

2 Next, please.  
3 MR. TIGAR: Carol Howe.  
4 THE COURT: Okay.  
5 THE COURTROOM DEPUTY: Would you raise your right  
6 hand, please.  
7 (Carol Howe affirmed.)  
8 THE COURTROOM DEPUTY: Would you have a seat, please.  
9 Would you state your full name for the record and  
10 spell your last name.  
11 THE WITNESS: Carol Elizabeth Howe, H-O-W-E.  
12 THE COURTROOM DEPUTY: Thank you.  
13 THE COURT: Proceed.  
14 DIRECT EXAMINATION  
15 BY MR. THURSCHELL:  
16 Q. Good morning, Ms. Howe.  
17 Ms. Howe, where do you live?  
18 A. In Tulsa, Oklahoma.  
19 Q. And if you could just lean forward a little bit and speak  
20 into the microphone, it would help people hear.  
21 Ms. Howe, in the fall of 1994, were you present on  
22 numerous occasions at the area known as Elohim City?  
23 A. Yes, I was.  
24 Q. And if I showed you a map of the state of Oklahoma, could  
25 you identify for the jury where it's located?

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Carol Howe - Direct

1 A. Yes, I could.  
2 MR. THURSCHELL: I'm going to show the witness and  
3 the jury what's been previously admitted as D1801.  
4 BY MR. THURSCHELL:  
5 Q. Now, can you -- let me back out.  
6 Do you recognize this map as a map of Oklahoma?  
7 A. Yes, I do.  
8 Q. Okay. And I cut it off a little bit here, but I'll extend  
9 it.  
10 And focusing in, can you see that this is Oklahoma  
11 City where I'm pointing right here?  
12 A. Yes, sir.  
13 Q. Now -- and then this would be Tulsa, which is where you  
14 live?  
15 A. Yes, sir.  
16 Q. Okay. Now, in relation to Tulsa, what we see here -- can  
17 you point on this map to where Elohim City is located? I can  
18 zoom in a little bit, if that would help.  
19 What you have to do is take the light pen that's on  
20 your front of you -- it's attached to the wire -- and touch it  
21 to the actual television screen.  
22 You have to go underneath the glass. I'm sorry.  
23 A. It's right around in this area somewhere in there.  
24 Q. I'm going to focus in on that area. It's going to change  
25 where your marks are, but tell me if I still have the right

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Carol Howe - Direct

1 area. Do you see -- do you see a town that -- where Elohim  
2 City is located and a post office address?

3 A. In Muldrow, which is right there.  
4 Q. And is Muldrow -- what is that major highway that's  
5 indicated running right next to Muldrow?  
6 A. Interstate 40.  
7 Q. And if you go east on Interstate 40, where do you get to?  
8 What's the first state you reach?  
9 A. Arkansas.  
10 Q. Okay. And if you -- what's the first major city you get to  
11 if you travel west on I-40?  
12 A. Sallisaw, Oklahoma.  
13 Q. And after that?  
14 A. Oklahoma City.  
15 Q. Oklahoma City. Okay. Thank you very much.  
16 I-40 runs directly through Oklahoma City?  
17 A. Yes, sir.  
18 Q. Now, in your -- the occasions that you were present at  
19 Elohim City, did you have a chance to overhear conversations  
20 among individuals who identified themselves with Elohim City?  
21 A. Yes, sir.  
22 Q. Okay. And did you get a chance to observe their  
23 activities?  
24 A. Yes, I did.  
25 Q. Did you get a chance to overhear any of the individuals who

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Carol Howe - Direct

1 identified themselves talking about their political views?  
2 A. Yes, I did.  
3 Q. Can you tell the jury what the political views -- if there  
4 was a general sentiment there towards the federal government?  
5 Can you describe that for the jury?  
6 A. Yes. There was a very antigovernment sentiment out at  
7 Elohim City that the federal government was an evil entity,  
8 talking about destroying the government. Very antigovernment.  
9 Q. You say talk about destroying the government. Did you ever  
10 hear any individuals who identified themselves at Elohim City  
11 advocate the direct use of violence against the government?  
12 A. Yes, I did.  
13 Q. By force of arms?  
14 A. Yes, sir.  
15 Q. Do you know who Robert Millar is?  
16 A. Yes, I do.  
17 Q. Who is he?  
18 A. He's the patriarch at Elohim City, the leader at the  
19 compound.  
20 Q. Did you ever hear him advocate the use of direct violent  
21 action against the federal government?  
22 A. Yes, I did.  
23 Q. And if you can, was -- did he -- was he a religious leader?  
24 A. Yes, he was.  
25 Q. And were at least one of those occasions where you heard

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Carol Howe - Direct

1 him advocate that during a sermon?  
2 A. Yes, sir.  
3 Q. And where numerous members of the community were present?

4 A. Yes.  
5 Q. Did you hear talk about violence against the federal  
6 government and advocacy of violence against the federal  
7 government from others who lived at Elohim City?  
8 A. Yes.  
9 Q. Do you know who Andreas Strassmeier is?  
10 A. Yes, I do.  
11 Q. What was his position or role at Elohim City, if you know?  
12 A. He was a head of security in charge of security checks and  
13 weapons training, that sort of thing.  
14 Q. Now, you say "weapons training." Were there weapons at  
15 Oklahoma -- at Elohim City, if you know?  
16 A. Yes.  
17 Q. Were there -- can you -- are you familiar -- did you come  
18 to be familiar with certain weapons that were legal and certain  
19 weapons that were not legal?  
20 A. Yes, sir.  
21 Q. Were the weapons at Elohim City legal, or illegal?  
22 MS. WILKINSON: Objection, your Honor.  
23 THE COURT: Sustained.  
24 BY MR. THURSCHELL:  
25 Q. Was it -- was it common for individuals to carry arms and

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Carol Howe - Direct

1 use them at Elohim City?  
2 A. Yes, sir.  
3 Q. Would it -- could you characterize the number or extent of  
4 the armament there during the period that you're familiar with?  
5 A. Very extensive armaments.  
6 Q. Mr. Strassmeier: Did you ever hear him advocate direct  
7 violent action against the federal government?  
8 MS. WILKINSON: Objection.  
9 THE COURT: Overruled.  
10 THE WITNESS: Yes, sir.  
11 BY MR. THURSCHELL:  
12 Q. And you heard that from others as well?  
13 A. Yes.  
14 Q. Are you familiar with an individual by the name of Dennis  
15 Mahon?  
16 A. Yes, I am.  
17 Q. And was Dennis -- did Dennis Mahon spend considerable time  
18 at Elohim City during the period that you are familiar with?  
19 A. Yes, he did.  
20 Q. Did he at any point live there?  
21 A. He had a trailer out there that he would go and stay in  
22 while he was out there, but he did not take up permanent  
23 residence there.  
24 Q. Was he affiliated with another political group that you  
25 know of?

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Carol Howe - Direct

1 A. Yes.  
2 Q. Would that be the group with the initials WAR?  
3 A. Yes.  
4 Q. And what does that -- what do those initials stand for?

5 A. White Aryan Resistance.  
6 Q. Was Mr. Mahon an individual who -- did you ever hear him  
7 advocate direct violent action against the federal government?  
8 A. Yes, sir.  
9 Q. Now, are you familiar with what Timothy McVeigh looks like,  
10 Ms. Howe?  
11 A. Yes, sir.  
12 Q. Have you seen photographs of Timothy McVeigh?  
13 A. Yes, I have.  
14 Q. Did you ever see Timothy McVeigh at the Elohim City  
15 compound?  
16 A. I believe I did.  
17 Q. All right. When did you see him?  
18 A. It was in July of 1994.  
19 Q. Okay. And where did you see him?  
20 A. He was at a section of the compound walking across a lawn  
21 near the church building.  
22 Q. And was he accompanied by any other individuals who you  
23 know?  
24 A. Yes, he was.  
25 Q. And who were they?

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Carol Howe - Direct

1 A. A man named Peter Ward and a man named Andreas Strassmeier.  
2 Q. About how far away were you when you believe you saw  
3 Timothy McVeigh?  
4 A. Approximately 70 feet.  
5 Q. At the time that you saw him, did you know his name was  
6 Timothy McVeigh?  
7 A. No, sir.  
8 Q. You subsequently came to learn his name was Timothy  
9 McVeigh?  
10 A. Correct.  
11 Q. Now, did you have occasion to -- did Mr. Mahon -- strike  
12 that.  
13 Did Mr. Mahon have an apartment in Tulsa, Oklahoma,  
14 during this time period?  
15 A. A house, yes.  
16 Q. A house. And did you have occasion to spend time there  
17 during the time period we're talking about, fall, 1994?  
18 A. Yes, sir.  
19 Q. Did Mr. Mahon in your recollection -- did he ever receive  
20 any phone calls while you were in the house with him?  
21 A. Yes, sir.  
22 Q. Do you recall Mr. Mahon ever saying or mentioning the name  
23 "Tim Tuttle"?  
24 MS. WILKINSON: Objection.  
25 THE COURT: Overruled.

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Carol Howe - Direct

1 THE WITNESS: Yes, I do.  
2 BY MR. THURSCHWELL:  
3 Q. Okay. Could you tell the jury not any contents of the  
4 phone call that he related to you but how you came to hear his  
5 name; that is, Tim Tuttle's name?

6 A. Mr. Mahon received a phone call. We were sitting in the  
7 living room. He went into the bedroom to answer the phone, and  
8 I heard his statements from where I was sitting.  
9 Q. And what did you hear him say?  
10 A. I heard him say, "Tim Tuttle, Tuttle, Tuttle, Tuttle,  
11 Tuttle," and laughed.  
12 Q. And you subsequently had a conversation about that phone  
13 call that he had received?  
14 A. Yes. When he came back --  
15 MR. THURSCHWELL: No, just so we know.  
16 Nothing further, your Honor.  
17 THE COURT: All right. Ms. Wilkinson.  
18 CROSS-EXAMINATION  
19 BY MS. WILKINSON:  
20 Q. Good morning, Ms. Howe.  
21 A. Good morning.  
22 Q. We've not met, have we?  
23 A. No, ma'am.  
24 Q. When you were at the compound or the village -- how do you  
25 refer to Elohim City?

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Carol Howe - Cross

1 A. As a compound.  
2 Q. When you were at the compound, did you know Joan Millar?  
3 A. Pardon?  
4 Q. Did you know Joan Millar?  
5 A. Yes, sir (sic).  
6 Q. And she knew most of the people there?  
7 A. Yes, ma'am.  
8 Q. She knew everybody there?  
9 A. Yes, ma'am.  
10 Q. And she attended some of these same sermons that you've  
11 described for the jury?  
12 A. Yes, she did.  
13 Q. And as far as you know, she's an honest person?  
14 A. Yes, ma'am.  
15 Q. And she would be more knowledgeable than you, wouldn't she,  
16 about what occurred at Elohim City?  
17 A. I would think so.  
18 Q. She was there every day; correct?  
19 A. More often than me, yes.  
20 Q. You were not.  
21 A. Right.  
22 Q. And so if we wanted to know about Elohim City and what  
23 occurred there, she would be a good source; correct?  
24 A. I would think so.  
25 MR. THURSCHWELL: Objection, your Honor. Opinion.

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Carol Howe - Cross

1 THE COURT: Sustained.  
2 BY MS. WILKINSON:  
3 Q. Ms. Howe, you look a little different today than you did  
4 when you were back at Elohim City, don't you?  
5 A. Yes, ma'am.  
6 Q. Changed your hair color?

7 A. Yes, ma'am.  
8 Q. And you had a tattoo, didn't you, at that time?  
9 A. Yes, I did.  
10 Q. What kind of tattoo did you have?  
11 A. Swastika on my shoulder.  
12 Q. You were a believer at certain times in your life in  
13 white -- white supremacy, weren't you?  
14 A. At one period, yes.  
15 Q. Well, you were a believer back in March of 1994; correct?  
16 A. Yes, ma'am.  
17 Q. You had an incident, you claim, with several  
18 African-Americans; correct?  
19 A. Three. Yes, ma'am.  
20 Q. And right after that time, you got yourself in touch with a  
21 number called a "racist hot line," didn't you?  
22 A. Yes, I did.  
23 Q. And that's what you did after you thought that you had some  
24 encounter with some African-American men?  
25 A. When I did, yes.

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Carol Howe - Cross

1 Q. And you decided that the correct response was to call a hot  
2 line; correct?  
3 A. I was angry at the time, and so I did call.  
4 Q. And in response, you called a number where you heard a  
5 racist message; correct?  
6 A. Yes, ma'am.  
7 Q. And you didn't just hear it, you wrote to the address that  
8 they gave you on that message; correct?  
9 A. Later, I did, yes.  
10 Q. You wanted to meet people that had similar views?  
11 A. Yes, ma'am.  
12 Q. And you did that, didn't you?  
13 A. Yes, I did.  
14 Q. That's how you met Dennis Mahon?  
15 A. Yes.  
16 Q. And you began to socialize with him?  
17 A. Yes, I did.  
18 Q. And you had some kind of falling out; correct?  
19 A. Yes.  
20 Q. And after that, you visited Elohim City?  
21 A. Prior to that and then after that.  
22 Q. So you went to Elohim City when you were still in touch  
23 with Mr. Mahon and on good terms; correct?  
24 A. Yes, ma'am.  
25 Q. And you went there willingly?

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Carol Howe - Cross

1 A. Yes, I did.  
2 Q. With him?  
3 A. Yes.  
4 Q. And you knew what the beliefs were at Elohim City?  
5 A. Not until I went there.  
6 Q. But you knew what Mr. Mahon's beliefs were?  
7 A. Yes, I did.

8 Q. He was a white supremacist; correct?  
9 A. Correct.  
10 Q. And you agreed with him at that time?  
11 A. That's correct.  
12 Q. And after you heard these conversations in April of 1995,  
13 you heard about the bombing on April 19; correct?  
14 A. Correct.  
15 Q. And you saw pictures of Mr. McVeigh?  
16 A. Yes, I did.  
17 Q. And in fact, you reported that you had information, didn't  
18 you?  
19 A. Yes.  
20 Q. And when you reported that information, you said you might  
21 know who John Doe No. 1 was?  
22 A. I was asked to identify some composites, yes.  
23 Q. And you gave some information, didn't you?  
24 A. Yes, I did.  
25 Q. And you said you thought you knew who John Doe No. 1 was?

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Carol Howe - Cross

1 A. Yes.  
2 Q. And you said you thought you knew who John Doe No. 2 was?  
3 A. Correct.  
4 Q. And you said they were the Ward brothers that were were at  
5 Elohim City; correct?  
6 A. Correct.  
7 Q. And in fact when you made those statements, you compared  
8 them to Timothy McVeigh and said they didn't look like Timothy  
9 McVeigh, didn't you?  
10 A. Correct.  
11 Q. And at that time, you never mentioned that you had seen  
12 Timothy McVeigh at Elohim City, did you?  
13 A. Not on that date.  
14 Q. No, you didn't. Even though you were asked about John Doe  
15 No. 1 and John Doe No. 2 and the photographs of Timothy  
16 McVeigh; correct?  
17 A. Correct. Later on, I did talk about Tim McVeigh.  
18 Q. You didn't do that right after the bombing when your memory  
19 would have been freshest, did you?  
20 A. Not on April 21.  
21 THE COURT: Let's let her finish the answers. Go a  
22 little slower, here.  
23 BY MS. WILKINSON:  
24 Q. If you could just respond to my questions, Mrs. Howe.  
25 You did not report that information on April 21, just

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Carol Howe - Cross

1 two days after the bombing, did you?  
2 A. No, ma'am.  
3 Q. And that's when your memory would have been freshest,  
4 wouldn't it have been?  
5 A. Yes.  
6 Q. And after that, you agreed with law enforcement to go into  
7 Elohim City and do some investigation, didn't you?  
8 A. Yes, I did.

9 Q. You cooperated with law enforcement at that time?  
10 A. Yes.  
11 Q. And you went back to Elohim City?  
12 A. Yes, I did.  
13 Q. And you tried to look for the Ward brothers?  
14 A. Yes.  
15 Q. And after that, you were debriefed by the agents, weren't  
16 you?  
17 A. Yes, I was.  
18 Q. And at that time, you never reported that you had seen  
19 Timothy McVeigh at Elohim City, did you?  
20 A. It would have been at that time, yes, that I did.  
21 Q. You did?  
22 A. Yes.  
23 Q. When was that?  
24 A. It was approximately April 25 or 24. I was at the Tulsa  
25 ATF office. At the time that I was at that office, I was shown

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Carol Howe - Cross

1 videotape. One videotape included Timothy McVeigh. I looked  
2 at the videotape and I told them that he looked familiar; that  
3 I had seen him at a rally.  
4 Q. You said you had seen him at a Klan rally. You didn't say  
5 that you had seen him at Elohim City?  
6 A. They're all white separatists.  
7 Q. But they're different locations, aren't they?  
8 A. They hold rallies at Elohim City.  
9 Q. But you said you had seen him at a Klan rally -- correct --  
10 not at a rally at Elohim City? You said you had seen him at a  
11 Klan rally?  
12 A. At a Klan rally.  
13 Q. So your memory has improved since then, hasn't it?  
14 A. Not particularly.  
15 Q. Well, you now know more details, don't you?  
16 A. No.  
17 Q. Well, you never mentioned a conversation about Tim Tuttle  
18 at that time, did you?  
19 A. No. I didn't know the significance.  
20 Q. In fact, you were very concerned about the bombing in  
21 Oklahoma City, weren't you?  
22 A. Yes, I was.  
23 Q. And you were trying to help out?  
24 A. That's right.  
25 Q. Trying to cooperate?

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Carol Howe - Cross

1 A. Correct.  
2 Q. And you've said you were very concerned and assisting the  
3 Government in any way you could?  
4 A. That's correct.  
5 Q. And you never provided that information as to Tim Tuttle to  
6 the United States Government, did you?  
7 A. Not at that time, I didn't.  
8 Q. You didn't provide it for many months, did you?  
9 A. No.

10 Q. In fact, you've never provided it to the U.S. Government,  
11 have you?  
12 A. No. Through testimony, I have.  
13 Q. But never provided it to the agents that you were --  
14 THE COURT: Well, are you speaking specifically about  
15 what she's just said with respect to Dennis Mahon?  
16 MS. WILKINSON: No -- yes, about him hearing "Timothy  
17 Tuttle."  
18 THE COURT: I think we should be very specific when  
19 you're asking her questions like this as to what you are  
20 asking.  
21 MS. WILKINSON: I'm sorry, your Honor.  
22 BY MS. WILKINSON:  
23 Q. You've never provided the United States Government with the  
24 information you testified to today concerning hearing Mr. Mahon  
25 say the name "Tim Tuttle."

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Carol Howe - Cross

1 A. No.  
2 Q. You were asked, were you not, when you were cooperating  
3 with the Government right after the bombing, Ms. Howe, about  
4 what you knew about Mr. Mahon, weren't you?  
5 A. Yes, I was.  
6 Q. And you provided that information?  
7 A. Yes, I did.  
8 Q. You provided that he had been at the compound?  
9 A. Yes, ma'am.  
10 Q. And that he shared some of the views of the people out at  
11 Elohim City?  
12 A. Yes.  
13 Q. And you never mentioned at that time that he had talked  
14 about some man named "Tim Tuttle"?  
15 A. No.  
16 Q. Correct?  
17 A. He talked about a lot of people. I didn't know the name  
18 was significant at the time.  
19 Q. You were also asked about Mr. Strassmeier, weren't you,  
20 after the bombing?  
21 A. Yes.  
22 Q. And you told the Government what you knew about  
23 Mr. Strassmeier?  
24 A. Correct.  
25 Q. And you never mentioned to the Government at that time that

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Carol Howe - Cross

1 you had seen Andreas Strassmeier and Tim McVeigh together at  
2 Elohim City; correct?  
3 A. I didn't know Tim McVeigh at that point.  
4 Q. On April 21, you didn't know who Tim McVeigh was?  
5 A. No. I was met early Friday morning before apparently that  
6 I had seen all the video and the TV.  
7 Q. How about when you were interviewed on April 25?  
8 A. At that time, I had seen video of him.  
9 Q. Everyone in America had seen Timothy McVeigh's picture,  
10 hadn't they?

11 A. I think so.  
12 Q. And you didn't mention when you talked about Andreas  
13 Strassmeier on that day that you had seen him with Timothy  
14 McVeigh at the compound in Elohim City, did you?  
15 A. No.  
16 Q. And you were debriefed again in May, weren't you, after  
17 you --  
18 A. Yes.  
19 Q. -- cooperated? And you never mentioned that you had seen  
20 Andreas Strassmeier and Timothy McVeigh on the compound in  
21 Elohim City in May of 1994, did you?  
22 A. Not then, no.  
23 Q. You knew they were very interested in information about  
24 Timothy McVeigh, didn't you?  
25 A. Yes.

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Carol Howe - Cross

1 Q. You knew he was under arrest?  
2 A. Yes.  
3 Q. You knew he was one of the main suspects in the bombing?  
4 A. Yes.  
5 Q. And you knew that they were questioning you about Andreas  
6 Strassmeier?  
7 A. At that time, no. On the first --  
8 Q. You didn't provide any information on Andreas Strassmeier  
9 after the bombing.  
10 A. Yes, I did, but not at the time that I thought you were  
11 asking about, the 1st through the 3rd of May.  
12 Q. You knew that the Government was trying to investigate  
13 whether there was any connection between Elohim City and  
14 Timothy McVeigh; correct?  
15 A. I'm sorry. Could you repeat that?  
16 Q. You knew that the Government was trying to investigate in  
17 May of 1995 whether there was any connection between Timothy  
18 McVeigh and Elohim City.  
19 A. I didn't know -- yeah, I think so.  
20 Q. That's why you went to the compound, didn't you?  
21 A. Yes.  
22 Q. That was your whole purpose in cooperating?  
23 A. Right.  
24 Q. And you knew that; and even knowing that, you never told  
25 them that you saw Andreas Strassmeier and Timothy McVeigh

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Carol Howe - Cross

1 together in Elohim City in 1994, when you had those  
2 conversations with agents in May of 1995?  
3 MR. THURSCHELL: Objection, your Honor. Asked and  
4 answered several times.  
5 THE COURT: Yes. We've been over this with her.  
6 MS. WILKINSON: No further questions.  
7 THE COURT: All right. Any redirect?  
8 MR. THURSCHELL: Yes. Briefly, your Honor.  
9 REDIRECT EXAMINATION  
10 BY MR. THURSCHELL:  
11 Q. Ms. Howe, you were asked by the prosecution about a visit

12 to Elohim City you undertook at the request of the Government  
13 after the bombing. Is that right?  
14 A. Correct.  
15 Q. Did you on that visit get -- speak to people at the  
16 compound about the bombing?  
17 A. Yes, I did.  
18 Q. What was the general sentiment at the compound about the  
19 bombing?  
20 A. They were supportive of the bombing.  
21 Q. All right. Now, at the time -- you also said, I believe,  
22 in response to a question that you were not aware -- you were  
23 not aware of the significance of the name "Tim Tuttle" at the  
24 time that Ms. Wilkinson was asking you about. Is that correct?  
25 A. Yes.

13752

Carol Howe - Redirect

1 Q. All right. And do you recall when you first became aware  
2 that Tim Tuttle had anything to do -- the name "Tim Tuttle" had  
3 anything to do with the Oklahoma City bombing case?  
4 A. It was approximately the first of this year, and somebody  
5 mentioned the name to me; and I didn't understand in what  
6 context. They only said, "Have you ever heard the name 'Tim  
7 Tuttle'?" And at that point, I remembered that I did because  
8 of the incident that had occurred; and then I -- I didn't know  
9 the significance of the name, but I -- I did realize that it  
10 was significant.  
11 Q. Were you at that point in time -- were you providing  
12 information to the ATF? Were you still -- were you under some  
13 kind of government contract or --  
14 A. Yes, I was.  
15 Q. All right. Now, have you testified under oath before about  
16 the -- your overhearing the name Tim Tuttle and seeing Timothy  
17 McVeigh at the compound?  
18 A. Yes, I have.  
19 Q. Prior to this?  
20 A. Yes.  
21 Q. Prior to this date?  
22 A. Yes, I have.  
23 Q. And that was fairly recently?  
24 A. Yes, it was.  
25 MR. THURSCHWELL: Nothing further, your Honor.

13753

1 MS. WILKINSON: May I have a moment, your Honor?  
2 THE COURT: Yes.  
3 MS. WILKINSON: We have no further questions.  
4 THE COURT: The witness now excused?  
5 MR. THURSCHWELL: The witness is excused, your Honor.  
6 THE COURT: You may step down. You are excused.