Q. Mr. Manning, let's talk about the car itself
18 for a moment.

19 A. Okay.

20 Q. The car was a 1977 model of the Mercury
21 Marquis; is that right?

22 A. Yes.

23 Q. So it was 18 years old at the time you sold it
24 to Mr. McVeigh; is that right?

25 A. Yes.

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1 Q. And it had over 97,000 miles on it at the time?

2 A. I don't recall the speedometer reading. I had
3 no occasion where it was any big deal to see
4 how many miles were on the car.

5 Q. So you don't know how many miles were on it.

6 A. I never actually physically looked at the
7 odometer myself.

8 Q. You had described it at one time as a
9 roachmobile; is that right?

10 A. Correct.

11 Q. Would that be an accurate description of the
12 car?

13 A. It was rough, yes.

14 Q. In fact, there was something wrong with the
15 transmission.

16 A. I believe it just had a leak.

17 Q. That's something wrong with the transmission,
18 is it not?

19 A. Yes, it is.

20 Q. And you had to put some transmission fluid in
21 it yourself?

22 A. Not myself, one of the guys in the shop did.

23 Q. And when Mr. McVeigh left with the car, in

24 fact, he took some transmission fluid with him,
25 did he not?

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1 A. Yes.

2 Q. Is that right?

3 A. Yes.

4 Q. Because he was going to need it for that car?

5 A. Yes.

6 Q. The gas gauge didn't work in the car either,
7 did it?

8 A. I don't recall.

9 Q. When you saw Mr. McVeigh that day, did anything
10 come to your attention about him being
11 different from the previous times you'd seen
12 him?

13 A. His hair was cut different.

14 Q. Anything about his demeanor or the way that he
15 acted that was different?

16 A. No.

17 Q. When you had the car there at the lot on
18 Firestone-- at Firestone after you bought it
19 yourself, there were a number of people that
20 had access to the car; is that true?

21 A. Yes.

22 Q. For example, Mr. Fulgium had access to the car
23 and took it home on at least one night.
24 A. Correct.
25 Q. And Joe Grimes had access to the car.

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1 A. He had access.
2 Q. And Art Wells had access to the car; is that
3 right?
4 A. Yeah.
5 Q. Was the car ever cleaned, while it was in your
6 possession at Firestone, by you or by anybody
7 else?
8 A. If anything, maybe some trash taken out of it,
9 but there was never a cleaning done to it.
10 Q. Do you recall taking trash out of it yourself?
11 A. Not myself, no.
12 Q. Do you recall any of your employees or any of
13 the people that work there taking trash out of
14 it?
15 A. The only thing I recall having been taken from
16 the car is-- taken out of the car was some
17 wiring that was hanging down underneath the
18 dash by the accelerator and brake pedal.
19 MR. NIGH: I need just a moment.
20 Q. (BY MR. NIGH) Mr. Manning, when you had

21 telephone conferences with the attorneys for
22 the government, were any of those conference
23 calls where an FBI agent was also on the line?

24 A. Yeah, a couple of times.

25 Q. And when you met with the lawyers for the

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1 government in person, was there an FBI agent
2 present for those meetings?

3 A. Yes, there was.

4 MR. HIGH: Mr. Mackey, are the notes
5 from those meetings going to be produced for
6 us? We would request production at this time--
7 of them at this time before we conclude with
8 Mr. Manning, the statements under the Jencks
9 Act.

10 MR. MACKEY: That would be notes by
11 whom, Mr. Nigh?

12 MR. NIGH: By the FBI agents or FBI
13 302s or inserts which describe those meetings.

14 MR. MACKEY: For the record, all the
15 302s and inserts relating to statements by Mr.
16 Manning have been previously produced to
17 counsel for this defense.

18 MR. NIGH: Are there any-- let me
19 ask. if I may. are there any additional

19 son, if I may, are there any additional
20 statements or notes of statements made by Mr.
21 Manning to attorneys for the government when an
22 FBI agent was present that are not contained
23 within these 302s and inserts?

24 MR. MACKEY: Not to my knowledge, Mr.
25 Nigh, but I'll be happy to examine that after

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1 the close of this proceeding.

2 MR. NIGH: Of course the purpose
3 would be for me to be able to review them
4 before we conclude this proceeding.

5 MR. MACKEY: I understand. I have no
6 knowledge of agents' notes concerning the
7 interviews of Mr. Manning that were not reduced
8 to written form in those 302s and the inserts
9 that have been previously produced to you.

10 MR. NIGH: We'll leave it at that for
11 now, I suppose.

12 Q. (BY MR. NIGH) Mr. Manning, how many bottles of
13 transmission fluid did Mr. McVeigh take with
14 him when he left in the Mercury Marquis that
15 day?

16 A. Two that I gave him, and he said he had some of
17 his own.

18 Q. Did he tell you how many of his own he had?
19 A. I think-- I remember a couple. He said it-- I
20 don't remember exactly.
21 Q. And were these quart bottles?
22 A. Correct.
23 Q. So he had at least two and probably some more;
24 is that right?
25 A. Yeah, two that I know of for sure.

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1 Q. And those were the ones that you provided to
2 him yourself?
3 A. Yes.
4 Q. Were they two full bottles?
5 A. Yes.
6 Q. Based upon the work you do as a mechanic, in
7 your experience at Firestone, if the odometer
8 on the Mercury Marquis read 97,000 miles, was
9 it possible that it had 197,000 miles on it?
10 A. It's very possible. It could have rolled over.
11 Q. Did you know the owners of the Mercury Marquis,
12 the previous owners, before Mr. McVeigh bought
13 it?
14 A. No, I did not.
15 Q. Do you know what they did for a living or how
16 they used the car or what they may have done in

17 the car?

18 A. No.

19 Q. Do you know the mechanical history of the car?

20 A. No.

21 MR. NIGH: I believe that that's all

22 I have.

23 MR. JONES: Wait, wait.

24 (THEREUPON, an off-the-record

25 discussion was had).

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1 Q. (BY MR. NIGH) Mr. Manning, when you met with

2 the government in person, did you tell them

3 what your memory and recollection was of these

4 events that you've described?

5 A. Yes.

6 Q. And when you talked to them on the telephone,

7 did you tell them about your memory of these

8 events that you've described today?

9 A. Yes.

10 Q. That's all I have. Thank you, Mr. Manning.

11 REDIRECT EXAMINATION

12 BY MR. MACKEY:

13 Q. Mr. Manning, today is not the first day that

14 you've spoken to Attorney Robert Nigh about

15 this case is it?

15 this case, is it:

16 A. No, it's not.

17 Q. When did you speak to him?

18 A. The 29th of October?

19 Q. Of this year?

20 A. Yes.

21 Q. So you took his call like you took the
22 Government lawyers' calls to discuss this
23 case.

24 A. Correct.

25 Q. In the conversation with Mr. Nigh just last

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1 week, did he ask you whether Tim McVeigh left
2 the premises of the Firestone Store on April
3 14th?

4 A. No, he did not.

5 Q. Mr. Manning, let me hand you at this time what
6 I've marked as Government's Exhibits 23 and
7 24. Have you seen those before today?

8 A. Yes.

9 Q. Do you recognize those to be a transcript of
10 tape-recorded conversations between yourself--

11 MR. NIGH: I'm going to object on the
12 grounds of relevance to this.

13 MR. MACKEY: I'll attempt to make

14 that--

15 MR. NIGH: I'm sorry?

16 MR. MACKEY: I'll attempt to make
17 that finding apparent by this question.

18 Q. (BY MR. MACKEY) Mr. Manning, do you understand
19 those to be transcripts of tape-recorded
20 conversations between yourself and
21 representatives of Timothy McVeigh?

22 A. Yes.

23 Q. One is dated Government Exhibit 23, being
24 11-16, 1995?

25 A. Uh-huh. Yes.

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1 Q. Let me just verify the government numbers are
2 right.

3 A. Exhibit 24?

4 Q. Exhibit 24, thank you. And Exhibit 23 is dated
5 June 3rd, 1995.

6 A. Correct.

7 Q. And those represent transcripts of two
8 conversations you had with defense
9 representatives for Mr. McVeigh in June and
10 November of 1995, correct?

11 A. Correct.

12 Q. Did you read those-- each of those?

13 A. Yes.

14 Q. And did, at any point in time, those
15 representatives ask you explicitly did Tim
16 McVeigh leave the Firestone Store on April
17 14th?

18 A. No, they didn't.

19 MR. NIGH: I object on the grounds of
20 relevance.

21 Q. (BY MR. MACKEY) When did the-- to the best of
22 your recollection, Mr. Manning, did anyone ask
23 you that specific question?

24 A. Sometime in the past couple of months.

25 Q. Do you know who it was that asked you that

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1 specific question?

2 A. I believe it was you.

3 Q. And when asked that specific question, Mr.
4 Manning, what answer did you give about whether
5 Tim McVeigh had left the premises of the
6 Firestone Store?

7 A. I said yes.

8 Q. And was your answer that time the same as the
9 answer you've given today in this deposition?

10 MR. NIGH: I object, it's leading.

11

11 A. res.

12 Q. (BY MR. MACKEY) Incidentally, Mr. Manning, you
13 refer to a statement that you made on Saturday,
14 April 22nd, 1995, your first occasion to meet
15 and discuss with the FBI. Do you recall Mr.
16 Nigh's questions--

17 A. About--

18 Q. -- about that?

19 A. I believe so, yes.

20 Q. That would be most close in time, would it not
21 be, to the events that you've described today?

22 A. Yeah.

23 Q. Do you remember telling Agent Rindt on April
24 22nd, 1995, that Tim McVeigh, to the best of
25 your recollection, arrived at 9 a.m. and

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1 departed between 10 and 10:30 a.m. that
2 morning?

3 MR. NIGH: I object as leading.

4 A. That would be correct.

5 Q. (BY MR. MACKEY) There were a number of
6 documents that you alluded to as serving as
7 your foundation, Mr. Manning, for why you
8 recall these events taking place on April
9 14th. Do you recall those questions by Mr.

10 Manning-- or, excuse me, Mr. Nigh?
11 A. Yes.
12 Q. Direct your attention to the title of the
13 Pontiac. Is there a date on the reverse side
14 when Tim McVeigh signed over the title?
15 A. Yes.
16 Q. And what is that date?
17 A. 14 April 1995.
18 Q. For the record, you've identified the bill of
19 sale, the Pontiac title and the work order, all
20 bearing the same date of April 14th, 1995; is
21 that correct?
22 A. Correct.
23 Q. Mr. Nigh asked you some questions about the
24 date that the-- excuse me, the time that the
25 McVeigh sales ticket was voided. Do you recall

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1 those questions?
2 A. Yes.
3 Q. And, specifically, they were directed to
4 document marked as Defendant No. 9-- Tim
5 McVeigh No. 9. Had you noticed before today
6 that there was a variance between the 9 o'clock
7 time on Exhibit 13 and other documents?
8 A. Yes, I knew that.

9 Q. And what would explain why there was a one-hour
10 difference for transactions in April of 1995?

11 A. We didn't reset the clock on the computer when
12 the time changed the first part of April.

13 Q. Did you know that that would have-- the time
14 would have sprung forward in April-- early
15 April 1995?

16 A. Yes.

17 Q. With that fact in mind, what time, then, based
18 on your review of the records, was that
19 transaction voided?

20 A. 9:20.

21 Q. A.m.?

22 A. Yes.

23 Q. Mr. Manning, have you ever been to James
24 Fulgium's house?

25 A. Yes.

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1 Q. Do you know approximately the distance between
2 Firestone and his residence?

3 A. Yes.

4 Q. And what would you estimate that to be?

5 A. Mile and a half.

6 Q. You mentioned Joe Grimes and Art Wells as being

7 other employees that had, quote, access to the
8 vehicle. Could you describe what access they
9 actually used, whether they were ever in the
10 Mercury?

11 A. Access would have been if I would have given
12 one of them the keys to drive it or have it
13 pulled in to do something or to move it. I had
14 control of the keys.

15 Q. Did you ever give them the keys to move the
16 Mercury?

17 A. It was moved several times, probably.

18 Q. Only in the distances noted on the photograph
19 within the distance from the city lot to the
20 service area.

21 A. Yes.

22 MR. NIGH: I object as leading.

23 Q. Thanks, Mr. Manning, I have no other
24 questions.

25 RE-CROSS EXAMINATION

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1 BY MR. NIGH:

2 Q. Mr. Manning, prior to the time that you spoke
3 to Mr. Mackey, you talked to the FBI
4 approximately eight times; is that right?

5 A. Approximately.

6 Q. And in your conversations with the FBI, you
7 made every effort to tell them all the details
8 about what happened on the 14th of April.

9 A. Yes, to the best of my recollection.

10 Q. But you never told them about Tim McVeigh
11 saying he was going to leave and come back;
12 isn't that right?

13 A. The thought never crossed my mind.

14 Q. And the first time that anybody even-- ever
15 asked you about it was when Mr. Mackey asked
16 you about it; is that right?

17 A. I believe so.

18 Q. Was that when Mr. Mackey had come to see you in
19 person?

20 A. I can't remember for sure.

21 Q. Was there an FBI agent present with Mr. Mackey
22 when he asked you about that?

23 A. I believe so.

24 Q. Did Mr. Mackey show you any documents or ask
25 you about any particular events in reference to

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1 Mr. McVeigh leaving and coming back?

2 A. No.

3 Q. Did he tell you that there was a reason he
4 wanted to ask you that question?

5 A. No, nothing that I can remember. If I may
6 add-- can I add something here?

7 Q. Sure.

8 A. I distinctly remember him being gone for a
9 short time.

10 Q. And the first time you related that to anybody
11 from the government was when Mr. Mackey asked
12 you about it.

13 A. To the best of my recollection.

14 Q. How long ago was that?

15 A. Three weeks, a month. I don't remember
16 exactly.

17 Q. Approximately three weeks ago?

18 A. Three weeks to a month. I'm not sure.

19 Q. Three weeks or a month prior to this day, which
20 is November 7th of 1996.

21 A. I'd say, to the best of my recollection.

22 Q. So the first time that you ever said anybody--
23 anything to anyone about it was in, at the
24 earliest, October of 1996; is that right?

25 A. That'd be close.

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1 Q. Approximately a year and a half after the
2 events that you were describing; is that right?

3 A. Uh-huh.

4 Q. Is that yes?

5 A. Yes.

6 MR. NIGH: That's all I have.

7 MR. JONES: Just a second.

8 MR. NIGH: Almost.

9 Q. (BY MR. NIGH) Mr. Manning, did Mr. McVeigh say
10 where he was going?

11 A. No.

12 Q. How long was he gone?

13 A. Ten, fifteen minutes.

14 Q. Do you remember specifically?

15 A. I can't give the exact time. I remember we
16 concluded the deal. I pulled the car in so we
17 could take care of the-- checking it over and
18 backed the car out, and then he was back.

19 Q. Do you know which direction he went?

20 A. No, sir, I don't.

21 Q. Do you know what time it was when he left?

22 A. No, I wasn't-- all I know was there was a short
23 period of time that he was-- he was not on the
24 lot, and he wasn't up in the front room.

25 Q. Do you know what time it was when he returned?

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1 A. I don't have any exact times, no.

2 Q. Approximate time?

3 A. 10:15, 10:20, somewhere in that general
4 vicinity.

5 MR. NIGH: That's all I have.

6 MR. MACKEY: I have nothing else.

1 C E R T I F I C A T E

2 STATE OF KANSAS)
3) ss:
4 COUNTY OF SHAWNEE)

4 I, Eleonora M. Lyon, a Certified Shorthand
5 Reporter, commissioned as such by the Supreme
6 Court of the State of Kansas, and authorized to
7 take depositions within said State pursuant to
8 K.S.A. 60-228 and authorized to administer
9 oaths to witnesses pursuant to K.S.A. 20-913,
10 certify that pursuant to Court Order, there
11 came before me in the offices of the U. S.
12 Federal Courthouse, 444 Quincy Avenue, in the
13 City of Topeka, County of Shawnee, and State of
14 Kansas, on the 7th day of November, 1996,
15 beginning at 1:30 p.m.,

16 THOMAS MANNING,

17 who was by me first duly sworn to testify to
18 the truth, the whole truth, and nothing but the
19 truth concerning the matters in controversy in
20 this cause, and that the deposition given by
21 him, as herein set forth, was taken by me in
22 machine shorthand in the presence of said
23 witness, and afterwards reduced to typewriting
24 under my supervision; that I am not an attorney
or relative of either party, or clerk or
stenographer of either party, or otherwise
interested in the events of the action or
proceeding.

18 IN TESTIMONY WHEREOF, I have hereunto set
19 my hand and Official Seal this _____ day of
20 _____, 1996.

21 _____
22 Eleonora M. Lyon
23 CERTIFIED SHORTHAND REPORTER

24 COSTS: _____

