

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLORADO

Criminal Action No. 96-CR-68

UNITED STATES OF AMERICA,  
Plaintiff,

vs.

TERRY LYNN NICHOLS,  
Defendant.

REPORTER'S TRANSCRIPT

(Trial to Jury: Volume 78)

PROCEEDINGS

Proceedings before the HONORABLE RICHARD P. MATSCH,  
Judge, United States District Court for the District of  
Colorado, commencing at 1:33 p.m., on the 17th day of November,  
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,  
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APPEARANCES

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MEARNS, JAMIE ORENSTEIN, and AITAN GOELMAN, Special Attorneys  
to the U.S. Attorney General, 1961 Stout Street, Suite 1200,  
Denver, Colorado, 80294, appearing for the plaintiff.

MICHAEL TIGAR, RONALD WOODS, REID NEUREITER, and JANE  
TIGAR, Attorneys at Law, 1120 Lincoln Street, Suite 1308,  
Denver, Colorado, 80203, appearing for Defendant Nichols.

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PROCEEDINGS

(Reconvened at 1:33 p.m.)

THE COURT: Be seated, please.

Mr. Tigar.

(At the bench:)

(Bench Conference 78B1 is not herein transcribed by court  
order. It is transcribed as a separate sealed transcript.)

(In open court:)

(Jury in at 1:37 p.m.)

THE COURT: We apologize for the few minutes' delay. Sometimes I take up a matter with the lawyers in the case outside of your presence to discuss a matter that shouldn't be heard by you, and we did that. That's why we delayed a few minutes before having you come back into the courtroom. We didn't forget about you.

Please resume the stand under your oath.

(Karen Anderson was recalled to the stand.)

THE COURT: Miss Wilkinson.

MS. WILKINSON: Thank you, your Honor.

DIRECT EXAMINATION CONTINUED

BY MS. WILKINSON:

Q. Miss Anderson, before we left this morning, you were telling the jury that you had reviewed some of the property seized from Mr. Nichols' house and you recognized it as your own; is that right?

A. Yes.

Q. And did you specifically view some ammunition that was seized from his house?

A. Yes.

MS. WILKINSON: Your Honor, may the witness step down to identify some exhibits?

THE COURT: All right.

Karen Anderson - Direct

BY MS. WILKINSON:

Q. Miss Anderson, if you could step down.

If you can stand over here so you can face the jury. And can you keep your voice up, or would you prefer to have a microphone?

A. No, I can keep it up.

Q. Let me show you Government's Exhibit --

THE COURT: It is hard to hear with her back turned to us.

MR. TIGAR: Your Honor, if this is the same ammunition that was shown to a witness at the witness stand, we don't see the need for the demonstration.

THE COURT: Well, she's being asked to identify particular exhibits, as I understand the approach.

MS. WILKINSON: That's right, your Honor. There's a specific piece of ammunition that she actually took a look at and pulled apart.

THE COURT: You may proceed, but I'd like to use a microphone.

If you want to move, Mr. Tigar, to observe this better, you of course may.

MR. TIGAR: Thank you, your Honor.

THE COURT: Your choice.

BY MS. WILKINSON:

Q. Okay, Miss, Anderson, for the record, I'm showing you 1863,

Karen Anderson - Direct

karen Anderson - Direct

this ammo can. Did you put this ammunition that was here in this box?

A. Yes.

Q. Let me show you, if you could turn and face the jury, Government's Exhibit 1863.

A. Yes, that's .308 API, armor-piercing incendiary.

Q. And do you recognize the stamp on that bag?

A. That's the stamp from my little stamp kit that I had when I was a kid.

Q. Did you have bags just like this stamped LC .308 with armor-piercing rounds in it before November 8, 1994?

A. Yes.

Q. Now, did you look at these other rounds that were in Government's Exhibit 1863?

A. Yes.

Q. Including 1863D? Is that another --

A. Yes.

Q. -- one of your stamped bags?

A. Right.

Q. And did you examine this ammunition to determine if it was your ammunition?

A. Yes.

Q. Let me show you Government's Exhibit 1863B. Do you recognize that?

A. Yes. That's a .30-06 round. It's a tracer round by

Karen Anderson - Direct

Mr. Woody Stroman in Wisconsin.

Q. Did you pull this bullet apart?

A. Yes, I did.

Q. Why don't you take that with you to the witness stand, and you can tell the jury about what you did.

A. Basically I just --

THE COURT: To the witness stand, she said.

BY MS. WILKINSON:

Q. I'm sorry, I meant to the witness stand.

A. Basically I just took and I pressed it against a hard piece of metal and with a pair of pliers and wiggled it back and forth and pulled it apart. All of Mr. Stroman's tracer is -- basically it is like a -- sort of like a cake mix, and he puts that in there. All military tracer has a copper backing and is just a small hole in the back side of it. The other people that are making it, commercial-type tracers, also were doing it with a pellet form, which is a hole in the back side of it about the large size of a pencil lead. This is from Stroman's tracer. It's also copyrighted.

Q. Miss Anderson, let's go back to October of 1994. Did you purchase some ammunition in or around October of 1994?

A. Yes, we did.

Q. From whom did you purchase it?

A. Mr. Stroman.

Q. That's the same gentleman you've been discussing?

Karen Anderson - Direct

A. Yes.

Q. Where does he live?

A. He lives in Monroe, Wisconsin.

Q. What type of ammunition did you purchase from him?

A. I purchased approximately 500 rounds of .30-06 tracer that was not marked. In other words, it didn't have the color code on the end of the bullet to tell you what it was. There was a hundred rounds each of .38 and .357 tracer. There was a thousand rounds of 9-millimeter tracer bullets only, not the loaded cartridge. There was 500 rounds of .45 tracer bullets, not loaded cartridges. In the second box was 10,000 rounds of large-rifle primers and 10,000 rounds of small-rifle primers.

Q. How were these items shipped to you?

A. UPS.

Q. When did you receive them, approximately?

A. Oh, approximately the -- probably about the third week in October.

Q. And how many boxes arrived?

A. Two. Two large boxes.

Q. Where did you store those boxes?

A. Unfortunately, right at the back door.

Q. Back door of the house?

A. Yes.

Q. In Arkansas?

A. Yes.

Karen Anderson - Direct

Q. And were they there when you left on November 4, 1994?

A. Yes.

Q. Now, you just told us that certain rounds were not marked.

A. Yes. In other words, to tell what type an exotic ammo, they have a color code on the tip of the copper bullet. That way you know whether they're tracers, incendiaries or APIs.

Q. What is the color marking for tracer ammunition?

A. It can be either red or orange, depending on what type of tracer it is.

Q. Does Mr. Stromen normally mark the tips of the ammunition before he sells it?

A. He does. He usually marks all of his calibers, except I have asked on my large calibers, .30-06, .302, .223, not to color it because his paint chips off. I have a ink that I use, myself, that I like a lot better.

Q. So when you had this ammunition in your house, it was unmarked; it didn't have a red tip; correct?

A. That's correct.

Q. How do you mark it?

A. I take -- and it's regular colored ink that they used to use in the old grocery stores that is a grocery-store stamp ink; and I put it on a ink pad like what you use for rubber stamps but it's foam, and I dip my bullets in that.

Q. Were you planning to do that with the two boxes of

ammunition you had received in the fall of 1994?

Karen Anderson - Direct

A. Yes.

Q. When you returned home from over the weekend of November 5, 1994, was your ammunition in your house?

A. No.

Q. Did you ever see it again?

A. Not until it became on the Government had it.

Q. You mean from the stuff that you saw in Mr. Nichols' house?

A. Yes.

Q. Now, tell us a little bit about the formula or the recipe for those bullets that you've pulled apart and are able to identify as the ammunition that you purchased.

A. This is military formula and -- that he's copyrighted it. I mean I can't tell you exactly every item that's used to mix it up, but it is a patented formula on this that he has.

Q. And what's different about his formula and the other tracer rounds that you're familiar with?

A. The others are like a pellet, and it's about the size of a large lead pencil. That is what we call a commercial tracer that the guys take and put in there, and then you have a regular military tracer that you'll notice it right off the bat because it has what they call a copper flashing on the back side of the bullet with a little, tiny puncture hole in so that when it goes off, that flash from the powder will ignite through and melt that copper and also set the tracer igniter off and make it work.

Karen Anderson - Direct

Q. Before coming to court today, were you asked to look at all the tracer rounds that you identified and determine whether they were rounds that were consistent with Mr. Stromen's formula that you had purchased in October of 1994?

A. Yes, I was.

Q. And did you make up an exhibit like the one in front of you for each set of ammunition that you found in the ammo cans?

A. Yes, I did.

Q. And what was your conclusion as to where those -- or who manufactured those -- that ammunition?

A. Mr. Stromen's ammunition.

Q. Why don't you open Government's Exhibit 1860.

Can you look in Government's Exhibit 1860,

Ms. Anderson.

A. Yes.

Q. Do you see ammunition in that one plastic bag?

A. Yes.

Q. How is that marked?

A. It's marked with Stromen's tracer, same type as the other.

Q. And did you do the same thing that you described for the jury, pull the bullet apart to make that examination?

A. Yes, I did.

Q. Can you tell the Government exhibit number up there on that bag?

A. 1860A.

Karen Anderson - Direct

Q. 1860A, and was that ammunition that was manufactured by Mr. Stromen for you?

A. Yes, it was.

Q. Now, can you see the other ammunition in that exhibit?

A. Yes.

Q. Do you recognize it?

A. Yes.

Q. How do you recognize it?

A. Mr. Stromen I know for a fact had made a large purchase from IMI because he had told me.

MR. TIGAR: Excuse me, your Honor.

THE COURT: Just a moment.

Because he told you?

THE WITNESS: Yes.

THE COURT: Stricken.

BY MS. WILKINSON:

Q. Can you just tell us how you personally recognize that ammunition. Did you do the test that you described on one of the bullets that came from that ammo can?

A. Yes.

Q. Did you notice anything about the tips of that ammunition?

A. Yes.

Q. What did you notice?

A. It's been put on with a felt marker. You can take your finger and put it off.

Karen Anderson - Direct

MR. TIGAR: Excuse me. Lack of personal knowledge.

THE COURT: Sustained.

Please just answer questions that you know from your own observation.

MS. WILKINSON: Your Honor, maybe I'm not asking clear questions. I apologize.

THE COURT: What exhibit is this? I'm confused.

MS. WILKINSON: It's 1860. It's all the ammunition -

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THE COURT: There's different parcels, as I understand.

MS. WILKINSON: There was the one marked 1860A, which was the one bullet that she pulled apart. Now I'm asking her to look at all the other that's contained in 1860.

THE COURT: All right.

BY MS. WILKINSON:

Q. Miss Anderson, when you looked at the bullet in your hand, what did you notice about the tip, yourself?

A. I noticed that the tip is definitely not Mr. Stromen's -- that he puts on there, and it is not my tip that I put on there

HERE.

MR. TIGAR: Excuse me, your Honor. Could we have some foundation on this? I'm sorry. Your Honor, I object, lack of foundation.

MS. WILKINSON: I think I can clear it up with a few more questions, your Honor.

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THE COURT: All right. The answer just given is stricken.

BY MS. WILKINSON:

Q. Miss Anderson, I'm asking you about the color. Was it a red color?

A. Yes.

Q. Was it the way you put your red color on the tip of your bullets?

A. No.

Q. You can put that down. Now, can you look at the next ammo can and read off the tag, the Government exhibit sticker that's up on top of the green ammo can. Can you read the sticker number, Miss Anderson?

A. 1862.

Q. And can you look inside 1862.

A. Yes.

Q. Is there an 1862A there?

A. Yes.

Q. Did you take 1862A from 1862?

A. Yes.

Q. What did you do to it?

A. I pulled it apart, and it had exactly the same bullet that the others had.

Q. What do you mean by that?

A. In other words, it was one of Mr. Stromen's rounds.

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Q. You recognize the formula --

A. Yes.

Q. -- and the -- Now, you told us that there's a difference between military tracer rounds and Mr. Stromen's tracer rounds. Is there anything else about the shape of the bullet, other than the copper flashing, that's different from the military tracer bullet?

A. Well, this bullet -- I'm sorry to say, but the bullet has probably went down in here somewhere -- The bullet that they have is -- doesn't have the copper flashing on the back. You see the formula right flat against the back side of the bullet.

Q. All right. And is there a boattailing that you see on a military tracer round?

A. Yes. Yes. The -- Mr. Stromen's does not have a boattail. It's what we call a straight back. All military has a boattail on it.

Q. When you looked at the item in your hand, what did you see?

Did you see any boattailing?

A. No.

Q. And no copper flashing?

A. No.

Q. Did you notice anything about the tips of those bullets?

A. The same tips that are -- that's not my -- in other words, they are not painted by me.

Q. Now, you told us that the ammunition you purchased in

Karen Anderson - Direct

October of 1994 you had not painted before it was stolen; is that right?

A. I had not painted the large caliber.

Q. Can you look at the cardboard box that's right in front of you. First read the Government sticker number, Miss Anderson, that's on top. Miss Anderson --

A. 1865.

Q. Okay. Could you look inside of 1865. Do you recognize those bullets?

A. Yes.

Q. You have 1865A in your hand?

A. Yes, I do.

Q. What is that?

A. It's a .45 caliber tracer bullet with Mr. Stromen's formula in it.

Q. Did you pull it apart and examine it?

A. Yes.

Q. What did you find?

A. That it is Mr. Stromen's formula back in there.

Q. You didn't see any copper flashing?

A. No.

Q. And no boattailing?

A. No.

Q. Did you examine the other ammunition that's in that exhibit?

Karen Anderson - Direct

A. Yes.

Q. What did you notice?

A. On the 9-millimeter, the same thing.

Q. What do you mean?

A. It has the regular Mr. Stromen, it's a straight bullet, it has no copper flashing, and it also has his formula which covers right to the back side of the bullet.

Q. Excuse me.

Now, back in October of 1994, do you -- did you and Mr. Moore keep firearms in your house?

A. Yes.

Q. Were you familiar with those firearms?

A. Very.

Q. How were you familiar with them?

A. Through cleaning them and shooting quite a few of them.



Q. Was that primarily your responsibility, to clean them?  
A. I sort of took it on hand.  
Q. Based on that, did you become familiar with the guns in Mr. Moore's collection as well as your guns?  
A. Yes.  
Q. Can you tell us what type of guns you had in your house prior to November 5, 1994?  
A. We had a lot of collector's guns, we had .22's, we had .45's, we had Mini-14's in both 10 -- we had -- in Ruger, we had both Mini-14's and 10/22's. We had a Mini-30, which is

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also by Ruger, AR-15's. We had an SKS. There was an AK, shotguns, Browning .22's.

Q. Did you have any handguns?

A. We had handguns. We had some Smith & Wessons. There was some .22's, some .38's.

Q. And do you recall approximately how many firearms you had in your house before November 5 of 1994?

A. In the vicinity of 70 to probably 80.

Q. Now, let's turn to the weekend of November 5, 1994. Do you recall what day of the week November 5 was in 1994?

A. Most assuredly.

Q. What day of the week was it?

A. It was on a Saturday.

Q. Were you at home in Arkansas that day?

A. No. I was in Shreveport, Louisiana.

Q. What were you doing in Shreveport?

A. Attending a gun show.

Q. And when did you leave for that gun show?

A. I left Friday morning at 8:00 in the morning.

Q. And what were you -- how long were you planning to stay?

A. I would be there till it closes, which is at 4:00 on Sunday night; and it takes me about an hour to two hours to pack up, and then it's about a three-and-a-half to four-hour drive home.

Q. Had you registered for that gun show?

A. Yes, I had.

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Q. Was this a gun show that you had attended in the past?

A. Yes.

Q. When you arrived in Shreveport on Friday, did you contact Mr. Moore back at the residence?

A. That afternoon, yes.

Q. Without telling us what you discussed, what was his demeanor?

A. He was quite happy.

Q. And on the morning of November 5, 1994, where were you?

A. I was at Shreveport, at the convention center at the gun show.

Q. Did you contact Mr. Moore that evening?

A. I tried around 5:00 when they closed and couldn't get a hold of him

HOLD OF HIM.

Q. Did you eventually get a hold of him?

A. About four hours later, yes.

Q. Without telling us the substance of your conversation, what was his demeanor at that time?

A. It wasn't too swift. His voice quivered when I talked to him.

Q. Did he ask you to do something at that time?

A. Yes.

Q. As a result, what did you do on Sunday, November 6?

A. I went and bought two shotguns --

Q. Did you read --

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A. -- at the gun show Sunday afternoon.

Q. Did you return home that evening?

A. Yes.

Q. What did you do when you got home? Could you get into the house?

A. No.

Q. Why not?

A. The house was totally locked up. He's setting (sic) in the living room chair. He sees me there, but he won't unlock the door.

Q. "He" being whom?

A. Mr. Moore.

Q. What happened? Did he eventually let you in the house?

A. No, I had to find my key and I had to let myself in. And he's just sitting there, and you can visibly see that he was shook up.

Q. Now, at that point did you and -- did Mr. Moore tell you what occurred on November 5, 1994?

A. He told me that on the phone Saturday night when I finally got a hold of him.

Q. When you got into the house, could you see what had happened on November 5, 1994?

A. Definitely.

Q. What did you notice about the house?

A. I went into the bedroom. The drawers are open. The stuff

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is all thrown out on the floor. The closet doors were totally open. There was nothing left in the closets.

Q. Whose bedroom are you talking about?

A. Mr. Moore's bedroom.

Q. Do you have a separate bedroom?

A. Yes.

Q. Did you go into your bedroom?

A. Yes.

Q. What did you notice with your bedroom?

A. My quilt was missing, my pillowcase was missing.

Q. And after you noticed that all these items were missing, what did you do?

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A. We set (sic) down there that night because the police wanted us to make up a list of what we could remember on the guns, and we sat down that night and made a list up on the guns.

Q. What did you do with the list?

A. We turned it over to the police.

Q. Did you type the list?

A. Handwritten first; and then Monday morning, I typed it, myself.

Q. When did you turn it in to the police?

A. Tuesday.

Q. Why did you wait till Tuesday?

A. We called, and they asked -- they said they were busy right

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now and it would be all right if we brought it down the next day.

Q. Meaning you called them on Monday?

A. Yes.

Q. You brought it down on Tuesday?

A. Yes.

Q. Did you ever make another list?

A. Yes.

Q. When did you do that?

A. Sometime later on that week, probably like Thursday, Friday.

Q. What was the purpose of that second list?

A. Mainly, as you set (sic) down and you calmed yourself down and you started remembering what things you had and you're looking at your list, you remembered things that you did not put on there.

Q. Now, let's go back to -- so you can tell the jury about the things that were in the house prior to November 5, 1994. Did you and Mr. Moore have any cash in the house?

A. Yes.

Q. How much cash did you have?

A. There was probably in the vicinity of between 8- and \$9,000.

Q. Do you know where that cash was?

A. It usually lays on the computer desk.

Karen Anderson - Direct

Q. Okay. Did you have any other valuables in the house?

A. Yes.

Q. What type of valuables did you have?

A. We had some little gold Tiki dolls that were from Costa Rica. We had some jade that was from Costa Rica. We had a box that had semiprecious stones in it, diamonds, some emeralds, opal, aquamarines. There was a gold nugget in there. There was a couple of the gold Tiki dolls were in there. There was a couple of gold coins in there. There was some rings that were made from lost wax that were made to hold the gold coins. They

were in there.

Q. Now, are you talking about two different boxes that held all these items?

A. The jade was in a separate box by itself.

Q. What type of box?

A. Cigar box.

Q. What color was the box?

A. Had yellow, and it could have been yellow or white or yellow and -- basically yellow on white or white on yellow, one of the ways.

Q. Did you have any other cigar boxes in the house?

A. Yes.

Q. What type?

A. We had the same type that were Sir Edward cigar boxes.

Q. And did you -- what type of box held the semiprecious

Karen Anderson - Direct  
stones and the other items?

A. It was a cardboard box, approximately about 10-by-10. It was perfectly square, maybe 6 to 7 inches high.

Q. I want to show you a photograph that's already in evidence from Mr. Nichols' house, Government's Exhibit 1776A. Do you see that photograph?

A. Yes.

Q. Do you see that box, the red and white box there on top of the ammo cans?

A. Yes.

Q. Do you recognize that?

A. It looks similar to one that we had.

Q. What type of box?

A. A regular cigar box, and inside that was -- the jade was wrapped up in little pieces of toilet paper.

Q. Now, were there any keys in that box?

A. Yes, there was.

Q. What type of keys?

A. Two safety-deposit-box keys.

Q. Were you familiar with those keys?

A. Yes.

Q. You didn't have access to those safety-deposit boxes, did you?

A. No.

Q. How were you familiar with the keys?

Karen Anderson - Direct

A. Mr. Moore had a habit of taking and putting an M on the outside of the package.

Q. Now, do you know whether both keys for the safety-deposit box or both those keys were for the same safety-deposit box?

A. No, one was for the one in Hot Springs, Arkansas --

MR. TIGAR: Excuse me, your Honor.

THE COURT: Just a moment.

MR. TIGAR: Lack of personal knowledge.

THE COURT: All right, thank you, your Honor.

THE COURT: Yes. What's the basis for that knowledge?

BY MS. WILKINSON:

Q. Had you looked in this cigar box and seen those keys before November 5, 1994?

A. I have gotten those keys out for them when they have needed to have them before.

Q. Meaning Mr. and Mrs. Moore?

A. Yes.

Q. So you're familiar with those keys?

A. Yes.

Q. Could you recognize them?

A. Yes.

Q. Tell us what the procedure was for whether those -- both of those keys were for the same box or two different boxes.

A. The one was Hot Springs, Arkansas. And that was --

THE COURT: Just a moment. There's no foundation for her to answer that question.

Karen Anderson - Direct

BY MS. WILKINSON:

Q. Did you recognize the envelopes for those keys?

A. Yes.

Q. Could you look in your folder there. It should be right in front of you.

A. This one?

Q. And see if you could find Government's Exhibit 1873 and 1871, please.

A. '73.

Q. And '71.

Starting with Government's Exhibit 1873, do you recognize that?

A. Yes.

Q. Would you take it out of the plastic, please.

Tell us how you recognize that.

A. I basically recognize it from the M that's on the package. He has always done that with his key.

Q. And did you know from personal knowledge for which bank that key was?

A. Yes.

Q. For which bank?

A. That's for the Hot Springs, Arkansas bank.

Q. Now, take a look at Government's Exhibit 1871.

A. Okay.

Q. Do you recognize that?

Karen Anderson - Direct

A. Yes.

Q. How do you recognize it?

A. First Union is their bank that they have down in Sebastian, Florida.

Q. And how do you know --

MR. TIGAR: Object: Lack of personal knowledge, your Honor

10001.

THE COURT: It would be better if we knew how she knew these things before you ask the question.

MS. WILKINSON: Yes, your Honor.

BY MS. WILKINSON:

Q. Miss Anderson, as part of working with Mr. Moore, had you come to know his residence in Sebastian, Florida?

A. Yes.

Q. Have you lived there?

A. I have not lived there; I have visited there.

Q. Have you taken care of their property?

A. Yes.

Q. And have you also become familiar with their banking practices?

A. Yes.

Q. How have you become familiar with that?

A. Because at times when they are out of town, they have me deliver stuff to their bank for them. Not their safety-deposit box, but to their bank.

Karen Anderson - Direct

Q. And how do you know that they -- where they have safety-deposit boxes?

A. Because if something ever happened to them, they wanted me to have access to the keys.

MR. TIGAR: Your Honor, I object to the --

THE COURT: I'll sustain the objection. There's an inadequate foundation for it.

MS. WILKINSON: Okay. We'll move on, your Honor.

BY MS. WILKINSON:

Q. Miss Anderson, you told us that in that cigar box, there was also jade; is that right?

A. Yes.

Q. Are you familiar with that jade?

A. Yes.

Q. How did you become familiar with that jade?

A. I've been given the opportunity to look over it and pick out whatever pieces I would like to have.

Q. And are you familiar with a photograph of that jade that was taken prior to November 5, 1994?

A. Yes.

Q. Let me show you Government's Exhibit 1747. Should be on your screen. Do you see that?

A. Yes.

Q. Do you recognize that?

A. Yes.

Karen Anderson - Direct

Q. How do you recognize it?

A. Because when we moved up from Fort Lauderdale and all of this, this was part of the paperwork that he handed me; and we had went and laid this all out. And I just compared pieces

with what we had when we first moved up and wrapped them all back up in a box.

Q. Does this photograph show the Tiki dolls that you had?

A. Yes.

Q. Does it also show the jade that you had?

A. Yes.

MS. WILKINSON: Government offers 1747.

MR. TIGAR: May I inquire, your Honor?

THE COURT: You may.

VOIR DIRE EXAMINATION

BY MR. TIGAR:

Q. Ms. Anderson, my name is Michael Tigar. I'm one of the lawyers appointed to help Terry Nichols.

When was this photograph taken?

A. The photograph was probably right after he came back from -- you're asking me to answer something that somebody else has done.

Q. Were you present when the photograph was taken?

A. I was not present. I was only been present when he handed me this photo and we moved up to the farm. I was not present when he took this photo.

Karen Anderson - Voir Dire

MR. TIGAR: We object, your Honor.

THE COURT: Well, I don't know who he is --

THE WITNESS: Mr. Moore.

THE COURT: -- who the --

Well, you just wait for the lawyers, will you, please.

THE WITNESS: Yes.

MS. WILKINSON: Let me ask a few more questions, your Honor.

THE COURT: All right.

DIRECT EXAMINATION CONTINUED

BY MS. WILKINSON:

Q. Whose photograph is this?

A. This is Mr. Moore's and Mrs. Moore's.

Q. Did you see this photograph prior to November 5, 1994?

A. Yes.

Q. And did you compare the jade that was in the cigar box to the photograph?

A. Yes, I have.

Q. Did you do that during the move from Florida to Arkansas?

A. Yes.

MS. WILKINSON: Your Honor, we'd offer it based on that foundation, 1747.

MR. TIGAR: May I ask just one more, your Honor?

THE COURT: Yes.

VOIR DIRE EXAMINATION

Karen Anderson - Voir Dire

BY MR. TIGAR:

Q. Is it your testimony that all of the jade that's depicted

in this photograph was later examined by you personally?

A. Yes.

Q. So that you saw every single piece that was on there?

A. Except for two.

MR. TIGAR: No objection, your Honor.

THE COURT: All right. 1747 is now received.

MS. WILKINSON: May we publish it, your Honor?

THE COURT: Yes.

DIRECT EXAMINATION CONTINUED

BY MS. WILKINSON:

Q. Now, Miss Anderson, look down at the photo, if you could, and tell the jury where the jade is depicted in this photograph. Is it the top of the photograph or the bottom?

A. It is more or less pretty close to the middle.

Q. Are you talking about -- I'm not asking about one specific piece. I'm asking about all of the jade. Just circle it, please.

A. This right here?

Q. Yes.

A. Is that what you're talking about?

Q. Yes.

A. All right.

Q. Now, were you asked to compare a piece of jade that was in

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the custody of the FBI with this photograph?

A. Yes.

Q. Did you do that?

A. Yes.

Q. Can you pull that piece out of your envelope there in front of you.

Do you recognize that?

A. Yes, I do.

Q. Is that a piece of jade from this collection?

A. Yes, it is.

Q. Can you circle on this exhibit, Government's Exhibit 1747, that piece of jade.

A. I'm not very good at this. It's that piece right there.

Q. Okay. So if you were counting in from the left side there, in that row, which is the one, two -- is that the third row?

A. One, two, three, four. From the top, it's the third row down, and one, two, three, four -- fifth piece in.

Q. The fifth or the sixth?

A. Oh, I'm counting from which side?

Q. From the left.

A. Oh, okay. It was the sixth from the left. I'm sorry.

Q. Okay.

THE COURT: Do we have a record reference as to what piece of jade is being compared?

BY MS. WILKINSON:

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Q. Could you read the exhibit sticker there on the piece of



Q. Could you read the exhibit sticker there on the piece of jade?

A. 1748.

MS. WILKINSON: Your Honor, we'll offer 1748 at this time.

MR. TIGAR: Your Honor -- no showing of connection yet, your Honor, require additional foundation.

THE COURT: Well, that objection is overruled. 1748 is received.

BY MS. WILKINSON:

Q. Now, could you take --

MR. TIGAR: May I approach on that, your Honor?

THE COURT: No. It's received. Received.

BY MS. WILKINSON:

Q. Miss Anderson, take 1748 -- that is, the piece of jade -- out of the plastic, would you. Just hold it up for the jury to see.

And are there any markings on that piece of jade?

A. It's what they call string-cut jade. They do this in the jungles with --

THE COURT: No. The question is are there any markings on it.

BY MS. WILKINSON:

Q. Just describe the markings, Miss Anderson.

A. It has similar to what it would look like a face on there,

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the two holes on there that make it look like eyes and the V that makes it look like a nose; and they have three stripes across the bottom that makes it look like a collar.

Q. Okay. You can put that back in the plastic.

Let me show the photograph of the garage again, 1776A.

Do you see that, the cigar box up there on the top?

A. Yes.

Q. Was that piece of jade in a box similar to that in your home?

A. Yes, it was.

Q. Where was that cigar box?

A. In the top drawer as you just go down the hallway and make an immediate right-hand turn, there is a built-in chest of drawers; and it was all kept in the top drawer.

Q. And were those two safety-deposit keys that you identified also in that cigar box?

A. Yes, they were.

Q. And when was the last time that you saw them in your home?

A. The last time I saw them was probably in August.

Q. Of 1994?

A. Yes.

Q. Now, you said when you went into your room after November 5, 1994, you noticed that your quilt was gone; is that right?

A. Yes.

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Q. And have you seen a photograph, Government's Exhibit -- hold on one second. Have you seen a photograph of your quilt?

A. Yes.

MS. WILKINSON: I'm sorry, your Honor, I can't find the photograph on the computer.

BY MS. WILKINSON:

Q. Can you look in your envelope, Miss Anderson, and see if you can find that photograph.

THE COURT: You may approach to help her.

MS. WILKINSON: Thank you, your Honor.

Your Honor, it's not in the envelope, but I have it on the screen. It's Government's Exhibit 1771. It's 2 of eight that's been previously entered into evidence.

BY MS. WILKINSON:

Q. Miss Anderson, this is a photograph from Mr. Nichols' bedroom. Did you recognize that quilt?

A. Sure do.

Q. How do you recognize it?

A. It's my quilt off of my bed.

Q. Do you recognize the pattern?

A. Yes.

Q. What do you recognize about it?

A. I've got matching sheets to go with it. I've got matching pillowcases. I've got the bed skirt and everything that goes with it.

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Q. Do you have those other items, the bed skirt --

A. All except for the pillowcase that they took.

Q. Ms. Anderson, where did you purchase that quilt and bed sheets?

A. Purchased it at a K-Mart.

Q. Do you recall when you purchased it?

A. I'd had it for about two years.

Q. Now, do you see a photograph that's up there in -- excuse me, not in front of you. Let me show you another one.

Do you see a photograph that's in front of you that shows a firearm in a bag?

A. Yes.

Q. Can you read the Government exhibit number off there?

A. 1816A.

Q. And do you recognize that firearm in that bag?

A. Yes, I do.

Q. How do you recognize it?

A. Shot that gun a couple of three times. Also recognize the bag.

Q. What type of gun is it?

A. It's a Smith & Wesson 9-millimeter.

Q. And how do you recognize the bag that it's contained in?

A. Those used to be old camera-type bags, and Mr. Moore's the only person I've ever seen have any of those; and we've still

got about four or five of them left.

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Q. All right. Let's display this for the jury. It's 1816A, which has already been entered into evidence.

Now, are you describing this -- the bag right there in the center with the firearm in it?

A. Yes.

Q. And did you ever sell or give any of those bags away?

A. Never.

Q. And have you seen that firearm before coming to court today?

A. Yes.

Q. Would you recognize it?

A. Yes.

Q. I'm going to show you 1816.

Is that the firearm?

A. Sure is.

Q. You said -- how many times have you fired that?

A. Probably altogether, maybe 20, 30 times.

Q. And was that in your house prior to November 5, 1994?

A. Yes, it was.

Q. Thank you.

A. I need a bigger table.

Q. I'll take that one. Thank you.

Miss Anderson, I've just handed up a few more exhibits to you. Do you recognize Government Exhibit 1861?

A. 18 what? '61?

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Q. '61.

A. Yes.

Q. What is that?

A. Without even opening it, it has got soft-point carving, original carbine, military strippers.

Q. Do you recognize the box?

A. Yes.

Q. How do you recognize the box?

A. I hauled it up from Ft. Lauderdale, Florida.

Q. And what type of ammunition is inside?

A. It's called M-1 carbine.

Q. Could you open the box, please.

Miss Anderson, could you explain to the jury what type of ammunition that is?

A. It's what the regular military carbine shot. It's a soft point, got a lead point on it, got the original military carbine stripper clips.

Q. Did you have that in your house prior to November 5, 1994?

A. Yeah, setting (sic) right by the bathroom door where you stumbled over it every time you went through.

Q. Did you ever sell that ammunition --

A. Never.

Q. -- to anyone? Were you collecting that?

A. Yes, that was to go with these carbines, his two original military carbines he had.

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Q. "He," who do you mean by "he"?

A. Mr. Moore.

Q. Now, did you also review other photographs from Mr. Nichols' house and see other items that you recognized as yours?

A. Several times.

Q. Did you see -- can you tell the jury about what type of blankets you had in your living room prior to November 5, 1994?

A. It was a Mexican-type blanket that laid on the couch that I kept there all the time. I had one that matched it just like it. That was also gone when I came home.

Q. And if I showed you a photograph of that, could you recognize it?

A. Yes.

Q. All right. I'll pull it up.

MS. WILKINSON: May I have a moment, your Honor?

THE COURT: Yes.

MS. WILKINSON: There it is.

BY MS. WILKINSON:

Q. Government Exhibit 1773, photograph 6, which has already been moved into evidence, do you recognize that?

A. Yep, sure do.

Q. Can you point out what you recognize in that photograph by using the pen that you have there and circling it for the jury, please.

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A. There's the blanket like that. He also had an Army cot blanket that was missing, and we also had gun cases similar to those right there.

Q. Now, do you have another box or container of ammunition in front of you?

A. Yes.

Q. Can you see that Christmas can that's up there by your hand?

A. Yes.

Q. Can you read the Government exhibit sticker No. on that one?

A. 1864.

Q. Do you recognize the ammunition in there?

A. Yes.

Q. How do you recognize 1864?

A. Pulled some of it apart again. It's Mr. Stromen's tracer formula, also in the 9-millimeter that's in here.

Q. It's 9-millimeter?

A. Yes.

Q. Is that's all that's in there. from what you can see?

X. IS THAT ALL THAT'S IN THERE, FROM WHAT YOU CAN SEE.

A. This whole can's 9-millimeter. Yep.

MS. WILKINSON: Your Honor, may Miss Anderson step down so she can identify the firearms? I can have Mr. Tongate assist me, maybe she won't have to step down, if I --

THE COURT: Let's do it that way.

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BY MS. WILKINSON:

Q. I'll hand you these back, just put them back on the table.

You can leave that folder right there.

A. Okay.

MS. WILKINSON: Agent Tongate, can you start with Government's Exhibit 1808 and hand it up to Miss Anderson.

BY MS. WILKINSON:

Q. Now, Miss Anderson, do you recognize Government's Exhibit 1808?

A. Yes.

Q. How do you recognize it?

A. I remember when Mr. Moore bought it. It's a fake Hollywood Uzi gun, 9-millimeter.

Q. What do you mean by a fake Hollywood?

A. It just shoots blanks, that's it.

Q. How do you know that?

A. There's no markings on here. If you had a regular Uzi, it would have a A1 or A2 stamp on here. It does not have. If you

look down the barrel, it's smooth, there is no riflings down there whatsoever.

Q. Now, when you reported to the police in Hot Springs that you had been robbed on November 5, 1994 --

THE COURT: There is no evidence of that.

MS. WILKINSON: I'll rephrase it, your Honor.

BY MS. WILKINSON:

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Q. Did you report your property missing?

A. Yes.

Q. And when you did that, you provided a list of that property; is that right?

A. Yes.

Q. And did you include an Uzi on that list?

A. Yes.

MR. TIGAR: Objection, your Honor, as to the list and what she reported in the past.

MS. WILKINSON: I can introduce the list, your Honor.

THE COURT: All right.

BY MS. WILKINSON:

Q. Miss Anderson, would you recognize the list that you made?

A. Yes.

Q. Take a look at Government's Exhibit 1738, which should be in your envelope.

And look for 1739.

Do you recognize those two lists?

A. Sure do.

Q. Starting with 1738, is that the first list that you made?

A. That's the first list that was turned in on Tuesday.

Q. When did you make that list?

A. I made it Sunday night and typed it up Monday morning.

MS. WILKINSON: Your Honor, we offer Government's Exhibit 1738.

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MR. TIGAR: May I inquire, your Honor?

THE COURT: Yes.

VOIR DIRE EXAMINATION

BY MR. TIGAR:

Q. Miss Anderson, you made that list based on what Mr. Moore told you; is that correct?

A. Incorrect.

Q. All right. You made that list based on your knowledge of the firearms; right?

A. You still worded it wrong. It was based on both of our knowledges of the firearms.

Q. All right. Now, when you got home that night, you noticed that the certain firearms that had been there before weren't there; correct?

A. Certainly.

Q. And you weren't there and you don't know of your own personal knowledge how those firearms got to be not there; is that correct?

A. I was not there when the robbery happened.

Q. So that the list you were making -- and the list you were making was to give to the police department; correct?

A. I was making the list of firearms that were missing from the house to give to the police.

Q. And you've testified: You're in the ammunition business; correct?

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A. Correct.

Q. You're not in the firearm sales business; is that correct?

A. No, I am not.

Q. And Mr. Moore is not in the firearm sales business anymore, is he?

A. No.

Q. So the purpose of this list was simply to give to people who might want to know what you and Mr. Moore said was gone from the house; right?

A. Explain that again.

Q. The purpose -- you made this list to give it to the police; correct?

A. Yes.

Q. To the insurance company; correct?

A. Yes.

MR. TIGAR: Your Honor, we object to it.

THE COURT: What's the objection?

MR. TIGAR: It's hearsay, your Honor. There's no showing of regular course of business. If it's for refreshment of recollection, it's --

THE COURT: Are you calling Mr. Moore as a witness?

MS. WILKINSON: Yes, we are, your Honor.

THE COURT: Then I'll receive it subject to his connection, with his participation.

MR. TIGAR: Thank you, your Honor. On that basis,

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that Mr. Moore will be called as a witness, we consent to its admission.

THE COURT: All right. Now, that's two lists?

MS. WILKINSON: Yes, your Honor.

MR. TIGAR: I've seen both of them. That's our objection. Both of them can come in on that basis, your Honor, as far as we're concerned.

THE COURT: All right.

MS. WILKINSON: We'd like to publish 1738, your Honor.

THE COURT: Okay.

DIRECT EXAMINATION CONTINUED

BY MS. WILKINSON:

Q. Now, Miss Moore, this is the list -- Miss Anderson, this is the list you said you created the night you came back, November 6, 1994?

A. Yes.

Q. And this is page 1; is that right?

A. Yes.

Q. Let me show you page 2. Is that from that same list?

A. Is it all right if I take this out?

Q. Sure.

A. Yes.

Q. Page 3?

A. Yes.

Q. Page 4. These are the pistols that were missing?

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A. Yes.

Q. Okay. And page 5.

A. Yes.

Q. Okay. Let's look at this at page 5 for a minute, could we?

A. Yes.

Q. You see Item No. 4 here?

A. Yes.

Q. What does that indicate?

A. That is 35-millimeter cameras. A Dorskocil case is a gun case that has foam on the inside of it, and what Mr. Moore has done with that is -- and I was setting (sic) there watching him

done with that is and I was seeing (sic) there watching him do this -- he cut out places for his cameras and his lens so they would set in there so when we were on vacation or traveling like that, that they set there and they were protected.

Q. And the next item, No. 5, the JVC video camera, did you have a video camera in your residence prior to November 5, 1994?

A. Yes, we did.

Q. Was it taken?

A. Yes, it was.

Q. Was any of it left behind?

A. Yes. There is what you call the deck part of it. It's before they came in with the cameras that had the whole unit together. The camera was separate. You had to have a deck for

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your tape to be able to record on it.

Q. And that part was still in your house when you returned November 6; is that right?

A. Yes.

Q. Okay. Now the next item, No. 7, says cigar box, 40 to 50 pieces of string -- can you see what that says?

A. Yes.

Q. What does it say?

A. It says 40 to 50 pieces of string-sawn pre-Columbian jade.

Q. Is that the jade that you identified in the cigar box that you've identified for the jury?

A. Yes.

Q. Now, the next item number, 8, says four military vibration detectors, transmitters, and receivers. Did you have four of those items in your home before November 5, 1994?

A. Yes.

Q. Were you familiar with them?

A. Yes.

Q. Had you seen them?

A. Yes.

Q. Could you recognize them?

A. Yes.

Q. Now, the next item, No. 9, says two large, unopened boxes of tracer ammo. Is that the ammunition you've described for the jury?

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A. Yes, it is.

Q. Now, the next two items say silver and gold?

A. Yes.

Q. Did you have silver and gold in your house prior to November 5, 1994?

A. Yes, in the same drawer that the jade was listed in.

Q. Were you familiar with it?

A. Yes.

Q. How were you familiar with it?



A. I was with him when he purchased it.  
Q. Had you seen it in that drawer?  
A. Yes.  
Q. Approximately how much silver and gold did you have in the house prior to November 5, 1994?  
A. I really can't give you an exact answer on it. I know that the whole top drawer was almost full.  
Q. Now, were there any unique markings on that silver or gold that would be able to say it was yours vs. someone else's?  
A. No, that's the sad part. There were silver rounds and silver bars.  
Q. Now, let's look at the revised list, the next list, 1739. Does page 1 show some of the long rifles that were missing from your home on November 5, 1994?  
A. Yes.  
Q. And for the jury's sake, when did you create this revised

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list?

A. Probably about -- I'm going to say Thursday or Friday of that same following week, right after the robbery.  
Q. Now, up at the top, do you see there it's dated 11-13-94?  
A. Right.  
Q. Did you type that?  
A. Yes.  
Q. Let's look at page 2 of that list, 1739.  
A. Yes.  
Q. And does this include additional long rifles that were taken -- that were missing from your home?  
A. Yes.  
Q. Look at page 3. Can you tell the jury what's on page 3?  
A. Basically on page 3 we had what we called the miscellaneous stuff. We had some of the handguns, the jewelry, the silver, the red box, the cigar box. The cameras is on there. We'd forgot about the M-60 bipods. They weren't there. We had forgot about the Tapco 47-millimeter flare launchers. Discovered that wasn't there, either.  
Q. Now, look down at the bottom of that page. Do you see where it says new bedspread, sheets, and blankets?  
A. Yes.  
Q. So did you report those as missing back in November of 1994?  
A. Yes.

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Q. And did you turn in this list to the police?  
A. Yes.  
Q. Did you also turn it in to the insurance company?  
A. Yes.  
Q. Let's talk for a minute, if we can, Miss Anderson, about the firearms that you had in the house prior to November 5, 1994. Did you have insurance for those firearms?

A. We had basic homeowner's insurance.

Q. Did you have any special riders --

A. No.

Q. -- to cover those firearms? Did you know that --

A. Yes, we did.

Q. -- prior to November 5, 1994?

THE COURT: Just a moment. You know, it's difficult for the reporter if you don't wait for the question --

THE WITNESS: I'm sorry.

THE COURT: -- and answer. When two people talk at the same time, it's hard to get.

MS. WILKINSON: Sorry, your Honor.

THE COURT: Go ahead.

BY MS. WILKINSON:

Q. Let's slow down a little bit, Miss Anderson. Okay?

A. Okay.

Q. Did you know that you did not have the riders necessary to cover all the firearms you had in your home prior to

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November 5, 1994?

A. Yes.

Q. So you knew that the insurance company would not reimburse -- did you personally know --

MR. TIGAR: Object.

THE COURT: Yes.

MS. WILKINSON: I think I know what he's going to say, your Honor.

THE COURT: Yes, you sure do.

BY MS. WILKINSON:

Q. Did you personally know that you would not be reimbursed for all of the firearms that were missing from your home on November 5, 1994?

A. Yes.

Q. Let's continue, if you could. Look at some of these firearms.

MS. WILKINSON: Agent Tongate, could you show her Government's Exhibit 1780.

Agent Tongate, if it's easier, you can just start with the one there and tell me the exhibit number, and we'll do it in the order you have there.

AGENT TONGATE: 1804.

MS. WILKINSON: 1804? Please give Miss Anderson 1804.

BY MS. WILKINSON:

Q. Do you recognize that firearm, Miss Anderson?

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A. Sure do.

Q. How do you recognize it?

A. Flash hider, it's a Ruger Mini-14, original, folding stock.

Q. Let's break it down a little bit there. If you can, he

Q. Let's break it down a little bit there. If you can, be careful of the microphone there. You just hit it again.

Okay --

A. And I just pointed it at the Judge again, too.

Q. Yeah, don't do that. Don't do that. No matter how mad he makes you, don't do that.

A. I'll try to keep it here, then.

THE COURT: You don't have to worry.

BY MS. WILKINSON:

Q. Now, let's start from the flash hider. How do you recognize that?

A. That's that Choate flash hider. They're made out of Arkansas.

Q. And did you have one of those on a Mini-14 in your house

prior to November --

A. Yes, I did.

Q. Let me finish my question, please. November 5, 1994, did you?

A. Yes.

Q. And did you have that Mini-14 in your home prior to November 5 of 1994?

A. Yes.

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Q. You can give it back to Agent Tongate, and he'll give you the next exhibit.

MS. WILKINSON: Agent Tongate, if you just hand it to Miss Anderson, I'll have her read the Government exhibit number into the record.

THE WITNESS: 1788.

BY MS. WILKINSON:

Q. Do you recognize that firearm, Government's Exhibit 1788?

A. Yes, we had one like this in the collection.

Q. What type of firearm is it?

A. It's a stainless carbine, Iver Johnson.

Q. Is there anything unique about that firearm?

A. Just other than it being stainless. They didn't produce that many of them.

Q. Could you read the serial number that's on that firearm?

A. Would you like to get me a flashlight? That's terrible. I can't. I have bad -- the light is --

THE COURT: We have one.

THE WITNESS: Thank you.

BY MS. WILKINSON:

Q. Can you see it now?

A. Yeah. We got her now. SS02029.

Q. Now, do you recognize that serial number?

A. Sure do.

Q. Before -- you can give it back to Agent Tongate.

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A. I'll keep the flashlight.

Q. Before coming to court today, did you look for some serial numbers for some of the firearms that were missing from your home?

A. I've been looking every (sic) since the day that it happened.

Q. Did you recently find some of those serial numbers?

A. Yes.

Q. How did that come about?

A. It came about because I was looking for a telephone number that I knew that I had wrote down on a file, and I couldn't find it. And so I was dragging out the whole file cabinet where what I call the dead files are that they've previously had things in them but you're no longer interested in that so you throw them out and you put in the bottom of cabinets, and that's where they lie along with some tablets.

Q. Did you find a writing tablet there?

A. Yes, I did.

Q. Had you written on that tablet?

A. Yes.

Q. Did you recognize the handwriting as yours?

A. Yes.

Q. Do you know when you wrote those numbers down?

A. Approximately.

Q. When did you do that?

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A. Somewhere from when we moved from the old farm over to the new farm, so it had to be after Christmas in '92 or the first two weeks in '93.

Q. Did you bring that to court today?

A. Yes.

Q. Can you look in the envelope and see if you see it in there.

Can you read the Government exhibit sticker number, please.

A. 2103.

MS. WILKINSON: Government offers 2103, your Honor.

MR. TIGAR: May I inquire?

THE COURT: Yes.

VOIR DIRE EXAMINATION

BY MR. TIGAR:

Q. Miss Anderson, will you please look at the first page that contains serial numbers. And count up to the third item from the bottom. Do you see that there?

A. Yep.

Q. All right. And is it your testimony that you prepared this list -- well, let me ask you this: When is it that you say that you prepared this list?

A. I prepared this list in -- sometime in the last part of January -- the last part of December in '92 or in the first couple, three weeks in '93.

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MR. TIGAR: May we approach, your Honor?

THE COURT: Yes.

(At the bench:)

(Bench Conference 78B2 is not herein transcribed by court order. It is transcribed as a separate sealed transcript.)

Karen Anderson - Voir Dire

(In open court:)

DIRECT EXAMINATION CONTINUED

BY MS. WILKINSON:

Q. Miss Anderson, tell us the number of the notepad that you have in front of you, the Government exhibit number.

A. 2103.

MS. WILKINSON: Your Honor, we'd offer 2103.

THE COURT: You made your objection.

MR. TIGAR: I have, your Honor.

THE COURT: Overruled, and 2103 is received.

BY MS. WILKINSON:

Q. Miss Anderson, take the item out of the envelope, would you. Can you describe -- hold it up for the jury for a moment and just show it to them. Can you describe the condition of the tablet.

A. It's been around a while.

Q. What do you mean by that?

A. Well, you can look at the paper; the paper is old, all the way through. Back on the back is American Assault Company, is my rubber stamp when I first had it made up.

THE COURT: Excuse me. Are there things on there other than this list?

MS. WILKINSON: I don't believe there are.

BY MS. WILKINSON:

Q. Are there, Miss Anderson?

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A. No, just the rubber stamp that was right on the back.

MS. WILKINSON: May I retrieve that exhibit?

THE COURT: Yes.

BY MS. WILKINSON:

Q. If you could take a look at the next firearm, Miss Anderson.

Do you see the Government exhibit sticker on there?

A. 1810.

Q. 1810. Do you recognize 1810?

A. Yes.

Q. How do you recognize 1810?

A. It's a Remington Model 700, jewel bolt.

Q. Did you have that firearm in your home prior to November 5 --

A. Yes.

Q. -- 1994. Do you notice anything about the scope on that?

A. It's a scope. That's all I can say. It's just a Tasco. There's lots of Tasco scopes around.

Q. Nothing unusual about that scope; is that right?

A. Nothing unusual about it.

Q. You mention that it had a jewel bolt?

A. Yes, a jewel-bolt carrier on here.

Q. What does that mean?

A. Just a decoration that they put. It makes the gun worth about 25, 30 bucks more because of that.

Karen Anderson- Direct

Q. It's just some kind of carving on the bolt?

A. Yeah, it's a small type, heat-type etching that they put in there.

Q. Is there any etching on the forepiece or the handgrip --

A. You've got what you call your checkering up on the forepiece and the handgrip.

Q. What does checkering mean?

A. It's just a design where they've taken the wood and they've made it, when you're gripping, you hold onto it a lot easier, it won't slip quite as easy.

Q. You can give that back to Agent Tongate and take a look at the next one.

What's the exhibit number on that, Miss Anderson?

A. 1796.

Q. Do you know what type of firearm that is?

A. Yep.

Q. What is it?

A. It's a 12-gauge shotgun. Winchester.

Q. Do you recognize it?

A. Sure do.

Q. How do you recognize it?

A. Purchased in '83, at Ft. Lauderdale, Florida.

Q. You purchased it?

A. Yes.

Q. Where did you purchase it?

Q. Where did you purchase it.

Karen Anderson- Direct

A. At a gun shop in Davie, Florida.

Looked a lot better.

Q. Miss Anderson, let's just do what the Judge said and answer the questions, okay.

Can you tell us the serial number on that firearm?

A. We got L1404875.

MS. WILKINSON: Your Honor, at this time we'd offer Government's Exhibit 1751, an ATF self-authenticating record.

THE COURT: 1751?

MS. WILKINSON: Yes, your Honor.

MR. TIGAR: May I inquire, your Honor?

THE COURT: Yes. I need to see it.

MS. WILKINSON: Sure.

Do you want my copy, your Honor?

VOIR DIRE EXAMINATION

BY MR. TIGAR:

Q. Miss Anderson, have you seen this ATF record that's being offered here?

A. Have I seen that record?

Q. Yeah.

A. Not at first, no.

Q. No, have you seen it ever, before coming here today?

A. One time.

Q. And are you satisfied that it's accurate?

A. Yes.

Karen Anderson - Voir Dire

Q. It is the business of the Bureau of Alcohol, Tobacco, and Firearms to keep accurate records of serial numbers of firearms?

MS. WILKINSON: Your Honor, objection. I don't know how she would --

THE COURT: Sustained as to how she would know that.

BY MR. TIGAR:

Q. Have you ever held a federal firearms license?

A. Yes, I have.

Q. And in the operation of your federal firearms license, have you had occasion to deal with ATF forms?

A. No, because I never purchased guns.

Q. In the -- in the purchase and sale of firearms, have you ever filled out an ATF form?

A. Yes, I have.

Q. Do you understand that as a citizen, it is your obligation to fill those out accurately?

A. Yes.

Q. And do you understand from going to gun shows that it is the obligation of dealers to make those forms out accurately?

A. Not all gun dealers have to make them out.

Q. Is it your understanding that all gun dealers that are required to make them out have the obligation to make them out

accurately?

A. Yes.

Karen Anderson - Voir Dire

MR. TIGAR: No objection.

THE COURT: Okay. 1751's received.

MS. WILKINSON: Thank you, your Honor.

You can give that firearm back to Agent Tongate.

DIRECT EXAMINATION CONTINUED

BY MS. WILKINSON:

Q. And let me show this to you on the ELMO. Showing you the front page of Government's Exhibit 1751. Miss Anderson, would you turn to -- I'm going to turn to page 2. Can you read the part that says, "The disposition"?

A. Yes.

Q. Do you see that?

A. Yes.

Q. Can you read it out loud for the jury.

A. It says, The disposition of the U.S. Repeating Arms (Winchester) shotgun, model 1200 Defender, 12 gauge, Serial No. L1404875 by Danco -- I think that's how you pronounce it -- Arms & Police Supply, Davie, Florida, Karen Derr Anderson, Fort Lauderdale, Florida, on 1-11-93 (sic).

Q. And I take it you're Karen Derr Anderson?

A. Yes.

THE COURT: I think you misread the date.

THE WITNESS: 1-11 -- '83.

BY MS. WILKINSON:

Q. And did you purchase this firearm on that day?

Karen Anderson - Direct

A. Yes.

Q. Miss Anderson, did you ever give that firearm away to anyone?

A. No.

Q. Did you ever agree to sell it on consignment?

A. No.

Q. Can you take a look at the next firearm, please.

A. 1786.

Q. Have you seen 1786 before?

A. Yes.

Q. Was it in your home prior to November 5, 1994?

A. Yes.

Q. How do you recognize 1786?

A. Sometime in September --

Q. Of what year?

A. Of '94. We had taken this out of the case because my horseshoer's gun had been stolen, and he was interested in purchasing it. And we really didn't know if we were interested in selling it or not. It was a type of rifle he was hunting for.



Q. And is there anything unique about that rifle?

A. It also has -- it's a Remington. It has a jewel bolt carrier on it, has a nice wood checkering on the foregrip and this, and it had the custom sewing on it.

Q. Was that your sling?

Karen Anderson - Direct

A. Yes.

Q. And did it have that sling on Government's Exhibit 1786 prior to November 5, 1994?

A. Yes, it did.

Q. You can give that back to Agent Tongate.

A. 1814.

Q. Do you recognize 1814?

A. Yep.

Q. Was that gun in your house prior to November 5, 1994?

A. Yes, it was.

Q. How do you recognize it as your gun?

A. Bill Stoneman, which is a machinist in our hometown, makes these flash hidere; and I purchased a bunch of them from him. And when we got a stainless, we would put one of these on it.

Q. And up there at the top of the barrel, is that that flash hider that you described?

A. That's right here.

Q. You bought that where?

A. From a gentleman by the name of Bill Stoneman.

Q. And Mr. Stoneman makes these flash hidere?

A. In Hot Springs, Arkansas.

Q. And did you have that flash hider on that Mini-14 prior to November 5, 1994?

A. Yes.

Q. Can give that back to Agent Tongate.

Karen Anderson - Direct

A. 1780.

Q. Is 1780 your firearm?

A. Yes.

Q. How do you recognize it?

A. Start with the flash hider, another Stoneman flash hider. Has a Ramline stock on it. Also, the gun that I personally used for testing tracers when we get our tracers in to see if they work okay.

Q. Would you take a look at that serial number, please.

A. 18358815.

Q. Okay. Let me show you Government's Exhibit 2103 on the ELMO here. This is the tablet you told the jury that you found. You see that?

A. No, it's too dark.

Q. Does that help?

A. That's worse.

Q. Sorry about that.

THE COURT: Why don't we just hand her the exhibit.

THE WITNESS: There. You got it.

THE WITNESS: there. You got it.

MS. WILKINSON: We'll use a copy, your Honor. That will be easier.

BY MS. WILKINSON:

Q. How is that? Is that better?

A. A lot better.

Q. Now, can you tell us the serial number one more time.

Karen Anderson - Direct

A. 18358815.

Q. Do you see where I'm pointing the pen?

A. Yes.

Q. Do you see that same serial number --

A. Yes.

Q. -- for a Mini-14 listed there?

A. Yes, I do.

Q. You can give that gun back to Agent Tongate.

What number is that, Miss Anderson?

A. 1806.

Q. Do you recognize that firearm?

A. Sure do.

Q. What type of firearm is it?

A. It's a regular old just 12-gauge Mossberg.

Q. Is it a shotgun?

A. Yes.

Q. How do you recognize it as yours?

A. Well, you won't believe it, but I actually shot a pair of blue jeans with this a couple of three times.

Q. Why did do you that?

A. It was when the shotgun blue jeans were popular, and they cost about a hundred bucks; and I figured if you went and bought a pair, yourself, and you shot them, you saved about \$90. So that's what I did.

Q. You used 1806 for that; right?

Karen Anderson - Direct

A. Yes, I did.

Q. Okay. You can give that back to Agent Tongate.

A. Okay. 1798.

Q. What type of firearm is 1798?

A. It's an original carbine, military, what they call a Paratrooper carbine with a bayonet lug on the front of it. Folding stock. You got your oil can, which usually those are always missing.

Q. Did you have one of those in your home prior to November 5, 1994?

A. Yes.

Q. You can give that back to Agent Tongate.

A. 1812.

Q. 1812. Have you seen that gun before?

A. Yes.

Q. Did you have it in your house prior to November 5, 1994?

A. Yes.

Q. What type of gun is it?

A. It's a Grand. Military, World War II, original. Excellent shape.

Q. How do you recognize it?

A. It was purchased along with another rifle at the same time.

Q. Have you seen that other rifle on the table that's in front of you?

A. Yes, I have.

Karen Anderson - Direct

Q. What type of gun is the other one that was purchased with that Grand?

A. It's a collector's piece, gold . . .

Q. Is it a commemorative gun?

A. It's a commemorative gun. I just can't remember what the make of it is right now.

Q. Why don't you switch with Agent Tongate and take a look at that one. What's the Government exhibit number on that?

A. 1792.

Q. Is that the other gun you were talking about?

A. Yes, it's a lever action. Gold commemorative. They were purchased from the same gentleman in Hot Springs.

Q. Do you recognize it?

A. Yes.

Q. What do you recognize about it?

A. Just a commemorative gun. You don't see that many of them around any more.

Q. Did you have both of those firearms in your home prior to November 5, 1994?

A. Yes.

Q. You can give that back to Mr. Tongate.

What's the Government exhibit sticker?

A. 1833.

Q. Do you recognize 1833?

A. Yes. We had one similar to this, also. It's a heavy

Karen Anderson - Direct

barrel, AR-15. .223 caliber.

Q. There's not anything unique about that firearm, is there?

A. No.

Q. But you had one just like it in your home --

A. Yes.

Q. -- prior to November 5, 1994?

A. Yes. I had purchased one down in Texarkana.

Q. You can give it back to Agent Tongate.

A. 1794. Ruger 10/22, shoots a .22 round. Common gun. We had several of these like this.

Q. Again, is there anything unique about that firearm?

A. No, ma'am.

Q. But you had one just like it in your home --

A. Yes.

Q. -- prior to November 5, 1994?

A. Yes.  
Q. Along with the other guns that you've already identified?  
A. Yes.  
Q. Thank you. You can give that to Agent Tongate.  
A. 1800.  
Q. And do you recognize that gun?  
A. Yes.  
Q. What type of gun is it?  
A. They call them gas guns, flare guns. They're used to shoot 37-millimeter. They don't have any rifling. They have what

Karen Anderson - Direct

they call a smooth bore on the inside of them.

Q. What are they used for?

A. Basically military police uses them, prison system uses them. They're used a lot on boats, for flares.

Q. And did you have that firearm in your home -- excuse me -- prior to November 5, 1994?

A. Yes.

Q. Now, can you read the serial number on that gun?

A. Here we go again.

Got to find it.

Can't find it.

THE COURT: Agent Tongate, can you assist?

THE WITNESS: I can't remember where. Some of these are really hard to find.

Is it in there, that way.

THE COURT: You shouldn't be talking. Just looking.

THE WITNESS: That says, "37-millimeter" right there, "long-range gas gun."

BY MS. WILKINSON:

Q. Miss Anderson, can you look on the tag that's attached to that? Do you see a serial number listed there?

A. No, ma'am.

Q. Did you say it was a 37-millimeter?

A. Yes. Yes, 37-millimeter flare pistol.

Q. Why don't we wait till the break, and you can take a look

Karen Anderson - Direct

for it.

Can I show you Government's exhibit 2103, the list that you made.

Miss Anderson --

A. Yes.

Q. -- take a look at your computer screen. And do you see this list? I'm pointing to the second --

A. There you go.

Q. -- item on there.

A. Yes.

Q. What does that say?

A. "Trueflite Flare, 37-millimeter, 5403."

Q. Is that the firearm that you were just handling?

A. Yes, that's the 5403.

A. If it's got the 5403 on it, it certainly is.

Q. Is that a Trueflite Flare 37-millimeter?

A. Yes.

Q. Why don't you just leave it there and we'll take a look at that time during the break.

Can you look at the next firearm?

A. Oh, I found it. It's obvious. It bit me. My hand was on it the whole time. Right here.

Q. What does it say?

A. 5403.

Q. Same as the number these on the tablet, 2103?

A. Yes.

Karen Anderson - Direct

1022.

Q. What's --

A. Folding stock.

Q. What's the Government exhibit number on that, Miss Anderson?

A. 1782.

Q. Do you recognize it?

A. Yes. We had one similar to that in the house.

Q. What type of firearm is it?

A. It's a 10/22.

Q. Is there anything unusual about that firearm?

A. Original folding stock on it. Leather sling on it.

Q. And did you have one just like that in your home prior to November 5, 1994?

A. Yes, ma'am.

Q. Thank you.

A. 1802.

Q. What type of gun is that?

A. It's a lever action gun, .30-30 Winchester.

Q. Did you have one of those in your home?

A. Yes, we did.

Q. Is there anything unusual about that particular firearm?

A. No.

Q. Give that back to Agent Tongate.

A. 1784.

Karen Anderson - Direct

Q. Do you recognize 1784?

A. Yes.

Q. How do you recognize it?

A. It's just a standard blue Mini-14.

Q. Nothing unique about that firearm?

A. No, ma'am.

Q. Could you read or find the serial number on that?

A. No. 1875548 -- or 53.

Q. Okay. Let me show you Government's Exhibit 2103 again. You said it was a Mini-14; is that right?

A. Yes.

... 100.  
Q. Do you see where I'm pointing here?  
A. Yes.  
Q. Is that the same number, 18755453?  
A. Yes, ma'am.  
Q. Is that your firearm?  
A. Yes.  
Q. Give it back to Agent Tongate.  
A. 1790.  
Q. 17 what?  
A. 1790.  
Q. Do you recognize 1790?  
A. Yes, ma'am.  
Q. How do you recognize it?  
A. It's my baby.

Karen Anderson - Direct

Q. What do you mean by that?  
A. I like shooting this gun. It's a custom-made stock. It was made basically for me. It's my length. Two guys in Oklahoma made it. It's Mr. Moore's gun, but I took it from him.  
Q. And why did you take it from him?  
A. Because I really like the way it shoots.  
Q. Okay.  
A. It's a nice gun to shoot.  
Q. Any doubt in your mind that it's your gun?  
A. No, ma'am.  
Q. And did you tell us exactly what type it was?  
A. It's a .308 caliber. It was basically what they take that -- it's been rebarreled for .308. It was a Concaro gun, but they've redone the barrel on it to make it --  
Q. And it had been rebarreled as a .308 before you had it?  
A. No.  
Q. Pardon?  
A. No.  
Q. Was it a .308 when you had it in your house --  
A. Yes.  
Q. -- prior to November 5, 1994?  
A. Yes.  
Q. Yes, it was?  
A. Yes.

Karen Anderson - Direct

Q. You can give it back to Agent Tongate.  
Now, do you see the small handgun, Government's Exhibit 1869 in front of you. Is that still up there?  
A. Okay.  
Q. You previously identified that; correct?  
A. Yes.  
Q. Can you find the serial number on that gun?  
THE COURT: I'm sorry, what's the number of this?  
MS. WILKINSON: 1869.

THE COURT: All right.

THE WITNESS: Yeah.

BY MS. WILKINSON:

Q. Could you read it for the jury?

A. Model 39-2, 109904.

Q. Is that the number, the serial number?

A. Well, this is the number that's right above the Model 39-2.

Q. Is there any number on there that says 2172717?

A. That's what I see, unless you've got something under the tape here.

Q. Well, I may have the wrong number. So that may be my mistake, so I'll check that. Thank you. You may put that down.

Now, Miss Anderson, did you also view some photographs from Mr. Nichols' house that showed some boxes and some photography equipment?

Karen Anderson - Direct

A. Yes.

Q. Let me show you Government's Exhibit 1773, No. 5.  
Can you see that photograph?

A. No.

Q. Hold on one second.

Do you see that photograph?

A. Yes, ma'am.

Q. Do you recognize those gun cases in that photograph?

A. Some of them, yes.

Q. Do you see that box right up there on one of the top shelves?

A. That's upside down.

Q. Yes.

A. Yes.

Q. Have you seen this photograph prior to coming to court today?

A. Yes, I have.

Q. Did you recognize that box?

A. Yes.

Q. How did you recognize it?

A. We had one just exactly like it that had a tripod in it.

Q. Does that say "tripod" upside down?

A. It says . . . .

Q. Let me see if I can zoom in for you. Does that help?

A. No, it makes it fuzzy for me, I'm sorry.

Karen Anderson - Direct

Q. Had you identified that as a tripod box before you came to court today?

A. Yes.

Q. And was the tripod box taken or missing from your home on November 5, 1994?

A. Yes, ma'am.

Q. What was in that box?

A. There was a tripod in it.

Q. Now, you've told us that other photographic equipment was taken; is that right?

A. Yes.

Q. Could you tell us what photographic equipment was taken?

A. There was a Dorskocil case that had the camera cutouts with it, with the cameras, the 35-millimeter cameras.

MS. WILKINSON: Your Honor, this might be a time to take a break. We have some other firearms we need to show Miss Anderson; we need to move them around.

THE COURT: All right. You may step down now, Miss Anderson.

Members of the jury, we'll take our midafternoon recess, as usual, with the customary cautions regularly given and I trust regularly obeyed; and that is to avoid discussion of the case among yourselves and with all other persons and maintain open minds about what you're seeing and hearing as evidence in the case. You're excused now, 20 minutes.

Karen Anderson - Direct

(Jury out at 3:03 p.m.)

THE COURT: I want to go back a moment to 1748. I may have missed something there. That's a piece of jade.

MS. WILKINSON: Yes, your Honor.

THE COURT: Was that identified by someone else earlier?

MS. WILKINSON: No. It will be by a witness that's going to be called.

THE COURT: I'm going to keep it out of evidence now until it is identified and connected to the defendant.

MR. TIGAR: Yes, your Honor. I'm sorry I didn't make my point clear.

THE COURT: I understood that, but I thought it had been identified by somebody else, and I'm mistaken. So I'll exclude it from evidence until it is.

MS. WILKINSON: Your Honor, we are going to show that to Mr. Moore, but we'll just have him take a look at that time without showing it to the jury, so he can identify it on the photograph.

THE COURT: I'm not going to strike the testimony of this witness; she identified what it was about. But I'm not going to take it into evidence yet.

MR. TIGAR: Thank you.

MR. MACKEY: That exhibit is a subject of factual stipulation 13, and we'll publish that later in the trial.

Karen Anderson - Direct

THE COURT: I can't remember all the stipulations.

MR. TIGAR: Your Honor, regardless of the stipulation, it goes with another witness, and she will be here.

THE COURT: Okay. I'll wait expectantly.

We're in recess 20 minutes



WE ARE IN RECESS. 20 MINUTES.

(Recess at 3:05 p.m.)

(Reconvened at 3:24 p.m.)

THE COURT: Be seated, please.

(Jury in at 3:24 p.m.)

THE COURT: Please resume the stand under your oath.

Ms. Wilkinson, you may continue.

MS. WILKINSON: Thank you, your Honor.

BY MS. WILKINSON:

Q. Now, Ms. Anderson, we'll try it where you let me finish the question and then you answer it.

A. Yes, ma'am.

Q. Okay. You've looked at some other firearms that were recovered in this case, have you not?

A. Yes.

MS. WILKINSON: Your Honor, if we could -- for ease, if she could just step down and I'll read the exhibit numbers off.

THE COURT: All right.

MS. WILKINSON: It will go a little quicker.

THE COURT: You may step down.

Karen Anderson - Direct

BY MS. WILKINSON:

Q. Ms. Anderson, can you kind of come around here at least so you can face the jury.

There you go.

Did you look at these firearms before you came into court today?

A. Yes, I have.

Q. Do you recognize them as firearms you had in your house prior to November 5, 1994?

A. Yes, I do.

Q. Look at Government's Exhibit 1822. Do you recognize that?

A. Yes. It's a .50 caliber State Arms.

Q. Did you have a .50 caliber in your home prior to November 5?

A. Yes, we did.

Q. All right. How about Government's Exhibit 1826? Do you recognize that?

A. Yes. Blue Mini-14, folding stock.

Q. Anything unusual about that gun?

A. It's -- usually they come with a straight wood stock. This is a Ramline folding stock also.

Q. Show the jury just what you mean by a folding stock.

A. This here comes out and opens up into a full stock.

Q. Meaning this portion?

A. Like that.

Karen Anderson - Direct

Q. All right.

A. So it can be shot either from the hip or from the shoulder.

Q. Now, how about Government's Exhibit 1827? Do you recognize

that gun?

A. Yes, I do.

Q. What type of firearm is that?

A. Oh, I have to look at the caliber.

We're looking at an Interarms -- this is what they call a Tenite stock. They usually come with a wood stock, but this is a Tenite stock on it.

Q. Do you recognize that firearm?

A. Yep, I do.

Q. Did you have one in your home on November 5?

A. Yes, ma'am.

Q. Now, take a look at this one, Government's Exhibit 1825. Did you have a firearm that was designed exactly this way on November 5?

A. Yep. It had a wood stock and a wood forepiece.

Q. So it didn't have the pistol grip. Is that right?

A. Yes.

Q. Otherwise, do you recognize the firearm?

A. The rest of it just exactly like it would if it had a wood forepiece and a wood stock.

Q. And that's Government's Exhibit No. 1825. Is that correct?

A. Yes.

Karen Anderson - Direct

Q. What about this one, 1830? Do you recognize that?

A. Yes. It's a standard Mini-14.

Q. Nothing unusual about that?

A. Has a Choate stock on it with a hooded site on it. You don't see those around very often.

Q. What are you talking about?

A. The hooded sight right there, yes. Hooded because it's round and covered. Usually it's an open sight.

Q. Did you have that hooded sight on that firearm before November 5, '94?

A. Yes, ma'am.

Q. Finally, take a look at Government's Exhibit 1829. Do you recognize that one?

A. It's a carbine, military. Has what they call a bayonet lug on the front of it. Has a military strap on it, sling.

Q. Did you have a gun similar to that in your home?

A. Yes.

Q. Prior to November 5, 1994?

A. Yes, ma'am.

Q. Thank you. You can take your seat.

Now, Ms. Moore (sic), I'm not going to pick this one up. This is the one you told us, Government's Exhibit 1822?

A. State Arms.

Q. .50 caliber?

A. .50 caliber, State Arms.

Karen Anderson - Direct

Q. How big is the ammunition that goes in one of these guns?

A. Pretty good size.  
Q. How would you describe that for the record?  
A. Approximately 6 inches long. Case is maybe an inch in diameter.  
Q. Is this firearm considered a machine gun?  
A. No.  
Q. And is any portion of this firearm, Government's Exhibit 1822, registered with the ATF?  
A. Yes.  
Q. What portion of it?  
A. The action.  
Q. What do you mean by "the action"?  
A. That piece that the barrel hooks onto. This section right here.  
Q. Right below the scope?  
A. Yes, below the scope. That section right there.  
Q. And did you -- Mr. Moore have that registered with ATF prior to the -- prior to November 5, 1994?  
A. Yes.  
Q. In front of you, Ms. Anderson, should be Government's Exhibit 1867. Do you see that?  
A. Yes.  
Q. And inside, could you open it up and see if you recognize 1867A and B?

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A. Yes.  
Q. What are they?  
A. They're what they call a military detector sensors that detects movement on your property.  
Q. Did you have those in your home prior to November 5, 1994?  
A. Yes.  
Q. How many of those did you have?  
A. Four.  
Q. Look inside Government's Exhibit 1866. Do you see two additional items?  
A. Yes.  
Q. Are they the same things?  
A. Yes, ma'am.  
Q. Tell us how many of those platoon early-warning systems you see in front of you.  
A. A total of four.  
Q. And that's 1867A and B and 1866A and B?  
A. Yes.  
Q. Had you used those four platoon early-warning systems in your home for security prior to November 5, 1994?  
A. No.  
Q. Ms. Anderson, did you have any security system set up around your home prior to November 5, 1994?  
A. Nothing other than a human body being there.  
Q. Now, after you came back to the house on November 6 and

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made up these lists, did you meet with the police?

A. Yes.

Q. Were you asked to provide any names?

A. Yes.

Q. What were you asked to do?

A. We were asked to provide our thinking of anybody that had been to the house.

Q. Meaning visited your property?

A. Yes.

Q. Had many people visited your property there?

A. No.

Q. Did you give the name Tim McVeigh?

A. Yes.

Q. What did you tell them about Tim McVeigh?

MR. TIGAR: Object, your Honor.

THE COURT: What's the objection?

MR. TIGAR: I'm sorry. Hearsay, unless not admitted for the truth.

MS. WILKINSON: It's not admitted for the truth, your Honor.

MR. TIGAR: No objection, your Honor.

THE COURT: I assumed that it wasn't going to be for the truth.

I'm glad we cleared it up.

MR. TIGAR: I understand.

Karen Anderson - Direct

THE COURT: Go ahead. You may answer.

BY MS. WILKINSON:

Q. Just to explain to the jury the process, tell them what you told the police in Arkansas about Timothy McVeigh at that time.

A. Well, we were asked people basically might be aggravated at you or people that might have visited your home.

Q. Did Mr. McVeigh fit both of those categories?

A. Yes.

Q. Did you give them any personal information about Mr. McVeigh?

A. Yes.

Q. What type of personal information did you give them?

A. We told them that he had been stationed at Fort Riley. We gave them an address as to the drop box that I had for him.

Q. Where was that drop box located?

A. In Kingman, Arizona.

Q. Did you have any telephone number to contact Mr. McVeigh?

A. No.

Q. Had he ever given you one?

A. No.

Q. And do you recall when you gave that information to the police?

A. I believe the same time that we remitted the list of the guns.

Q. That week after November 5, 1994?

Karen Anderson - Direct

A. Yes.

Q. Now, you gave them Timothy McVeigh -- you gave the police the name "Timothy McVeigh." Did they ask you to spell that name when you gave it to them?

A. Not to my recollection.

Q. Did you hand them any written materials with Mr. McVeigh's name on it?

A. No.

Q. Do you recall whether they were taking notes while you were talking to them?

A. Yes, they were.

Q. And they never asked you for clarification on how to spell Mr. McVeigh's name?

A. Not to my rec -- however you say it -- recollection.

Q. Your recollection?

A. Recollection.

Q. Now, when was the last time prior to November 5, 1994, that you had spoken to Tim McVeigh?

A. Repeat that.

Q. When was the last time that you had spoken to Tim McVeigh before November 5, 1994?

A. It was in the spring of '94.

Q. And you hadn't talked to him yourself after that time; is that right?

A. No.

Karen Anderson - Direct

Q. Before November 5, 1994?

A. No.

Q. Well, let's go back -- why don't you tell the jury when you first ever heard the name "Timothy McVeigh."

A. I heard it through a phone call through Mr. Moore. He had called me from down in Ft. Lauderdale when he was living there.

Q. What year was that?

A. That was in '93.

Q. 1993?

A. Yes.

Q. That was the first time you ever heard the name "Timothy McVeigh"?

A. Yes.

Q. What did Mr. Moore tell you about Timothy McVeigh?

A. That he had met this young man at the armory, the gun show that they have down on State Road 84, and that he had talked with him for quite a while and that he also had some army pants that might fit me -- in other words, some camouflage pants -- that I could use at the farm and wanted to know what size I wore and if I would be interested in having them.

Q. Did Mr. Moore bring you some camouflage pants when he came back from Florida that year?

A. Yes, he did.

Q. Did he tell you how Timothy McVeigh was dressed when he first met him in 1993?

Karen Anderson - Direct

MR. TIGAR: Object to that, your Honor.

THE COURT: Sustained.

BY MS. WILKINSON:

Q. Did Mr. Moore tell you whether he would see Mr. McVeigh after that time?

A. He told me that he had told him about the show up in --

MR. TIGAR: Your Honor, I object to the hearsay, not the future but the past.

MS. WILKINSON: Your Honor, again it's not being admitted for the truth. We're trying to move on to the next time when Ms. Anderson actually saw and met Mr. McVeigh. Just laying the foundation for that.

THE COURT: Well, I don't know how it can be other than for the truth of what was said.

MS. WILKINSON: Well, I can ask her what she did as a result of the conversation instead.

THE COURT: All right.

BY MS. WILKINSON:

Q. Ms. Anderson after that conversation, did there come a time when you went to a gun show in Tulsa, Oklahoma?

A. Yes.

Q. In 1993?

A. Yes.

Q. When was that in 1993?

A. It's usually held the first weekend in April, or it could

Karen Anderson - Direct

be the last weekend in March.

Q. Do you have any specific recollection of which weekend it was in the year of 1993?

A. I thought it was in the first weekend in April. And they always hold it right around that time.

Q. But it could have been the last weekend in March?

A. Yes. It depends upon how Easter falls for that show.

Q. Did you go to the Tulsa gun show to sell ammunition?

A. Yes.

Q. Did you set up your table?

A. Yes.

Q. Did there come a time when you met Timothy McVeigh?

A. Yes.

Q. What happened?

A. I was setting the table up, and I was also talking with another gentleman that was there at the table; and I turned around because I heard somebody say, "Are you K. Anderson?"

And I turned around and I said, "Yes, I am."

And he goes, "I'm Timothy McVeigh."

And I says, "Oh, nice meeting you."

Q. When you say "K. Anderson," that is an abbreviation for Karen?

A. Yes.

Q. Ms. Anderson, did you ever use an alias or a false name at a gun show?

Karen Anderson - Direct

A. No.

Q. Has Mr. Moore, based on your personal knowledge, ever used an alias at a gun show?

A. Yes.

Q. What name does he use?

A. Bob Miller.

Q. And is he sometimes referred to as "Bob from Arkansas"?

A. Yes.

Q. Now, when you met Mr. McVeigh, did you talk to him that day?

A. Yes.

Q. And generally, what type of conversation did you have with him?

A. Basically, it was just about the gun show because he was so impressed on how huge it was.

Q. Did he -- was he selling any items at that gun show that you could see?

A. Not till Saturday morning when he came in and he had -- he had a cot and he had a sleeping bag and he had some books and he had a couple shirts.

Q. For sale?

A. Yes. And he asked if he could use part of the table; and I had a card table that sets (sic) at the end of my table, and I took my books off of it and just scooted everything up tighter. And I said, "You can use this end of it."

Karen Anderson - Direct

Q. You allowed him to share your table at the gun show?

A. Yes, ma'am.

Q. Did you see him selling any firearms at that time?

A. No.

Q. Have you ever seen Mr. McVeigh sell firearms at a gun show?

A. No.

Q. Now, did he stay there all day Saturday?

A. Yes.

Q. Did you speak to him during that time?

A. Yes.

Q. And did you have other general conversation?

A. Yes.

Q. What happened at the end of the gun show that weekend?

A. Mr. Moore and I had talked about him coming down and helping at the farm because I was so far behind on all of my chores over the winter months with just moving in there, and he followed me home from the gun show.

Q. When you say "he," who do you mean?

A. Mr. McVeigh.

Q. And had you had a conversation with Mr. McVeigh about his financial condition?

A. He said he was a little short on money.

A. He said he was a little short on money.  
Q. Did you invite him to come to your ranch?  
A. Yes.  
Q. What happened?

Karen Anderson - Direct

A. He followed me home on Sunday night.  
Q. Do you recall how long he stayed in the spring of 1993?  
A. Anywhere from a week to ten days.  
Q. Do you recall whether it was before the fire in Waco on April 19, 1993, or after?  
A. Before.  
Q. Now, you said he stayed a couple days or a week. Is that right?  
A. Yes.  
Q. What did Mr. McVeigh do while he was there?  
A. I had him raking leaves. I had him filling in holes where some holes had been dug out in the yard. I had him helping me bag some of the ammo up. I had him helping me assemble some little kits -- just whatever I could think of that would keep him occupied.  
Q. During that time, did you discuss with him your ammunition business?  
A. Yes.  
Q. And did you see him doing anything else during that time when he wasn't doing odd jobs for you?  
A. He either -- most of the time was either reading all of our gun magazines we had, or he was listening to his world-band radio.  
Q. Did you give him free access to your house?  
A. Sorrily, yes.

Karen Anderson - Direct

Q. Did you allow him to go into any rooms he chose?  
A. Yes.  
Q. If he had wanted to look in Mr. Moore's master bedroom, could he have looked in there?  
A. Yes.  
Q. Are there times when you were outside?  
A. Yes.  
Q. Why is that?  
A. Taking care of the animals.  
Q. Is that something you do every day?  
A. Yes.  
Q. During Mr. McVeigh's visit in early April of 1993, did you ever have an occasion to take him around the area?  
A. Yes.  
Q. That is, outside your property?  
A. Yes.  
Q. Where did you take him?  
A. I had to go in town to the insurance office, I needed to go to the grocery store, I needed to go to the tag office, and I asked if he'd like to take a ride around and see what the town



looked like.

Q. During that time, did you show him some of the roads that surround your property?

A. To go to the insurance property or to where the insurance company is from our new farm that we have, you have to take the

Karen Anderson - Direct

route that goes around by where our old place used to be.

Q. Let me show you Government's Exhibit 1743.

Do you recognize this over -- this aerial photograph?

A. Give me just a second.

Q. Sure.

A. Yes.

Q. Can you see it?

A. Yes.

Q. What does it depict?

A. Basically --

Q. You can't use the pen yet, Ms. Anderson. We don't have it into evidence, so just tell us what it shows and then we'll move on.

A. It shows the road that goes in front of our piece of property, and it also shows the road that comes around the property that goes over -- that cuts over to Highway 70; in other words, goes by our old farm, also.

MS. WILKINSON: Your Honor, we'd offer 1743.

MR. TIGAR: No objection.

THE COURT: Received, 1743; may be published.

BY MS. WILKINSON:

Q. All right, Ms. Anderson. Orient the jury and tell them what they're looking at, please. You can use your pen to --

A. This is -- from what I can see, this is Highway 270 west, like this, right here where these trees are. Our property is

Karen Anderson - Direct

right in here.

Q. So your property is off Highway 270 west?

A. 270, yes.

Q. And approximately how large is your property?

A. 10 acres. It's about 335 across the front.

Q. How many buildings are on your property, approximately?

A. Wait a minute. One, two, three, four -- five.

Q. There is a house, I take it?

A. There is a house. There is a boat shed. There is a wood shed, shop, hay barn along with where the ducks stay when they're sick, and there is a horse barn.

Q. How far off Highway 270 is the house approximately?

A. Close to 630. 630, 640 feet.

Q. Is it difficult to see from Highway 270?

A. Unless you're driving into town in the summertime -- you have to just look at a precise moment. Then you'll catch a glimpse of it. In the wintertime, you can see it a little bit easier through the trees.

Q. Let's take the jury back behind your property. Is there a creek back there?

A. Yes.

Q. Could you indicate generally where that creek is located?

A. It runs right back up in here somewhere. It's a little hard to tell.

Oh, no, I'm sorry. It runs right through here. This

Karen Anderson - Direct

is a very large creek that runs like this right here.

Q. Now, if you could show the jury where you took Mr. McVeigh that day you were showing him around Royal.

A. They have the beginning of it right here.

Q. And you're talking about the very side --

A. The very side road where you come off of 270 is just about right here.

Q. And you would have come out of your property, I take it, and taken a ride on 270?

A. Yes.

Q. And then where did you go?

A. You go down there. It's exactly a half mile down to Bradley's, and you take a right-hand turn and come up this

little road that's right -- it's not -- that's right in there.

Q. And then where did you go?

A. And it comes on up and around, and it -- as it comes up the

side of the mountain, it comes through here.

Q. What type of road is that?

A. It comes right here.

Q. Now, are you talking about the bottom of the photograph?

A. Yeah, the bottom of the photograph. This is the road that comes right through here.

Q. What type of road is that?

A. That's what they call a pea-rock road.

Q. Do you remember the name of it?

Karen Anderson - Direct

A. I call it Nubbin Ridge Road. There is about three different names for it, but most of the people around there call it Nubbin Ridge Road.

Q. Are there any other roads off Nubbin Ridge Road there?

A. A lot of little side roads, yes.

Q. Did you take Mr. McVeigh down any of those side roads?

A. No.

Q. And did you go anywhere else with him that day?

A. Basically just to the insurance company. From there, we went down to the tag company. Had to pick up tags for my brown pickup and then came back to the grocery store and then came home.

Q. Okay. Now, let's go -- if you're down there at the bottom of your photograph -- see -- and you can put a little X there, near Nubbin Ridge Road where you stopped

near Nuddin Ridge Road where you stopped.

A. Yes.

Q. Would you put an X there, please.

A. Right here?

Q. Approximately how far is that from your property?

THE COURT: By the roads?

MS. WILKINSON: Yes, your Honor.

THE WITNESS: Probably about maybe somewhere between

3

and 5.

BY MS. WILKINSON:

Q. If you walk straight back from that property towards your

Karen Anderson - Direct

property, would it be shorter?

A. Yes. You would probably -- it's probably maybe a mile and a half across.

Q. And would you have to cross that creek to get to your property?

A. Yes.

Q. You can push the side of the pen and you'll erase all those marks.

A. Oh, good.

Q. We'll be done with that exhibit.

A. It's not erasing.

Q. Pressing the side, that little button.

A. Yes.

Q. Okay. Well, you can just leave it alone and we'll go on to the next exhibit.

MS. WILKINSON: I'm sorry, your Honor. I didn't realize the screen was down.

Can we go back to it?

Yes. Thank you.

BY MS. WILKINSON:

Q. Now, do you see Government's Exhibit 1740 in front of you?

A. Yes.

Q. Do you recognize that?

A. Yes.

Q. What does that show?

Karen Anderson - Direct

A. It's a back side of the house.

MS. WILKINSON: Your Honor, we'd offer 1740.

MR. TIGAR: No objection, your Honor.

THE COURT: Received.

MS. WILKINSON: And I believe it's marked E.

BY MS. WILKINSON:

Q. Now, this shows the back of your house, Ms. Anderson?

A. Yes.

Q. Right in the middle of the photograph, do you see that silver box?

A. Yes.

Q. Can you mark that with an X.

-  
-  
What is that?

A. That's the electrical and the telephone and the fuse boxes to everything inside the house.

Q. Let's take a look at Government's Exhibit 1740D. Do you recognize that?

A. Yes.

Q. What does that show?

A. It shows the carport where you go into the dining room of the house and the garage.

Q. Is that the door that you and Mr. Moore and Mrs. Moore use?

A. Yes.

MS. WILKINSON: Government offers 1740D.

MR. TIGAR: May I inquire, your Honor?

Karen Anderson - Direct

THE COURT: Yes.

VOIR DIRE EXAMINATION

BY MR. TIGAR:

Q. Ms. Anderson, do you know when this photograph was taken?

A. Yes.

Q. When?

A. Recently. August.

Q. Pardon?

A. August.

Q. August of '97?

A. Yes.

Q. And the vehicle that's shown in the photograph: That is the same one that you owned in 1994?

A. Mr. Moore owned that, yes.

Q. So it is the same one?

A. Yes.

Q. And -- but -- picture that we're seeing here is in the same condition as it was in 1994?

A. Yes.

MR. TIGAR: No objection.

THE COURT: All right. It's received. 1740D.

DIRECT EXAMINATION CONTINUED

BY MS. WILKINSON:

Q. Tell the jury what this shows.

A. It shows it's a three-car carport. That's the back door

Karen Anderson - Direct

there is what you see that opens right up into the dining room.

Q. Now, your red mark from the last time is there. Is that the bottom of the door where the red mark is?

A. Yes.

Q. That's the door that you all enter the home?

A. Yes.

Q. Used to enter the home.

See that small satellite dish there on the right?

A. Yes.

Q. Do you know if that was there in 1994?

A. No, it was not.

Q. Other than that, is this a fair and accurate depiction of the way the home looked in 1994?

A. Yes.

Q. I think you told Mr. Tigar that that van was owned by Mr. Moore in the fall of 1994?

A. Yes.

Q. Now let's look at Government's Exhibit 1740C. Is that just another angle of the same -- showing the same area?

A. Yes, ma'am.

MS. WILKINSON: Government offers 1740C, your Honor.

MR. TIGAR: No objection.

THE COURT: Received.

BY MS. WILKINSON:

Q. Ms. Anderson, what does that show the jury?

Karen Anderson - Direct

A. It shows the garage door that opens up into the shop and basically just his van and the carport, and Boots is laying there. And that's about it.

Q. Now, I'd like to show you an exhibit that's not yet in evidence. Government's Exhibit 1740B. Do you recognize that?

A. Yes.

Q. Is that just another angle of the garage you've just described?

A. Yes.

MS. WILKINSON: Government offers 1740B.

MR. TIGAR: No objection, your Honor.

THE COURT: Received.

BY MS. WILKINSON:

Q. Now, Ms. Anderson, this is the side of the garage right here with the little window. Is that right?

A. Yes.

Q. If you follow that grassy area back, what do you come upon?

A. To the back?

Q. Yes.

A. You come to the back side of the house, propane tank.

Q. And what's back behind the house, the green area?

A. Behind the house is -- directly there to the north, it has a hill that drops right down and then opens up into the front pasture.

Q. Okay. And these trees there: Is that a wooded area?

Karen Anderson - Direct

A. Yes.

Q. Are there woods all around your property?

A. On two sides of it.

Q. Which two sides?

A. On the east side and on the south side.

Q. Now I'd like to show you one other photograph of the house that hasn't yet been moved into evidence, Government's Exhibit 1740A. Do you recognize that?

A. Yes.

Q. Is that again just one more angle showing the entrance that you and the Moores used?

A. Yes.

MS. WILKINSON: Government offers 1740A.

MR. TIGAR: No objection, your Honor.

THE COURT: Received.

BY MS. WILKINSON:

Q. Now, if you're standing back looking at this photograph or looking at your home from this angle, Ms. Anderson, where are you standing?

A. Pretty close to the boat shed and right next to the east side fence. You're within 10, 15 feet.

Q. And if you were to look back behind your shoulder, could you see the horses?

A. You would have to look over your left shoulder.

Q. Now, is there anybody else who has property adjacent to

Karen Anderson - Direct  
yours?

A. I don't know the name of the people that own the 10 acres on the east side, but on the west side, Walt Powell and his wife.

Q. Approximately how far is their home from your home?

A. Let's see, 335 -- maybe 4, 450 feet.

Q. And was the home generally in this condition when

Mr. McVeigh visited it in the spring of 1993?

A. Yes.

Q. And you told us he had access to all of the buildings that you've described and all the rooms in this house?

A. Yes.

Q. Where did Mr. McVeigh sleep when he was visiting in April of 1993?

A. The couch.

Q. When was the next time that you personally saw Mr. McVeigh again?

A. Knob Creek, the fall show.

Q. What is Knob Creek?

A. Knob Creek is a large machine-gun shoot that people from all over the United States come to. They also have exhibit tables there.

Q. Do you regularly attend that show?

A. Yes.

Q. And that was when -- when in 1993?

Karen Anderson - Direct

A. Usually right around the third weekend in October.

Q. How did you see Mr. McVeigh at that gun show?

A. I don't remember whether it was a Friday or Saturday. I just turned around, and there was this tall guy with a smiling face and said "Hi." And that's where he was.

Q. How long did you see him that day?

A. Only for maybe 15, 20 minutes.

... only for maybe 10, 20 minutes.

Q. Did you see him at any other time at the Knob Creek machine-gun shoot?

A. Walking around, and that was it.

Q. Never spoke to him after that?

A. No.

Q. Now, between those two times that you saw Mr. McVeigh in 1993 -- that is, the spring of 1993 when he stayed at your house and seeing him in Knob Creek -- did you talk to him over the telephone during that time period?

A. No.

Q. Did you exchange any letters with him?

A. Yes.

Q. Do you recall the substance of those letters?

A. I think the first letter that I ever received from him was basically letting me know that he had a security job and that he was in Kingman, Arizona, and that he gave me an address of a drop box and asked me to not put down "Timothy McVeigh" but please address it "Tim Tuttle."

Karen Anderson - Direct

Q. And did you do that?

A. Yes.

Q. Now, after you saw Mr. McVeigh at Knob Creek, did he write to you again after that?

A. There might have been one small letter there. I just --

Q. You don't have any specific recollection?

A. No.

Q. I take it you didn't keep track at that time of all the correspondence that Mr. McVeigh was sending?

MR. TIGAR: Objection to leading, your Honor.

THE COURT: Sustained.

BY MS. WILKINSON:

Q. Did you keep track of the correspondence Mr. McVeigh was sending to you at that time?

A. No.

Q. When was the next time you saw Mr. McVeigh in person?

A. Either January or February of '94.

Q. Where did you see him?

A. At my house.

Q. Had you invited him?

A. No.

Q. Did he just show up?

A. Telephone call.

Q. What happened?

A. He had called and he says, "I know Bob stays in Florida for

Karen Anderson - Direct

the winter, but I'm going home to Kingman and," he says, "would you mind, I'm not too far" -- he says, "Would you mind if I come and spend the night?"

And I said, "No, come on. Try to get in early enough and I'll pull out some steaks and I'll fix steak dinner."

Q. When he referred to "Bob was in Florida for the winter," who did you understand him to be referring to?  
A. Mr. Moore.  
Q. And did Mr. Moore stay in Florida every winter?  
A. Yes.  
Q. Did Mr. McVeigh show up that evening?  
A. Yes.  
Q. Did you cook dinner for him?  
A. Yes.  
Q. Did you have conversation?  
A. Yes.  
Q. Did you discuss any political issues at that time?  
A. We talked about Waco.  
Q. And did you notice any change in Mr. McVeigh's demeanor at that time?  
A. Was just a little bit more adamant on Waco than he had been prior to that.  
Q. And did he discuss the fire at Waco?  
A. Yes.  
Q. When did Mr. McVeigh leave after that?

Karen Anderson - Direct

A. He left the next morning.  
Q. Did he tell you where he was going?  
A. Said he was going home, so I assume that was Kingman.  
Q. But you didn't know where home was; is that right?  
A. I considered Kingman as home to him.  
Q. And did he ever tell you about where his family was from?  
A. Other than just New York state. That was it.  
Q. He never gave you any details?  
A. No.  
Q. Did he ever give you a phone number in Kingman?  
A. One time when I was coming through years and years ago, but I mean it was -- it was just to say hello, and that was it.  
Q. I'm sorry. I think I misunderstood. Did he give you a phone number where you could reach him in Kingman?  
A. When I was going to visit my mother in Vegas one time, and I think that was the business phone number of where he was working, and that was it.  
Q. Did you call him?  
A. I called and said, "Hello."  
    And he says, "How's everything going?"  
    And I said, "Fine."  
    And he says, "Are you on your way?"  
    And I said, "Yeah. I'm going to see my mother, and we're going camping."  
Q. Did you see him at that time?

Karen Anderson - Direct

A. No.  
Q. Do you recall when that was?  
A. No, I don't.



Q. Now, when Mr. McVeigh visited for the one night in the winter of 1994, do you recall where he slept?

A. He slept in my bedroom.

Q. Where did you sleep?

A. I slept in Mr. Moore's bedroom.

Q. Mr. Moore wasn't there, I take it.

A. Right.

Q. Did he have access to your house during that one-night visit?

A. Could very well have. When I took my shower.

Q. Did you ever show Mr. McVeigh, Mr. Moore's or your gun collection?

A. Not the whole collection.

Q. Did you discuss guns with Mr. McVeigh?

A. Yes.

Q. I think you just said while you were in the shower. Could Mr. McVeigh have gone into Mr. Moore's room?

A. Yeah, because I'm usually in there 15 to 20 minutes.

Q. That is where the majority of the firearms were kept?

A. Yes.

Q. Did you keep any handgun in any other location?

A. There was a handgun that I kept that was a Ruger Bull

Karen Anderson - Direct

Barrel .22. It was underneath the TV in the video cabinet.

Q. Did you ever tell Mr. McVeigh that it was there?

A. Yes.

Q. When did you tell him that?

A. On one of the times when we were setting (sic) on the floor and we were discussing what we liked to shoot; and I turned around and I says, "Gee, I really like to shoot this," and opened the cabinet up and showed it to him.

Q. After November 5, 1994, did you notice whether that handgun was still in the cabinet under the television?

A. It took about three weeks before it dawned on me to think about it, but it wasn't there.

Q. You noticed that it was missing?

A. Yes.

Q. Now, after Mr. McVeigh's visit in the winter of 1994, did he ever come to your house again?

A. Yes, he came in the spring.

Q. Spring of 1994?

A. Yes.

Q. How long did he stay?

A. Three, four days.

Q. And at that time, did you consider him a friend?

A. Yes.

Q. Did you trust him?

A. Yes.

Karen Anderson - Direct

Q. You didn't keep anything from him around the house?

A. No.

A. NO.

Q. Did he have access to the refrigerator?

A. Extremely well.

Q. Why do you say that?

A. He just ate like a horse. That was all.

Yes, he did.

Q. Now, during that visit in the spring of 1994, do you recall him doing anything around the house while he was there?

A. Well, I had him helping me again, putting some things together.

Q. And do you recall him having any conversations with Mr. Moore?

A. Yes.

Q. Mr. Moore was present at that time?

A. Yes.

Q. And do you recall any of the topics that they discussed -- that you heard them discuss?

A. Well, they discussed Waco all over again. They discussed some of the things about the New World Order. They discussed a launcher, a parachute flare launcher that Mr. Moore was not too happy with him about.

Q. With him about? What do you mean, Mr. McVeigh?

A. Mr. McVeigh.

Q. Why was that?

Karen Anderson - Direct

A. He had turned --

MR. TIGAR: Object, unless there is personal knowledge, your Honor, of this background.

MS. WILKINSON: Trying to establish that, your Honor.

THE COURT: Well, I think you're asking about a conversation in her presence.

MS. WILKINSON: I was.

THE COURT: Isn't that what you are asking?

BY MS. WILKINSON:

Q. You're talking about a conversation that you heard. Is that right?

A. Yes.

Q. Okay. What happened?

A. I was setting (sic) in the living room working on some bullets, and I had heard Roger turn; and -- he didn't turn. When I turned around, he was looking straight forward. And he told Tim -- he says, "I'm really not happy about you stealing my flare launcher design and then wanting me to buy them back because you couldn't sell them."

And Tim was not happy about that at all.

Q. Could you see that in Mr. McVeigh's face?

A. Very well.

Q. What did you observe?

A. He just never said anything. He set his jaw and sat down and picked up a magazine and started reading.

Karen Anderson - Direct

Q. Did he leave after that?  
A. Shortly.  
Q. How shortly after?  
A. It was probably sometime later on that day.  
Q. Did he ever return to your house again?  
A. No.  
Q. Did you ever receive any letters from him again?  
A. Not for quite some time.  
Q. Eventually, though, did you receive some correspondence?  
A. Yes.  
Q. Now, you told us that during that two- or three-day visit in the spring of '94 that Mr. Moore and Mr. McVeigh discussed the New World Order. Is that right?  
A. Yes.  
Q. Had you heard them discuss the New World Order at any other time?  
A. Yes.  
Q. Had they discussed it the previous year in the spring of '93 when he visited?  
A. Yes.  
Q. After that visit, did you and Mr. Moore go to some military bases in the summer of 1993?  
A. Yes.  
Q. Why did you do that?  
A. Just to see what was going on.

Karen Anderson - Direct

Q. What was your concern?  
A. My concern was basically you've read all of this literature and you've heard all of this and you were worried about the -- talking about black helicopters with no numbers and things on it like this and you wondered if it's our military, why aren't we numbering our vehicles and that, because I thought we were supposed to.  
Q. Did you and Mr. Moore discuss your concerns?  
A. Yes.  
Q. Had you discussed them with Mr. McVeigh in the spring of '93?  
A. Yes.  
Q. And did you tell Mr. McVeigh that you and Mr. Moore were going to go to military bases to look for these -- this foreign military equipment in the summer of 1993?  
A. Yes.  
Q. Did you discuss that with Mr. McVeigh in the subsequent visits; that is, in the fall of 1993, the winter of '94, and the spring of '94?  
A. Not heavily, but on small terms, yes.  
Q. Was Mr. McVeigh interested in those topics?  
A. Yes.  
Q. Was he more interested than you were?  
A. Quite a bit.  
Q. How can you say that?

Karen Anderson - Direct

A. Basically because he would try to talk with me and tell me what was going to happen, and my statement was -- is that until they're here knocking on my door, I believe in watching for things but don't get overreactive about it.

Q. Did Mr. McVeigh discuss with you that some kind of action should be taken?

A. He just was very upset about Waco, and I never heard him come out and say that he was going to take some kind of action.

Q. Now, did you report to him during these conversations what you and Mr. Moore had seen at the military bases in the summer of 1993?

A. It might have been through a letter, yes.

Q. Did you see anything?

A. No.

Q. Did you get access to some of the military bases?

A. Only the ones that had museums.

Q. You didn't see any foreign military equipment?

A. No.

Q. After that, did your interest in the New World Order concept and issues -- was it lowered, was it minimized?

A. It was more fun to go swimming.

Q. Now, you told us that during your visits with Mr. McVeigh in 1993 and 1994 that he talked about Waco, you talked about firearms and other things. Did you ever talk to him about any valuables that you had in your house?

Karen Anderson - Direct

A. We didn't come out and say anything about particularly gold and silver, but gold and silver was discovered -- it was discussed on a monetary basis on how much a person -- in other words, your value of what you have, how you should divide it up.

Q. Did you have some concern about keeping gold and silver in your house in case of some kind of financial disaster in the country?

A. We had, yes.

Q. Did you discuss that with Mr. McVeigh?

A. Yes.

Q. Did he share your views?

A. Yes.

Q. Now, after November 5, 1994, did you and Mr. Moore correspond with Mr. McVeigh?

A. I didn't catch the date again.

Q. After November 5, 1994, after you noticed your property was missing, did you correspond with Mr. McVeigh?

A. Yes.

Q. Was that after you had told the police that Mr. McVeigh was a regular visitor at your home?

A. Yes.

Q. Why did you correspond with Mr. McVeigh at that time?

A. Basically, I was hoping that he could help us on how to set up security around the ranch and that, what we could do. I had

Karen Anderson - Direct

already installed -- not when the first letter went -- I hadn't put the fence in yet, but that was the overall deal. The robbery, you know: How could this have happened?

Q. At that time, were you suspicious about whether Mr. McVeigh had been involved in the robbery?

A. Yes and no.

Q. What do you mean by that?

A. You have very few people that have access, less than five, to your house. You have a hard time believing that a friend would set you up. You're hoping a friend, if they've had military background, might be able to help you find this stuff.

Q. Did there come a time when you became more suspicious of Mr. McVeigh?

A. Yes.

Q. When was that?

A. In January.

Q. Of 1995?

A. Yes.

Q. What caused you to become more suspicious?

A. Of a map that I received and then maybe a week later of a letter that I had received.

Q. All right. Let's start with the map. What did you receive?

A. I received a map that would basically be like the one that we just looked at but is drawn up that shows the road where the

Karen Anderson - Direct

house is and it shows the road that goes around to the old farm and everything and approximately of where the van was also found.

Q. All right. Now, when you say the picture we just looked at, are you talking about aerial photograph we looked at that showed your property and the roads around that?

A. Similar to that, but it's just black and white like the sewer department writes up.

Q. You received that in January of 1995?

A. Yes.

Q. Do you recall the envelope that it was in?

A. Yes. That was extremely unusual, I thought.

Q. What was unusual about it?

A. No. 1, it was addressed to Carol Moore at the old farm address.

Q. That's Roger's wife?

A. Yes.

Q. Okay.

A. Then the return address was addressed back to me at the P.O. box. And when I looked at the outside, it had been stamped from Springfield, Missouri.

Q. So it had your return address and Mrs. Moore's old address?

A. It was the old farm address, to Carol Moore, with my return address, the P.O. box, and a Springfield, Missouri postal stamp

-----, the letter was, with a return address, returned to the sender  
on it with insufficient postage on being mailed; so it would

Karen Anderson - Direct

naturally not be shipped to the farm but would be shipped back  
to the P.O. box, to me.

Q. Had you sent that letter?

A. No.

Q. So it made you suspicious, I take it?

A. Well, I called --

MR. TIGAR: Object to what Counsel takes it, your  
Honor.

THE COURT: Yes. Stricken.

BY MS. WILKINSON:

Q. How did you feel when you received the map?

A. I felt like somebody was trying to say, Hey, you know, we  
had --

MR. TIGAR: Excuse me, your Honor.

THE COURT: Speculation on her part.

MR. TIGAR: Speculation.

THE COURT: Yes. Sustained.

BY MS. WILKINSON:

Q. What did you do once you received that letter -- that map?

A. Called Mr. Moore down in Florida and asked him if by any  
means Carol had requested a map of the area.

Q. Did you receive any other correspondence in early 1995?

A. A week later from Tim.

Q. Tim McVeigh?

A. Yes.

Karen Anderson - Direct

Q. What was that correspondence about?

A. Basically the correspondence was that under no  
circumstances --

MR. TIGAR: Excuse me, your Honor. If she's  
describing a document, may we either have it or evidence of why  
it's not here?

THE COURT: Yes. You need to lay a foundation for  
this.

MS. WILKINSON: Well, your Honor, I wanted her to  
describe it first and then move it into evidence. Is that all  
right, or would you like me to do it the other way?

THE COURT: I think it ought to be the other way in  
view of the objection.

MS. WILKINSON: Okay.

I believe I have it on the screen and she can look at  
it, your Honor.

THE COURT: Well, do we have the document here?

She's  
referring to a document.

MS. WILKINSON: We do. I think -- hold on one  
second.

I'm not sure if it's in her folder or not. We're

looking for it.

BY MS. WILKINSON:

Q. Could you look and see if that letter is in your folder from Mr. McVeigh, Ms. Anderson?

A. I don't see it.

Karen Anderson - Direct

Q. You don't see it?

A. No, ma'am.

MS. WILKINSON: Your Honor, I have a copy in my notebook, if I could use that for purposes of laying a foundation.

THE COURT: All right.

BY MS. WILKINSON:

Q. Let me hand up Government's Exhibit 1746. Take a look at it -- or a copy of it.

Do you recognize that?

A. Yes.

Q. Do you recognize the envelope?

A. Yes.

Q. How do you recognize it?

A. I'm the one that got it and opened it up and read it.

Q. Do you recognize the letter?

A. Yes. I recognize the writing.

Q. How many pages is the letter?

A. Oh, one, two -- basically three pages. You have five here, but it's the back side.

MS. WILKINSON: Your Honor, at this time we'd offer 1746 and the stipulation that it's Mr. McVeigh's handwriting.

MR. TIGAR: Yes. May I inquire about the letter itself? There is no question about the handwriting.

THE COURT: Yes, you may.

Karen Anderson - Voir Dire

VOIR DIRE EXAMINATION

BY MR. TIGAR:

Q. Ms. Anderson, this -- this letter, if you look, is postmarked on a certain date. If you could look at the envelope.

A. Uh-huh.

Q. And do you recall receiving it shortly after that date?

A. January 12?

Q. Yes.

A. No, I don't.

Q. Do you remember receiving it sometime in January?

A. Yes.

Q. Okay. And it is addressed to Bob Miller. Is that Mr. Moore's name?

A. Yes.

Q. And the P.O. box -- that is the Moore/Miller/Anderson post office box?

A. Yes.

Q. And the return address, it says is "Luttle." That is a name that Mr. McVeigh used?

A. Yes.

MR. TIGAR: No objection, your Honor.

THE COURT: All right. 1746 is received.

DIRECT EXAMINATION CONTINUED

BY MS. WILKINSON:

Karen Anderson - Direct

Q. Now, Ms. Anderson, you can put the letter down.

You were telling us about the substance of this letter. What was Mr. McVeigh writing to you about?

MR. TIGAR: Your Honor, the letter speaks for itself.

THE COURT: Yes.

BY MS. WILKINSON:

Q. Did you read the letter?

A. Yes.

Q. Did you read it to Mr. Moore over the telephone?

A. Yes.

Q. And after that, did you and Mr. Moore correspond with Mr. McVeigh?

A. Yes.

Q. Did you personally write any letters to Mr. McVeigh?

A. Yes.

Q. You did?

A. Yes.

Q. And do you recall the substance of those letters?

A. The substance of my letters was to try and --

MR. TIGAR: Excuse me, your Honor. If it's established that she doesn't have the letters anymore, then we'll take the secondary evidence.

BY MS. WILKINSON:

Q. Do you have those letters that you wrote to Mr. McVeigh?

A. No.

Karen Anderson - Direct

Q. He didn't send them back to you, did he?

A. No.

Q. Tell us what you wrote to Mr. McVeigh about.

A. I wrote to Tim trying to find out a better way to set up security. In other words, I had wrote in there that I had built a fence and put a woven-wire fence across the front part of the property and installed a gate and was getting ready to work on the side fences, wanted to know how I could find how long whoever this party was that robbed us -- where he might have observed us from and looked and asked him, and that was basically my idea and would he be interested in coming back and working on trying to help us find who it was that robbed us.

Q. Did Mr. McVeigh ever come to visit your property again?

A. No.

Q. Now, you've identified these firearms, ammunition, the quilt, the blanket, camera case, the cigar box, the keys. Did you ever agree to give any of those items to Mr. Terry Nichols?



you ever agree to give any of those items to Mr. Terry Nichols.

A. Under no circumstances.

Q. Did you ever agree to give that property back to anybody else?

A. No.

MS. WILKINSON: We have no further questions, your Honor.

THE COURT: All right. Mr. Tigar.  
CROSS-EXAMINATION

Karen Anderson - Cross

BY MR. TIGAR:

Q. Ms. Anderson, are you Mr. Moore's girlfriend?

A. Yes.

Q. And you have been for how long?

A. 20 years.

Q. Now, do you know a man named Steven Colbern?

A. Sure do.

Q. When did you first meet Mr. Colbern?

MS. WILKINSON: Objection, your Honor. It's beyond the scope and irrelevant unless there is a proper foundation.

THE COURT: Sustained.

BY MR. TIGAR:

Q. Did you help Mr. Colbern get together with Mr. McVeigh?

MS. WILKINSON: Objection. Same objection.

THE COURT: Sustained.

BY MR. TIGAR:

Q. You've told us that you're in the firearms business; correct?

A. Told you I was in the ammunition business.

Q. Ammunition business. Now, do you remember being interviewed by the Federal Bureau of Investigation on the 11th of May, 1995?

A. Not offhand.

Q. Do you remember being shown a photographic lineup?

A. Yes.

Karen Anderson - Cross

Q. Do you remember being asked if you were familiar with anyone by the name of Steven Colbern?

MS. WILKINSON: Objection, your Honor.

THE COURT: Sustained.

BY MR. TIGAR:

Q. Did you tell the truth to the FBI when you were interviewed on the 11th of May, 1995?

MS. WILKINSON: Objection, your Honor, if it's referring to the same incident.

THE COURT: Well, I -- about what? I'll sustain the objection to the question because it's not clear what you're asking.

BY MR. TIGAR:

Q. You've talked about your relationship with Mr. McVeigh; correct?

A. Yes.

Q. All right. Did you understand that Mr. McVeigh was interested in finding people who shared his political views?

MS. WILKINSON: Objection, your Honor.

THE COURT: Overruled.

THE WITNESS: Everybody is interested in finding somebody with their political views. I mean, I would rather talk to somebody about the Republican Party than the Democrat Party, so give me a for-instance on what you mean.

BY MR. TIGAR:

Karen Anderson - Cross

Q. Well, were you interested in helping Mr. McVeigh find people who were -- who shared his political views?

A. I don't entirely know what his political views were.

Q. Did you ever forward correspondence for Mr. McVeigh?

A. No.

Q. Did you ever help to put Mr. McVeigh in touch with other customers that you had?

A. Not in the plural form. Customer.

Q. Did you ever help Mr. McVeigh get together with any customer, singular, that you had?

A. Yes.

Q. And what was your reason for putting Mr. McVeigh in touch with that customer?

MS. WILKINSON: Objection, your Honor.

THE COURT: Overruled.

THE WITNESS: Mainly because Mr. McVeigh said he liked to do maneuvers in the desert and go out and shoot and see how he could work on survival, and this party was interested in doing the same thing.

BY MR. TIGAR:

Q. And so you put these two parties together; is that correct?

A. No.

Q. What did you do to help them get together, if anything?

MS. WILKINSON: Objection, your Honor. Again this is beyond the scope.

Karen Anderson - Cross

THE COURT: Overruled.

THE WITNESS: All I did was give a name and an address.

BY MR. TIGAR:

Q. Now, did you think there was anything wrong with giving that name and address?

A. No.

Q. Did you tell the FBI when they asked you whether or not you had given that name and address?

A. You haven't clarified what name and what address.

Q. There is only one person that you helped Mr. McVeigh get in

contact with; correct?

A. Correct.

Q. Did the FBI ask you about that person?

A. Yes.

Q. Did you tell the truth?

A. Yes.

Q. Did you tell the truth the first time you were asked?

A. No.

Q. All right. Now, when was the first time you were asked?

A. Over the telephone.

Q. And when was the second time you were asked?

A. 20 minutes later, I phoned the FBI back and said, "I recognize the name after I have written it down."

Q. Now, you're telling us that the first time you were asked

Karen Anderson - Cross

was over the telephone; is that correct?

A. Yes. Yes.

Q. At that time, were you also shown some pictures?

A. No.

Q. All right. When were you first shown the pictures?

A. Maybe a day or two later.

Q. And is it your testimony that -- well, at the time you were shown the pictures, were you also asked about this person?

A. Yes.

Q. Were you asked about this person by Special Agent Mark Jessie.

A. Yes.

Q. Did you tell the truth?

A. Yes.

Q. Isn't it a fact that what you said was you were not familiar with anybody with that name?

A. At that -- when he was showing the pictures?

Q. Yes, ma'am.

A. No. No.

Q. That is not the fact?

A. No.

Q. Now, you then -- after your -- after discussing this with the FBI, you then talked about your contacts with this person. Is that correct?

A. Yes.

Karen Anderson - Cross

Q. And you told them that -- what you've related to us; that is, that this was someone who had wanted to do maneuvers in the desert and you were putting them together with Mr. McVeigh. Correct?

A. The first part of the conversation was on the ammunition.

Q. And you told the FBI about the contact you had with this person. Correct?

A. Yes.

Q. Now, had you ever met this person in person?

A. No.

A. NO.  
Q. What is this person's name?  
A. Steven Colbern.  
Q. Have you corresponded with Mr. Colbern?  
A. Letter-writing?  
Q. Yes.  
A. No.  
Q. Has Mr. Colbern made orders from you?  
A. Yes.  
Q. How many times has Mr. Colbern made orders from you?  
A. Two or three.  
Q. Have you had telephone calls with Mr. Colbern?  
A. Did you say "from"?  
Q. From Mr. Colbern, yes.  
A. Yes.  
Q. How many?

Karen Anderson - Cross

A. I could not give you an exact number. I have no idea.  
Q. Did you have seven or eight telephone calls with him?  
A. Probably.  
Q. Do you remember telling that to the FBI?  
A. Somewhere in that vicinity, yes.  
Q. And he told you he was a chemist; right?

MS. WILKINSON: Objection, your Honor, to what he told

Ms. Anderson.

THE COURT: Sustained at this point.

BY MR. TIGAR:

Q. What did Mr. Colbern order from you?  
A. The first time, a can of .50 caliber ammunition.  
Q. And the second time?  
A. Was back after more .50 caliber.  
Q. In your telephone conversation -- did he ever order anything other than .50 caliber ammunition from you?  
A. I think he might have ordered some .308.  
Q. Now, will you -- is it your business to sell this ammunition to anyone who calls?  
A. Yes.  
Q. And are you interested in what the people are going to do with it?  
A. Yes and no.  
Q. Were you interested in the case of Mr. Colbern what he was going to do with it?

Karen Anderson - Cross

A. I had no reason to be. It's standard .50 caliber ammunition.  
Q. Did you discuss his occupation with him?  
A. No.  
Q. Did you -- pardon?  
A. No.  
Q. Did he tell you what his occupation was?

MS. WILKINSON: Objection, your Honor.  
THE COURT: Overruled.  
Did he?  
THE WITNESS: I'm sorry?  
THE COURT: Did he tell you his occupation?  
THE WITNESS: Not me.

BY MR. TIGAR:

Q. He didn't tell you his occupation?  
A. Right.  
Q. Well, did Mr. -- let's -- Mr. Moore goes by the name Bob Miller, also. Correct?  
A. Yes.  
Q. Has he ever gone by the name Bob Anderson?  
A. He does not go by that. People have assumed it.  
Q. People have called him Bob Anderson?  
A. Yes.  
Q. So he's known as Bob Miller, Bob Anderson, and Roger Moore; correct?

Karen Anderson - Cross

A. Yes.  
Q. Now, did Mr. Moore talk to Mr. Colbern?  
A. Yes.  
Q. And do you know how many occasions he talked to Mr. Colbern?  
A. No.  
Q. Now, the interview that you had with the FBI in May of 1995 was not the first time that you had discussed this robbery; is that right?  
A. With the FBI?  
Q. No, with anybody.  
A. No.  
Q. All right. First time you discussed it was -- first time you discussed this episode was with Mr. Moore, when you got home on the Sunday. Correct?  
A. No. I discussed it on the phone with him Saturday night.  
Q. Saturday night. Now, did he call you, or did you call him?  
A. I always call in.  
Q. So he had not called you all during the day; is that right?  
A. You're incorrect.  
Q. All right. Had he called you during the day?  
A. He cannot call me personally. He called the promoter's residence trying to get a hold of me.  
Q. Did you talk to Mr. Moore before you called on the phone that night?

Karen Anderson - Cross

A. No.  
Q. That day. All right. Did you -- did Mr. Stromen -- is that -- am I pronouncing that correctly?  
A. There is a Mr. Stromen.  
Q. Mr. Stromen who is an ammunition dealer?

A. No.

Q. What does he make? What does he do?

A. He produces tracer components and sells the ammunition.

Q. He sells ammunition?

A. Yes. Sorry.

Q. Mr. Stromen: Did you know that Mr. Moore and Mr. Stromen had a telephone conversation the evening of the 5th?

A. If I'm not there, how would I know?

Q. All I'm asking is whether you knew or not. Did you know?

A. I was not there.

Q. Now, were you interviewed by the police?

A. Not other than when I went down with this list with Mr. Moore to the police department.

Q. Now, that -- did you type up the list?

A. Yes.

Q. When you typed up the list, did you keep it -- a tally of the total value that was on the list?

A. No, I did not.

Q. Do you know what the total is on the first list?

A. No, I do not.

Karen Anderson - Cross

Q. Do you know what the total is on the second list?

A. No, I do not.

Q. Now, you said that there was insurance on the premises; correct?

A. Homeowners.

Q. And in whose name was the insurance?

A. Mr. Moore's and Carol's, I believe.

Q. Now, you told us today that some of these guns are yours. Correct?

A. Yes.

Q. Did Mr. -- were you interviewed by an insurance agent, Mr. Spivey?

A. Yes.

Q. Did Mr. Moore say the guns were all his?

A. I have no idea. I do not remember.

Q. You were present when Mr. Spivey was interviewed -- interviewing Mr. Moore?

A. He preferred that I would not be around because I was not there when the robbery happened.

Q. Now, did Mr. Spivey to your knowledge record the interview?

A. Yes.

Q. Were you the only female person in the house other than -- well, were you the only female person in the house at that time?

A. Yes.

Karen Anderson - Cross

Q. Have you -- did you participate in any part of the interview?

A. I get sort of noseey once in a while, and I probably interrupted in one part of the interview; and I remember he stopped the tape and clarified who I was.

Q. So you were there at least enough to have your voice picked up by the tape-recording machine so far as you could tell; is that correct?

A. Yes.

Q. Now, did -- did you ever see a check that was made out by the insurance company with respect to this claimed loss?

A. Yes.

Q. And to whom -- to whom was it made out?

A. Mr. Moore.

Q. Did you participate with Mr. Moore in choosing the amount of insurance that would be claimed on the -- excuse me -- that would be purchased for the home?

A. I was present, yes.

Q. And do you know what the policy limits were for contents?

A. Not -- I could not set (sic) here and give and you exact on it, no.

Q. Would it refresh your recollection if I said \$63,000?

A. No.

Q. Do you know -- did you watch Mr. Spivey make out a list of the amount of money that was going to be claimed for the loss?

Karen Anderson - Cross

A. I may have. I don't recall it.

Q. Do you recall the amount of the total loss that you claimed, or that was claimed on that -- with Mr. Spivey?

A. I thought it was somewhere in the vicinity between 60- and 70,000.

Q. Do you know what the deductible was on your policy?

Excuse me. Do you know what the deductible was on the policy?

A. I'm going to guess. This would just purely be an assumption of 500 --

THE COURT: Don't make an assumption if you don't know.

THE WITNESS: I don't know.

BY MR. TIGAR:

Q. If I said \$500, would that refresh your recollection?

A. I assume that would be it.

Q. Do you know a total amount that you claimed when Mr. Spivey was making out these forms in your house?

A. No, I do not.

Q. If I said \$63,428, would that refresh your recollection?

A. I already told you I thought it was in the vicinity between 60- and 70,000.

Q. But that does not refresh your recollection as to the more precise number?

A. No.

Karen Anderson - Cross

KAREN ANDERSON - CROSS

Q. Did Mr. Spivey take pictures?

A. I don't remember.

Q. At that time, did Mr. Moore have a filing cabinet?

A. Yes.

Q. A small, two-drawer filing cabinet?

A. We've got three or four of them.

Q. And do you recall that at the time the label on one of those drawers said "racing gasoline"?

A. I have no idea.

Q. You don't remember?

A. No.

Q. Now, you made two lists. Is that correct? One on the 5th and one on the 13th?

A. Yes.

Q. And you typed those out yourself. Correct?

A. Yes.

Q. Was Mr. Moore providing the information to help make them out?

A. On some of them, yes.

Q. And in addition to changing the items that were on there, did you change the amounts you were claiming?

A. Only by going by the Shotgun News on what guns were bringing.

Q. I'm going to show you what's been received as Government's Exhibit 1738. Is that the first page of the list that you made

Karen Anderson - Cross  
on November 9, 1994?

You see the top there?

A. Yeah. Yes.

Q. Now, you notice Item No. 8 here is a Remington Nylon 6622 LR brown. Do you see that?

A. Yeah. That means long rifle.

Q. And you have that at \$124; is that correct?

A. Right. Right.

Q. Now, is there an equivalent item on this list dated the 13th?

A. Well, there is three Remington nylon .22's.

Q. Right. And on the 13th you value them at 125, 115 and 135; correct?

A. Right.

Q. Is that right?

A. Correct.

Q. And on the 5th, you've got them --

A. We're talking about a \$1 difference?

Q. Pardon me?

A. You're looking here at a Remington nylon .22, .22 long rifle, clean brown, \$125 that was made on the second list. On the first list, it was a Remington nylon .22 long rifle brown for \$124?

Q. That's what I'm asking.

A. Is that the discrepancy you're talking about?



Karen Anderson - Cross

Q. No. The item -- the first item, Remington -- Item No. 6 is \$125. Do you see that?

A. Yes.

Q. And that's the same on both lists. Correct?

A. But that doesn't necessarily mean that they're all three in the same order.

Q. So that when we look at these two lists, we might see that things are in a -- in different orders. Is that correct?

A. True.

Q. Now, the changes that we see between the two documents: What is the reason that you would change the amount of money that was claimed for particular things?

A. Mainly because this was not a collection that was up for sale, and some of these prices -- both of us are totally out of date as to what they're bringing now or at that time.

Q. Now, at that time, did you attempt to find a list of serial numbers?

A. Yes.

Q. And were you able to do so at that time?

A. No.

Q. And was that because the list of serial numbers had been placed in Mr. Moore's van?

A. Yes.

Q. Had you placed it there?

A. Yes.

Karen Anderson - Cross

Q. And in addition to placing the list of serial numbers in Mr. Moore's van, what else was in that same location in the van?

A. 7-, 800 bucks in cash.

Q. Now, when you went to look, did you go to check and see if the 7-, \$800 was missing?

MS. WILKINSON: Your Honor, I don't believe she can testify about the condition of the van after the incident or robbery or whatever because she said she wasn't there, unless Mr. Tigar makes clear what time --

THE COURT: I understood the question to be did she go to look.

MS. WILKINSON: Before? I'm not sure of the timing, I guess.

THE COURT: The witness probably doesn't remember the question now.

BY MR. TIGAR:

Q. You didn't look in the van on the 5th, did you?

A. Wasn't there.

Q. Right. You didn't -- you looked at the van after you got back; right?

A. Yes.

Q. When you looked in it, was the 7- or \$800 there?

A. No. He took it out and put it back in the house.  
Q. You said -- well, you know that from talking to Mr. Moore;

Karen Anderson - Cross  
correct?

A. Yes.

Q. Now, you also testified that you had found this list -- correct -- which has been received in evidence as Government's 2103? Is that right?

A. Yes.

Q. Is that right?

A. Yes.

Q. And is it your testimony that you made this list up sometime, what, in 1993?

A. Probably in January of '93.

Q. And you were very careful to note down the serial numbers accurately. Is that your testimony?

A. I'm not going to say I was accurate on them, no.

Q. You were doing the best you could?

A. Yes.

Q. And look at the third item from the bottom, the Ruger Mini-30, 189-57425. Have you ever seen that gun within the last two years?

A. I've seen a lot of -- what was it, Mini-30's?

Q. Yes.

A. I don't see it on this sheet, in other words.

Q. Third one from the bottom?

A. There it is.

Q. There it is. You see it?

Karen Anderson - Cross

A. Yes.

Q. Have you seen that gun in the last two years?

A. No.

Q. Were you with Mr. Moore when he looked at a number of firearms that were in the custody of the FBI?

A. In Washington, D.C.?

Q. At any time.

A. No.

Q. Were you with Mr. Moore when he looked at a number of firearms in Hot Springs, Arkansas, on the 28th of April, 1995?

A. To the best of my knowledge, I didn't know they were ever in Hot Springs.

THE COURT: It's not clear as to whether you're asking --

MR. TIGAR: I'm sorry, your Honor. My question is inartful. Let me go back and look at it again.

THE COURT: All right.

BY MR. TIGAR:

Q. Were you with Mr. Moore in Washington, D.C., on the 4th of May, 1995?

A. No.

Q. So you don't know what conversation he had with the agents

Q. So you don't know what conversation he had with the agents at that time?

A. No.

Q. Is it your testimony that you and Mr. Moore -- or

Karen Anderson - Cross

Mr. Moore -- were the owners of a Ruger Mini-30 with the Serial No. 189-57425?

A. To the best of my knowledge, yes.

Q. Now, you told us that when the FBI asked you on the telephone about Mr. Colbern that you did not tell the truth. Is that right?

A. I said I didn't tell the truth. I did not recognize the name until I wrote the three names down.

Q. Uh-huh. You didn't recognize it until you wrote it down?

A. Yes.

Q. And how many times had you known Mr. Colbern -- how many times had you talked to Mr. Colbern? You said about eight telephone calls?

A. Seven or eight.

Q. Now, in addition to what you've talked to us about, you have also conducted an investigation in an attempt to find out more about this episode. Is that correct?

A. Yes.

Q. And you contacted a Mr. Abeyta. Is that correct?

A. Yes.

Q. And who is Mr. Abeyta?

A. Charlie Abeyta is a friend that used to be a bail bondsman up in the Wagoner/Muskogee, Oklahoma, area.

Q. And you conducted an investigation with him. Is that right?

Karen Anderson - Cross

A. Yes.

Q. Drove around looking for people?

A. Not looking for people. We went to Ft. Smith, Arkansas, and went to all of the pawn shops.

Q. Now, was it Mr. Moore's habit to carry a great deal of cash?

A. Yes.

Q. About how much cash did Mr. Moore carry with him as a usual matter?

A. 6-, 8,000.

Q. Pardon?

A. 6- to 8,000. Maybe more, maybe a little less.

Q. Ever as much as \$50,000?

A. Not as far as I know.

Q. Isn't it a fact that you displayed \$50,000 to a person in Oklahoma in connection with one of Mr. Moore's ventures?

MS. WILKINSON: Objection, your Honor, as to relevance.

THE COURT: Overruled.

THE WITNESS: Repeat it, please.

BY MR. TIGAR:

Q. Isn't it a fact that you displayed \$50,000 in cash to someone in Oklahoma in connection with one of Mr. Moore's ventures?

A. I did, yeah.

Karen Anderson - Cross

Q. You did?

A. I did.

Q. Now, was that his money?

A. Yes.

Q. So on that occasion, he was carrying a little more than 7,000 -- right, or --

A. He wasn't carrying \$7,000.

Q. Oh, you were?

A. I was.

Q. All right. Now -- so is it your habit to carry a large amount of currency?

A. Yes.

Q. Now, you said that Mr. Moore got into the gun-show business when?

A. Back in the 60's.

Q. And he also had a boat business; is that right?

A. Correct.

Q. Now, Mr. Moore and Mrs. Moore bought this farm where you're now living in what year?

A. Where we're now living in August of '92.

Q. Now, at that time, they took title and you said the deed is -- lists them as brother and sister?

A. Correct.

Q. And that's an error?

A. Yes.

Karen Anderson - Cross

Q. How long have you been living at the farm?

A. That farm?

Q. That farm.

A. I moved there right after Christmas when everybody went back to south Florida.

Q. Now, Mr. and Mrs. Moore -- how much of the year is she at the farm?

A. Close to three-quarters of the time.

Q. And how long -- how much of the time is Mr. Moore at the farm?

A. He's there basically from the first part of April until about the first or second week in December.

Q. Now, during the time that you and Mr. Moore were traveling to gun shows, was there always somebody at the house?

A. At first, no. Later on, yes.

Q. When did there start being somebody else at the house?

A. For sure all the time from when we bought the new farm and probably two years back, so I would say somewhere in 1990.

Q. But other than having someone stay at the farm, you say you did not have any security system. Correct?

A. Correct.

Q. Did you discuss -- were you a part of negotiating with the insurance company as to what kind of insurance you would carry on the farm?

A. Basically, yes.

Karen Anderson - Cross

Q. Were you the principal person responsible for negotiating with the insurance company?

A. No.

Q. Who was?

A. Both Mr. and Mrs. Moore.

Q. The house that we've seen pictures of has about 1700-some square feet. Correct?

A. I have no idea.

Q. It has no gun safes; correct?

A. No.

Q. You have no perimeter security; correct?

A. We do now.

Q. You did -- at the time, in November of 1994, you had no perimeter security; correct?

A. No.

Q. And in -- did you ever discuss with the insurance agent the idea of having a floater policy?

A. Yes.

Q. Did you decide to buy a floater policy?

A. No.

Q. Did -- so all you had was the contents coverage that went along with the homeowners' insurance; correct?

A. Yes.

Q. And what was your understanding in October of 1994 as to what the contents coverage was supposed to cover?

Karen Anderson - Cross

A. Covers your personal items. It covers certain amount of jewelry, covers some cash. It covers your appliances in there. If you had a hailstorm, it covered your hailstorm on your roof. I mean just the same thing that every U.S. citizen has.

Q. Did you go with Mr. Moore to meet with Ms. Priddy in the insurance office with respect to this matter?

A. Ms. who?

Q. Ms. Priddy, P-R-I-D-D-Y. Do you know a Ms. Priddy?

A. I know a Jan Dies.

Q. You know a Ms. Dies. Do you know a Ms. Priddy?

A. Not offhand.

Q. Did you go with Mr. Moore to talk with Ms. Dies about the insurance claim?

A. Yes.

Q. Do you remember discussing with Ms. Dies the amount of coverage that you had in relationship to the loss that you were claiming?

CLAIMING:

A. Offhand, yes.

Q. Pardon me?

A. Offhand, yes.

Q. Offhand, yes. And do you remember Ms. Dies explaining that although you had \$63,000 in contents coverage, that coverage was not going to cover the \$63,000 loss that you had presented to her?

A. Yes.

Karen Anderson - Cross

Q. Do you remember Mr. Moore becoming angry with anyone in the Farmers Insurance office there with respect to this matter?

A. We were both upset with Mr. Spivey.

Q. All right. Now, Mr. Spivey -- he's the one that came out to the house; correct?

A. Yes.

Q. I'm talking about the insurance office that's in town. There is an insurance office; right?

A. Yes.

Q. And that's where Ms. Dies works?

A. Yes.

Q. Do you remember Mr. Moore becoming angry at the people that worked in that insurance office over this issue?

A. No, I don't.

Q. Do you remember Mr. Moore having an angry telephone conversation within your earshot where you could hear him talking to the people in that insurance office?

A. No, I don't.

Q. Now, these guns that you've identified: Many of them are unique, aren't they?

A. Quite a few are.

Q. Yes. So that you certainly did not have any difficulty recognizing many of them when they were shown to you. Is that correct?

A. No, I did not.

Karen Anderson - Cross

Q. And when you tell us, for example, that a particular gun has a unique characteristic, those are characteristics that would stand out to people that have your level of experience in firearms. Is that fair to say?

A. Yes.

Q. Now, you said that you stored things in cigar boxes; right? Some things?

A. Yes, some things.

Q. And those were yellow and white cigar boxes?

A. There were some yellow and whites and some whites on yellows. A red --

Q. Pardon me?

A. Red colors were also on the cigar boxes.

Q. Now, in preparing for your testimony today, you have visited Denver; is that right?

-----, -- ---- -g--  
A. True.

Q. On how many -- how many times have you visited Denver?

A. Twice.

Q. And have you conferred with lawyers for the Government on other occasions than when you visited Denver?

A. Once.

Q. So that would be three times?

A. Yes.

Q. And when and where was the first meeting that you had with Government lawyers?

Karen Anderson - Cross

A. Oh -- well, it was in Oklahoma City, but I can't tell you what time it was.

Q. Was that in connection with your grand jury testimony?

A. Yes. Then I've had more meetings because there was one other time, the very first time we ever got to see the guns.

Q. So that was the first time?

A. The first time was in -- for the grand jury, then.

Q. And when was the second time you met with Government lawyers, of these three times?

A. It was on a December, and that was the first time I saw the guns.

Q. December of '95, you think?

A. Probably. I just --

Q. When is the third time of the three?

A. They came for an interview at the house.

Q. And those are the only three times you've met with Government lawyers?

A. Other than the two here at Denver.

Q. You had two more, two in Denver. All right. There were two in Denver. When was the first one in Denver?

A. September.

Q. Of what year?

A. This year.

Q. And when was the second?

A. Three weeks ago.

Karen Anderson - Cross

Q. That would be in October?

A. Whatever three weeks ago. Would be the last part of October, I guess. When the blizzard was.

Q. Okay. All right. Did you meet with Government lawyers in November of 1996?

A. I can't -- I can't give you a date on when these was. I really don't know.

Q. You've told us about five, which includes your Oklahoma City.

A. Right.

Q. So that would be -- if we leave off Oklahoma City, that would be four; correct?

A. Correct.

Q. Isn't it a fact you've had seven meetings?  
A. I have no idea.  
Q. Well, let's look.  
A. Refresh my memory.  
Q. I will. Have you met with Government lawyers in -- over the last couple of days, over the weekend?  
A. Yes.  
Q. All right. And how long a time did you meet with them over the weekend?  
A. Well, I sat and read my Quarter Horse Journal for four hours, and then I met with them for about two.  
Q. Two hours. And which Government employees did you meet

Karen Anderson - Cross  
with?

A. I guess you would say Patra Butler. I don't know what David's last name, Broomley or Brumley. And with Ms. Wilkerson (sic).  
Q. Did you meet with Government lawyers on the 14th; that is, Friday?  
A. This Friday?  
Q. Yes.  
A. Only for about 20 minutes.  
Q. All right. That's two. Did you meet with Government lawyers between the 23rd and 27th of October, 1997?  
A. If that was when I was here three weeks ago, when the blizzard was.  
Q. All right. And how many days did you stay meeting with the Government lawyers on that occasion?  
A. I only met with them for the one afternoon.  
Q. How many days were you here?  
A. Maybe four.  
Q. And did you meet with other Government employees during the four days you were here other than the Government lawyers?  
A. The same people.  
Q. FBI agents?  
A. Yes.  
Q. And then were you here in early September?  
A. Yes.

Karen Anderson - Cross

Q. For how many days?  
A. Two or three.  
Q. Would the 3rd through the 6th of September refresh your recollection?  
A. No. I'm not very good on dates.  
Q. And again, how long did you meet with Government lawyers on that occasion?  
A. I met with them approximately -- not quite a full day.  
Q. And you met with FBI agents in addition to that?  
A. Yes.  
Q. Were you here in July?



A. I don't think so.

THE COURT: Of 1997?

MR. TIGAR: 1997, yes, your Honor.

THE WITNESS: I don't believe so.

BY MR. TIGAR:

Q. Now, when you met with the Government lawyers, did they ask you the questions that they've been asking you today?

A. Not all of them, no.

Q. Most of them?

A. No.

Q. Did they show you the things that you have been shown today?

A. I've been shown the pictures, same pictures that I was shown by the FBI when I identified merchandise back in Hot

Karen Anderson - Cross  
Springs.

Q. Did they show you weapons?

A. Yes.

Q. And you looked at them?

A. Yes.

Q. Did they discuss with you what might happen on cross-examination?

A. No. They didn't know what you would come up with.

Q. Is that what they said?

A. I asked what cross would be, and they said they had no idea what they would come up with on me from you.

Q. So you were left to your own devices. Is that right?

A. Yes.

Q. Now, you say -- refresh my recollection, please: You first met Timothy McVeigh at the farm. Is that right?

A. No.

Q. No?

A. First met him at Tulsa, Oklahoma.

Q. Tulsa, at the gun show?

A. Yes.

Q. Now, you told us that Mr. Moore had called you from Florida -- is that correct -- at one point?

A. Correct.

Q. And he told you he had met somebody at a gun show. Correct?

Karen Anderson - Cross

A. True.

Q. And how many times have you heard the name "Timothy McVeigh," referred to as "Timothy McVeigh"?

A. If you count reading the papers, thousands.

Q. Uh-huh. And did -- when Mr. Moore first called you, did he tell of you someone he'd met named McVeigh?

A. Yes. He said Tim McVeigh.

Q. Didn't you tell the FBI on the 28th of April, 1995, that you had only heard the name "McVeigh" on one occasion?

A. Not that I know of. I don't remember that

A. Not sure I know of. I don't remember that.

Q. I want to show you what's the agent's report of interview, the part I've highlighted in blue, and ask you if that refreshes your recollection that you told Agents Jessie and Crutchfield on the 28th of April, 1995, that you had only heard the name McVeigh on one occasion?

A. I don't recall saying that. No, I don't.

Q. Do you remember telling the agents that the first time you ever saw McVeigh was when he came to the farm to do odd jobs?

A. No.

Q. Do you remember telling them that the first time he stopped by was in April or May, 1993?

A. Of April of '93?

Q. Yes.

A. I believe that was the first time he stopped by the farm.

Q. Do you remember saying if that was the first time you had

Karen Anderson - Cross

seen him?

A. No.

Q. Now, you mentioned that your recollection now is that the first time you saw him was at the Tulsa gun show. Correct?

A. I know the first time I saw him was at the Tulsa gun show.

Q. Now, did you ever get Mr. McVeigh's help in picking up or delivering an automobile?

A. Sure did.

Q. When was that?

A. That spring that -- when he came and followed me back to the farm.

Q. So he -- oh. He followed you back to the farm. Let's get the chronology here. You met him at the gun show; correct?

A. Yes.

Q. And then he followed you back to the farm; correct?

A. On Sunday night after the show.

Q. And how long did he stay at the farm?

A. About a week.

Q. Now, when did he help you with the -- to move the automobile?

A. Sometime in there. I don't know exactly when.

Q. And what did that involve, moving the automobile?

A. Moving the automobile from Sebastian up to -- with Carol Moore and a friend of hers. They drove it to Pensacola, Florida. We left early in the morning, drove straight through

Karen Anderson - Cross

in Mr. McVeigh's car, and picked up my Chevy van that I have and turned around and came right back to the farm.

Q. Now, during the time that Mr. McVeigh was at your house, you say he listened to a world-band radio?

A. Yes.

Q. Was there any particular -- did he hook up a special antenna for his radio?

A. Yeah, he ran one of these little like wire antennas -- it's

a clear wire -- through the window and got the ladder and just draped the wire over the roof of the house.

Q. Did you ever listen to the program that he was looking -- that he was listening to?

A. No.

Q. At this Tulsa gun show, you cleared off a card table for him; correct?

A. Yes.

Q. What was he selling?

A. He had -- to the best of my recollection, I believe there was a cot there. I know there was a couple of shirts. There was something like a pullover sweater. There was some brown military-type manuals, books, they call them. If there was something else, it's just not --

Q. Did he have copies of political books?

A. He might have had a Turner Diary or two on there. I really don't remember.

Karen Anderson - Cross

Q. Well, what is -- did you ever talk to him about The Turner Diaries?

A. No. He wanted me to read it.

Q. Did you read it?

A. I got through 36 pages of it.

Q. All right. But he urged you to read it. Is that correct?

A. Yes.

Q. Is that right?

A. Yes.

Q. Now, about -- when is the first time you can ever remember getting a letter from Mr. McVeigh?

A. The first time I remember getting one -- and I can't tell you when it was. I just know it was sometime during the summer when he informed that he had -- was in Kingman, Arizona, and that he had a drop box, this 1711 Stockton Road, and please don't send it in the name of "Tim McVeigh," please send it in the name of "Tim Tuttle." That's the first letter I ever remember receiving.

Q. That was in 1993?

A. It could very well have been.

Q. Now, from that day down to that letter that you showed us on the 10th of January, dated the 10th of January that's in evidence -- and we'll talk about in a little bit -- how many letters did Tim McVeigh send to you?

A. I could not if you stuck me with a knife in the heart give

Karen Anderson - Cross

you an exact date.

Q. That isn't in the cards.

A. Good.

Q. That is a cross-examine -- cross-examination technique they probably didn't warn you about but that you need not fear, so just give us your best recollection and then we'll go on to

something else.

A. All right. From -- let's say I got that letter in July. That's an assumption.

Q. Okay.

A. From when till when, then?

Q. Yes.

A. Do you mean till now -- till the bomb?

Q. Well, you haven't gotten any letters from him lately, have you?

A. No.

Q. All right. Well, just until the 10th of January, 1995, how many?

A. If there was five, six, maybe.

Q. And did you send him letters?

A. Yes.

Q. How many letters did you send him?

A. Probably two or three.

Q. And in these letters that he was sending you, did he discuss his political views?

Karen Anderson - Cross

A. At times, he would discuss the New World Order.

Q. Now, what did you understand the New World Order to be?

A. Basically a U.N. takeover of the Government to where instead of us having the government as our bosses, the U.N. had it; that we would have a worldwide monitor of money; that we all had the same type of money; basically that it would be divided up even amongst everybody on that principle. That's what I understood. As to give you a perbatim (sic) as to what it was, I really don't know.

Q. Now, when you heard Mr. McVeigh say these things, did you become concerned that maybe there were New World Order military vehicles that were out there in some military base?

A. Quite possible.

Q. And is that -- was it based on that concern that you went down and looked at military bases?

A. I've never went down. I've went up, but not down.

Q. Went up, not down. Excuse me. That you went to military bases?

A. Yes.

Q. Now, had Mr. McVeigh told you that he had seen Russian military vehicles at a U.S. military base?

A. Yes, he had.

Q. And you were concerned enough to go take a look; is that correct?

A. Up north.

Karen Anderson - Cross

Q. Up north. Yes.

THE COURT: Well, we're right at --

MR. TIGAR: Yes, I'm about to start with this document, your Honor, so it would be a good breaking point.

THE COURT: Well, I think we'll break right now.

THE COURT: Well, I think we'll break right now.

MR. TIGAR: Thank you, your Honor.

THE COURT: You may step down now, and we'll continue at 8:45.

And, members of the jury, we are at our usual closing time for the workday for you, so we will recess at this time until 8:45 tomorrow morning. And, of course, during this time, you will follow the cautions required of you at all times in recess of keeping open minds, avoiding discussion of the case with all other persons, including other jurors, and being very careful now about all of the things that you might read, see, and hear in any form of communication or publication, to stay away from anything that could influence you here, knowing, of course, that you must decide on the evidence and the law presented to you in this trial.

You're excused now till 8:45 tomorrow morning.

(Jury out at 5:00 p.m.)

THE COURT: And you're excused till 8:45 tomorrow morning.

Recess.

(Recess at 5:01 p.m.)

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#### PLAINTIFF'S EXHIBITS

Exhibit	Offered	Received	Refused	Reserved	Withdrawn
1738	9013	9015			

1739

1740E	9074	9074			
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#### PLAINTIFF'S EXHIBITS (continued)

Exhibit	Offered	Received	Refused	Reserved	Withdrawn
1740D	9074	9075			
1740C	9076	9076			
1740B	9077	9077			
1740A	9078	9078			
1743	9069	9069			
1746	9096	9097			
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2103

9031

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REPORTERS' CERTIFICATE

We certify that the foregoing is a correct transcript from the record of proceedings in the above-entitled matter. Dated at Denver, Colorado, this 17th day of November, 1997.

---

Paul Zuckerman

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Kara Spitler

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