

1                                    IN THE UNITED STATES DISTRICT COURT  
 2                                    FOR THE DISTRICT OF COLORADO  
 3                                    Criminal Action No. 96-CR-68  
 4                                    UNITED STATES OF AMERICA,  
 5                                    Plaintiff,  
 6                                    vs.  
 7                                    TERRY LYNN NICHOLS,  
 8                                    Defendant.

ff

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 10                                    REPORTER'S TRANSCRIPT  
                                   (Trial to Jury: Volume 78)

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12                                    Proceedings before the HONORABLE RICHARD P.  
 MATSCH,  
 13                                    Judge, United States District Court for the District of  
 14                                    Colorado, commencing at 1:33 p.m., on the 17th day of  
 November,  
 15                                    1997, in Courtroom C-204, United States Courthouse,  
 Denver,  
 16                                    Colorado.

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Transcription  
Street,  
629-9285

Proceeding Recorded by Mechanical Stenography,  
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APPEARANCES

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Denver, Colorado, 80203, appearing for Defendant

\* \* \* \* \*

PROCEEDINGS

(Reconvened at 1:33 p.m.)

THE COURT: Be seated, please.

13 Mr. Tigar.

14 (At the bench:)

15 (Bench Conference 78B1 is not herein transcribed by  
court

16 order. It is transcribed as a separate sealed  
transcript.)

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8975

1 (In open court:)

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

3 THE COURT: We apologize for the few minutes'  
delay.

4 Sometimes I take up a matter with the lawyers in the  
case

5 outside of your presence to discuss a matter that  
shouldn't be

6 heard by you, and we did that. That's why we delayed a  
few

We 7 minutes before having you come back into the courtroom.

8 didn't forget about you.

9 Please resume the stand under your oath.

10 (Karen Anderson was recalled to the stand.)

11 THE COURT: Miss Wilkinson.

12 MS. WILKINSON: Thank you, your Honor.

13 DIRECT EXAMINATION CONTINUED

14 BY MS. WILKINSON:

were 15 Q. Miss Anderson, before we left this morning, you

property 16 telling the jury that you had reviewed some of the

your 17 seized from Mr. Nichols' house and you recognized it as

18 own; is that right?

19 A. Yes.

was 20 Q. And did you specifically view some ammunition that

21 seized from his house?

22 A. Yes.

step down 23 MS. WILKINSON: Your Honor, may the witness

24 to identify some exhibits?

25 THE COURT: All right.

1 BY MS. WILKINSON:

2 Q. Miss Anderson, if you could step down.

3 If you can stand over here so you can face the  
jury.

4 And can you keep your voice up, or would you prefer to  
have a

5 microphone?

6 A. No, I can keep it up.

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

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

9 us.

10 MR. TIGAR: Your Honor, if this is the same  
ammunition

11 that was shown to a witness at the witness stand, we  
don't see

12 the need for the demonstration.

13 THE COURT: Well, she's being asked to  
identify

14 particular exhibits, as I understand the approach.

15 MS. WILKINSON: That's right, your Honor.  
There's a

16 specific piece of ammunition that she actually took a  
look at

17 and pulled apart.

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

19 microphone.

20 If you want to move, Mr. Tigar, to observe

this

21 better, you of course may.

22 MR. TIGAR: Thank you, your Honor.

23 THE COURT: Your choice.

24 BY MS. WILKINSON:

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

8977

Karen Anderson - Direct

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

2 this box?

3 A. Yes.

4 Q. Let me show you, if you could turn and face the  
jury,

5 Government's Exhibit 1863.

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

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

8 A. That's the stamp from my little stamp kit that I  
had when I

9 was a kid.

10 Q. Did you have bags just like this stamped LC .308  
with

11 armor-piecing rounds in it before November 8, 1994?

12 A. Yes.

13 Q. Now, did you look at these other rounds that were  
in

14 Government's Exhibit 1863?

15 A. Yes.

16 Q. Including 1863D? Is that another --

17 A. Yes.

18 Q. -- one of your stamped bags?

19 A. Right.

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

22 A. Yes.

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

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

8978

Karen Anderson - Direct

1 Mr. Woody Stromen in Wisconsin.

2 Q. Did you pull this bullet apart?

3 A. Yes, I did.

4 Q. Why don't you take that with you to the witness  
stand, and

5 you can tell the jury about what you did.

6 A. Basically I just --

7 THE COURT: To the witness stand, she said.

8 BY MS. WILKINSON:

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

10 A. Basically I just took and I pressed it against a  
hard piece

11 of metal and with a pair of pliers and wiggled it back  
and

12 forth and pulled it apart. All of Mr. Stroman's tracer  
is --

13 basically it is like a -- sort of like a cake mix, and  
he puts

14 that in there. All military tracer has a copper  
backing and is

15 just a small hole in the back side of it. The other  
people

16 that are making it, commercial-type tracers, also were  
doing it

17 with a pellet form, which is a hole in the back side of  
it

18 about the large size of a pencil lead. This is from  
Stromen's

19 tracer. It's also copyrighted.

20 Q. Miss Anderson, let's go back to October of 1994.  
Did you

21 purchase some ammunition in or around October of 1994?

22 A. Yes, we did.

23 Q. From whom did you purchase it?

24 A. Mr. Stromen.

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



Karen Anderson – Direct

1 A. Yes.

2 Q. Where does he live?

3 A. He lives in Monroe, Wisconsin.

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

5 A. I purchased approximately 500 rounds of .30-06  
tracer that

6 was not marked. In other words, it didn't have the  
color code

7 on the end of the bullet to tell you what it was.  
There was a

8 hundred rounds each of .38 and .357 tracer. There was  
a

9 thousand rounds of 9-millimeter tracer bullets only,  
not the

10 loaded cartridge. There was 500 rounds of .45 tracer  
bullets,

11 not loaded cartridges. In the second box was 10,000  
rounds of

12 large-rifle primers and 10,000 rounds of small-rifle  
primers.

13 Q. How were these items shipped to you?

14 A. UPS.

15 Q. When did you receive them, approximately?

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

17 October.

18 Q. And how many boxes arrived?

19 A. Two. Two large boxes.

20 Q. Where did you store those boxes?

21 A. Unfortunately, right at the back door.

22 Q. Back door of the house?

23 A. Yes.

24 Q. In Arkansas?

25 A. Yes.

8980

Karen Anderson – Direct

1994? 1 Q. And were they there when you left on November 4,

2 A. Yes.

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

4 A. Yes. In other words, to tell what type an exotic  
ammo,

5 they have a color code on the tip of the copper bullet.  
That

6 way you know whether they're tracers, incendiaries or  
APIs.

7 Q. What is the color marking for tracer ammunition?

8 A. It can be either red or orange, depending on what  
type of

9 tracer it is.

10 Q. Does Mr. Stromen normally mark the tips of the  
ammunition

11 before he sells it?

12 A. He does. He usually marks all of his calibers,  
except I

not to 13 have asked on my large calibers, .30-06, .302, .223,

that I use, 14 color it because his paint chips off. I have a ink

15 myself, that I like a lot better.

was 16 Q. So when you had this ammunition in your house, it

17 unmarked; it didn't have a red tip; correct?

18 A. That's correct.

19 Q. How do you mark it?

used to 20 A. I take -- and it's regular colored ink that they

stamp 21 use in the old grocery stores that is a grocery-store

rubber 22 ink; and I put it on a ink pad like what you use for

23 stamps but it's foam, and I dip my bullets in that.

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

25 ammunition you had received in the fall of 1994?

8981

Karen Anderson - Direct

1 A. Yes.

November 5, 2 Q. When you returned home from over the weekend of

3 1994, was your ammunition in your house?

4 A. No.

5 Q. Did you ever see it again?

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

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

8 A. Yes.

9 Q. Now, tell us a little bit about the formula or the  
recipe

10 for those bullets that you've pulled apart and are able  
to

11 identify as the ammunition that you purchased.

12 A. This is military formula and -- that he's  
copyrighted it.

13 I mean I can't tell you exactly every item that's used  
to mix

14 it up, but it is a patented formula on this that he  
has.

15 Q. And what's different about his formula and the  
other tracer

16 rounds that you're familiar with?

17 A. The others are like a pellet, and it's about the  
size of a

18 large lead pencil. That is what we call a commercial  
tracer

19 that the guys take and put in there, and then you have  
a

20 regular military tracer that you'll notice it right off  
the bat

21 because it has what they call a copper flashing on the  
back

22 side of the bullet with a little, tiny puncture hole in  
so that

23 when it goes off, that flash from the powder will  
ignite

igniter 24 through and melt that copper and also set the tracer  
25 off and make it work.

8982

Karen Anderson - Direct

1 Q. Before coming to court today, were you asked to  
look at all 2 the tracer rounds that you identified and determine  
whether 3 they were rounds that were consistent with Mr.  
Stromen's 4 formula that you had purchased in October of 1994?

5 A. Yes, I was.

6 Q. And did you make up an exhibit like the one in  
front of you 7 for each set of ammunition that you found in the ammo  
cans?

8 A. Yes, I did.

9 Q. And what was your conclusion as to where those --  
or who 10 manufactured those -- that ammunition?

11 A. Mr. Stromen's ammunition.

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

13 Can you look in Government's Exhibit 1860,

14 Ms. Anderson.

15 A. Yes.

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

17 A. Yes.

18 Q. How is that marked?

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

20 Q. And did you do the same thing that you described  
for the

21 jury, pull the bullet apart to make that examination?

22 A. Yes, I did.

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

24 bag?

25 A. 1860A.

8983

Karen Anderson - Direct

1 Q. 1860A, and was that ammunition that was  
manufactured by

2 Mr. Stromen for you?

3 A. Yes, it was.

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

5 A. Yes.

6 Q. Do you recognize it?

7 A. Yes.

8 Q. How do you recognize it?

9 A. Mr. Stromen I know for a fact had made a large  
purchase

10 from IMI because he had told me.

11 MR. TIGAR: Excuse me, your Honor.

12 THE COURT: Just a moment.

13 Because he told you?

14 THE WITNESS: Yes.

15 THE COURT: Stricken.

16 BY MS. WILKINSON:

17 Q. Can you just tell us how you personally recognize  
that

18 ammunition. Did you do the test that you described on  
one of

19 the bullets that came from that ammo can?

20 A. Yes.

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

22 A. Yes.

23 Q. What did you notice?

24 A. It's been put on with a felt marker. You can take  
your

25 finger and put it off.

8984

Karen Anderson – Direct

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

2 THE COURT: Sustained.

3 Please just answer questions that you know  
from your

4 own observation.

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

6 questions. I apologize.

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

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

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

11 MS. WILKINSON: There was the one marked  
1860A, which

12 was the one bullet that she pulled apart. Now I'm  
asking her

13 to look at all the other that's contained in 1860.

14 THE COURT: All right.

15 BY MS. WILKINSON:

16 Q. Miss Anderson, when you looked at the bullet in  
your hand,

17 what did you notice about the tip, yourself?

18 A. I noticed that the tip is definitely not Mr.  
Stromen's --

19 that he puts on there, and it is not my tip that I put  
on

20 there.

21 MR. TIGAR: Excuse me, your Honor. Could we  
have some

22 foundation on this? I'm sorry. Your Honor, I object,  
lack of

23 foundation.



a few 24 MS. WILKINSON: I think I can clear it up with  
25 more questions, your Honor.

8985

Karen Anderson – Direct

is 1 THE COURT: All right. The answer just given  
2 stricken.

3 BY MS. WILKINSON:

it a 4 Q. Miss Anderson, I'm asking you about the color. Was  
5 red color?

6 A. Yes.

your 7 Q. Was it the way you put your red color on the tip of  
8 bullets?

9 A. No.

next ammo 10 Q. You can put that down. Now, can you look at the

sticker that's 11 can and read off the tag, the Government exhibit

sticker 12 up on top of the green ammo can. Can you read the

13 number, Miss Anderson?

14 A. 1862.

15 Q. And can you look inside 1862.

16 A. Yes.

17 Q. Is there an 1862A there?

18 A. Yes.

19 Q. Did you take 1862A from 1862?

20 A. Yes.

21 Q. What did you do to it?

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

23 the others had.

24 Q. What do you mean by that?

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

8986

Karen Anderson - Direct

1 Q. You recognize the formula --

2 A. Yes.

3 Q. -- and the -- Now, you told us that there's a  
difference

4 between military tracer rounds and Mr. Stromen's tracer  
rounds.

5 Is there anything else about the shape of the bullet,  
other

6 than the copper flashing, that's different from the  
military

7 tracer bullet?

8 A. Well, this bullet -- I'm sorry to say, but the  
bullet has

9 probably went down in here somewhere -- The bullet that  
they

10 have is -- doesn't have the copper flashing on the  
back. You

11 see the formula right flat against the back side of the  
bullet.

12 Q. All right. And is there a boattailing that you see  
on a

13 military tracer round?

14 A. Yes. Yes. The -- Mr. Stromen's does not have a  
boattail.

15 It's what we call a straight back. All military has a  
boattail

16 on it.

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

18 Did you see any boattailing?

19 A. No.

20 Q. And no copper flashing?

21 A. No.

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

23 A. The same tips that are -- that's not my -- in other  
words,

24 they are not painted by me.

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

8987

Karen Anderson - Direct

1 October of 1994 you had not painted before it was  
stolen; is

2 that right?

3 A. I had not painted the large caliber.

4 Q. Can you look at the cardboard box that's right in  
front of  
Anderson,

5 you. First read the Government sticker number, Miss

6 that's on top. Miss Anderson --

7 A. 1865.

8 Q. Okay. Could you look inside of 1865. Do you  
recognize

9 those bullets?

10 A. Yes.

11 Q. You have 1865A in your hand?

12 A. Yes, I do.

13 Q. What is that?

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

15 in it.

16 Q. Did you pull it apart and examine it?

17 A. Yes.

18 Q. What did you find?

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

20 Q. You didn't see any copper flashing?

21 A. No.

22 Q. And no boattailing?

23 A. No.

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

25 exhibit?

8988

Karen Anderson – Direct

1 A. Yes.

2 Q. What did you notice?

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

4 Q. What do you mean?

5 A. It has the regular Mr. Stroman, it's a straight  
bullet, it

6 has no copper flashing, and it also has his formula  
which

7 covers right to the back side of the bullet.

8 Q. Excuse me.

9 Now, back in October of 1994, do you -- did  
you and

10 Mr. Moore keep firearms in your house?

11 A. Yes.

12 Q. Were you familiar with those firearms?

13 A. Very.

14 Q. How were you familiar with them?

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

16 Q. Was that primarily your responsibility, to clean  
them?

17 A. I sort of took it on hand.

18 Q. Based on that, did you become familiar with the

guns in

19 Mr. Moore's collection as well as your guns?

20 A. Yes.

21 Q. Can you tell us what type of guns you had in your  
house

22 prior to November 5, 1994?

23 A. We had a lot of collector's guns, we had .22's, we  
had

24 .45's, we had Mini-14's in both 10 -- we had -- in  
Ruger, we

25 had both Mini-14's and 10/22's. We had a Mini-30,  
which is

8989

Karen Anderson - Direct

AK, 1 also by Ruger, AR-15's. We had an SKS. There was an

2 shotguns, Browning .22's.

3 Q. Did you have any handguns?

4 A. We had handguns. We had some Smith & Wessons.  
There was

5 some .22's, some .38's.

6 Q. And do you recall approximately how many firearms  
you had

7 in your house before November 5 of 1994?

8 A. In the vicinity of 70 to probably 80.

9 Q. Now, let's turn to the weekend of November 5, 1994.  
Do you

10 recall what day of the week November 5 was in 1994?

11 A. Most assuredly.

12 Q. What day of the week was it?

13 A. It was on a Saturday.

14 Q. Were you at home in Arkansas that day?

15 A. No. I was in Shreveport, Louisiana.

16 Q. What were you doing in Shreveport?

17 A. Attending a gun show.

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

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

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

21 A. I would be there till it closes, which is at 4:00  
on Sunday

22 night; and it takes me about an hour to two hours to  
pack up,

23 and then it's about a three-and-a-half to four-hour  
drive home.

24 Q. Had you registered for that gun show?

25 A. Yes, I had.

8990

Karen Anderson - Direct

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

2 A. Yes.

3 Q. When you arrived in Shreveport on Friday, did you  
contact

4 Mr. Moore back at the residence?

5 A. That afternoon, yes.

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

8 A. He was quite happy.

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

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

12 Q. Did you contact Mr. Moore that evening?

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

15 Q. Did you eventually get a hold of him?

16 A. About four hours later, yes.

17 Q. Without telling us the substance of your  
conversation, what

18 was his demeanor at that time?

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

20 him.

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

22 A. Yes.

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

24 A. I went and bought two shotguns --

25 Q. Did you read --



Karen Anderson – Direct

1 A. -- at the gun show Sunday afternoon.

2 Q. Did you return home that evening?

3 A. Yes.

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

6 A. No.

7 Q. Why not?

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

11 Q. "He" being whom?

12 A. Mr. Moore.

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

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

16 shook up.

17 Q. Now, at that point did you and -- did Mr. Moore  
tell you

18 what occurred on November 5, 1994?

19 A. He told me that on the phone Saturday night when I

finally

20 got a hold of him.

21 Q. When you got into the house, could you see what had

22 happened on November 5, 1994?

23 A. Definitely.

24 Q. What did you notice about the house?

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

The stuff

8992

Karen Anderson – Direct

1 is all thrown out on the floor. The closet doors were  
totally

2 open. There was nothing left in the closets.

3 Q. Whose bedroom are you talking about?

4 A. Mr. Moore's bedroom.

5 Q. Do you have a separate bedroom?

6 A. Yes.

7 Q. Did you go into your bedroom?

8 A. Yes.

9 Q. What did you notice with your bedroom?

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

11 Q. And after you noticed that all these items were  
missing,

12 what did you do?

13 A. We set (sic) down there that night because the  
police

on the 14 wanted us to make up a list of what we could remember  
the 15 guns, and we sat down that night and made a list up on  
the 16 guns.  
17 Q. What did you do with the list?  
18 A. We turned it over to the police.  
19 Q. Did you type the list?  
it, 20 A. Handwritten first; and then Monday morning, I typed  
21 myself.  
22 Q. When did you turn it in to the police?  
23 A. Tuesday.  
24 Q. Why did you wait till Tuesday?  
busy right 25 A. We called, and they asked -- they said they were

8993

Karen Anderson - Direct

next 1 now and it would be all right if we brought it down the  
2 day.  
3 Q. Meaning you called them on Monday?  
4 A. Yes.  
5 Q. You brought it down on Tuesday?  
6 A. Yes.  
7 Q. Did you ever make another list?

8 A. Yes.

9 Q. When did you do that?

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

11 Friday.

12 Q. What was the purpose of that second list?

13 A. Mainly, as you set (sic) down and you calmed  
yourself down

14 and you started remembering what things you had and  
you're

15 looking at your list, you remembered things that you  
did not

16 put on there.

17 Q. Now, let's go back to -- so you can tell the jury  
about the

18 things that were in the house prior to November 5,  
1994. Did

19 you and Mr. Moore have any cash in the house?

20 A. Yes.

21 Q. How much cash did you have?

22 A. There was probably in the vicinity of between 8-  
and

23 \$9,000.

24 Q. Do you know where that cash was?

25 A. It usually lays on the computer desk.

house? 1 Q. Okay. Did you have any other valuables in the

2 A. Yes.

3 Q. What type of valuables did you have?

Costa 4 A. We had some little gold Tiki dolls that were from

5 Rica. We had some jade that was from Costa Rica. We

had a box 6 that had semiprecious stones in it, diamonds, some

7 opal, aquamarines. There was a gold nugget in there.

There 8 was a couple of the gold Tiki dolls were in there.

There was a 9 couple of gold coins in there. There was some rings

that were 10 made from lost wax that were made to hold the gold

coins. They 11 were in there.

held 12 Q. Now, are you talking about two different boxes that

13 all these items?

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

15 Q. What type of box?

16 A. Cigar box.

17 Q. What color was the box?

18 A. Had yellow, and it could have been yellow or white

or 19 yellow and -- basically yellow on white or white on

yellow, one

20 of the ways.

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

22 A. Yes.

23 Q. What type?

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

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

8995

Karen Anderson - Direct

1 stones and the other items?

2 A. It was a cardboard box, approximately about 10- by-10. It

3 was perfectly square, maybe 6 to 7 inches high.

4 Q. I want to show you a photograph that's already in evidence

5 from Mr. Nichols' house, Government's Exhibit 1776A. Do you

6 see that photograph?

7 A. Yes.

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

9 the ammo cans?

10 A. Yes.

11 Q. Do you recognize that?

12 A. It looks similar to one that we had.

13 Q. What type of box?

jade was

14 A. A regular cigar box, and inside that was -- the

15 wrapped up in little pieces of toilet paper.

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

17 A. Yes, there was.

18 Q. What type of keys?

19 A. Two safety-deposit-box keys.

20 Q. Were you familiar with those keys?

21 A. Yes.

boxes, did

22 Q. You didn't have access to those safety-deposit

23 you?

24 A. No.

25 Q. How were you familiar with the keys?

8996

Karen Anderson - Direct

the

1 A. Mr. Moore had a habit of taking and putting an M on

2 outside of the package.

deposit

3 Q. Now, do you know whether both keys for the safety-

box?

4 box or both those keys were for the same safety-deposit

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

6 MR. TIGAR: Excuse me, your Honor.

7 THE COURT: Just a moment.

8 MR. TIGAR: Lack of personal knowledge.

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

10 BY MS. WILKINSON:

11 Q. Had you looked in this cigar box and seen those  
keys before

12 November 5, 1994?

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

14 to have them before.

15 Q. Meaning Mr. and Mrs. Moore?

16 A. Yes.

17 Q. So you're familiar with those keys?

18 A. Yes.

19 Q. Could you recognize them?

20 A. Yes.

21 Q. Tell us what the procedure was for whether those --  
both of

22 those keys were for the same box or two different  
boxes.

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

24 THE COURT: Just a moment. There's no  
foundation for

25 her to answer that question.



1 BY MS. WILKINSON:

2 Q. Did you recognize the envelopes for those keys?

3 A. Yes.

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

6 A. This one?

7 Q. And see if you could find Government's Exhibit 1873  
and  
8 1871, please.

9 A. '73.

10 Q. And '71.

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

13 A. Yes.

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

15 Tell us how you recognize that.

16 A. I basically recognize it from the M that's on the  
package.

17 He has always done that with his key.

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

20 A. Yes.

21 Q. For which bank?

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

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

24 A. Okay.

25 Q. Do you recognize that?

8998

Karen Anderson – Direct

1 A. Yes.

2 Q. How do you recognize it?

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

4 Florida.

5 Q. And how do you know --

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

7 Honor.

8 THE COURT: It would be better if we knew how  
she knew

9 these things before you ask the question.

10 MS. WILKINSON: Yes, your Honor.

11 BY MS. WILKINSON:

12 Q. Miss Anderson, as part of working with Mr. Moore,  
had you

13 come to know his residence in Sebastian, Florida?

14 A. Yes.

15 Q. Have you lived there?

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

17 Q. Have you taken care of their property?

18 A. Yes.  
19 Q. And have you also become familiar with their  
banking  
20 practices?  
21 A. Yes.  
22 Q. How have you become familiar with that?  
23 A. Because at times when they are out of town, they  
have me  
24 deliver stuff to their bank for them. Not their  
safety-deposit  
25 box, but to their bank.

8999

Karen Anderson – Direct

1 Q. And how do you know that they -- where they have  
2 safety-deposit boxes?  
3 A. Because if something ever happened to them, they  
wanted me  
4 to have access to the keys.

5 MR. TIGAR: Your Honor, I object to the --  
6 THE COURT: I'll sustain the objection.  
There's an  
7 inadequate foundation for it.

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

9 BY MS. WILKINSON:  
10 Q. Miss Anderson, you told us that in that cigar box,  
there

11 was also jade; is that right?

12 A. Yes.

13 Q. Are you familiar with that jade?

14 A. Yes.

15 Q. How did you become familiar with that jade?

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

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

20 A. Yes.

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

23 A. Yes.

24 Q. Do you recognize that?

25 A. Yes.

9000

Karen Anderson - Direct

1 Q. How do you recognize it?

all of  
2 A. Because when we moved up from Fort Lauderdale and

and we  
3 this, this was part of the paperwork that he handed me;

pieces  
4 had went and laid this all out. And I just compared

5 with what we had when we first moved up and wrapped  
them all

6 back up in a box.

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

8 A. Yes.

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

10 A. Yes.

11 MS. WILKINSON: Government offers 1747.

12 MR. TIGAR: May I inquire, your Honor?

13 THE COURT: You may.

14 VOIR DIRE EXAMINATION

15 BY MR. TIGAR:

16 Q. Ms. Anderson, my name is Michael Tigar. I'm one of  
the

17 lawyers appointed to help Terry Nichols.

18 When was this photograph taken?

19 A. The photograph was probably right after he came  
back

20 from -- you're asking me to answer something that  
somebody else

21 has done.

22 Q. Were you present when the photograph was taken?

23 A. I was not present. I was only been present when he  
handed

24 me this photo and we moved up to the farm. I was not  
present

25 when he took this photo.

9001

Karen Anderson - Voir Dire

1 MR. TIGAR: We object, your Honor.

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

3 THE WITNESS: Mr. Moore.

4 THE COURT: -- who the --

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

6 THE WITNESS: Yes.

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

8 Honor.

9 THE COURT: All right.

10 DIRECT EXAMINATION CONTINUED

11 BY MS. WILKINSON:

12 Q. Whose photograph is this?

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

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

15 A. Yes.

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

17 the photograph?

18 A. Yes, I have.

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

20 A. Yes.

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

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

24 THE COURT: Yes.

25 VOIR DIRE EXAMINATION

9002

Karen Anderson – Voir Dire

1 BY MR. TIGAR:

2 Q. Is it your testimony that all of the jade that's  
depicted  
3 in this photograph was later examined by you  
personally?

4 A. Yes.

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

6 A. Except for two.

7 MR. TIGAR: No objection, your Honor.

8 THE COURT: All right. 1747 is now received.

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

10 THE COURT: Yes.

11 DIRECT EXAMINATION CONTINUED

12 BY MS. WILKINSON:

13 Q. Now, Miss Anderson, look down at the photo, if you  
could,

14 and tell the jury where the jade is depicted in this  
15 photograph. Is it the top of the photograph or the  
bottom?

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

17 Q. Are you talking about -- I'm not asking about one  
specific

18 piece. I'm asking about all of the jade. Just circle  
it,

19 please.

20 A. This right here?

21 Q. Yes.

22 A. Is that what you're talking about?

23 Q. Yes.

24 A. All right.

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

9003

Karen Anderson - Direct

1 the custody of the FBI with this photograph?

2 A. Yes.

3 Q. Did you do that?

4 A. Yes.

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

6 of you.

7 Do you recognize that?



8 A. Yes, I do.

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

10 A. Yes, it is.

11 Q. Can you circle on this exhibit, Government's  
Exhibit 1747,

12 that piece of jade.

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

14 Q. Okay. So if you were counting in from the left  
side there,

15 in that row, which is the one, two -- is that the third  
row?

16 A. One, two, three, four. From the top, it's the  
third row

17 down, and one, two, three, four -- fifth piece in.

18 Q. The fifth or the sixth?

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

20 Q. From the left.

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

22 Q. Okay.

23 THE COURT: Do we have a record reference as  
to what

24 piece of jade is being compared?

25 BY MS. WILKINSON:

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

3 A. 1748.

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

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

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

10 BY MS. WILKINSON:

11 Q. Now, could you take --

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

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

14 BY MS. WILKINSON:

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

18 And are there any markings on that piece of  
jade?

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

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

23 BY MS. WILKINSON:

24 Q. Just describe the markings, Miss Anderson.

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

9005

Karen Anderson – Direct

the V 1 the two holes on there that make it look like eyes and  
2 that makes it looks like a nose; and they have three  
stripes 3 across the bottom that makes it look like a collar.

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

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

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

7 A. Yes.

8 Q. Was that piece of jade in a box similar to that in  
your 9 home?

10 A. Yes, it was.

11 Q. Where was that cigar box?

12 A. In the top drawer as you just go down the hallway  
and make

13 an immediate right-hand turn, there is a built-in chest  
of

14 drawers; and it was all kept in the top drawer.

15 Q. And were those two safety-deposit keys that you  
identified

16 also in that cigar box?

17 A. Yes, they were.

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

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

20 Q. Of 1994?

21 A. Yes.

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

24 right?

25 A. Yes.

9006

Karen Anderson - Direct

1 Q. And have you seen a photograph, Government's  
Exhibit --

2 hold on one second. Have you seen a photograph of your  
quilt?

3 A. Yes.

4 MS. WILKINSON: I'm sorry, your Honor, I can't  
find

5 the photograph on the computer.

6 BY MS. WILKINSON:

7 Q. Can you look in your envelope, Miss Anderson, and

see if

8 you can find that photograph.

9 THE COURT: You may approach to help her.

10 MS. WILKINSON: Thank you, your Honor.

11 Your Honor, it's not in the envelope, but I  
have it on

12 the screen. It's Government's Exhibit 1771. It's 2 of  
eight

13 that's been previously entered into evidence.

14 BY MS. WILKINSON:

15 Q. Miss Anderson, this is a photograph from Mr.  
Nichols'

16 bedroom. Did you recognize that quilt?

17 A. Sure do.

18 Q. How do you recognize it?

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

20 Q. Do you recognize the pattern?

21 A. Yes.

22 Q. What do you recognize about it?

23 A. I've got matching sheets to go with it. I've got  
matching

24 pillowcases. I've got the bed skirt and everything  
that goes

25 with it.

9007

Karen Anderson – Direct

1 Q. Do you have those other items, the bed skirt --  
2 A. All except for the pillowcase that they took.  
3 Q. Ms. Anderson, where did you purchase that quilt and  
bed  
4 sheets?  
5 A. Purchased it at a K-Mart.  
6 Q. Do you recall when you purchased it?  
7 A. I'd had it for about two years.  
8 Q. Now, do you see a photograph that's up there in --  
excuse  
9 me, not in front of you. Let me show you another one.  
10 Do you see a photograph that's in front of you  
that  
11 shows a firearm in a bag?  
12 A. Yes.  
13 Q. Can you read the Government exhibit number off  
there?  
14 A. 1816A.  
15 Q. And do you recognize that firearm in that bag?  
16 A. Yes, I do.  
17 Q. How do you recognize it?  
18 A. Shot that gun a couple of three times. Also  
recognize the  
19 bag.  
20 Q. What type of gun is it?  
21 A. It's a Smith & Wesson 9-millimeter.  
22 Q. And how do you recognize the bag that it's  
contained in?

23 A. Those used to be old camera-type bags, and Mr.  
Moore's the  
24 only person I've ever seen have any of those; and we've  
still  
25 got about four or five of them left.

9008

Karen Anderson - Direct

1816A, 1 Q. All right. Let's display this for the jury. It's  
2 which has already been entered into evidence.

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

5 A. Yes.

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

7 A. Never.

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

10 A. Yes.

11 Q. Would you recognize it?

12 A. Yes.

13 Q. I'm going to show you 1816.

14 Is that the firearm?

15 A. Sure is.

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

17 A. Probably altogether, maybe 20, 30 times.  
18 Q. And was that in your house prior to November 5,  
1994? 19 A. Yes, it was.  
20 Q. Thank you.  
21 A. I need a bigger table.  
22 Q. I'll take that one. Thank you.  
23 Miss Anderson, I've just handed up a few more  
exhibits  
24 to you. Do you recognize Government Exhibit 1861?  
25 A. 18 what? '61?

9009

Karen Anderson - Direct

1 Q. '61.  
2 A. Yes.  
3 Q. What is that?  
4 A. Without even opening it, it has got soft-point  
carving,  
5 original carbine, military strippers.  
6 Q. Do you recognize the box?  
7 A. Yes.  
8 Q. How do you recognize the box?  
9 A. I hauled it up from Ft. Lauderdale, Florida.  
10 Q. And what type of ammunition is inside?  
11 A. It's called M-1 carbine.



12 Q. Could you open the box, please.

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

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

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

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

21 Q. Did you ever sell that ammunition --

22 A. Never.

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

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

9010

Karen Anderson - Direct

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

2 A. Mr. Moore.

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

5 yours?

6 A. Several times.

7 Q. Did you see -- can you tell the jury about what  
type of

8 blankets you had in your living room prior to November  
5, 1994?

9 A. It was a Mexican-type blanket that laid on the  
couch that I

10 kept there all the time. I had one that matched it  
just like

11 it. That was also gone when I came home.

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

14 A. Yes.

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

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

17 THE COURT: Yes.

18 MS. WILKINSON: There it is.

19 BY MS. WILKINSON:

20 Q. Government Exhibit 1773, photograph 6, which has  
already

21 been moved into evidence, do you recognize that?

22 A. Yep, sure do.

23 Q. Can you point out what you recognize in that  
photograph by

24 using the pen that you have there and circling it for  
the jury,

25 please.

9011

Karen Anderson – Direct

1 A. There's the blanket like that. He also had an Army  
cot

2 blanket that was missing, and we also had gun cases  
similar to

3 those right there.

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

5 front of you?

6 A. Yes.

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

8 hand?

9 A. Yes.

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

11 one?

12 A. 1864.

13 Q. Do you recognize the ammunition in there?

14 A. Yes.

15 Q. How do you recognize 1864?

16 A. Pulled some of it apart again. It's Mr. Stromen's  
tracer

17 formula, also in the 9-millimeter that's in here.

18 Q. It's 9-millimeter?

19 A. Yes.

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

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

22 MS. WILKINSON: Your Honor, may Miss Anderson  
step

23 down so she can identify the firearms? I can have Mr.  
Tongate

24 assist me, maybe she won't have to step down, if I --

25 THE COURT: Let's do it that way.

9012

Karen Anderson - Direct

1 BY MS. WILKINSON:

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

3 You can leave that folder right there.

4 A. Okay.

5 MS. WILKINSON: Agent Tongate, can you start  
with

6 Government's Exhibit 1808 and hand it up to Miss  
Anderson.

7 BY MS. WILKINSON:

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

9 1808?

10 A. Yes.

11 Q. How do you recognize it?

Hollywood 12 A. I remember when Mr. Moore bought it. It's a fake  
13 Uzi gun, 9-millimeter.  
14 Q. What do you mean by a fake Hollywood?  
15 A. It just shoots blanks, that's it.  
16 Q. How do you know that?  
Uzi, it 17 A. There's no markings on here. If you had a regular  
If you 18 would have a A1 or A2 stamp on here. It does not have.  
down 19 look down the barrel, it's smooth, there is no riflings  
that 20 there whatsoever.  
21 Q. Now, when you reported to the police in Hot Springs  
22 you had been robbed on November 5, 1994 --  
23 THE COURT: There is no evidence of that.  
24 MS. WILKINSON: I'll rephrase it, your Honor.  
25 BY MS. WILKINSON:

9013

Karen Anderson - Direct

1 Q. Did you report your property missing?  
2 A. Yes.  
3 Q. And when you did that, you provided a list of that  
4 property; is that right?  
5 A. Yes.

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

7 A. Yes.

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

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

11 THE COURT: All right.

12 BY MS. WILKINSON:

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

14 A. Yes.

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

17 And look for 1739.

18 Do you recognize those two lists?

19 A. Sure do.

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

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

22 Q. When did you make that list?

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

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

25 Exhibit 1738.

Karen Anderson – Direct

1 MR. TIGAR: May I inquire, your Honor?

2 THE COURT: Yes.

3 VOIR DIRE EXAMINATION

4 BY MR. TIGAR:

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

7 A. Incorrect.

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

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

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

15 A. Certainly.

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

19 A. I was not there when the robbery happened.

20 Q. So that the list you were making -- and the list  
you were  
21 making was to give to the police department; correct?  
22 A. I was making the list of firearms that were missing  
from  
23 the house to give to the police.  
24 Q. And you've testified: You're in the ammunition  
business;  
25 correct?

9015

Karen Anderson - Voir Dire

1 A. Correct.  
2 Q. You're not in the firearm sales business; is that  
correct?  
3 A. No, I am not.  
4 Q. And Mr. Moore is not in the firearm sales business  
anymore,  
5 is he?  
6 A. No.  
7 Q. So the purpose of this list was simply to give to  
people  
8 who might want to know what you and Mr. Moore said was  
gone  
9 from the house; right?  
10 A. Explain that again.  
11 Q. The purpose -- you made this list to give it to the  
police;  
12 correct?



13 A. Yes.

14 Q. To the insurance company; correct?

15 A. Yes.

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

17 THE COURT: What's the objection?

18 MR. TIGAR: It's hearsay, your Honor. There's  
no

19 showing of regular course of business. If it's for  
refreshment

20 of recollection, it's --

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

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

23 THE COURT: Then I'll receive it subject to  
his

24 connection, with his participation.

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

9016

Karen Anderson – Voir Dire

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

2 admission.

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

4 MS. WILKINSON: Yes, your Honor.

5 MR. TIGAR: I've seen both of them. That's  
our

6 objection. Both of them can come in on that basis,  
your Honor,

7 as far as we're concerned.

8 THE COURT: All right.

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

10 THE COURT: Okay.

11 DIRECT EXAMINATION CONTINUED

12 BY MS. WILKINSON:

13 Q. Now, Miss Moore, this is the list -- Miss Anderson,  
this is

14 the list you said you created the night you came back,

15 November 6, 1994?

16 A. Yes.

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

18 A. Yes.

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

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

21 Q. Sure.

22 A. Yes.

23 Q. Page 3?

24 A. Yes.

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

Karen Anderson – Direct

1 A. Yes.

2 Q. Okay. And page 5.

3 A. Yes.

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

5 A. Yes.

6 Q. You see Item No. 4 here?

7 A. Yes.

8 Q. What does that indicate?

9 A. That is 35-millimeter cameras. A Doskocil case is  
a gun

10 case that has foam on the inside of it, and what Mr.  
Moore has

11 done with that is -- and I was setting (sic) there  
watching him

12 do this -- he cut out places for his cameras and his  
lens so

13 they would set in there so when we were on vacation or

14 traveling like that, that they set there and they were

15 protected.

16 Q. And the next item, No. 5, the JVC video camera, did  
you

17 have a video camera in your residence prior to November  
5,

18 1994?

19 A. Yes, we did.

20 Q. Was it taken?

21 A. Yes, it was.

22 Q. Was any of it left behind?  
23 A. Yes. There is what you call the deck part of it.  
It's  
24 before they came in with the cameras that had the whole  
unit  
25 together. The camera was separate. You had to have a  
deck for

9018

Karen Anderson - Direct

1 your tape to be able to record on it.  
2 Q. And that part was still in your house when you  
returned  
3 November 6; is that right?  
4 A. Yes.  
5 Q. Okay. Now the next item, No. 7, says cigar box, 40  
to 50  
6 pieces of string -- can you see what that says?  
7 A. Yes.  
8 Q. What does it says?  
9 A. It says 40 to 50 pieces of string-sawn pre-  
Columbian jade.  
10 Q. Is that the jade that you identified in the cigar  
box that  
11 you've identified for the jury?  
12 A. Yes.  
13 Q. Now, the next item number, 8, says four military  
vibration

four of 14 detectors, transmitters, and receivers. Did you have

15 those items in your home before November 5, 1994?

16 A. Yes.

17 Q. Were you familiar with them?

18 A. Yes.

19 Q. Had you seen them?

20 A. Yes.

21 Q. Could you recognize them?

22 A. Yes.

boxes 23 Q. Now, the next item, No. 9, says two large, unopened

described for 24 of tracer ammo. Is that the ammunition you've

25 the jury?

9019

Karen Anderson – Direct

1 A. Yes, it is.

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

3 A. Yes.

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

in. 6 A. Yes, in the same drawer that the jade was listed

7 Q. Were you familiar with it?

8 A. Yes.

9 Q. How were you familiar with it?

10 A. I was with him when he purchased it.

11 Q. Had you seen it in that drawer?

12 A. Yes.

13 Q. Approximately how much silver and gold did you have  
in the

14 house prior to November 5, 1994?

15 A. I really can't give you an exact answer on it. I  
know that

16 the whole top drawer was almost full.

17 Q. Now, were there any unique markings on that silver  
or gold

18 that would be able to say it was yours vs. someone  
else's?

19 A. No, that's the sad part. There were silver rounds  
and

20 silver bars.

21 Q. Now, let's look at the revised list, the next list,  
1739.

22 Does page 1 show some of the long rifles that were  
missing from

23 your home on November 5, 1994?

24 A. Yes.

25 Q. And for the jury's sake, when did you create this  
revised

9020

Karen Anderson - Direct

1 list?

2 A. Probably about -- I'm going to say Thursday or  
Friday of

3 that same following week, right after the robbery.

4 Q. Now, up at the top, do you see there it's dated  
11-13-94?

5 A. Right.

6 Q. Did you type that?

7 A. Yes.

8 Q. Let's look at page 2 of that list, 1739.

9 A. Yes.

10 Q. And does this include additional long rifles that  
were

11 taken -- that were missing from your home?

12 A. Yes.

13 Q. Look at page 3. Can you tell the jury what's on  
page 3?

14 A. Basically on page 3 we had what we called the  
miscellaneous

15 stuff. We had some of the handguns, the jewelry, the  
silver,

16 the red box, the cigar box. The cameras is on there.  
We'd

17 forgot about the M-60 bipods. They weren't there. We  
had

18 forgot about the Tapco 47-millimeter flare launchers.

19 Discovered that wasn't there, either.

20 Q. Now, look down at the bottom of that page. Do you  
see

21 where it says new bedspread, sheets, and blankets?

22 A. Yes.

of 23 Q. So did you report those as missing back in November

24 1994?

25 A. Yes.

9021

Karen Anderson - Direct

1 Q. And did you turn in this list to the police?

2 A. Yes.

3 Q. Did you also turn it in to the insurance company?

4 A. Yes.

about 5 Q. Let's talk for a minute, if we can, Miss Anderson,

November 5, 6 the firearms that you had in the house prior to

7 1994. Did you have insurance for those firearms?

8 A. We had basic homeowner's insurance.

9 Q. Did you have any special riders --

10 A. No.

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

12 A. Yes, we did.

13 Q. -- prior to November 5, 1994?

difficult 14 THE COURT: Just a moment. You know, it's

15 for the reporter if you don't wait for the question --



16 THE WITNESS: I'm sorry.

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

19 MS. WILKINSON: Sorry, your Honor.

20 THE COURT: Go ahead.

21 BY MS. WILKINSON:

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

23 A. Okay.

24 Q. Did you know that you did not have the riders  
necessary to

25 cover all the firearms you had in your home prior to

9022

Karen Anderson - Direct

1 November 5, 1994?

2 A. Yes.

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

5 MR. TIGAR: Object.

6 THE COURT: Yes.

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

9 THE COURT: Yes, you sure do.

10 BY MS. WILKINSON:

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

14 A. Yes.

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

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

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

22 AGENT TONGATE: 1804.

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

24 BY MS. WILKINSON:

25 Q. Do you recognize that firearm, Miss Anderson?

9023

Karen Anderson - Direct

1 A. Sure do.

2 Q. How do you recognize it?

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

can, be  
again.

4 Q. Let's break it down a little bit there. If you  
5 careful of the microphone there. You just hit it

6 Okay --

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

mad he

8 Q. Yeah, don't do that. Don't do that. No matter how  
9 makes you, don't do that.

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

11 THE COURT: You don't have to worry.

12 BY MS. WILKINSON:

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

of

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

house

17 Q. And did you have one of those on a Mini-14 in your  
18 prior to November --

19 A. Yes, I did.

1994, did

20 Q. Let my finish my question, please. November 5,  
21 you?

22 A. Yes.

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

25 A. Yes.

9024

Karen Anderson – Direct

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

3 MS. WILKINSON: Agent Tongate, if you just  
hand it to

4 Miss Anderson, I'll have her read the Government  
exhibit number  
5 into the record.

6 THE WITNESS: 1788.

7 BY MS. WILKINSON:

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

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

10 Q. What type of firearm is it?

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

12 Q. Is there anything unique about that firearm?

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

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

16 A. Would you like to get me a flashlight? That's  
terrible. I

17 can't. I have bad -- the light is --

18 THE COURT: We have one.

19 THE WITNESS: Thank you.  
20 BY MS. WILKINSON:  
21 Q. Can you see it now?  
22 A. Yeah. We got her now. SS02029.  
23 Q. Now, do you recognize that serial number?  
24 A. Sure do.  
25 Q. Before -- you can give it back to Agent Tongate.

9025

Karen Anderson - Direct

1 A. I'll keep the flashlight.  
2 Q. Before coming to court today, did you look for some  
serial  
3 numbers for some of the firearms that were missing from  
your  
4 home?  
5 A. I've been looking every (sic) since the day that it  
6 happened.  
7 Q. Did you recently find some of those serial numbers?  
8 A. Yes.  
9 Q. How did that come about?  
10 A. It came about because I was looking for a telephone  
number  
11 that I knew that I had wrote down on a file, and I  
couldn't  
12 find it. And so I was dragging out the whole file  
cabinet

13 where what I call the dead files are that they've  
previously

14 had things in them but you're no longer interested in  
that so

15 you throw them out and you put in the bottom of  
cabinets, and

16 that's where they lie along with some tablets.

17 Q. Did you find a writing tablet there?

18 A. Yes, I did.

19 Q. Had you written on that tablet?

20 A. Yes.

21 Q. Did you recognize the handwriting as yours?

22 A. Yes.

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

24 A. Approximately.

25 Q. When did you do that?

9026

Karen Anderson - Direct

1 A. Somewhere from when we moved from the old farm over  
to the

2 new farm, so it had to be after Christmas in '92 or the  
first

3 two weeks in '93.

4 Q. Did you bring that to court today?

5 A. Yes.

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

in

7 there.

8 Can you read the Government exhibit sticker  
number,  
9 please.

10 A. 2103.

11 MS. WILKINSON: Government offers 2103, your  
Honor.

12 MR. TIGAR: May I inquire?

13 THE COURT: Yes.

14 VOIR DIRE EXAMINATION

15 BY MR. TIGAR:

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

19 A. Yep.

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

23 A. I prepared this list in -- sometime in the last  
part of

24 January -- the last part of December in '92 or in the  
first  
25 couple, three weeks in '93.

Karen Anderson – Voir Dire

1 MR. TIGAR: May we approach, your Honor?

2 THE COURT: Yes.

3 (At the bench:)

4 (Bench Conference 78B2 is not herein transcribed by  
court

5 order. It is transcribed as a separate sealed  
transcript.)

6

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22



23  
24  
25

9031

Karen Anderson – Voir Dire

1 (In open court:)

2 DIRECT EXAMINATION CONTINUED

3 BY MS. WILKINSON:

4 Q. Miss Anderson, tell us the number of the notepad  
that you

5 have in front of you, the Government exhibit number.

6 A. 2103.

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

8 THE COURT: You made your objection.

9 MR. TIGAR: I have, your Honor.

10 THE COURT: Overruled, and 2103 is received.

11 BY MS. WILKINSON:

12 Q. Miss Anderson, take the item out of the envelope,  
would  
13 you. Can you describe -- hold it up for the jury for a  
moment

14 and just show it to them. Can you describe the  
condition of

15 the tablet.

16 A. It's been around a while.

17 Q. What do you mean by that?

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

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

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

24 BY MS. WILKINSON:

25 Q. Are there, Miss Anderson?

9032

Karen Anderson- Direct

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

2 MS. WILKINSON: May I retrieve that exhibit?

3 THE COURT: Yes.

4 BY MS. WILKINSON:

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

7 Do you see the Government exhibit sticker on  
there?

8 A. 1810.

9 Q. 1810. Do you recognize 1810?

10 A. Yes.

11 Q. How do you recognize 1810?

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

13 Q. Did you have that firearm in your home prior to

14 November 5 --

15 A. Yes.

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

17 A. It's a scope. That's all I can say. It's just a  
Tasco.

18 There's lots of Tasco scopes around.

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

20 A. Nothing unusual about it.

21 Q. You mention that it had a jewel bolt?

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

23 Q. What does that mean?

24 A. Just a decoration that they put. It makes the gun  
worth

25 about 25, 30 bucks more because of that.

9033

Karen Anderson- Direct

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

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

3 there.

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

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

7 Q. What does checkering mean?

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

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

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

14 A. 1796.

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

16 A. Yep.

17 Q. What is it?

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

19 Q. Do you recognize it?

20 A. Sure do.

21 Q. How do you recognize it?

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

23 Q. You purchased it?

24 A. Yes.

25 Q. Where did you purchase it?

Karen Anderson- Direct

1 A. At a gun shop in Davie, Florida.

2 Looked a lot better.

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

4 the questions, okay.

5 Can you tell us the serial number on that  
firearm?

6 A. We got L1404875.

7 MS. WILKINSON: Your Honor, at this time we'd  
offer

8 Government's Exhibit 1751, an ATF self-authenticating  
record.

9 THE COURT: 1751?

10 MS. WILKINSON: Yes, your Honor.

11 MR. TIGAR: May I inquire, your Honor?

12 THE COURT: Yes. I need to see it.

13 MS. WILKINSON: Sure.

14 Do you want my copy, your Honor?

15 VOIR DIRE EXAMINATION

16 BY MR. TIGAR:

17 Q. Miss Anderson, have you seen this ATF record that's  
being

18 offered here?

19 A. Have I seen that record?

20 Q. Yeah.

21 A. Not at first, no.

today? 22 Q. No, have you seen it ever, before coming here

23 A. One time.

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

25 A. Yes.

9035

Karen Anderson – Voir Dire

1 Q. It is the business of the Bureau of Alcohol,  
Tobacco, and 2 Firearms to keep accurate records of serial numbers of  
3 firearms?

4 MS. WILKINSON: Your Honor, objection. I  
don't know 5 how she would --

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

7 BY MR. TIGAR:

8 Q. Have you ever held a federal firearms license?

9 A. Yes, I have.

10 Q. And in the operation of your federal firearms  
license, have

11 you had occasion to deal with ATF forms?

12 A. No, because I never purchased guns.

13 Q. In the -- in the purchase and sale of firearms,  
have you

14 ever filled out an ATF form?

15 A. Yes, I have.

16 Q. Do you understand that as a citizen, it is your  
obligation

17 to fill those out accurately?

18 A. Yes.

19 Q. And do you understand from going to gun shows that  
it is

20 the obligation of dealers to make those forms out  
accurately?

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

22 Q. Is it your understanding that all gun dealers that  
are

23 required to make them out have the obligation to make  
them out

24 accurately?

25 A. Yes.

9036

Karen Anderson – Voir Dire

1 MR. TIGAR: No objection.

2 THE COURT: Okay. 1751's received.

3 MS. WILKINSON: Thank you, your Honor.

4 You can give that firearm back to Agent  
Tongate.

5 DIRECT EXAMINATION CONTINUED

6 BY MS. WILKINSON:

7 Q. And let me show this to you on the ELMO. Showing  
you the

8 front page of Government's Exhibit 1751. Miss

Anderson, would

9 you turn to -- I'm going to turn to page 2. Can you  
read the

10 part that says, "The disposition"?

11 A. Yes.

12 Q. Do you see that?

13 A. Yes.

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

15 A. It says, The disposition of the U.S. Repeating Arms  
16 (Winchester) shotgun, model 1200 Defender, 12 gauge,  
Serial No.

17 L1404875 by Danco -- I think that's how you pronounce  
it --

18 Arms & Police Supply, Davie, Florida, Karen Derr  
Anderson, Fort

19 Lauderdale, Florida, on 1-11-93 (sic).

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

21 A. Yes.

22 THE COURT: I think you misread the date.

23 THE WITNESS: 1-11 -- '83.

24 BY MS. WILKINSON:

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

9037

Karen Anderson - Direct

1 A. Yes.

2 Q. Miss Anderson, did you ever give that firearm away



to

3 anyone?

4 A. No.

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

6 A. No.

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

8 A. 1786.

9 Q. Have you seen 1786 before?

10 A. Yes.

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

12 A. Yes.

13 Q. How do you recognize 1786?

14 A. Sometime in September --

15 Q. Of what year?

16 A. Of '94. We had taken this out of the case because

my

17 horseshoer's gun had been stolen, and he was interested

in

18 purchasing it. And we really didn't know if we were

interested

19 in selling it or not. It was a type of rifle he was

hunting

20 for.

21 Q. And is there anything unique about that rifle?

22 A. It also has -- it's a Remington. It has a jewel

bolt

23 carrier on it, has a nice wood checkering on the

foregrip and

24 this, and it had the custom sewing on it.

25 Q. Was that your sling?

9038

Karen Anderson - Direct

1 A. Yes.

1786

2 Q. And did it have that sling on Government's Exhibit

3 prior to November 5, 1994?

4 A. Yes, it did.

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

6 A. 1814.

7 Q. Do you recognize 1814?

8 A. Yep.

1994?

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

10 A. Yes, it was.

11 Q. How do you recognize it as your gun?

12 A. Bill Stoneman, which is a machinist in our  
hometown, makes

13 these flash hidere; and I purchased a bunch of them  
from him.

14 And when we got a stainless, we would put one of these  
on it.

15 Q. And up there at the top of the barrel, is that that  
flash

16 hider that you described?

17 A. That's right here.

18 Q. You bought that where?  
19 A. From a gentleman by the name of Bill Stoneman.  
20 Q. And Mr. Stoneman makes these flash hidere?  
21 A. In Hot Springs, Arkansas.  
22 Q. And did you have that flash hider on that Mini-14  
prior to  
23 November 5, 1994?  
24 A. Yes.  
25 Q. Can give that back to Agent Tongate.

9039

Karen Anderson - Direct

1 A. 1780.  
2 Q. Is 1780 your firearm?  
3 A. Yes.  
4 Q. How do you recognize it?  
5 A. Start with the flash hider, another Stoneman flash  
hider.  
6 Has a Ramline stock on it. Also, the gun that I  
personally  
7 used for testing tracers when we get our tracers in to  
see if  
8 they work okay.  
9 Q. Would you take a look at that serial number,  
please.  
10 A. 18358815.  
11 Q. Okay. Let me show you Government's Exhibit 2103 on

the

you 12 ELMO here. This is the tablet you told the jury that

13 found. You see that?

14 A. No, it's too dark.

15 Q. Does that help?

16 A. That's worse.

17 Q. Sorry about that.

exhibit. 18 THE COURT: Why don't we just hand her the

19 THE WITNESS: There. You got it.

That 20 MS. WILKINSON: We'll use a copy, your Honor.

21 will be easier.

22 BY MS. WILKINSON:

23 Q. How is that? Is that better?

24 A. A lot better.

time. 25 Q. Now, can you tell us the serial number one more

9040

Karen Anderson - Direct

1 A. 18358815.

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

3 A. Yes.

4 Q. Do you see that same serial number --

5 A. Yes.

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

7 A. Yes, I do.

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

9 What number is that, Miss Anderson?

10 A. 1806.

11 Q. Do you recognize that firearm?

12 A. Sure do.

13 Q. What type of firearm is it?

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

15 Q. Is it a shotgun?

16 A. Yes.

17 Q. How do you recognize it as yours?

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

20 Q. Why did do you that?

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

25 Q. You used 1806 for that; right?

Karen Anderson – Direct

1 A. Yes, I did.

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

3 A. Okay. 1798.

4 Q. What type of firearm is 1798?

5 A. It's an original carbine, military, what they call  
a  
it.  
6 Paratrooper carbine with a bayonet lug on the front of

7 Folding stock. You got your oil can, which usually  
those are  
8 always missing.

9 Q. Did you have one of those in your home prior to  
November 5,  
10 1994?

11 A. Yes.

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

13 A. 1812.

14 Q. 1812. Have you seen that gun before?

15 A. Yes.

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

17 A. Yes.

18 Q. What type of gun is it?

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

20 shape.

21 Q. How do you recognize it?

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

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

24 of you?

25 A. Yes, I have.

9042

Karen Anderson – Direct

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

2 that Grand?

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

4 Q. Is it a commemorative gun?

5 A. It's a commemorative gun. I just can't remember  
what the

6 make of it is right now.

7 Q. Why don't you switch with Agent Tongate and take a  
look at

8 that one. What's the Government exhibit number on  
that?

9 A. 1792.

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

11 A. Yes, it's a lever action. Gold commemorative.  
They were

12 purchased from the same gentleman in Hot Springs.

13 Q. Do you recognize it?

14 A. Yes.

15 Q. What do you recognize about it?

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

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

20 A. Yes.

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

22 What's the Government exhibit sticker?

23 A. 1833.

24 Q. Do you recognize 1833?

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

9043

Karen Anderson - Direct

1 barrel, AR-15. .223 caliber.

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

3 A. No.

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

5 A. Yes.

6 Q. -- prior to November 5, 1994?

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

8 Q. You can give it back to Agent Tongate.

9 A. 1794. Ruger 10/22, shoots a .22 round. Common



gun. We

10 had several of these like this.

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

12 A. No, ma'am.

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

14 A. Yes.

15 Q. -- prior to November 5, 1994?

16 A. Yes.

17 Q. Along with the other guns that you've already  
identified?

18 A. Yes.

19 Q. Thank you. You can give that to Agent Tongate.

20 A. 1800.

21 Q. And do you recognize that gun?

22 A. Yes.

23 Q. What type of gun is it?

24 A. They call them gas guns, flare guns. They're used  
to shoot

25 37-millimeter. They don't have any rifling. They have  
what

9044

Karen Anderson - Direct

1 they call a smooth bore on the inside of them.

2 Q. What are they used for?

3 A. Basically military police uses them, prison system  
uses

4 them. They're used a lot on boats, for flares.

5 Q. And did you have that firearm in your home --  
excuse me --

6 prior to November 5, 1994?

7 A. Yes.

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

9 A. Here we go again.

10 Got to find it.

11 Can't find it.

12 THE COURT: Agent Tongate, can you assist?

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

15 Is it in there, that way.

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

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

19 BY MS. WILKINSON:

20 Q. Miss Anderson, can you look on the tag that's  
attached to

21 that? Do you see a serial number listed there?

22 A. No, ma'am.

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

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

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

9045

Karen Anderson - Direct

1 for it.

list

2 Can I show you Government's exhibit 2103, the

3 that you made.

4 Miss Anderson --

5 A. Yes.

see

6 Q. -- take a look at your computer screen. And do you

7 this list? I'm pointing to the second --

8 A. There you go.

9 Q. -- item on there.

10 A. Yes.

11 Q. What does that say?

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

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

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

15 Q. Is that a Trueflite Flare 37-millimeter?

16 A. Yes.

look at

17 Q. Why don't you just leave it there and we'll take a

18 that time during the break.

19 Can you look at the next firearm?

20 A. Oh, I found it. It's obvious. It bit me. My hand

was on

21 it the whole time. Right here.

22 Q. What does it say?

23 A. 5403.

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

25 A. Yes.

9046

Karen Anderson - Direct

1 1022.

2 Q. What's --

3 A. Folding stock.

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

6 A. 1782.

7 Q. Do you recognize it?

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

9 Q. What type of firearm is it?

10 A. It's a 10/22.

11 Q. Is there anything unusual about that firearm?

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

13 Q. And did you have one just like that in your home  
prior to

14 November 5, 1994?

15 A. Yes, ma'am.

16 Q. Thank you.

17 A. 1802.

18 Q. What type of gun is that?

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

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

21 A. Yes, we did.

22 Q. Is there anything unusual about that particular  
firearm?

23 A. No.

24 Q. Give that back to Agent Tongate.

25 A. 1784.

9047

Karen Anderson - Direct

1 Q. Do you recognize 1784?

2 A. Yes.

3 Q. How do you recognize it?

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

5 Q. Nothing unique about that firearm?

6 A. No, ma'am.

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

8 A. No. 1875548 -- or 53.

9 Q. Okay. Let me show you Government's Exhibit 2103  
again.

10 You said it was a Mini-14; is that right?

11 A. Yes.

12 Q. Do you see where I'm pointing here?  
13 A. Yes.  
14 Q. Is that the same number, 18755453?  
15 A. Yes, ma'am.  
16 Q. Is that your firearm?  
17 A. Yes.  
18 Q. Give it back to Agent Tongate.  
19 A. 1790.  
20 Q. 17 what?  
21 A. 1790.  
22 Q. Do you recognize 1790?  
23 A. Yes, ma'am.  
24 Q. How do you recognize it?  
25 A. It's my baby.

9048

Karen Anderson - Direct

1 Q. What do you mean by that?  
2 A. I like shooting this gun. It's a custom-made  
stock. It  
3 was made basically for me. It's my length. Two guys  
in  
4 Oklahoma made it. It's Mr. Moore's gun, but I took it  
from  
5 him.  
6 Q. And why did you take it from him?

7 A. Because I really like the way it shoots.

8 Q. Okay.

9 A. It's a nice gun to shoot.

10 Q. Any doubt in your mind that it's your gun?

11 A. No, ma'am.

12 Q. And did you tell us exactly what type it was?

13 A. It's a .308 caliber. It was basically what they  
take

14 that -- it's been rebarreled for .308. It was a  
Concarno gun,

15 but they've redone the barrel on it to make it --

16 Q. And it had been rebarreled as a .308 before you had  
it?

17 A. No.

18 Q. Pardon?

19 A. No.

20 Q. Was it a .308 when you had it in your house --

21 A. Yes.

22 Q. -- prior to November 5, 1994?

23 A. Yes.

24 Q. Yes, it was?

25 A. Yes.

9049

Karen Anderson - Direct

1 Q. You can give it back to Agent Tongate.

2  
Government's

Now, do you see the small handgun,

3 Exhibit 1869 in front of you. Is that still up there?

4 A. Okay.

5 Q. You previously identified that; correct?

6 A. Yes.

7 Q. Can you find the serial number on that gun?

8 THE COURT: I'm sorry, what's the number of  
this?

9 MS. WILKINSON: 1869.

10 THE COURT: All right.

11 THE WITNESS: Yeah.

12 BY MS. WILKINSON:

13 Q. Could you read it for the jury?

14 A. Model 39-2, 109904.

15 Q. Is that the number, the serial number?

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

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

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

19 tape here.

20 Q. Well, I may have the wrong number. So that may be  
my

21 mistake, so I'll check that. Thank you. You may put  
that

22 down.

23 Now, Miss Anderson, did you also view some



photographs

24 from Mr. Nichols' house that showed some boxes and some  
25 photography equipment?

9050

Karen Anderson – Direct

1 A. Yes.

2 Q. Let me show you Government's Exhibit 1773, No. 5.

3 Can you see that photograph?

4 A. No.

5 Q. Hold on one second.

6 Do you see that photograph?

7 A. Yes, ma'am.

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

9 A. Some of them, yes.

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

11 shelves?

12 A. That's upside down.

13 Q. Yes.

14 A. Yes.

15 Q. Have you seen this photograph prior to coming to  
court

16 today?

17 A. Yes, I have.

18 Q. Did you recognize that box?  
19 A. Yes.  
20 Q. How did you recognize it?  
21 A. We had one just exactly like it that had a tripod  
in it.  
22 Q. Does that say "tripod" upside down?  
23 A. It says . . . .  
24 Q. Let me see if I can zoom in for you. Does that  
help?  
25 A. No, it makes it fuzzy for me, I'm sorry.

9051

Karen Anderson – Direct

1 Q. Had you identified that as a tripod box before you  
came to  
2 court today?  
3 A. Yes.  
4 Q. And was the tripod box taken or missing from your  
home on  
5 November 5, 1994?  
6 A. Yes, ma'am.  
7 Q. What was in that box?  
8 A. There was a tripod in it.  
9 Q. Now, you've told us that other photographic  
equipment was  
10 taken; is that right?  
11 A. Yes.

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

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

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

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

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

9052

Karen Anderson - Direct

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

2 THE COURT: I want to go back a moment to  
1748. I may

3 have missed something there. That's a piece of jade.

4 MS. WILKINSON: Yes, your Honor.

5 THE COURT: Was that identified by someone  
else  
6 earlier?

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

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

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

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

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

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

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

9053

Karen Anderson – Direct

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

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

4 THE COURT: Okay. I'll wait expectantly.

5 We're in recess. 20 minutes.

6 (Recess at 3:05 p.m.)

7 (Reconvened at 3:24 p.m.)

8 THE COURT: Be seated, please.

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

10 THE COURT: Please resume the stand under your  
oath.

11 Ms. Wilkinson, you may continue.

12 MS. WILKINSON: Thank you, your Honor.

13 BY MS. WILKINSON:

14 Q. Now, Ms. Anderson, we'll try it where you let me  
finish the

15 question and then you answer it.

16 A. Yes, ma'am.

17 Q. Okay. You've looked at some other firearms that  
were

18 recovered in this case, have you not?

19 A. Yes.

20 MS. WILKINSON: Your Honor, if we could -- for  
ease,

21 if she could just step down and I'll read the exhibit  
numbers

22 off.

23 THE COURT: All right.

24 MS. WILKINSON: It will go a little quicker.

25 THE COURT: You may step down.

9054

Karen Anderson - Direct

1 BY MS. WILKINSON:

2 Q. Ms. Anderson, can you kind of come around here at  
least so

3 you can face the jury.

4 There you go.

5 Did you look at these firearms before you came  
into

6 court today?

7 A. Yes, I have.

8 Q. Do you recognize them as firearms you had in your  
house

9 prior to November 5, 1994?

10 A. Yes, I do.

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

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

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

15 A. Yes, we did.

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

17 recognize that?

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

19 Q. Anything unusual about that gun?

20 A. It's -- usually they come with a straight wood  
stock. This

21 is a Ramline folding stock also.

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

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

24 Q. Meaning this portion?

25 A. Like that.

9055

Karen Anderson - Direct

1 Q. All right.

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

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

recognize

4 that gun?

5 A. Yes, I do.

6 Q. What type of firearm is that?

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

8 We're looking at an Interarms -- this is what  
they

9 call a Tenite stock. They usually come with a wood  
stock, but

10 this is a Tenite stock on it.

11 Q. Do you recognize that firearm?

12 A. Yep, I do.

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

14 A. Yes, ma'am.

15 Q. Now, take a look at this one, Government's Exhibit  
1825.

16 Did you have a firearm that was designed exactly this  
way on

17 November 5?

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

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

20 A. Yes.

21 Q. Otherwise, do you recognize the firearm?

22 A. The rest of it just exactly like it would if it had  
a wood

23 forepiece and a wood stock.

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



25 A. Yes.

9056

Karen Anderson – Direct

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

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

3 Q. Nothing unusual about that?

You

4 A. Has a Choate stock on it with a hooded site on it.

5 don't see those around very often.

6 Q. What are you talking about?

it's

7 A. The hooded sight right there, yes. Hooded because

8 round and covered. Usually it's an open sight.

before

9 Q. Did you have that hooded sight on that firearm

10 November 5, '94?

11 A. Yes, ma'am.

Do you

12 Q. Finally, take a look at Government's Exhibit 1829.

13 recognize that one?

bayonet lug

14 A. It's a carbine, military. Has what they call a

15 on the front of it. Has a military strap on it, sling.

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

17 A. Yes.

18 Q. Prior to November 5, 1994?

19 A. Yes, ma'am.

20 Q. Thank you. You can take your seat.

21 Now, Ms. Moore (sic), I'm not going to pick  
this one

22 up. This is the one you told us, Government's Exhibit  
1822?

23 A. State Arms.

24 Q. .50 caliber?

25 A. .50 caliber, State Arms.

9057

Karen Anderson – Direct

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

2 A. Pretty good size.

3 Q. How would you describe that for the record?

4 A. Approximately 6 inches long. Case is maybe an inch  
in

5 diameter.

6 Q. Is this firearm considered a machine gun?

7 A. No.

8 Q. And is any portion of this firearm, Government's  
Exhibit

9 1822, registered with the ATF?

10 A. Yes.

11 Q. What portion of it?

12 A. The action.

13 Q. What do you mean by "the action"?

14 A. That piece that the barrel hooks onto. This  
section right

15 here.

16 Q. Right below the scope?

17 A. Yes, below the scope. That section right there.

18 Q. And did you -- Mr. Moore have that registered with  
ATF

19 prior to the -- prior to November 5, 1994?

20 A. Yes.

21 Q. In front of you, Ms. Anderson, should be  
Government's

22 Exhibit 1867. Do you see that?

23 A. Yes.

24 Q. And inside, could you open it up and see if you  
recognize

25 1867A and B?

9058

Karen Anderson - Direct

1 A. Yes.

2 Q. What are they?

3 A. They're what they call a military detector sensors  
that

4 detects movement on your property.

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

6 A. Yes.

7 Q. How many of those did you have?

8 A. Four.

two

9 Q. Look inside Government's Exhibit 1866. Do you see  
10 additional items?

11 A. Yes.

12 Q. Are they the same things?

13 A. Yes, ma'am.

14 Q. Tell us how many of those platoon early-warning  
systems you

15 see in front of you.

16 A. A total of four.

17 Q. And that's 1867A and B and 1866A and B?

18 A. Yes.

19 Q. Had you used those four platoon early-warning  
systems in

20 your home for security prior to November 5, 1994?

21 A. No.

up

22 Q. Ms. Anderson, did you have any security system set

23 around your home prior to November 5, 1994?

24 A. Nothing other than a human body being there.

and

25 Q. Now, after you came back to the house on November 6

9059

Karen Anderson - Direct

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

2 A. Yes.

3 Q. Were you asked to provide any names?

4 A. Yes.

5 Q. What were you asked to do?

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

8 Q. Meaning visited your property?

9 A. Yes.

10 Q. Had many people visited your property there?

11 A. No.

12 Q. Did you give the name Tim McVeigh?

13 A. Yes.

14 Q. What did you tell them about Tim McVeigh?

15 MR. TIGAR: Object, your Honor.

16 THE COURT: What's the objection?

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

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

21 MR. TIGAR: No objection, your Honor.

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

24 I'm glad we cleared it up.

25 MR. TIGAR: I understand.

9060

Karen Anderson – Direct

1 THE COURT: Go ahead. You may answer.

2 BY MS. WILKINSON:

3 Q. Just to explain to the jury the process, tell them  
what you

4 told the police in Arkansas about Timothy McVeigh at  
that time.

5 A. Well, we were asked people basically might be  
aggravated at

6 you or people that might have visited your home.

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

8 A. Yes.

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

11 A. Yes.

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

13 A. We told them that he had been stationed at Fort  
Riley. We

14 gave them an address as to the drop box that I had for  
him.

15 Q. Where was that drop box located?

16 A. In Kingman, Arizona.

17 Q. Did you have any telephone number to contact Mr.  
McVeigh?  
18 A. No.  
19 Q. Had he ever given you one?  
20 A. No.  
21 Q. And do you recall when you gave that information to  
the  
22 police?  
23 A. I believe the same time that we remitted the list  
of the  
24 guns.  
25 Q. That week after November 5, 1994?

9061

Karen Anderson - Direct

1 A. Yes.  
2 Q. Now, you gave them Timothy McVeigh -- you gave the  
police  
3 the name "Timothy McVeigh." Did they ask you to spell  
that  
4 name when you gave it to them?  
5 A. Not to my recollection.  
6 Q. Did you hand them any written materials with Mr.  
McVeigh's  
7 name on it?  
8 A. No.  
9 Q. Do you recall whether they were taking notes while  
you were

10 talking to them?  
11 A. Yes, they were.  
12 Q. And they never asked you for clarification on how  
to spell  
13 Mr. McVeigh's name?  
14 A. Not to my rec -- however you say it --  
recollection.  
15 Q. Your recollection?  
16 A. Recollection.  
17 Q. Now, when was the last time prior to November 5,  
1994, that  
18 you had spoken to Tim McVeigh?  
19 A. Repeat that.  
20 Q. When was the last time that you had spoken to Tim  
McVeigh  
21 before November 5, 1994?  
22 A. It was in the spring of '94.  
23 Q. And you hadn't talked to him yourself after that  
time; is  
24 that right?  
25 A. No.

9062

Karen Anderson - Direct

1 Q. Before November 5, 1994?  
2 A. No.  
3 Q. Well, let's go back -- why don't you tell the jury  
when you



4 first ever heard the name "Timothy McVeigh."

He had  
living there.

5 A. I heard it through a phone call through Mr. Moore.  
6 called me from down in Ft. Lauderdale when he was

7 Q. What year was that?

8 A. That was in '93.

9 Q. 1993?

10 A. Yes.

"Timothy  
McVeigh"?

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

13 A. Yes.

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

gun show  
talked  
army pants  
pants --  
size I

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

he came

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

23 A. Yes, he did.

when he 24 Q. Did he tell you how Timothy McVeigh was dressed  
25 first met him in 1993?

9063

Karen Anderson - Direct

1 MR. TIGAR: Object to that, your Honor.

2 THE COURT: Sustained.

3 BY MS. WILKINSON:

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

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

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

9 MS. WILKINSON: Your Honor, again it's not  
being

10 admitted for the truth. We're trying to move on to the  
next

11 time when Ms. Anderson actually saw and met Mr.  
McVeigh. Just

12 laying the foundation for that.

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

15 MS. WILKINSON: Well, I can ask her what she  
did as a

16 result of the conversation instead.

17 THE COURT: All right.

18 BY MS. WILKINSON:

19 Q. Ms. Anderson after that conversation, did there  
come a time

20 when you went to a gun show in Tulsa, Oklahoma?

21 A. Yes.

22 Q. In 1993?

23 A. Yes.

24 Q. When was that in 1993?

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

9064

Karen Anderson - Direct

1 be the last weekend in March.

2 Q. Do you have any specific recollection of which  
weekend it

3 was in the year of 1993?

4 A. I thought it was in the first weekend in April.  
And they

5 always hold it right around that time.

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

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

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

9 A. Yes.

10 Q. Did you set up your table?

11 A. Yes.

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

13 A. Yes.

14 Q. What happened?

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

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

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

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

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

22 Karen?

23 A. Yes.

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

25 a gun show?

9065

Karen Anderson - Direct

1 A. No.

2 Q. Has Mr. Moore, based on your personal knowledge,  
ever used

3 an alias at a gun show?

4 A. Yes.

5 Q. What name does he use?

6 A. Bob Miller.

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

8 A. Yes.

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

11 A. Yes.

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

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

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

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

21 Q. For sale?

22 A. Yes. And he asked if he could use part of the  
table; and I

23 had a card table that sets (sic) at the end of my  
table, and I

tighter. 24 took my books off of it and just scooted everything up

25 And I said, "You can use this end of it."

9066

Karen Anderson – Direct

show? 1 Q. You allowed him to share your table at the gun

2 A. Yes, ma'am.

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

4 A. No.

gun show? 5 Q. Have you ever seen Mr. McVeigh sell firearms at a

6 A. No.

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

8 A. Yes.

9 Q. Did you speak to him during that time?

10 A. Yes.

11 Q. And did you have other general conversation?

12 A. Yes.

weekend? 13 Q. What happened at the end of the gun show that

and 14 A. Mr. Moore and I had talked about him coming down

of my 15 helping at the farm because I was so far behind on all

there, and he 16 chores over the winter months with just moving in

17 followed me home from the gun show.

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

19 A. Mr. McVeigh.

20 Q. And had you had a conversation with Mr. McVeigh  
about his

21 financial condition?

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

23 Q. Did you invite him to come to your ranch?

24 A. Yes.

25 Q. What happened?

9067

Karen Anderson – Direct

1 A. He followed me home on Sunday night.

2 Q. Do you recall how long he stayed in the spring of  
1993?

3 A. Anywhere from a week to ten days.

4 Q. Do you recall whether it was before the fire in  
Waco on

5 April 19, 1993, or after?

6 A. Before.

7 Q. Now, you said he stayed a couple days or a week.  
Is that

8 right?

9 A. Yes.

10 Q. What did Mr. McVeigh do while he was there?

11 A. I had him raking leaves. I had him filling in  
holes where  
12 some holes had been dug out in the yard. I had him  
helping me  
13 bag some of the ammo up. I had him helping me assemble  
some  
14 little kits -- just whatever I could think of that  
would keep  
15 him occupied.  
16 Q. During that time, did you discuss with him your  
ammunition  
17 business?  
18 A. Yes.  
19 Q. And did you see him doing anything else during that  
time  
20 when he wasn't doing odd jobs for you?  
21 A. He either -- most of the time was either reading  
all of our  
22 gun magazines we had, or he was listening to his world-  
band  
23 radio.  
24 Q. Did you give him free access to your house?  
25 A. Sorrily, yes.

9068

Karen Anderson - Direct

1 Q. Did you allow him to go into any rooms he chose?  
2 A. Yes.  
3 Q. If he had wanted to look in Mr. Moore's master



bedroom,

4 could he have looked in there?

5 A. Yes.

6 Q. Are there times when you were outside?

7 A. Yes.

8 Q. Why is that?

9 A. Taking care of the animals.

10 Q. Is that something you do every day?

11 A. Yes.

12 Q. During Mr. McVeigh's visit in early April of 1993,  
did you

13 ever have an occasion to take him around the area?

14 A. Yes.

15 Q. That is, outside your property?

16 A. Yes.

17 Q. Where did you take him?

18 A. I had to go in town to the insurance office, I  
needed to go

19 to the grocery store, I needed to go to the tag office,  
and I

20 asked if he'd like to take a ride around and see what  
the town

21 looked like.

22 Q. During that time, did you show him some of the  
roads that

23 surround your property?

24 A. To go to the insurance property or to where the  
insurance

take the 25 company is from our new farm that we have, you have to

9069

Karen Anderson – Direct

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

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

3 Do you recognize this over -- this aerial  
photograph?

4 A. Give me just a second.

5 Q. Sure.

6 A. Yes.

7 Q. Can you see it?

8 A. Yes.

9 Q. What does it depict?

10 A. Basically --

11 Q. You can't use the pen yet, Ms. Anderson. We don't  
have it

12 into evidence, so just tell us what it shows and then  
we'll

13 move on.

14 A. It shows the road that goes in front of our piece  
of

15 property, and it also shows the road that comes around  
the

16 property that goes over -- that cuts over to Highway  
70; in

17 other words, goes by our old farm, also.

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

19 MR. TIGAR: No objection.

20 THE COURT: Received, 1743; may be published.

21 BY MS. WILKINSON:

22 Q. All right, Ms. Anderson. Orient the jury and tell  
them

23 what they're looking at, please. You can use your pen  
to --

24 A. This is -- from what I can see, this is Highway 270  
west,

25 like this, right here where these trees are. Our  
property is

9070

Karen Anderson - Direct

1 right in here.

2 Q. So your property is off Highway 270 west?

3 A. 270, yes.

4 Q. And approximately how large is your property?

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

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

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

8 Q. There is a house, I take it?

9 A. There is a house. There is a boat shed. There is  
a wood

10 shed, shop, hay barn along with where the ducks stay  
when

11 they're sick, and there is a horse barn.

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

13 A. Close to 630. 630, 640 feet.

14 Q. Is it difficult to see from Highway 270?

15 A. Unless you're driving into town in the summertime  
-- you

16 have to just look at a precise moment. Then you'll  
catch a

17 glimpse of it. In the wintertime, you can see it a  
little bit

18 easier through the trees.

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

20 creek back there?

21 A. Yes.

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

23 A. It runs right back up in here somewhere. It's a  
little

24 hard to tell.

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

9071

Karen Anderson - Direct

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

2 Q. Now, if you could show the jury where you took Mr.  
McVeigh

3 that day you were showing him around Royal.

4 A. They have the beginning of it right here.

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

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

7 right here.

8 Q. And you would have come out of your property, I  
take it,

9 and taken a ride on 270?

10 A. Yes.

11 Q. And then where did you go?

12 A. You go down there. It's exactly a half mile down  
to

13 Bradley's, and you take a right-hand turn and come up  
this

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

15 Q. And then where did you go?

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

17 side of the mountain, it comes through here.

18 Q. What type of road is that?

19 A. It comes right here.

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

21 A. Yeah, the bottom of the photograph. This is the  
road that

22 comes right through here.

23 Q. What type of road is that?

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

25 Q. Do you remember the name of it?

9072

Karen Anderson - Direct

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

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

5 A. A lot of little side roads, yes.

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

7 A. No.

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

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

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

16 A. Yes.

17 Q. Would you put an X there, please.

18 A. Right here?

19 Q. Approximately how far is that from your property?

20 THE COURT: By the roads?

21 MS. WILKINSON: Yes, your Honor.

22 THE WITNESS: Probably about maybe somewhere  
between 3

23 and 5.

24 BY MS. WILKINSON:

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

9073

Karen Anderson - Direct

1 property, would it be shorter?

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

3 a half across.

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

5 property?

6 A. Yes.

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

8 marks.

9 A. Oh, good.

10 Q. We'll be done with that exhibit.

11 A. It's not erasing.

12 Q. Pressing the side, that little button.

13 A. Yes.

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

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

18 Can we go back to it?

19 Yes. Thank you.

20 BY MS. WILKINSON:

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

22 A. Yes.

23 Q. Do you recognize that?

24 A. Yes.

25 Q. What does that show?

9074

Karen Anderson – Direct

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

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

3 MR. TIGAR: No objection, your Honor.

4 THE COURT: Received.

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



6 BY MS. WILKINSON:

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

8 A. Yes.

9 Q. Right in the middle of the photograph, do you see  
that

10 silver box?

11 A. Yes.

12 Q. Can you mark that with an X.

13 What is that?

14 A. That's the electrical and the telephone and the  
fuse boxes

15 to everything inside the house.

16 Q. Let's take a look at Government's Exhibit 1740D.  
Do you

17 recognize that?

18 A. Yes.

19 Q. What does that show?

20 A. It shows the carport where you go into the dining  
room of

21 the house and the garage.

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

23 A. Yes.

24 MS. WILKINSON: Government offers 1740D.

25 MR. TIGAR: May I inquire, your Honor?

Karen Anderson - Direct

1 THE COURT: Yes.

2 VOIR DIRE EXAMINATION

3 BY MR. TIGAR:

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

5 A. Yes.

6 Q. When?

7 A. Recently. August.

8 Q. Pardon?

9 A. August.

10 Q. August of '97?

11 A. Yes.

12 Q. And the vehicle that's shown in the photograph:  
That is

13 the same one that you owned in 1994?

14 A. Mr. Moore owned that, yes.

15 Q. So it is the same one?

16 A. Yes.

17 Q. And -- but -- picture that we're seeing here is in  
the same

18 condition as it was in 1994?

19 A. Yes.

20 MR. TIGAR: No objection.

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

22 DIRECT EXAMINATION CONTINUED

23 BY MS. WILKINSON:

24 Q. Tell the jury what this shows.

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

9076

Karen Anderson - Direct

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

2 Q. Now, your red mark from the last time is there. Is  
that

3 the bottom of the door where the red mark is?

4 A. Yes.

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

6 A. Yes.

7 Q. Used to enter the home.

8 See that small satellite dish there on the  
right?

9 A. Yes.

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

11 A. No, it was not.

12 Q. Other than that, is this a fair and accurate  
depiction of

13 the way the home looked in 1994?

14 A. Yes.

15 Q. I think you told Mr. Tigar that that van was owned  
by

16 Mr. Moore in the fall of 1994?

17 A. Yes.

18 Q. Now let's look at Government's Exhibit 1740C. Is  
that just

19 another angle of the same -- showing the same area?

20 A. Yes, ma'am.

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

22 MR. TIGAR: No objection.

23 THE COURT: Received.

24 BY MS. WILKINSON:

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

9077

Karen Anderson - Direct

1 A. It shows the garage door that opens up into the  
shop and

2 basically just his van and the carport, and Boots is  
laying

3 there. And that's about it.

4 Q. Now, I'd like to show you an exhibit that's not yet  
in

5 evidence. Government's Exhibit 1740B. Do you  
recognize that?

6 A. Yes.

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

8 described?

9 A. Yes.

10 MS. WILKINSON: Government offers 1740B.

11 MR. TIGAR: No objection, your Honor.

12 THE COURT: Received.

13 BY MS. WILKINSON:

14 Q. Now, Ms. Anderson, this is the side of the garage  
right

15 here with the little window. Is that right?

16 A. Yes.

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

18 A. To the back?

19 Q. Yes.

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

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

22 A. Behind the house is -- directly there to the north,  
it has

23 a hill that drops right down and then opens up into the  
front

24 pasture.

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

9078

Karen Anderson – Direct

1 A. Yes.

2 Q. Are there woods all around your property?

3 A. On two sides of it.

4 Q. Which two sides?

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

6 Q. Now I'd like to show you one other photograph of  
the house

7 that hasn't yet been moved into evidence, Government's  
Exhibit

8 1740A. Do you recognize that?

9 A. Yes.

10 Q. Is that again just one more angle showing the  
entrance that

11 you and the Moores used?

12 A. Yes.

13 MS. WILKINSON: Government offers 1740A.

14 MR. TIGAR: No objection, your Honor.

15 THE COURT: Received.

16 BY MS. WILKINSON:

17 Q. Now, if you're standing back looking at this  
photograph or

18 looking at your home from this angle, Ms. Anderson,  
where are

19 you standing?

20 A. Pretty close to the boat shed and right next to the  
east

21 side fence. You're within 10, 15 feet.

22 Q. And if you were to look back behind your shoulder,  
could

23 you see the horses?

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

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

9079

Karen Anderson - Direct

1 yours?

2 A. I don't know the name of the people that own the 10  
acres

3 on the east side, but on the west side, Walt Powell and  
his

4 wife.

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

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

7 Q. And was the home generally in this condition when

8 Mr. McVeigh visited it in the spring of 1993?

9 A. Yes.

10 Q. And you told us he had access to all of the  
buildings that

11 you've described and all the rooms in this house?

12 A. Yes.

13 Q. Where did Mr. McVeigh sleep when he was visiting in  
April

14 of 1993?

15 A. The couch.

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

17 again?

18 A. Knob Creek, the fall show.  
19 Q. What is Knob Creek?  
20 A. Knob Creek is a large machine-gun shoot that people  
from  
exhibit  
21 all over the United States come to. They also have  
22 tables there.  
23 Q. Do you regularly attend that show?  
24 A. Yes.  
25 Q. And that was when -- when in 1993?

9080

Karen Anderson - Direct

1 A. Usually right around the third weekend in October.  
2 Q. How did you see Mr. McVeigh at that gun show?  
3 A. I don't remember whether it was a Friday or  
Saturday. I  
4 just turned around, and there was this tall guy with a  
smiling  
5 face and said "Hi." And that's where he was.  
6 Q. How long did you see him that day?  
7 A. Only for maybe 15, 20 minutes.  
8 Q. Did you see him at any other time at the Knob Creek  
9 machine-gun shoot?  
10 A. Walking around, and that was it.  
11 Q. Never spoke to him after that?



12 A. No.

13 Q. Now, between those two times that you saw Mr.  
McVeigh in  
14 1993 -- that is, the spring of 1993 when he stayed at  
your  
15 house and seeing him in Knob Creek -- did you talk to  
him over  
16 the telephone during that time period?

17 A. No.

18 Q. Did you exchange any letters with him?

19 A. Yes.

20 Q. Do you recall the substance of those letters?

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

9081

Karen Anderson - Direct

1 Q. And did you do that?

2 A. Yes.

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

just -- 5 A. There might have been one small letter there. I

6 Q. You don't have any specific recollection?

7 A. No.

the 8 Q. I take it you didn't keep track at that time of all  
9 correspondence that Mr. McVeigh was sending?

10 MR. TIGAR: Objection to leading, your Honor.

11 THE COURT: Sustained.

12 BY MS. WILKINSON:

13 Q. Did you keep track of the correspondence Mr.  
McVeigh was

14 sending to you at that time?

15 A. No.

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

17 A. Either January or February of '94.

18 Q. Where did you see him?

19 A. At my house.

20 Q. Had you invited him?

21 A. No.

22 Q. Did he just show up?

23 A. Telephone call.

24 Q. What happened?

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

Karen Anderson - Direct

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

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

6 Q. When he referred to "Bob was in Florida for the  
winter,"

7 who did you understand him to be referring to?

8 A. Mr. Moore.

9 Q. And did Mr. Moore stay in Florida every winter?

10 A. Yes.

11 Q. Did Mr. McVeigh show up that evening?

12 A. Yes.

13 Q. Did you cook dinner for him?

14 A. Yes.

15 Q. Did you have conversation?

16 A. Yes.

17 Q. Did you discuss any political issues at that time?

18 A. We talked about Waco.

19 Q. And did you notice any change in Mr. McVeigh's  
demeanor at

20 that time?

had been 21 A. Was just a little bit more adamant on Waco than he

22 prior to that.

23 Q. And did he discuss the fire at Waco?

24 A. Yes.

25 Q. When did Mr. McVeigh leave after that?

9083

Karen Anderson - Direct

1 A. He left the next morning.

2 Q. Did he tell you where he was going?

Kingman. 3 A. Said he was going home, so I assume that was

4 Q. But you didn't know where home was; is that right?

5 A. I considered Kingman as home to him.

from? 6 Q. And did he ever tell you about where his family was

7 A. Other than just New York state. That was it.

8 Q. He never gave you any details?

9 A. No.

10 Q. Did he ever give you a phone number in Kingman?

ago, but 11 A. One time when I was coming through years and years

it. 12 I mean it was -- it was just to say hello, and that was

you a 13 Q. I'm sorry. I think I misunderstood. Did he give

14 phone number where you could reach him in Kingman?  
15 A. When I was going to visit my mother in Vegas one  
time, and  
16 I think that was the business phone number of where he  
was  
17 working, and that was it.

18 Q. Did you call him?

19 A. I called and said, "Hello."

20 And he says, "How's everything going?"

21 And I said, "Fine."

22 And he says, "Are you on your way?"

23 And I said, "Yeah. I'm going to see my  
mother, and  
24 we're going camping."

25 Q. Did you see him at that time?

9084

Karen Anderson – Direct

1 A. No.

2 Q. Do you recall when that was?

3 A. No, I don't.

4 Q. Now, when Mr. McVeigh visited for the one night in  
the

5 winter of 1994, do you recall where he slept?

6 A. He slept in my bedroom.

7 Q. Where did you sleep?

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

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

10 A. Right.

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

12 visit?

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

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

15 collection?

16 A. Not the whole collection.

17 Q. Did you discuss guns with Mr. McVeigh?

18 A. Yes.

19 Q. I think you just said while you were in the shower.  
Could

20 Mr. McVeigh have gone into Mr. Moore's room?

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

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

23 A. Yes.

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

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

9085

Karen Anderson - Direct

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

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

3 A. Yes.

4 Q. When did you tell him that?

5 A. On one of the times when we were setting (sic) on  
the floor

6 and we were discussing what we liked to shoot; and I  
turned

7 around and I says, "Gee, I really like to shoot this,"  
and

8 opened the cabinet up and showed it to him.

9 Q. After November 5, 1994, did you notice whether that  
handgun

10 was still in the cabinet under the television?

11 A. It took about three weeks before it dawned on me to  
think

12 about it, but it wasn't there.

13 Q. You noticed that it was missing?

14 A. Yes.

15 Q. Now, after Mr. McVeigh's visit in the winter of  
1994, did

16 he ever come to your house again?

17 A. Yes, he came in the spring.

18 Q. Spring of 1994?

19 A. Yes.

20 Q. How long did he stay?

21 A. Three, four days.

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

23 A. Yes.

24 Q. Did you trust him?

25 A. Yes.

9086

Karen Anderson - Direct

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

2 A. No.

3 Q. Did he have access to the refrigerator?

4 A. Extremely well.

5 Q. Why do you say that?

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

7 Yes, he did.

8 Q. Now, during that visit in the spring of 1994, do  
you recall

9 him doing anything around the house while he was there?

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

11 together.

12 Q. And do you recall him having any conversations with

13 Mr. Moore?

14 A. Yes.

15 Q. Mr. Moore was present at that time?

16 A. Yes.

17 Q. And do you recall any of the topics that they  
discussed --

18 that you heard them discuss?



discussed 19 A. Well, they discussed Waco all over again. They  
discussed a 20 some of the things about the New World Order. They  
not too 21 launcher, a parachute flare launcher that Mr. Moore was  
22 happy with him about.  
23 Q. With him about? What do you mean, Mr. McVeigh?  
24 A. Mr. McVeigh.  
25 Q. Why was that?

9087

Karen Anderson - Direct

Honor. 1 A. He had turned --  
2 MR. TIGAR: Object, unless there is personal  
3 knowledge, your Honor, of this background.  
4 MS. WILKINSON: Trying to establish that, your  
a 5 THE COURT: Well, I think you're asking about  
6 conversation in her presence.  
7 MS. WILKINSON: I was.  
8 THE COURT: Isn't that what you are asking?  
9 BY MS. WILKINSON:  
Is 10 Q. You're talking about a conversation that you heard.  
11 that right?

12 A. Yes.

13 Q. Okay. What happened?

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

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

22 A. Very well.

23 Q. What did you observe?

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

9088

Karen Anderson - Direct

1 Q. Did he leave after that?

2 A. Shortly.

3 Q. How shortly after?

4 A. It was probably sometime later on that day.

5 Q. Did he ever return to your house again?

6 A. No.

7 Q. Did you ever receive any letters from him again?

8 A. Not for quite some time.

9 Q. Eventually, though, did you receive some  
correspondence?

10 A. Yes.

11 Q. Now, you told us that during that two- or three-day  
visit

12 in the spring of '94 that Mr. Moore and Mr. McVeigh  
discussed

13 the New World Order. Is that right?

14 A. Yes.

15 Q. Had you heard them discuss the New World Order at  
any other

16 time?

17 A. Yes.

18 Q. Had they discussed it the previous year in the  
spring of

19 '93 when he visited?

20 A. Yes.

21 Q. After that visit, did you and Mr. Moore go to some  
military

22 bases in the summer of 1993?

23 A. Yes.

24 Q. Why did you do that?

25 A. Just to see what was going on.

Karen Anderson - Direct

1 Q. What was your concern?

2 A. My concern was basically you've read all of this  
literature

3 and you've heard all of this and you were worried about  
the --

4 talking about black helicopters with no numbers and  
things on

5 it like this and you wondered if it's our military, why  
aren't

6 we numbering our vehicles and that, because I thought  
we were

7 supposed to.

8 Q. Did you and Mr. Moore discuss your concerns?

9 A. Yes.

10 Q. Had you discussed them with Mr. McVeigh in the  
spring of

11 '93?

12 A. Yes.

13 Q. And did you tell Mr. McVeigh that you and Mr. Moore  
were

14 going to go to military bases to look for these -- this  
foreign

15 military equipment in the summer of 1993?

16 A. Yes.

17 Q. Did you discuss that with Mr. McVeigh in the  
subsequent

18 visits; that is, in the fall of 1993, the winter of  
'94, and

19 the spring of '94?  
20 A. Not heavily, but on small terms, yes.  
21 Q. Was Mr. McVeigh interested in those topics?  
22 A. Yes.  
23 Q. Was he more interested than you were?  
24 A. Quite a bit.  
25 Q. How can you say that?

9090

Karen Anderson - Direct

1 A. Basically because he would try to talk with me and  
tell me  
2 what was going to happen, and my statement was -- is  
that until  
3 they're here knocking on my door, I believe in watching  
for  
4 things but don't get overreactive about it.  
5 Q. Did Mr. McVeigh discuss with you that some kind of  
action  
6 should be taken?  
7 A. He just was very upset about Waco, and I never  
heard him  
8 come out and say that he was going to take some kind of  
action.  
9 Q. Now, did you report to him during these  
conversations what  
10 you and Mr. Moore had seen at the military bases in the  
summer  
11 of 1993?

12 A. It might have been through a letter, yes.

13 Q. Did you see anything?

14 A. No.

15 Q. Did you get access to some of the military bases?

16 A. Only the ones that had museums.

17 Q. You didn't see any foreign military equipment?

18 A. No.

Order 19 Q. After that, did your interest in the New World

20 concept and issues -- was it lowered, was it minimized?

21 A. It was more fun to go swimming.

McVeigh 22 Q. Now, you told us that during your visits with Mr.

about 23 in 1993 and 1994 that he talked about Waco, you talked

about any 24 firearms and other things. Did you ever talk to him

25 valuables that you had in your house?

9091

Karen Anderson - Direct

1 A. We didn't come out and say anything about  
particularly gold

was 2 and silver, but gold and silver was discovered -- it

in other 3 discussed on a monetary basis on how much a person --

4 words, your value of what you have, how you should

divide it

5 up.

6 Q. Did you have some concern about keeping gold and  
silver in

7 your house in case of some kind of financial disaster  
in the

8 country?

9 A. We had, yes.

10 Q. Did you discuss that with Mr. McVeigh?

11 A. Yes.

12 Q. Did he share your views?

13 A. Yes.

14 Q. Now, after November 5, 1994, did you and Mr. Moore  
15 correspond with Mr. McVeigh?

16 A. I didn't catch the date again.

17 Q. After November 5, 1994, after you noticed your  
property was

18 missing, did you correspond with Mr. McVeigh?

19 A. Yes.

20 Q. Was that after you had told the police that Mr.  
McVeigh was

21 a regular visitor at your home?

22 A. Yes.

23 Q. Why did you correspond with Mr. McVeigh at that  
time?

24 A. Basically, I was hoping that he could help us on  
how to set

25 up security around the ranch and that, what we could  
do. I had

9092

Karen Anderson – Direct

I hadn't 1 already installed -- not when the first letter went --

The 2 put the fence in yet, but that was the overall deal.

3 robbery, you know: How could this have happened?

McVeigh 4 Q. At that time, were you suspicious about whether Mr.

5 had been involved in the robbery?

6 A. Yes and no.

7 Q. What do you mean by that?

than five, 8 A. You have very few people that have access, less

friend 9 to your house. You have a hard time believing that a

had 10 would set you up. You're hoping a friend, if they've

this stuff. 11 military background, might be able to help you find

suspicious of 12 Q. Did there come a time when you became more

13 Mr. McVeigh?

14 A. Yes.

15 Q. When was that?

16 A. In January.

17 Q. Of 1995?



18 A. Yes.

19 Q. What caused you to become more suspicious?

20 A. Of a map that I received and then maybe a week  
later of a

21 letter that I had received.

22 Q. All right. Let's start with the map. What did you  
23 receive?

24 A. I received a map that would basically be like the  
one that

25 we just looked at but is drawn up that shows the road  
where the

9093

Karen Anderson – Direct

1 house is and it shows the road that goes around to the  
old farm

2 and everything and approximately of where the van was  
also

3 found.

4 Q. All right. Now, when you say the picture we just  
looked

5 at, are you talking about aerial photograph we looked  
at that

6 showed your property and the roads around that?

7 A. Similar to that, but it's just black and white like  
the

8 sewer department writes up.

9 Q. You received that in January of 1995?

10 A. Yes.

11 Q. Do you recall the envelope that it was in?  
12 A. Yes. That was extremely unusual, I thought.  
13 Q. What was unusual about it?  
14 A. No. 1, it was addressed to Carol Moore at the old  
farm  
15 address.  
16 Q. That's Roger's wife?  
17 A. Yes.  
18 Q. Okay.  
19 A. Then the return address was addressed back to me at  
the  
20 P.O. box. And when I looked at the outside, it had  
been  
21 stamped from Springfield, Missouri.  
22 Q. So it had your return address and Mrs. Moore's old  
address?  
23 A. It was the old farm address, to Carol Moore, with  
my return  
24 address, the P.O. box, and a Springfield, Missouri  
postal stamp  
25 on it with insufficient postage on being mailed; so it  
would

9094

Karen Anderson - Direct

1 naturally not be shipped to the farm but would be  
shipped back  
2 to the P.O. box, to me.

3 Q. Had you sent that letter?

4 A. No.

5 Q. So it made you suspicious, I take it?

6 A. Well, I called --

7 MR. TIGAR: Object to what Counsel takes it,  
your

8 Honor.

9 THE COURT: Yes. Stricken.

10 BY MS. WILKINSON:

11 Q. How did you feel when you received the map?

12 A. I felt like somebody was trying to say, Hey, you  
know, we

13 had --

14 MR. TIGAR: Excuse me, your Honor.

15 THE COURT: Speculation on her part.

16 MR. TIGAR: Speculation.

17 THE COURT: Yes. Sustained.

18 BY MS. WILKINSON:

19 Q. What did you do once you received that letter --  
that map?

20 A. Called Mr. Moore down in Florida and asked him if  
by any

21 means Carol had requested a map of the area.

22 Q. Did you receive any other correspondence in early  
1995?

23 A. A week later from Tim.

24 Q. Tim McVeigh?

25 A. Yes.

Karen Anderson – Direct

1 Q. What was that correspondence about?

2 A. Basically the correspondence was that under no  
3 circumstances --

4 MR. TIGAR: Excuse me, your Honor. If she's  
5 describing a document, may we either have it or  
evidence of why

6 it's not here?

7 THE COURT: Yes. You need to lay a foundation  
for

8 this.

9 MS. WILKINSON: Well, your Honor, I wanted her  
to  
10 describe it first and then move it into evidence. Is  
that all

11 right, or would you like me to do it the other way?

12 THE COURT: I think it ought to be the other  
way in

13 view of the objection.

14 MS. WILKINSON: Okay.

15 I believe I have it on the screen and she can  
look at

16 it, your Honor.

17 THE COURT: Well, do we have the document  
here? She's

18 referring to a document.

second. 19 MS. WILKINSON: We do. I think -- hold on one

We're 20 I'm not sure if it's in her folder or not.

21 looking for it.

22 BY MS. WILKINSON:

folder 23 Q. Could you look and see if that letter is in your

24 from Mr. McVeigh, Ms. Anderson?

25 A. I don't see it.

9096

Karen Anderson - Direct

1 Q. You don't see it?

2 A. No, ma'am.

my 3 MS. WILKINSON: Your Honor, I have a copy in

4 notebook, if I could use that for purposes of laying a  
5 foundation.

6 THE COURT: All right.

7 BY MS. WILKINSON:

look at 8 Q. Let me hand up Government's Exhibit 1746. Take a

9 it -- or a copy of it.

10 Do you recognize that?

11 A. Yes.

12 Q. Do you recognize the envelope?

13 A. Yes.

14 Q. How do you recognize it?

15 A. I'm the one that got it and opened it up and read  
it.

16 Q. Do you recognize the letter?

17 A. Yes. I recognize the writing.

18 Q. How many pages is the letter?

19 A. Oh, one, two -- basically three pages. You have  
five here,

20 but it's the back side.

21 MS. WILKINSON: Your Honor, at this time we'd  
offer

22 1746 and the stipulation that it's Mr. McVeigh's  
handwriting.

23 MR. TIGAR: Yes. May I inquire about the  
letter

24 itself? There is no question about the handwriting.

25 THE COURT: Yes, you may.

9097

Karen Anderson - Voir Dire

1

VOIR DIRE EXAMINATION

2 BY MR. TIGAR:

3 Q. Ms. Anderson, this -- this letter, if you look, is  
4 postmarked on a certain date. If you could look at the  
5 envelope.

6 A. Uh-huh.

7 Q. And do you recall receiving it shortly after that  
date?

8 A. January 12?

9 Q. Yes.

10 A. No, I don't.

11 Q. Do you remember receiving it sometime in January?

12 A. Yes.

13 Q. Okay. And it is addressed to Bob Miller. Is that  
14 Mr. Moore's name?

15 A. Yes.

16 Q. And the P.O. box -- that is the Moore/Miller/  
Anderson post

17 office box?

18 A. Yes.

19 Q. And the return address, it says is "Tuttle." That  
is a

20 name that Mr. McVeigh used?

21 A. Yes.

22 MR. TIGAR: No objection, your Honor.

23 THE COURT: All right. 1746 is received.

24 DIRECT EXAMINATION CONTINUED

25 BY MS. WILKINSON:

9098

Karen Anderson - Direct

1 Q. Now, Ms. Anderson, you can put the letter down.

2                   You were telling us about the substance of  
this  
3                   letter. What was Mr. McVeigh writing to you about?  
4                   MR. TIGAR: Your Honor, the letter speaks for  
itself.  
5                   THE COURT: Yes.  
6                   BY MS. WILKINSON:  
7                   Q. Did you read the letter?  
8                   A. Yes.  
9                   Q. Did you read it to Mr. Moore over the telephone?  
10                  A. Yes.  
11                  Q. And after that, did you and Mr. Moore correspond  
with  
12                  Mr. McVeigh?  
13                  A. Yes.  
14                  Q. Did you personally write any letters to Mr.  
McVeigh?  
15                  A. Yes.  
16                  Q. You did?  
17                  A. Yes.  
18                  Q. And do you recall the substance of those letters?  
19                  A. The substance of my letters was to try and --  
20                  MR. TIGAR: Excuse me, your Honor. If it's  
21                  established that she doesn't have the letters anymore,  
then  
22                  we'll take the secondary evidence.  
23                  BY MS. WILKINSON:



24 Q. Do you have those letters that you wrote to Mr.  
McVeigh?

25 A. No.

9099

Karen Anderson - Direct

1 Q. He didn't send them back to you, did he?

2 A. No.

3 Q. Tell us what you wrote to Mr. McVeigh about.

4 A. I wrote to Tim trying to find out a better way to  
set up

5 security. In other words, I had wrote in there that I  
had

6 built a fence and put a woven-wire fence across the  
front part

7 of the property and installed a gate and was getting  
ready to

8 work on the side fences, wanted to know how I could  
find how

9 long whoever this party was that robbed us -- where he  
might

10 have observed us from and looked and asked him, and  
that was

11 basically my idea and would he be interested in coming  
back and

12 working on trying to help us find who it was that  
robbed us.

13 Q. Did Mr. McVeigh ever come to visit your property  
again?

14 A. No.

15 Q. Now, you've identified these firearms, ammunition,  
the  
16 quilt, the blanket, camera case, the cigar box, the  
keys. Did  
17 you ever agree to give any of those items to Mr. Terry  
Nichols?

18 A. Under no circumstances.

19 Q. Did you ever agree to give that property back to  
anybody  
20 else?

21 A. No.

22 MS. WILKINSON: We have no further questions,  
your  
23 Honor.

24 THE COURT: All right. Mr. Tigar.

25 CROSS-EXAMINATION

9100

Karen Anderson – Cross

1 BY MR. TIGAR:

2 Q. Ms. Anderson, are you Mr. Moore's girlfriend?

3 A. Yes.

4 Q. And you have been for how long?

5 A. 20 years.

6 Q. Now, do you know a man named Steven Colbern?

7 A. Sure do.

8 Q. When did you first meet Mr. Colbern?

beyond 9 MS. WILKINSON: Objection, your Honor. It's

10 the scope and irrelevant unless there is a proper  
foundation.

11 THE COURT: Sustained.

12 BY MR. TIGAR:

13 Q. Did you help Mr. Colbern get together with Mr.  
McVeigh?

14 MS. WILKINSON: Objection. Same objection.

15 THE COURT: Sustained.

16 BY MR. TIGAR:

17 Q. You've told us that you're in the firearms  
business;

18 correct?

19 A. Told you I was in the ammunition business.

20 Q. Ammunition business. Now, do you remember being  
21 interviewed by the Federal Bureau of Investigation on  
the 11th

22 of May, 1995?

23 A. Not offhand.

24 Q. Do you remember being shown a photographic lineup?

25 A. Yes.

9101

Karen Anderson – Cross

with 1 Q. Do you remember being asked if you were familiar

2 anyone by the name of Steven Colbern?

3 MS. WILKINSON: Objection, your Honor.

4 THE COURT: Sustained.

5 BY MR. TIGAR:

6 Q. Did you tell the truth to the FBI when you were  
interviewed

7 on the 11th of May, 1995?

8 MS. WILKINSON: Objection, your Honor, if it's  
9 referring to the same incident.

10 THE COURT: Well, I -- about what? I'll  
sustain the

11 objection to the question because it's not clear what  
you're

12 asking.

13 BY MR. TIGAR:

14 Q. You've talked about your relationship with Mr.  
McVeigh;

15 correct?

16 A. Yes.

17 Q. All right. Did you understand that Mr. McVeigh was  
18 interested in finding people who shared his political  
views?

19 MS. WILKINSON: Objection, your Honor.

20 THE COURT: Overruled.

21 THE WITNESS: Everybody is interested in  
finding

22 somebody with their political views. I mean, I would  
rather

23 talk to somebody about the Republican Party than the  
Democrat

24 Party, so give me a for-instance on what you mean.

25 BY MR. TIGAR:

9102

Karen Anderson - Cross

find 1 Q. Well, were you interested in helping Mr. McVeigh

2 people who were -- who shared his political views?

were. 3 A. I don't entirely know what his political views

McVeigh? 4 Q. Did you ever forward correspondence for Mr.

5 A. No.

other 6 Q. Did you ever help to put Mr. McVeigh in touch with

7 customers that you had?

8 A. Not in the plural form. Customer.

9 Q. Did you ever help Mr. McVeigh get together with any  
10 customer, singular, that you had?

11 A. Yes.

touch 12 Q. And what was your reason for putting Mr. McVeigh in

13 with that customer?

14 MS. WILKINSON: Objection, your Honor.

15 THE COURT: Overruled.

he liked 16 THE WITNESS: Mainly because Mr. McVeigh said

17 to do maneuvers in the desert and go out and shoot and  
see how

18 he could work on survival, and this party was  
interested in

19 doing the same thing.

20 BY MR. TIGAR:

21 Q. And so you put these two parties together; is that  
correct?

22 A. No.

23 Q. What did you do to help them get together, if  
anything?

24 MS. WILKINSON: Objection, your Honor. Again  
this is

25 beyond the scope.

9103

Karen Anderson – Cross

1 THE COURT: Overruled.

2 THE WITNESS: All I did was give a name and an  
3 address.

4 BY MR. TIGAR:

5 Q. Now, did you think there was anything wrong with  
giving

6 that name and address?

7 A. No.

8 Q. Did you tell the FBI when they asked you whether or  
not you

9 had given that name and address?

10 A. You haven't clarified what name and what address.

11 Q. There is only one person that you helped Mr.  
McVeigh get in

12 contact with; correct?

13 A. Correct.

14 Q. Did the FBI ask you about that person?

15 A. Yes.

16 Q. Did you tell the truth?

17 A. Yes.

18 Q. Did you tell the truth the first time you were  
asked?

19 A. No.

20 Q. All right. Now, when was the first time you were  
asked?

21 A. Over the telephone.

22 Q. And when was the second time you were asked?

23 A. 20 minutes later, I phoned the FBI back and said,  
"I

24 recognize the name after I have written it down."

25 Q. Now, you're telling us that the first time you were  
asked

9104

Karen Anderson - Cross

1 was over the telephone; is that correct?

2 A. Yes. Yes.

3 Q. At that time, were you also shown some pictures?

4 A. No.

5 Q. All right. When were you first shown the pictures?

6 A. Maybe a day or two later.

7 Q. And is it your testimony that -- well, at the time  
you were  
8 shown the pictures, were you also asked about this  
person?

9 A. Yes.

10 Q. Were you asked about this person by Special Agent  
Mark

11 Jessie.

12 A. Yes.

13 Q. Did you tell the truth?

14 A. Yes.

15 Q. Isn't it a fact that what you said was you were not  
16 familiar with anybody with that name?

17 A. At that -- when he was showing the pictures?

18 Q. Yes, ma'am.

19 A. No. No.

20 Q. That is not the fact?

21 A. No.

22 Q. Now, you then -- after your -- after discussing  
this with

23 the FBI, you then talked about your contacts with this  
person.

24 Is that correct?

25 A. Yes.



Karen Anderson - Cross

1 Q. And you told them that -- what you've related to  
us; that

2 is, that this was someone who had wanted to do  
maneuvers in the

3 desert and you were putting them together with Mr.  
McVeigh.

4 Correct?

5 A. The first part of the conversation was on the  
ammunition.

6 Q. And you told the FBI about the contact you had with  
this

7 person. Correct?

8 A. Yes.

9 Q. Now, had you ever met this person in person?

10 A. No.

11 Q. What is this person's name?

12 A. Steven Colbern.

13 Q. Have you corresponded with Mr. Colbern?

14 A. Letter-writing?

15 Q. Yes.

16 A. No.

17 Q. Has Mr. Colbern made orders from you?

18 A. Yes.

19 Q. How many times has Mr. Colbern made orders from  
you?

20 A. Two or three.  
21 Q. Have you had telephone calls with Mr. Colbern?  
22 A. Did you say "from"?  
23 Q. From Mr. Colbern, yes.  
24 A. Yes.  
25 Q. How many?

9106

Karen Anderson – Cross

1 A. I could not give you an exact number. I have no  
idea.

2 Q. Did you have seven or eight telephone calls with  
him?

3 A. Probably.

4 Q. Do you remember telling that to the FBI?

5 A. Somewhere in that vicinity, yes.

6 Q. And he told you he was a chemist; right?

7 MS. WILKINSON: Objection, your Honor, to what  
he told

8 Ms. Anderson.

9 THE COURT: Sustained at this point.

10 BY MR. TIGAR:

11 Q. What did Mr. Colbern order from you?

12 A. The first time, a can of .50 caliber ammunition.

13 Q. And the second time?

14 A. Was back after more .50 caliber.

15 Q. In your telephone conversation -- did he ever order  
16 anything other than .50 caliber ammunition from you?

17 A. I think he might have ordered some .308.

18 Q. Now, will you -- is it your business to sell this  
19 ammunition to anyone who calls?

20 A. Yes.

21 Q. And are you interested in what the people are going  
to do  
22 with it?

23 A. Yes and no.

24 Q. Were you interested in the case of Mr. Colbern what  
he was  
25 going to do with it?

9107

Karen Anderson - Cross

1 A. I had no reason to be. It's standard .50 caliber  
2 ammunition.

3 Q. Did you discuss his occupation with him?

4 A. No.

5 Q. Did you -- pardon?

6 A. No.

7 Q. Did he tell you what his occupation was?

8 MS. WILKINSON: Objection, your Honor.

9 THE COURT: Overruled.

10 Did he?

11 THE WITNESS: I'm sorry?

12 THE COURT: Did he tell you his occupation?

13 THE WITNESS: Not me.

14 BY MR. TIGAR:

15 Q. He didn't tell you his occupation?

16 A. Right.

17 Q. Well, did Mr. -- let's -- Mr. Moore goes by the  
name Bob

18 Miller, also. Correct?

19 A. Yes.

20 Q. Has he ever gone by the name Bob Anderson?

21 A. He does not go by that. People have assumed it.

22 Q. People have called him Bob Anderson?

23 A. Yes.

24 Q. So he's known as Bob Miller, Bob Anderson, and  
Roger Moore;

25 correct?

9108

Karen Anderson - Cross

1 A. Yes.

2 Q. Now, did Mr. Moore talk to Mr. Colbern?

3 A. Yes.

4 Q. And do you know how many occasions he talked to

5 Mr. Colbern?

6 A. No.

7 Q. Now, the interview that you had with the FBI in May  
of 1995

8 was not the first time that you had discussed this  
robbery; is

9 that right?

10 A. With the FBI?

11 Q. No, with anybody.

12 A. No.

13 Q. All right. First time you discussed it was --  
first time

14 you discussed this episode was with Mr. Moore, when you  
got

15 home on the Sunday. Correct?

16 A. No. I discussed it on the phone with him Saturday  
night.

17 Q. Saturday night. Now, did he call you, or did you  
call him?

18 A. I always call in.

19 Q. So he had not called you all during the day; is  
that right?

20 A. You're incorrect.

21 Q. All right. Had he called you during the day?

22 A. He cannot call me personally. He called the  
promoter's

23 residence trying to get a hold of me.

24 Q. Did you talk to Mr. Moore before you called on the  
phone

25 that night?

Karen Anderson - Cross

1 A. No.

-- is  
2 Q. That day. All right. Did you -- did Mr. Stromen  
3 that -- am I pronouncing that correctly?

4 A. There is a Mr. Stromen.

5 Q. Mr. Stromen who is an ammunition dealer?

6 A. No.

7 Q. What does he make? What does he do?

8 A. He produces tracer components and sells the  
ammunition.

9 Q. He sells ammunition?

10 A. Yes. Sorry.

11 Q. Mr. Stromen: Did you know that Mr. Moore and Mr.  
Stromen  
12 had a telephone conversation the evening of the 5th?

13 A. If I'm not there, how would I know?

14 Q. All I'm asking is whether you knew or not. Did you  
know?

15 A. I was not there.

16 Q. Now, were you interviewed by the police?

17 A. Not other than when I went down with this list with  
18 Mr. Moore to the police department.

19 Q. Now, that -- did you type up the list?

20 A. Yes.

tally of

21 Q. When you typed up the list, did you keep it -- a  
22 the total value that was on the list?  
23 A. No, I did not.  
24 Q. Do you know what the total is on the first list?  
25 A. No, I do not.

9110

Karen Anderson - Cross

1 Q. Do you know what the total is on the second list?  
2 A. No, I do not.  
3 Q. Now, you said that there was insurance on the  
premises;  
4 correct?  
5 A. Homeowners.  
6 Q. And in whose name was the insurance?  
7 A. Mr. Moore's and Carol's, I believe.  
8 Q. Now, you told us today that some of these guns are  
yours.  
9 Correct?  
10 A. Yes.  
11 Q. Did Mr. -- were you interviewed by an insurance  
agent,  
12 Mr. Spivey?  
13 A. Yes.  
14 Q. Did Mr. Moore say the guns were all his?  
15 A. I have no idea. I do not remember.

16 Q. You were present when Mr. Spivey was interviewed --  
17 interviewing Mr. Moore?

18 A. He preferred that I would not be around because I  
was not  
19 there when the robbery happened.

20 Q. Now, did Mr. Spivey to your knowledge record the  
interview?

21 A. Yes.

22 Q. Were you the only female person in the house other  
than --

23 well, were you the only female person in the house at  
that

24 time?

25 A. Yes.

9111

Karen Anderson - Cross

1 Q. Have you -- did you participate in any part of the  
2 interview?

3 A. I get sort of nosey once in a while, and I probably  
4 interrupted in one part of the interview; and I  
remember he  
5 stopped the tape and clarified who I was.

6 Q. So you were there at least enough to have your  
voice picked  
7 up by the tape-recording machine so far as you could  
tell; is  
8 that correct?



9 A. Yes.

10 Q. Now, did -- did you ever see a check that was made  
out by

11 the insurance company with respect to this claimed  
loss?

12 A. Yes.

13 Q. And to whom -- to whom was it made out?

14 A. Mr. Moore.

15 Q. Did you participate with Mr. Moore in choosing the  
amount

16 of insurance that would be claimed on the -- excuse me  
-- that

17 would be purchased for the home?

18 A. I was present, yes.

19 Q. And do you know what the policy limits were for  
contents?

20 A. Not -- I could not set (sic) here and give and you  
exact on

21 it, no.

22 Q. Would it refresh your recollection if I said  
\$63,000?

23 A. No.

24 Q. Do you know -- did you watch Mr. Spivey make out a  
list of

25 the amount of money that was going to be claimed for  
the loss?

1 A. I may have. I don't recall it.

2 Q. Do you recall the amount of the total loss that you  
3 claimed, or that was claimed on that -- with Mr.  
Spivey?

4 A. I thought it was somewhere in the vicinity between  
60- and  
5 70,000.

6 Q. Do you know what the deductible was on your policy?  
7 Excuse me. Do you know what the deductible  
was on the  
8 policy?

9 A. I'm going to guess. This would just purely be an  
10 assumption of 500 --

11 THE COURT: Don't make an assumption if you  
don't  
12 know.

13 THE WITNESS: I don't know.

14 BY MR. TIGAR:

15 Q. If I said \$500, would that refresh your  
recollection?

16 A. I assume that would be it.

17 Q. Do you know a total amount that you claimed when  
Mr. Spivey  
18 was making out these forms in your house?

19 A. No, I do not.

20 Q. If I said \$63,428, would that refresh your  
recollection?

21 A. I already told you I thought it was in the vicinity  
between

22 60- and 70,000.

23 Q. But that does not refresh your recollection as to  
the more

24 precise number?

25 A. No.

9113

Karen Anderson - Cross

1 Q. Did Mr. Spivey take pictures?

2 A. I don't remember.

3 Q. At that time, did Mr. Moore have a filing cabinet?

4 A. Yes.

5 Q. A small, two-drawer filing cabinet?

6 A. We've got three or four of them.

7 Q. And do you recall that at the time the label on one  
of

8 those drawers said "racing gasoline"?

9 A. I have no idea.

10 Q. You don't remember?

11 A. No.

12 Q. Now, you made two lists. Is that correct? One on  
the 5th

13 and one on the 13th?

14 A. Yes.

15 Q. And you typed those out yourself. Correct?

16 A. Yes.

17 Q. Was Mr. Moore providing the information to help  
make them

18 out?

19 A. On some of them, yes.

20 Q. And in addition to changing the items that were on  
there,

21 did you change the amounts you were claiming?

22 A. Only by going by the Shotgun News on what guns were  
23 bringing.

24 Q. I'm going to show you what's been received as  
Government's

25 Exhibit 1738. Is that the first page of the list that  
you made

9114

Karen Anderson – Cross

1 on November 9, 1994?

2 You see the top there?

3 A. Yeah. Yes.

4 Q. Now, you notice Item No. 8 here is a Remington  
Nylon 6622

5 LR brown. Do you see that?

6 A. Yeah. That means long rifle.

7 Q. And you have that at \$124; is that correct?

8 A. Right. Right.

9 Q. Now, is there an equivalent item on this list dated  
the

10 13th?  
11 A. Well, there is three Remington nylon .22's.  
12 Q. Right. And on the 13th you value them at 125, 115  
and 135;  
13 correct?  
14 A. Right.  
15 Q. Is that right?  
16 A. Correct.  
17 Q. And on the 5th, you've got them --  
18 A. We're talking about a \$1 difference?  
19 Q. Pardon me?  
20 A. You're looking here at a Remington nylon .22, .22  
long  
list. On 21 rifle, clean brown, \$125 that was made on the second  
brown 22 the first list, it was a Remington nylon .22 long rifle  
23 for \$124?  
24 Q. That's what I'm asking.  
25 A. Is that the discrepancy you're talking about?

9115

Karen Anderson - Cross

No. 6 is 1 Q. No. The item -- the first item, Remington -- Item  
2 \$125. Do you see that?  
3 A. Yes.

4 Q. And that's the same on both lists. Correct?

5 A. But that doesn't necessarily mean that they're all  
three in

6 the same order.

7 Q. So that when we look at these two lists, we might  
see that

8 things are in a -- in different orders. Is that  
correct?

9 A. True.

10 Q. Now, the changes that we see between the two  
documents:

11 What is the reason that you would change the amount of  
money

12 that was claimed for particular things?

13 A. Mainly because this was not a collection that was  
up for

14 sale, and some of these prices -- both of us are  
totally out of

15 date as to what they're bringing now or at that time.

16 Q. Now, at that time, did you attempt to find a list  
of serial

17 numbers?

18 A. Yes.

19 Q. And were you able to do so at that time?

20 A. No.

21 Q. And was that because the list of serial numbers had  
been

22 placed in Mr. Moore's van?

23 A. Yes.

24 Q. Had you placed it there?

25 A. Yes.

9116

Karen Anderson – Cross

1 Q. And in addition to placing the list of serial  
numbers in

2 Mr. Moore's van, what else was in that same location in  
the

3 van?

4 A. 7-, 800 bucks in cash.

5 Q. Now, when you went to look, did you go to check and  
see if

6 the 7-, \$800 was missing?

7 MS. WILKINSON: Your Honor, I don't believe  
she can

8 testify about the condition of the van after the  
incident or

9 robbery or whatever because she said she wasn't there,  
unless

10 Mr. Tigar makes clear what time --

11 THE COURT: I understood the question to be  
did she go

12 to look.

13 MS. WILKINSON: Before? I'm not sure of the  
timing, I

14 guess.

15 THE COURT: The witness probably doesn't  
remember the

16 question now.

17 BY MR. TIGAR:  
18 Q. You didn't look in the van on the 5th, did you?  
19 A. Wasn't there.  
20 Q. Right. You didn't -- you looked at the van after  
you got  
21 back; right?  
22 A. Yes.  
23 Q. When you looked in it, was the 7- or \$800 there?  
24 A. No. He took it out and put it back in the house.  
25 Q. You said -- well, you know that from talking to Mr.  
Moore;

9117

Karen Anderson - Cross

1 correct?  
2 A. Yes.  
3 Q. Now, you also testified that you had found this  
list --  
4 correct -- which has been received in evidence as  
Government's  
5 2103? Is that right?  
6 A. Yes.  
7 Q. Is that right?  
8 A. Yes.  
9 Q. And is it your testimony that you made this list up  
10 sometime, what, in 1993?



11 A. Probably in January of '93.  
12 Q. And you were very careful to note down the serial  
numbers  
13 accurately. Is that your testimony?  
14 A. I'm not going to say I was accurate on them, no.  
15 Q. You were doing the best you could?  
16 A. Yes.  
17 Q. And look at the third item from the bottom, the  
Ruger  
18 Mini-30, 189-57425. Have you ever seen that gun within  
the  
19 last two years?  
20 A. I've seen a lot of -- what was it, Mini-30's?  
21 Q. Yes.  
22 A. I don't see it on this sheet, in other words.  
23 Q. Third one from the bottom?  
24 A. There it is.  
25 Q. There it is. You see it?

9118

Karen Anderson - Cross

1 A. Yes.  
2 Q. Have you seen that gun in the last two years?  
3 A. No.  
4 Q. Were you with Mr. Moore when he looked at a number  
of  
5 firearms that were in the custody of the FBI?

6 A. In Washington, D.C.?

7 Q. At any time.

8 A. No.

9 Q. Were you with Mr. Moore when he looked at a number  
of  
10 firearms in Hot Springs, Arkansas, on the 28th of  
April, 1995?

11 A. To the best of my knowledge, I didn't know they  
were ever  
12 in Hot Springs.

13 THE COURT: It's not clear as to whether  
you're  
14 asking --

15 MR. TIGAR: I'm sorry, your Honor. My  
question is  
16 inartful. Let me go back and look at it again.

17 THE COURT: All right.

18 BY MR. TIGAR:

19 Q. Were you with Mr. Moore in Washington, D.C., on the  
4th of  
20 May, 1995?

21 A. No.

22 Q. So you don't know what conversation he had with the  
agents  
23 at that time?

24 A. No.

25 Q. Is it your testimony that you and Mr. Moore -- or

Karen Anderson - Cross

1 Mr. Moore -- were the owners of a Ruger Mini-30 with  
the Serial

2 No. 189-57425?

3 A. To the best of my knowledge, yes.

4 Q. Now, you told us that when the FBI asked you on the  
5 telephone about Mr. Colbern that you did not tell the  
truth.

6 Is that right?

7 A. I said I didn't tell the truth. I did not  
recognize the

8 name until I wrote the three names down.

9 Q. Uh-huh. You didn't recognize it until you wrote it  
down?

10 A. Yes.

11 Q. And how many times had you known Mr. Colbern -- how  
many

12 times had you talked to Mr. Colbern? You said about  
eight

13 telephone calls?

14 A. Seven or eight.

15 Q. Now, in addition to what you've talked to us about,  
you

16 have also conducted an investigation in an attempt to  
find out

17 more about this episode. Is that correct?

18 A. Yes.

19 Q. And you contacted a Mr. Abeyta. Is that correct?

20 A. Yes.

21 Q. And who is Mr. Abeyta?

22 A. Charlie Abeyta is a friend that used to be a bail  
bondsman  
23 up in the Wagoner/Muskogee, Oklahoma, area.

24 Q. And you conducted an investigation with him. Is  
that

25 right?

9120

Karen Anderson – Cross

1 A. Yes.

2 Q. Drove around looking for people?

3 A. Not looking for people. We went to Ft. Smith,  
Arkansas,  
4 and went to all of the pawn shops.

5 Q. Now, was it Mr. Moore's habit to carry a great deal  
of  
6 cash?

7 A. Yes.

8 Q. About how much cash did Mr. Moore carry with him as  
a usual  
9 matter?

10 A. 6-, 8,000.

11 Q. Pardon?

12 A. 6- to 8,000. Maybe more, maybe a little less.

13 Q. Ever as much as \$50,000?

14 A. Not as far as I know.

15 Q. Isn't it a fact that you displayed \$50,000 to a  
person in  
16 Oklahoma in connection with one of Mr. Moore's  
ventures?

17 MS. WILKINSON: Objection, your Honor, as to  
18 relevance.

19 THE COURT: Overruled.

20 THE WITNESS: Repeat it, please.

21 BY MR. TIGAR:

22 Q. Isn't it a fact that you displayed \$50,000 in cash  
to  
23 someone in Oklahoma in connection with one of Mr.  
Moore's  
24 ventures?

25 A. I did, yeah.

9121

Karen Anderson – Cross

1 Q. You did?

2 A. I did.

3 Q. Now, was that his money?

4 A. Yes.

5 Q. So on that occasion, he was carrying a little more  
than  
6 7,000 -- right, or --

7 A. He wasn't carrying \$7,000.

8 Q. Oh, you were?

9 A. I was.

10 Q. All right. Now -- so is it your habit to carry a  
large  
11 amount of currency?

12 A. Yes.

13 Q. Now, you said that Mr. Moore got into the gun-show  
business  
14 when?

15 A. Back in the 60's.

16 Q. And he also had a boat business; is that right?

17 A. Correct.

18 Q. Now, Mr. Moore and Mrs. Moore bought this farm  
where you're  
19 now living in what year?

20 A. Where we're now living in August of '92.

21 Q. Now, at that time, they took title and you said the  
deed  
22 is -- lists them as brother and sister?

23 A. Correct.

24 Q. And that's an error?

25 A. Yes.

9122

Karen Anderson - Cross

1 Q. How long have you been living at the farm?

2 A. That farm?

3 Q. That farm.

4 A. I moved there right after Christmas when everybody  
went

5 back to south Florida.

6 Q. Now, Mr. and Mrs. Moore -- how much of the year is  
she at

7 the farm?

8 A. Close to three-quarters of the time.

9 Q. And how long -- how much of the time is Mr. Moore  
at the

10 farm?

11 A. He's there basically from the first part of April  
until

12 about the first or second week in December.

13 Q. Now, during the time that you and Mr. Moore were  
traveling

14 to gun shows, was there always somebody at the house?

15 A. At first, no. Later on, yes.

16 Q. When did there start being somebody else at the  
house?

17 A. For sure all the time from when we bought the new  
farm and

18 probably two years back, so I would say somewhere in  
1990.

19 Q. But other than having someone stay at the farm, you  
say you

20 did not have any security system. Correct?

21 A. Correct.

22 Q. Did you discuss -- were you a part of negotiating

with the

23 insurance company as to what kind of insurance you  
would carry

24 on the farm?

25 A. Basically, yes.

9123

Karen Anderson – Cross

1 Q. Were you the principal person responsible for  
negotiating

2 with the insurance company?

3 A. No.

4 Q. Who was?

5 A. Both Mr. and Mrs. Moore.

6 Q. The house that we've seen pictures of has about  
1700--some

7 square feet. Correct?

8 A. I have no idea.

9 Q. It has no gun safes; correct?

10 A. No.

11 Q. You have no perimeter security; correct?

12 A. We do now.

13 Q. You did -- at the time, in November of 1994, you  
had no

14 perimeter security; correct?

15 A. No.

16 Q. And in -- did you ever discuss with the insurance



agent the

17 idea of having a floater policy?

18 A. Yes.

19 Q. Did you decide to buy a floater policy?

20 A. No.

21 Q. Did -- so all you had was the contents coverage  
that went

22 along with the homeowners' insurance; correct?

23 A. Yes.

24 Q. And what was your understanding in October of 1994  
as to

25 what the contents coverage was supposed to cover?

9124

Karen Anderson - Cross

1 A. Covers your personal items. It covers certain  
amount of

2 jewelry, covers some cash. It covers your appliances  
in there.

3 If you had a hailstorm, it covered your hailstorm on  
your roof.

4 I mean just the same thing that every U.S. citizen has.

5 Q. Did you go with Mr. Moore to meet with Ms. Priddy  
in the

6 insurance office with respect to this matter?

7 A. Ms. who?

8 Q. Ms. Priddy, P-R-I-D-D-Y. Do you know a Ms. Priddy?

9 A. I know a Jan Dies.

10 Q. You know a Ms. Dies. Do you know a Ms. Priddy?  
11 A. Not offhand.  
12 Q. Did you go with Mr. Moore to talk with Ms. Dies  
about the  
13 insurance claim?  
14 A. Yes.  
15 Q. Do you remember discussing with Ms. Dies the amount  
of  
16 coverage that you had in relationship to the loss that  
you were  
17 claiming?  
18 A. Offhand, yes.  
19 Q. Pardon me?  
20 A. Offhand, yes.  
21 Q. Offhand, yes. And do you remember Ms. Dies  
explaining that  
22 although you had \$63,000 in contents coverage, that  
coverage  
23 was not going to cover the \$63,000 loss that you had  
presented  
24 to her?  
25 A. Yes.

9125

Karen Anderson – Cross

1 Q. Do you remember Mr. Moore becoming angry with  
anyone in the  
2 Farmers Insurance office there with respect to this

matter?

3 A. We were both upset with Mr. Spivey.

4 Q. All right. Now, Mr. Spivey -- he's the one that  
came out

5 to the house; correct?

6 A. Yes.

7 Q. I'm talking about the insurance office that's in  
town.

8 There is an insurance office; right?

9 A. Yes.

10 Q. And that's where Ms. Dies works?

11 A. Yes.

12 Q. Do you remember Mr. Moore becoming angry at the  
people that

13 worked in that insurance office over this issue?

14 A. No, I don't.

15 Q. Do you remember Mr. Moore having an angry telephone  
16 conversation within your earshot where you could hear  
him

17 talking to the people in that insurance office?

18 A. No, I don't.

19 Q. Now, these guns that you've identified: Many of  
them are

20 unique, aren't they?

21 A. Quite a few are.

22 Q. Yes. So that you certainly did not have any  
difficulty

23 recognizing many of them when they were shown to you.  
Is that

24 correct?

25 A. No, I did not.

9126

Karen Anderson – Cross

1 Q. And when you tell us, for example, that a  
particular gun

2 has a unique characteristic, those are characteristics  
that

3 would stand out to people that have your level of  
experience in

4 firearms. Is that fair to say?

5 A. Yes.

6 Q. Now, you said that you stored things in cigar  
boxes; right?

7 Some things?

8 A. Yes, some things.

9 Q. And those were yellow and white cigar boxes?

10 A. There were some yellow and whites and some whites  
on

11 yellows. A red --

12 Q. Pardon me?

13 A. Red colors were also on the cigar boxes.

14 Q. Now, in preparing for your testimony today, you  
have

15 visited Denver; is that right?

16 A. True.

17 Q. On how many -- how many times have you visited  
Denver?

18 A. Twice.

19 Q. And have you conferred with lawyers for the  
Government on

20 other occasions than when you visited Denver?

21 A. Once.

22 Q. So that would be three times?

23 A. Yes.

24 Q. And when and where was the first meeting that you  
had with

25 Government lawyers?

9127

Karen Anderson - Cross

1 A. Oh -- well, it was in Oklahoma City, but I can't  
tell you

2 what time it was.

3 Q. Was that in connection with your grand jury  
testimony?

4 A. Yes. Then I've had more meetings because there was  
one

5 other time, the very first time we ever got to see the  
guns.

6 Q. So that was the first time?

7 A. The first time was in -- for the grand jury, then.

8 Q. And when was the second time you met with  
Government

9 lawyers, of these three times?

saw the

10 A. It was on a December, and that was the first time I  
11 guns.  
12 Q. December of '95, you think?  
13 A. Probably. I just --  
14 Q. When is the third time of the three?  
15 A. They came for an interview at the house.  
16 Q. And those are the only three times you've met with  
17 Government lawyers?  
18 A. Other than the two here at Denver.  
19 Q. You had two more, two in Denver. All right. There  
were  
20 two in Denver. When was the first one in Denver?  
21 A. September.  
22 Q. Of what year?  
23 A. This year.  
24 Q. And when was the second?  
25 A. Three weeks ago.

9128

Karen Anderson - Cross

of

1 Q. That would be in October?  
2 A. Whatever three weeks ago. Would be the last part  
3 October, I guess. When the blizzard was.  
4 Q. Okay. All right. Did you meet with Government

lawyers in

5 November of 1996?

6 A. I can't -- I can't give you a date on when these  
was. I

7 really don't know.

8 Q. You've told us about five, which includes your  
Oklahoma

9 City.

10 A. Right.

11 Q. So that would be -- if we leave off Oklahoma City,  
that

12 would be four; correct?

13 A. Correct.

14 Q. Isn't it a fact you've had seven meetings?

15 A. I have no idea.

16 Q. Well, let's look.

17 A. Refresh my memory.

18 Q. I will. Have you met with Government lawyers in --  
over

19 the last couple of days, over the weekend?

20 A. Yes.

21 Q. All right. And how long a time did you meet with  
them over

22 the weekend?

23 A. Well, I sat and read my Quarter Horse Journal for  
four

24 hours, and then I met with them for about two.

25 Q. Two hours. And which Government employees did you  
meet

1 with?

what

2 A. I guess you would say Patra Butler. I don't know

Wilkerson

3 David's last name, Broomley or Brumley. And with Ms.

4 (sic).

that is,

5 Q. Did you meet with Government lawyers on the 14th;

6 Friday?

7 A. This Friday?

8 Q. Yes.

9 A. Only for about 20 minutes.

Government

10 Q. All right. That's two. Did you meet with

11 lawyers between the 23rd and 27th of October, 1997?

the

12 A. If that was when I was here three weeks ago, when

13 blizzard was.

with the

14 Q. All right. And how many days did you stay meeting

15 Government lawyers on that occasion?

16 A. I only met with them for the one afternoon.

17 Q. How many days were you here?

18 A. Maybe four.



19 Q. And did you meet with other Government employees  
during the

20 four days you were here other than the Government  
lawyers?

21 A. The same people.

22 Q. FBI agents?

23 A. Yes.

24 Q. And then were you here in early September?

25 A. Yes.

9130

Karen Anderson – Cross

1 Q. For how many days?

2 A. Two or three.

3 Q. Would the 3rd through the 6th of September refresh  
your

4 recollection?

5 A. No. I'm not very good on dates.

6 Q. And again, how long did you meet with Government  
lawyers on

7 that occasion?

8 A. I met with them approximately -- not quite a full  
day.

9 Q. And you met with FBI agents in addition to that?

10 A. Yes.

11 Q. Were you here in July?

12 A. I don't think so.

13 THE COURT: Of 1997?

14 MR. TIGAR: 1997, yes, your Honor.

15 THE WITNESS: I don't believe so.

16 BY MR. TIGAR:

17 Q. Now, when you met with the Government lawyers, did  
they ask

18 you the questions that they've been asking you today?

19 A. Not all of them, no.

20 Q. Most of them?

21 A. No.

22 Q. Did they show you the things that you have been  
shown

23 today?

24 A. I've been shown the pictures, same pictures that I  
was

25 shown by the FBI when I identified merchandise back in  
Hot

9131

Karen Anderson – Cross

1 Springs.

2 Q. Did they show you weapons?

3 A. Yes.

4 Q. And you looked at them?

5 A. Yes.

6 Q. Did they discuss with you what might happen on  
7 cross-examination?

8 A. No. They didn't know what you would come up with.

9 Q. Is that what they said?

10 A. I asked what cross would be, and they said they had  
no idea  
11 what they would come up with on me from you.

12 Q. So you were left to your own devices. Is that  
right?

13 A. Yes.

14 Q. Now, you say -- refresh my recollection, please:  
You first

15 met Timothy McVeigh at the farm. Is that right?

16 A. No.

17 Q. No?

18 A. First met him at Tulsa, Oklahoma.

19 Q. Tulsa, at the gun show?

20 A. Yes.

21 Q. Now, you told us that Mr. Moore had called you from  
22 Florida -- is that correct -- at one point?

23 A. Correct.

24 Q. And he told you he had met somebody at a gun show.

25 Correct?

9132

Karen Anderson – Cross

1 A. True.

2 Q. And how many times have you heard the name "Timothy

3 McVeigh," referred to as "Timothy McVeigh"?

4 A. If you count reading the papers, thousands.

5 Q. Uh-huh. And did -- when Mr. Moore first called  
you, did he

6 tell of you someone he'd met named McVeigh?

7 A. Yes. He said Tim McVeigh.

8 Q. Didn't you tell the FBI on the 28th of April, 1995,  
that

9 you had only heard the name "McVeigh" on one occasion?

10 A. Not that I know of. I don't remember that.

11 Q. I want to show you what's the agent's report of  
interview,

12 the part I've highlighted in blue, and ask you if that

13 refreshes your recollection that you told Agents Jessie  
and

14 Crutchfield on the 28th of April, 1995, that you had  
only heard

15 the name McVeigh on one occasion?

16 A. I don't recall saying that. No, I don't.

17 Q. Do you remember telling the agents that the first  
time you

18 ever saw McVeigh was when he came to the farm to do odd  
jobs?

19 A. No.

20 Q. Do you remember telling them that the first time he  
stopped

21 by was in April or May, 1993?

22 A. Of April of '93?

23 Q. Yes.

24 A. I believe that was the first time he stopped by the farm.

25 Q. Do you remember saying if that was the first time you had

9133

Karen Anderson – Cross

1 seen him?

2 A. No.

3 Q. Now, you mentioned that your recollection now is that the

4 first time you saw him was at the Tulsa gun show. Correct?

5 A. I know the first time I saw him was at the Tulsa gun show.

6 Q. Now, did you ever get Mr. McVeigh's help in picking up or

7 delivering an automobile?

8 A. Sure did.

9 Q. When was that?

10 A. That spring that -- when he came and followed me back to

11 the farm.

12 Q. So he -- oh. He followed you back to the farm. Let's get

13 the chronology here. You met him at the gun show; correct?

14 A. Yes.

15 Q. And then he followed you back to the farm; correct?

16 A. On Sunday night after the show.

17 Q. And how long did he stay at the farm?

18 A. About a week.

19 Q. Now, when did he help you with the -- to move the  
20 automobile?

21 A. Sometime in there. I don't know exactly when.

22 Q. And what did that involve, moving the automobile?

23 A. Moving the automobile from Sebastian up to -- with  
Carol  
24 Moore and a friend of hers. They drove it to  
Pensacola,  
25 Florida. We left early in the morning, drove straight  
through

9134

Karen Anderson - Cross

1 in Mr. McVeigh's car, and picked up my Chevy van that I  
have

2 and turned around and came right back to the farm.

3 Q. Now, during the time that Mr. McVeigh was at your  
house,

4 you say he listened to a world-band radio?

5 A. Yes.

6 Q. Was there any particular -- did he hook up a  
special

7 antenna for his radio?

8 A. Yeah, he ran one of these little like wire antennas  
-- it's

and just 9 a clear wire -- through the window and got the ladder  
10 draped the wire over the roof of the house.  
11 Q. Did you ever listen to the program that he was  
looking --  
12 that he was listening to?  
13 A. No.  
14 Q. At this Tulsa gun show, you cleared off a card  
table for  
15 him; correct?  
16 A. Yes.  
17 Q. What was he selling?  
18 A. He had -- to the best of my recollection, I believe  
there  
19 was a cot there. I know there was a couple of shirts.  
There  
20 was something like a pullover sweater. There was some  
brown  
21 military-type manuals, books, they call them. If there  
was  
22 something else, it's just not --  
23 Q. Did he have copies of political books?  
24 A. He might have had a Turner Diary or two on there.  
I really  
25 don't remember.

Turner 1 Q. Well, what is -- did you ever talk to him about The  
2 Diaries?  
3 A. No. He wanted me to read it.  
4 Q. Did you read it?  
5 A. I got through 36 pages of it.  
correct? 6 Q. All right. But he urged you to read it. Is that  
7 A. Yes.  
8 Q. Is that right?  
9 A. Yes.  
remember 10 Q. Now, about -- when is the first time you can ever  
11 getting a letter from Mr. McVeigh?  
can't tell 12 A. The first time I remember getting one -- and I  
13 you when it was. I just know it was sometime during  
the summer  
Arizona, and 14 when he informed that he had -- was in Kingman,  
15 that he had a drop box, this 1711 Stockton Road, and  
please  
it in 16 don't send it in the name of "Tim McVeigh," please send  
17 the name of "Tim Tuttle." That's the first letter I  
ever  
18 remember receiving.  
19 Q. That was in 1993?  
20 A. It could very well have been.  
21 Q. Now, from that day down to that letter that you



showed us

22 on the 10th of January, dated the 10th of January  
that's in

23 evidence -- and we'll talk about in a little bit -- how  
many

24 letters did Tim McVeigh send to you?

25 A. I could not if you stuck me with a knife in the  
heart give

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Karen Anderson - Cross

1 you an exact date.

2 Q. That isn't in the cards.

3 A. Good.

4 Q. That is a cross-examine -- cross-examination  
technique they

5 probably didn't warn you about but that you need not  
fear, so

6 just give us your best recollection and then we'll go  
on to

7 something else.

8 A. All right. From -- let's say I got that letter in  
July.

9 That's an assumption.

10 Q. Okay.

11 A. From when till when, then?

12 Q. Yes.

13 A. Do you mean till now -- till the bomb?

14 Q. Well, you haven't gotten any letters from him  
lately, have

15 you?

16 A. No.

17 Q. All right. Well, just until the 10th of January,  
1995, how

18 many?

19 A. If there was five, six, maybe.

20 Q. And did you send him letters?

21 A. Yes.

22 Q. How many letters did you send him?

23 A. Probably two or three.

24 Q. And in these letters that he was sending you, did  
he

25 discuss his political views?

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Karen Anderson – Cross

1 A. At times, he would discuss the New World Order.

2 Q. Now, what did you understand the New World Order to  
be?

3 A. Basically a U.N. takeover of the Government to  
where

4 instead of us having the government as our bosses, the  
U.N. had

5 it; that we would have a worldwide monitor of money;  
that we

6 all had the same type of money; basically that it would  
be

That's 7 divided up even amongst everybody on that principle.

to what 8 what I understood. As to give you a perbatim (sic) as

9 it was, I really don't know.

did you 10 Q. Now, when you heard Mr. McVeigh say these things,

military 11 become concerned that maybe there were New World Order

12 vehicles that were out there in some military base?

13 A. Quite possible.

you went 14 Q. And is that -- was it based on that concern that

15 down and looked at military bases?

16 A. I've never went down. I've went up, but not down.

military 17 Q. Went up, not down. Excuse me. That you went to

18 bases?

19 A. Yes.

Russian 20 Q. Now, had Mr. McVeigh told you that he had seen

21 military vehicles at a U.S. military base?

22 A. Yes, he had.

that 23 Q. And you were concerned enough to go take a look; is

24 correct?

25 A. Up north.

Karen Anderson – Cross

1 Q. Up north. Yes.

2 THE COURT: Well, we're right at --

3 MR. TIGAR: Yes, I'm about to start with this  
4 document, your Honor, so it would be a good breaking  
point.

5 THE COURT: Well, I think we'll break right  
now.

6 MR. TIGAR: Thank you, your Honor.

7 THE COURT: You may step down now, and we'll  
continue  
8 at 8:45.

9 And, members of the jury, we are at our usual  
closing  
10 time

11 until 8:45 tomorrow morning. And, of course, during  
this time,

12 you will follow the cautions required of you at all  
times in

13 recess of keeping open minds, avoiding discussion of  
the case

14 with all other persons, including other jurors, and  
being very

15 careful now about all of the things that you might  
read, see,

16 and hear in any form of communication or publication,  
to stay

17 away from anything that could influence you here,  
knowing, of

law 18 course, that you must decide on the evidence and the  
19 presented to you in this trial.  
20 You're excused now till 8:45 tomorrow morning.  
21 (Jury out at 5:00 p.m.)  
tomorrow 22 THE COURT: And you're excused till 8:45  
23 morning.  
24 Recess.  
25 (Recess at 5:01 p.m.)

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PLAINTIFF'S EXHIBITS

Withdrawn	Exhibit	Offered	Received	Refused	Reserved
	23	1738	9013	9015	
	24	1739		9016	
	25	1740E	9074	9074	

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1 PLAINIFF'S EXHIBITS (continued)

2 Exhibit Offered Received Refused Reserved  
Withdrawn

3	1740D	9074	9075		
4	1740C	9076	9076		
5	1740B	9077	9077		
6	1740A	9078	9078		
7	1743	9069	9069		
8	1746	9096	9097		
9	1747	9000	9002		
10	1748	9004	9004	9052	
11	1751		9036		
12	2103	9026			
13	2103	9031	9031		

14 \* \* \* \* \*

15 REPORTERS' CERTIFICATE

16 We certify that the foregoing is a correct  
transcript from

17 the record of proceedings in the above-entitled matter.  
Dated

18 at Denver, Colorado, this 17th day of November, 1997.

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21

22

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23

Paul Zuckerman

Kara Spitler

24

25