

21
22
23
24
Transcription
Street,
629-9285

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

9304

1 APPEARANCES
2 PATRICK RYAN, United States Attorney for the
Western
3 District of Oklahoma, 210 West Park Avenue, Suite 400,
Oklahoma
4 City, Oklahoma, 73102, appearing for the plaintiff.
5 LARRY MACKEY, SEAN CONNELLY, BETH WILKINSON,
GEOFFREY
6 MEARNS, JAMIE ORENSTEIN, and AITAN GOELMAN, Special
Attorneys
7 to the U.S. Attorney General, 1961 Stout Street, Suite
1200,
8 Denver, Colorado, 80294, appearing for the plaintiff.
9 MICHAEL TIGAR, RONALD WOODS, ADAM THURSCHELL,
REID
10 NEUREITER, and JANE TIGAR, Attorneys at Law, 1120
Lincoln
11 Street, Suite 1308, Denver, Colorado, 80203, appearing
for

12 Defendant Nichols.

13 * * * * *

14 PROCEEDINGS

15 (Reconvened at 1:32 p.m.)

16 THE COURT: Be seated, please.

17 (Jury in at 1:32 p.m.)

18 THE COURT: Please resume the stand, Mr.
Moore.

19 (Roger Moore was recalled to the stand.)

20 THE COURT: Miss Wilkinson.

21 MS. WILKINSON: Thank you, your Honor.

22 DIRECT EXAMINATION CONTINUED

23 BY MS. WILKINSON:

24 Q. Good afternoon, Mr. Moore.

25 A. Hi.

9305

Roger Moore - Direct

1 Q. Before lunch, you were telling us about reporting
the loss
2 of your property from November 5, 1994; is that right?

3 A. Uh-huh.

4 Q. I'm not sure that I spoke clearly each time I asked
you the
5 questions about the firearms, but were all those
firearms
6 stolen on November 5, 1994?

7 A. Yes.

8 Q. So I would have been wrong if I said November 4; is
that
9 right?

10 A. Yes.

11 Q. Now, after the robbery, did the police ask you to
come up
12 with the names of people who had visited your property?

13 A. Yes.

14 Q. Did you do that?

15 A. Yes.

16 Q. Did you provide those names to the sheriff's
office?

17 A. To the detective in charge of investigation.

18 Q. And is he a member of the sheriff's department?

19 A. Yes.

20 Q. And whose name did you provide at the top of your
list?

21 A. Timothy McVeigh.

22 Q. And had Timothy McVeigh visited your home?

23 A. Yes.

24 Q. Do you remember on how many occasions?

25 A. Three.

1 Q. Do you remember when you first met him?

2 A. Yes.

3 Q. When was that?

4 A. January '93 in Florida. Ft. Lauderdale.

5 Q. Where in Ft. Lauderdale did you meet him?

6 A. At a gun show on -- at the armory.

7 Q. What did you notice about him when you first saw
him?

8 A. He was dressed as if he was going to a military
parade in

9 his Desert Storm outfit.

10 Q. He was wearing --

11 A. Desert Storm.

12 Q. -- camouflage fatigues?

13 A. Desert Storm cameo.

14 Q. A sand color?

15 A. Yes.

16 Q. What else was he wearing?

17 A. His polished boots.

18 Q. Did you see anybody else dressed that like that at
the gun

19 show?

20 A. No.

21 Q. Did you speak to him that day?

22 A. Yes.

23 Q. And did you make arrangements to see him at another
gun

24 show?

he said 25 A. Later that day, I asked him where he was going, and

9307

Roger Moore – Direct

1 to Dinner Key, and I said, "Would you share a table?"

2 Q. Is Dinner Key another gun show?

3 A. Yes.

4 Q. In Florida?

5 A. South Florida.

6 Q. And how long was it after the first gun show in

7 January 1993 when you met Mr. McVeigh?

8 A. One month.

show? 9 Q. Did you share a table with him at that second gun

10 A. Yes.

11 Q. And did you talk to him during that gun show?

12 A. Some.

what 13 Q. Did you notice during those first two gun shows

14 Mr. McVeigh was selling?

bags, 15 A. T-shirts, canteens, duffel bags, couple of sleeping

16 and a pile of Turner Diaries.

17 Q. Turner Diaries, is that a book?

18 A. Yes.

19 Q. And he had several of them?
20 A. Six or seven.
21 Q. Now, the second gun show where you shared the table
with
22 Mr. McVeigh, was that also in January of 1993?
23 A. First week in April -- I mean, excuse me, first
week in
24 February.
25 Q. First week in February. Did you and Mr. McVeigh
get along

9308

Roger Moore - Direct

1 well at that point?
2 A. Yes.
3 Q. Did you make plans to see each other again?
4 A. Not to the degree of plans. I told him that if he
was
5 going west, the next best gun show that he could go to,
the
6 biggest, was Tulsa, Oklahoma.
7 Q. Did you tell him that you would be there?
8 A. Probably.
9 Q. Did you tell him about Karen Anderson?
10 A. Yes.
11 Q. Now, did you go to the gun show in Tulsa in the
spring of

12 1993?

13 A. Yes.

14 Q. Did you see Mr. McVeigh there?

15 A. Yes, I did.

16 Q. And during that time, did you have discussions with
him at

17 the Tulsa gun show?

18 A. Limited.

19 Q. Do you remember when the Tulsa gun show was in
1993?

20 A. It's usually the first weekend in April.

21 Q. Now, in 1993, do you recall the siege at Waco?

22 A. Kind of.

23 Q. All right. Do you recall when the fire was at
Waco?

24 A. The 19th.

25 Q. Of April?

9309

Roger Moore - Direct

1 A. Yes.

2 Q. Of 1993?

3 A. Yes.

4 Q. Did you see Mr. McVeigh at the gun show in Tulsa
before

5 that date, April 19, 1993?

6 A. No.

7 Q. Mr. Moore, did you hear my question? Did you see
8 Mr. McVeigh -- was the Tulsa gun show before the fire
at Waco?

9 A. Yes.

10 Q. Okay. If you don't understand my question, please
ask

11 me --

12 A. I'm sorry.

13 Q. -- to repeat it. So you said the gun show in Tulsa
was
14 during the first weekend of April of 1993?

15 A. Yes.

16 Q. You talked to Mr. McVeigh there?

17 A. Yes.

18 Q. At that time had you become interested in something
known
19 as the New World Order?

20 A. To a degree, yes.

21 Q. What had you done at that time?

22 A. At that time very little.

23 Q. Had you read any books about it?

24 A. One.

25 Q. All right. Were you concerned about it at that
time?

9310

Roger Moore - Direct

1 A. Somewhat.

with 2 Q. Did you discuss the New World -- New World Order

3 Mr. McVeigh?

4 A. Yes.

5 Q. Was he interested in that?

6 A. More than I was.

World 7 Q. Do you recall in general what he said about the New

8 Order?

9 A. He thought it was a U.N. takeover of the United

States, 10 basically a U.N. takeover of the entire world, one

currency, a 11 one-world government, a one-police-force government.

12 Q. Did you and Mr. McVeigh discuss whether there was

any 13 foreign military equipment on U.S. military bases?

14 A. Yes.

15 Q. Was he concerned about that?

16 A. Very much so.

17 Q. Did you want to look into that?

18 A. Yes.

19 Q. Did you do that in the summer of 1993?

20 A. Yes.

21 Q. Now, after the Tulsa gun show in April of 1993, did

22 Mr. McVeigh come to your home?

- 23 A. Yes.
- 24 Q. How long did he stay?
- 25 A. Approximately a week and a half.

9311

Roger Moore - Direct

- 1 Q. Did he come right after the Tulsa gun show?
- 2 A. Yes.
- 3 Q. Now, when he was there, did you speak to him?
- 4 A. Certainly.
- 5 Q. Did you talk about politics?
- 6 A. To some degree; not too much at that point. Talked
about
- 7 Waco most of the time.
- 8 Q. Okay. Again, were these discussions before the
fire?
- 9 A. Yes. He'd been to Waco.
- 10 Q. At that point he had already been to Waco?
- 11 A. Yes.
- 12 Q. Did he tell you what he had seen at Waco at that
point?
- 13 A. Well, he was back with the -- as far back as they
pushed
- 14 them, 2 miles back, you couldn't see too much. But he
was
- 15 extremely upset about it.
- 16 Q. Did he tell you what he saw? Were there agents
surrounding

17 the compound?

18 A. Yes.

19 Q. Was he upset about that?

20 A. Yes.

21 Q. Now, during this visit in early April of 1993, did
you talk

22 to him about firearms?

23 A. Yes.

24 Q. Was he interested in guns?

25 A. Tremendously.

9312

Roger Moore – Direct

1 Q. How do you know that?

2 A. He read every gun magazine that I had in the house.

3 Q. And did you discuss your firearms with Mr. McVeigh?

4 A. Only to a limited degree and basically on calibers.

5 Q. You did not show him your gun collection?

6 A. No.

7 Q. Now, what other type of things did you discuss with
8 Mr. McVeigh in early April of 1993 when he was at your
home?

9 A. What he was going to do when he left and which way
he was
10 going and what he wanted -- what he actually wanted to
see of

11 the West.

12 Q. What did he say?

13 A. He was going out West and then work his way up to
Oregon,
14 Washington, and then make a loop and go back to New
York.

15 Q. Did he ever mention to you anything the government
had done
16 to him?

17 A. He indicated that he thought there was a very good
18 possibility that when he got inoculated in Arabia that
they had
19 put a glass -- tiny glass transistor in his posterior.

20 Q. He told you that during that visit?

21 A. Yes.

22 Q. Was he concerned about that?

23 A. Yes.

24 Q. Now, during his visit in early April of 1993, did
he have
25 access to your home?

9313

Roger Moore - Direct

1 A. More than likely.

2 Q. And did you ever stop him from going into rooms
that he
3 wanted to go into?

4 A. No.

Anderson 5 Q. Did you tell him at that point that you and Miss

6 were going to go to military bases that summer?

7 A. I can't answer that question. I don't know.

8 Q. Could you have told him that?

9 A. I could have.

10 Q. And would you have shared that information with
him?

11 MR. TIGAR: Object to speculation.

12 THE COURT: Sustained.

13 BY MS. WILKINSON:

14 Q. Now, during that visit, did you discuss the
security of

15 your property with Mr. McVeigh?

16 A. Very -- quite a bit.

17 Q. What did you discuss with him?

18 A. How to best use anything that was on the market to
get more

19 security so that somebody couldn't just walk on.

20 Q. Did you walk your property with Mr. McVeigh?

21 A. Complete perimeter.

22 Q. Did you get advice from him about the security of
your

23 property?

24 A. Not really. Because it's a very difficult
situation.

25 MR. TIGAR: Excuse me, your Honor. If the
witness is

Roger Moore – Direct

1 consulting a writing during the testimony, we'd like to
see it.

2 MS. WILKINSON: I think it's a nervous habit.

3 BY MS. WILKINSON:

4 Q. Are you looking at a document in your hand?

5 A. I'm looking at the gun list.

6 Q. Why don't you just turn it over.

7 MR. TIGAR: Pardon me, your Honor. I didn't
know what

8 it was.

9 THE COURT: All right. Thank you.

10 THE WITNESS: I'm not looking at it. I was
just

11 holding it.

12 BY MS. WILKINSON:

13 Q. Mr. Moore, when you were talking to Mr. McVeigh
about

14 security, did you take any measures to establish more
security

15 for your property at that time?

16 A. No.

17 Q. Did you tell Mr. McVeigh that you had no security
devices

18 to your property?

19 A. Yes.

20 Q. Now, did there come a point when Mr. McVeigh left?

21 A. Yes.

22 Q. Do you recall why he left?

23 A. He seemed antsy, and I got the impression that we
were too

24 laid-back and easygoing with the animals and it just
wasn't

25 fast enough for him.

9315

Roger Moore - Direct

1 Q. Did he tell you where he was going?

2 A. Kingman.

3 Q. Now, did you exchange any letters with Mr. McVeigh
after

4 that visit in early spring of 1993?

5 A. Yes.

6 Q. Did he write you any letters after the fire at
Waco?

7 A. Yes.

8 Q. Do you recall him discussing the fire at Waco in
those

9 letters?

10 A. Yes.

11 Q. In substance, what did he say to you?

12 A. He was very upset. More so than before.

13 Q. Did you see him again in 1993?

14 A. Yes.

15 Q. Where?

16 A. Soldier of Fortune convention in the third week of
17 September.

18 Q. Soldier of Fortune convention. Where is that
located?

19 A. Las Vegas, Nevada.

20 Q. Is that where it's held every year?

21 A. Every year.

22 Q. And were you there to sell ammunition?

23 A. Yes.

24 Q. Was Miss Anderson with you?

25 A. Yes.

9316

Roger Moore – Direct

1 Q. When did you see Mr. McVeigh at that convention?

2 A. On Friday.

3 Q. Now, before you had -- between your visit with Mr.
McVeigh

4 at your property and seeing him at this Soldier of
Fortune

5 convention in the fall of 1993, had you and Miss
Anderson gone

6 out to look at military bases?

7 A. Yes.

8 Q. Did you look for foreign military equipment?

9 A. Yes.

10 Q. Did you find anything?

11 A. No.

World

12 Q. Did you become more or less interested in the New

13 Order after that?

14 A. Less.

Fortune

15 Q. Now, when you saw Mr. McVeigh at the Soldier of

16 convention, did you talk to him?

17 A. Yes.

18 Q. What did you talk about?

19 A. Not too much because he wasn't around much.

20 Q. All right. Did you tell him about your trip to the

21 military bases?

22 A. Yes.

World

23 Q. And did he tell you about his interest in the New

24 Order at that time?

25 A. He was more interested.

9317

Roger Moore - Direct

1 Q. More interested?

2 A. Yes.

in the 3 Q. Did you -- did he discuss with you the fire at Waco

4 fall of 1993?

5 A. Yes.

6 Q. What was his demeanor when he discussed that with
you?

7 A. Bright, flashing eyes.

8 Q. Now, did you and Mr. McVeigh have some argument
during that

9 Soldier of Fortune convention in the fall of 1993?

10 A. Yes.

11 Q. What was your argument about?

12 A. He seemed to be settled on a word of "patriot," and
there's

13 many people in that particular convention. And at that

14 convention they hand out a piece of paper that said,
"These are

15 not subjects to discuss, and it's a non-political
convention."

16 And there was a gentleman at the corner of the table
that had a

17 badge on his belt, partially hidden by his jacket, but
it was

18 still -- I could see it.

19 Q. Did it look like a law-enforcement badge?

20 A. It was a law-enforcement badge.

21 Q. What happened?

22 A. I finished talking with him; and in the last
sentence that

23 he gave me, the word "patriot" was in it. And McVeigh

walked

24 up at the time just exactly in time to hear that. When
the man

25 walked away, he followed the man and got hold of him by
the arm

9318

Roger Moore - Direct

1 and he started talking to him.

2 Q. Could you hear him talking to that law-enforcement
agent?

3 A. No. He was about 15 feet away.

4 Q. Did he return to your table?

5 A. Yes.

6 Q. What happened?

7 A. I told him not to do that, I could get kicked out
of the

8 show; and if I once got kicked out, I'd never be able
to get

9 back in.

10 Q. Now, do you recall whether that sheet -- or that
conduct

11 sheet that you received from the Soldier of Fortune gun
show,

12 whether it specifically prohibited the use of the word

13 "patriot"?

14 A. It did not.

15 Q. Then why were you so angry at Mr. McVeigh?

kind at 16 A. They didn't not want political discussion of any
17 that show.

business at 18 Q. What was your concern about your ammunition
19 that time?

20 A. I didn't want to get kicked out of the show.

talked to 21 Q. What was Mr. McVeigh's reaction to you when you
22 him about his confrontation or discussion with the
23 law-enforcement agent about the word "patriot"?

his voice, 24 A. He got in my face like a top sergeant and raised
25 and I raised my voice.

9319

Roger Moore - Direct

1 Q. You raised your voice?

2 A. Yes.

3 Q. And what happened?

4 A. We were asked to leave the booth.

5 Q. Who asked you to leave the booth?

6 A. The lady that was there.

7 Q. Did you leave?

8 A. Yes.

words? 9 Q. And did you and Mr. McVeigh exchange additional

10 A. We calmed down and went over to the refreshment
area.
11 Q. Did you see him again after that point? At the gun
show --
12 excuse me, at the Soldier of Fortune convention?
13 A. Only at the end.
14 Q. What happened at the end?
15 A. He gathered up his stuff and was going to come back
over to
16 the motel, and I asked him -- I told him that I
couldn't -- I
17 could no longer let him bunk into the motel like I did
the
18 previous night.
19 Q. Now, did you see him again then at the Soldier of
Fortune
20 convention --
21 A. No.
22 Q. -- in the fall of 1993?
23 A. No.
24 Q. Did you see him again in 1993 at another gun show?
25 A. Yes.

9320

Roger Moore - Direct

1 Q. When was that?
2 A. Two weeks later at Knob Creek, which is West Point,
3 Kentucky, 20 miles south of Louisville, Kentucky.

4 Q. Is that the machine-gun shoot that's held there?

5 A. Yes.

6 Q. When would that have been?

7 A. First week in October.

8 Q. Of which year?

9 A. '93.

10 Q. Okay. Were you able to speak to him at that point?

11 A. 10 or 15 minutes.

12 Q. Did you have any substantive discussions about any
of the
13 issues that you had raised --

14 A. No.

15 Q. -- at the Soldier of Fortune convention?

16 A. No.

17 Q. Did you spend any significant time with him at the
Knob
18 Creek machine-gun shoot?

19 A. No.

20 Q. Now, after that time, did he write you any letters,
after
21 October of 1993?

22 A. Yes.

23 Q. Do you remember the content of any of those
letters?

24 A. Not of any significance.

25 Q. Now, I want to ask you when was the next time that
you

Roger Moore - Direct

1 personally saw Mr. McVeigh again after October of 1993.

2 A. April -- between April and May of '94.

3 Q. Had he called in advance to tell you he was coming?

4 A. No.

5 Q. What happened?

6 A. Just showed up at the door and knocked.

7 Q. How long did he stay?

8 A. Overnight.

9 Q. Now, you let him stay at your house even though you
had had
10 this argument in the fall?

11 A. Pretty hard to kick somebody out when they knock on
your
12 door.

13 Q. Did Mr. McVeigh tell you where he was going after
he left
14 your home?

15 A. He said he was going to Saucier, Mississippi, and
look at
16 the 300 U.N. vehicles that were down there. And then
from
17 there, he was going to Avon Park, which is another base
that's
18 kind of out of the way in central Florida, and then he
was

19 going to go to his sister's and work as a electrical
assistant

20 to get money for traveling again.

21 Q. At any time during your conversations with Mr.
McVeigh, did

22 he tell you that he was going to Michigan?

23 A. Yes. This was before that.

24 Q. What did he say?

25 A. He never said he was going to Michigan. He wrote a
letter

9322

Roger Moore - Direct

1 saying he had gone to Michigan.

2 Q. Did he say why he was going to Michigan -- why he
had gone

3 to Michigan?

4 A. No.

5 Q. Now, in the spring of 1994 when Mr. McVeigh stayed
with

6 you, did you get into another argument with him?

7 A. No.

8 Q. Do you recall talking to him about some type of
launcher

9 system or rocket-flare system you had developed?

10 A. I made a comment.

11 Q. What did you say?

12 A. I didn't appreciate him stealing the idea.

13 Q. Did Mr. McVeigh leave shortly after that?

14 A. Yes.

15 Q. Did he ever come back to your house again after
that?

16 A. No.

17 Q. Now, that was sometime you said in the spring of
1994?

18 A. Yes.

19 Q. After that point, did he write you any letters?

20 A. Yes.

21 Q. Now, between that time -- that is, April of 1994 or
April

22 or May of 1994 -- and the robbery date, November 5,
1994, did

23 you receive any letters from Mr. McVeigh?

24 A. Yes.

25 Q. Do you remember the content of those letters?

9323

Roger Moore - Direct

1 A. The only letter I can remember the contents of was
the one

2 where he said he was in New York --

3 MR. TIGAR: Your Honor, may we have a date and
some

4 details as to whether the writing is in existence?

5 THE COURT: Yes, we ought to have a foundation
for the

6 absence of the letter.

7 MS. WILKINSON: Sure.

8 BY MS. WILKINSON:

9 Q. Do you recall when you received the letter?

10 A. No, I do not.

11 Q. What did you do with the letter after you read it?

Do you

12 recall?

13 A. No.

14 Q. Did you keep all of the letters that Mr. McVeigh --

15 A. No.

16 Q. -- sent you?

17 A. No, we did not.

18 Q. Now, tell us what Mr. McVeigh wrote you about
during that

19 time period.

20 A. He wrote about a black Ford following him on an
interstate

21 up in Illinois -- up in New York and that eventually
they

22 knocked him off the highway and wrecked his car.

23 Q. Now, let's move to November 5, 1994. After the
robbery on

24 that date, you said you gave the sheriff's office Mr.
McVeigh's

25 name?

Roger Moore - Direct

1 A. Yes.

2 Q. Did you try and contact Mr. McVeigh, yourself?

3 A. Several weeks later, when I wrote him about the robbery.

4 Q. Why did you do that?

5 A. I figured he ought to know, and I figured he might be able to help.

7 Q. At that time did you suspect his involvement?

8 A. It was possible.

9 Q. Why is that?

10 A. Well, they suggested to give them a list of anybody that
11 had been in the house in the last two years. We gave
12 them three names. He was the only one we couldn't find and
13 had no phone number for.

14 Q. Now, when you wrote him, did you -- did you keep a
15 copy of the letter you wrote him to tell him about the robbery?

16 A. You mean make a copy?

17 Q. Yeah.

18 A. No.

19 Q. Do you remember when you wrote it? The first
20 letter you wrote him about the robbery?

21 A. Late November, early December.

22 Q. And did you give him any of the details of the robbery?

23 A. Not the type of detail we're talking about that we give the

24 sheriff's office.

25 Q. All right. Did you invite him back to your property?

9325

Roger Moore - Direct

1 A. No.

2 Q. Not in that letter?

3 A. Not in that letter.

4 Q. Did you ever invite him back to your property?

5 A. Yes.

6 Q. Why did you do that?

7 A. The more we looked into it and the more we talked to

8 people, the more I decided that if he was involved and we could

9 get him back to the property, that Karen and I could stare him

10 down and he would eventually blink and we could find out

11 whether he was in on it.

12 Q. Well, while you were investigating the -- his potential

13 involvement, did you also investigate the potential
involvement

14 of other people?

15 A. Everywhere we could find help.

16 Q. And did you sometimes come across leads about
potential --

17 other robberies?

18 A. Yes.

19 Q. And were you interested in pursuing those leads?

20 A. Yes.

21 Q. Did you ever discuss a plan to capture the robbers?

22 A. Yes.

23 Q. What was that plan?

24 A. Three of the different people that we ran across in
-- that

25 had been robbed in '94 offered substantial rewards,
totaling a

9326

Roger Moore - Direct

1 hundred thousand dollars. And I wrote McVeigh, since
he's

2 always needing money, and I said, "If you'd come back
here and

3 solve these, you'd have a hundred thousand dollars."

4 Q. So you shared with him the plan to try and capture
the

5 robbers?

6 A. Right.

7 Q. And did he agree to come back?

8 A. In his last letter, he said he would come back in
May.

9 Q. But he never appeared before April 19, 1995?

10 A. No.

11 Q. Now, did you write to Mr. McVeigh again sometime in
the

12 spring of 1995?

13 A. We received his last letter in mid March; and just
before

14 going to Knob Creek, which is the second weekend in
April, I

15 wrote him back.

16 Q. Did you keep a copy of the letter that Mr. McVeigh
wrote

17 you in mid March of 1995?

18 A. No.

19 Q. In that letter, did he ask you certain questions?

20 A. Yes.

21 Q. And in your letter back to him, did you respond to
some of

22 those questions?

23 A. Some of them.

24 Q. When you wrote that letter in April of 1995, do you
recall

25 when you wrote it?

Roger Moore - Direct

1 A. On Wednesday on the way out of town to Knob -- to
2 Louisville, Kentucky.

3 Q. And do you recall the date or approximate date of
the gun
4 show that you were going to attend that year in 1995?

5 A. It would be the -- I'd have to look at a calendar.
It
6 would be the second Wednesday.

7 Q. So if April 19 were the third Wednesday, it would
have been
8 seven days before that, April 12?

9 A. Yes.

10 Q. You wrote the letter on April 12, 1995?

11 A. If it was a Wednesday.

12 Q. Okay. And when did you mail the letter?

13 A. On the way out of town.

14 Q. And do you recall preparing that letter?

15 A. Yes.

16 Q. And do you recall how you responded to Mr.
McVeigh's
17 questions?

18 A. To some degree.

19 Q. Okay. What was your purpose in writing that
letter?

20 A. Politeness and also to get him to come back.

21 Q. Did you discuss with him in that letter things that

you

22 thought he was interested in?

23 A. Yes.

24 Q. What type of things?

25 A. New World Order.

9328

Roger Moore - Direct

1 MR. TIGAR: Your Honor, if the letter is in
2 existence --

3 MS. WILKINSON: We're going to put in. I'm
just
4 laying the foundation. I'm about to offer it.

5 THE COURT: I thought the witness said he
didn't have
6 it.

7 MS. WILKINSON: He didn't have it, your Honor.

8 THE COURT: Well, if the letter's in
existence, let's
9 deal with it.

10 BY MS. WILKINSON:

11 Q. To what address did you mail the letter?

12 A. Kingman, Arizona.

13 Q. Take a look at Government's Exhibit 2104, please,
14 Mr. Moore.

15 Do you recognize that letter?

16 A. Yes.

17 Q. Did you write that letter?

18 A. Yes.

19 Q. Is that your handwriting?

20 A. Yes.

21 Q. Did you address it to Tim?

22 A. Yes. Tim Tuttle.

23 Q. How did you sign that letter?

24 A. Bob.

25 MS. WILKINSON: Government offers Exhibit
2104, your

9329

Roger Moore - Direct

1 Honor.

2 MR. TIGAR: No objection, your Honor.

3 THE COURT: 2104 is received.

4 MS. WILKINSON: We would like to publish it.

5 THE COURT: Yes.

6 BY MS. WILKINSON:

7 Q. Mr. Moore, would it be fair to say that you don't
have the

8 neatest handwriting?

9 A. Yes.

10 Q. Could you read this letter to the jury, and let's
start

11 with the first line.

12 THE COURT: I don't see it on the screen.

13 MS. WILKINSON: There it is.

14 THE COURT: Go ahead.

15 THE WITNESS: "Tim: I'm writing you this
letter and

16 answering it question for question."

17 BY MS. WILKINSON:

18 Q. Mr. Moore, does it say "writing" or "reading"?

19 A. "Reading," excuse me.

20 Q. Could you read that line again.

21 A. "Tim: I'm reading your letter and answering it
question

22 for question."

23 Q. Are you referring to the questions that Mr. McVeigh
asked

24 you in his previous letter?

25 A. Yes.

9330

Roger Moore - Direct

1 Q. Okay. Can you read the next line.

2 A. "No. 1, since the robbery, we are phasing out of
this

3 activity."

4 Q. What do you mean by "this activity"?

5 A. We're getting out of the business.

6 Q. What business?

7 A. The ammunition business.

8 Q. All right. And can you read the next line.

9 A. Yes.

10 Q. The next phrase.

11 A. "No. 2: Since November election, mail order is off

12 80 percent and some shows are off 50 to 75 percent.

All

13 dealers are getting creamed, no more money."

14 Q. And was that your -- just your interpretation of
what had

15 happened to your business since the election?

16 A. No, that's an interpretation of everybody I know
around the

17 country in the business.

18 Q. Okay. Read the next line, please.

19 A. "See what the NW0 has done to our dollar, 83 yen
from 144

20 in two years."

21 Q. Now, NW0, what does that stand for?

22 A. New World Order.

23 Q. Okay. "83 yen from 144 two years" -- does that say
"ago"?

24 A. "Ago."

25 Q. Read the next line, please.

Roger Moore – Direct

things
"Better
1 A. "Plan is to bring down country and have a few more
2 happen. Then offer the 90 percent solution." And then
3 red than dead."

the
4 Q. Okay. Let's go back. It says, "Plan is to bring
5 country down"?

6 A. Yes.

7 Q. What plan are you talking about?

that the
8 A. The United Nations' plan, or whatever plan it is
9 government -- that this New World Order has.

did you
10 Q. Okay. "And have a few more things happen," what
11 mean by that?

four things
12 A. Well, Trade Center bombing, anything. Three or
13 that would scare the heck out of the people in the
country,
14 they'd accept any kind of a compromise.

15 Q. All right. And then the next line, "They offer the
16 90 percent solution, better red than dead," what did
you mean
17 by that?

read
18 A. That's a standard buzzword in any book that you
19 anywhere on that type of subject.

Order? 20 Q. Meaning on the standard buzzwords for New World
21 A. No. "Better red than dead."
22 Q. But here what are you discussing?
23 A. Things that I thought he'd like to hear.
that for 24 Q. Now, go down to the next line, please, and read
25 the jury.

9332

Roger Moore – Direct

1 A. "Please remember I have a few more years of
experience plus
2 seven in Air Force and 40 years of shooting."
3 Q. Is that self-explanatory?
4 A. Yes.
5 Q. What does the next line say?
6 A. "Not much product to build, no sales."
7 Q. What are you talking about there?
8 A. There's nothing really to bag up and get ready to
go to a
9 show with because what inventory we had on hand would
probably
10 last six months.
11 Q. Meaning your ammunition inventory?
12 A. Yes.
13 Q. Now, read the next line to the jury, please.

to be 14 A. "This is the only cause, but the important thing is
15 as effective as possible."
16 Q. What did you mean by "the only cause"?
17 A. Educate people and get pamphlets and brochures and
18 magazines out to as many people as possible.
19 Q. Educate them about what?
20 A. The New World Order.
talked 21 Q. Is that referring to the same plan up here that you
22 about with the New World Order?
23 A. Yes.
past? 24 Q. And had you discussed that with Mr. McVeigh in the
25 A. Yes.

9333

Roger Moore - Direct

1 Q. And you knew he was -- did you know whether he was
2 interested in that?
3 A. You mean in getting out brochures and pamphlets?
the plan, 4 Q. Or interested in the whole -- educating people on
5 yes.
6 A. He'd been trying.
7 Q. Now, can you read the next line.
8 A. "I know of no people that are interested in this

plan."

9 Q. Which plan are you talking about?

10 A. The reward plan.

11 Q. All right. Read the next line, please.

12 A. "Even Special Forces people probably wouldn't tell
us as
13 the attitude of trust is mostly gone."

14 Q. What did you mean by that?

15 A. They're kind of a tight-lipped, high-echelon
organization;

16 and he wanted to know if he could get information from
Special
17 Forces people, and I said I don't think so.

18 Q. What type of information did he want to get from
Special
19 Forces people?

20 A. Something that might help him run down the robbers
and come
21 up with a reward.

22 Q. All right. Can you read the next line, please.

23 A. "After all this time, I can't believe you'd say I
drive you
24 batty as I've calmed down and you are getting more
hyper."

25 Q. Is that self-explanatory?

9334

Roger Moore - Direct

1 A. I would say so.

the
2 Q. Now, the next line, you say, "We must track down
3 robbers"; is that right?

4 A. Yes.

5 Q. Did you underline "must"?

6 A. Yes.

7 Q. Read that sentence to the jury, please.

who saw
8 A. "We must track down the robbers to know where and
9 and took certain stuff and also be able to determine
10 the security has been compromised."

11 Q. What were you referring to there?

12 A. The farm.

13 Q. The robbery of the farm?

14 A. Yes.

15 Q. Read the next line.

week."
16 A. "Got two super leads at the Tulsa gun show last

17 Q. What two leads are you referring to?

18 A. Robbery leads.

19 Q. Read the next line, please.

several
20 A. "Even if I wanted to," I don't -- "I didn't have
21 problems that you don't know about, I can't write on."

22 Q. What problems were you referring to?

23 A. One is Karen was not interested in me getting in on

a

24 robbery plan, running around the country with him
trying to do

25 that. She thought it was too dangerous. The other was
my

9335

Roger Moore - Direct

1 health.

2 Q. When you say "a robbery plan," what do you mean by
-- do

3 you mean actually conducting robberies or looking for
the

4 robbers?

5 A. Looking for the robbers.

6 Q. She didn't want you out there --

7 A. Undercover work.

8 Q. Read the next sentence, please.

9 A. "Karen is not interested in the slightest at this
point."

10 Q. What are you referring to there?

11 A. Basically the first -- the sentence above.

12 Q. Meaning your plan to capture the robbers?

13 A. Right.

14 Q. Read the next sentence, please.

15 A. "While I was gone to Florida this winter, she met
couple of

16 Special Forces Vietnam long-range reconnaissance, and

they have

of her 17 convinced her -- they have her convinced to put it out

18 mind and have fun."

Forces 19 Q. Had you discussed with Miss Anderson some Special

20 people she had met while you were away?

21 A. Yes.

you had 22 Q. And did she share with you her views on this plan

23 to capture the robbers?

24 A. Yes.

25 Q. What did she tell you?

9336

Roger Moore - Direct

the 1 A. She thought we ought to just forget about it, earn

2 money on the stock market, and wipe it out.

3 Q. Now, read the next line for the jury.

here 4 A. "I personally think each time you were -- you were

5 that you got the wrong impression."

6 Q. Next line.

interested." 7 A. "I'm the serious patriot, and Karen is not

patriot"? 8 Q. What did you mean when you said "I'm the serious

along
trying
you
pissed
to
goggles and

9 A. I was trying -- he always liked her better and got
10 with her better, and we always had friction, and I was
11 to reverse the situation.
12 Q. Why did you say you were a serious patriot?
13 A. I thought he'd like that.
14 Q. Now, starting with "Karen is not interested," could
15 read that again and go on to the next line.
16 A. Are we going back up?
17 Q. No. You read "I'm a serious patriot"; correct?
18 A. Yes.
19 Q. Could you just start from there?
20 A. "Karen is not interested in risks, etc. She's even
21 at me for taking night-vision photos and sending them
22 right-wing magazines."
23 Q. Did you ever take pictures with night-vision
24 send them to right-wing magazines?
25 A. Camera equipment.

9337

Roger Moore - Direct

1 Q. Pardon?
2 A. Night-vision camera equipment.

3 Q. Did you?

4 A. I've never owned them.

5 Q. Why did you say this in this letter?

6 A. I thought he'd like to hear it.

7 Q. Did you discuss with him looking for vehicles and
that type

8 of equipment?

9 A. With that type of equipment.

10 Q. Not with that type of equipment, but foreign
military?

11 A. Yes.

12 Q. But you never took photographs and sent them to
right-wing

13 magazines?

14 A. I didn't have the equipment.

15 Q. Did you ever take pictures at all at military
bases?

16 A. No.

17 Q. Did you ever take pictures and share them with
other people

18 of issues related to the New World Order?

19 A. No.

20 Q. Now, can you read the next line?

21 A. Anyone -- "Anyway, watch out for the radiation,
virus spray

22 and all other type of electron, electron mind-altering

23 devices."

24 Q. Had you ever discussed with Mr. McVeigh, radiation,

virus

25 spray, and all other type of electron mind-altering
devices?

9338

Roger Moore - Direct

1 A. I listened to what he had to say about it.

2 Q. Did he talk about all of those items?

3 A. Yes.

4 Q. Why did you put this in this letter?

5 A. I wanted to be -- look like I was on his side if
that was

6 the only way I was going to get him back to Arkansas.

7 Q. Read the next line, please.

8 A. "You need some space blankets to keep out of
satellites'

9 eyes."

10 Q. What was that a reference to, Mr. Moore?

11 A. That's a common-knowledge thing, that a space
blanket, if

12 you cover yourself with it, heat-imaging equipment
can't find

13 you.

14 Q. And did you discuss that with Mr. McVeigh previous
to this

15 letter?

16 A. Yes.

17 Q. What was the purpose of that?

18 A. He knew that from Desert Storm.
19 Q. Why did you discuss it with him?
20 A. I wanted to know about it.
21 Q. Read the last line, please.
22 A. "Let's let May go. If you want -- if you
want . . . write
23 when you move" and have news -- "or have news."
24 Q. And you signed it, "My best, Bob"?
25 A. Yes.

9339

Roger Moore - Direct

1 Q. And over there on the left, did you write "burn" on
there?
2 A. Yes.
3 Q. Why did you write that?
4 A. He always writes that on his.
5 Q. Now, you said, "Let's let May go." What was that a
6 reference to?
7 A. His last letter, he said something about coming in
May.
8 Q. Did you want him to come in May?
9 A. No.
10 Q. Why didn't you want him to come in May?
11 A. We're too -- Karen and I are too busy getting the
farm back

and I 12 from the winter ravages, and she has shows to go to;
13 didn't want him there when I was by myself.
14 Q. Why was that?
down. I 15 A. I wouldn't be -- I couldn't handle staring him
16 thought needed two of us.
to 17 Q. Now, in this letter, Mr. Moore, did you ever intend
18 refer to any plan to bomb the Murrah Building?
19 A. No.
could you 20 Q. Now, when you saw the robber on November 5, 1994,
21 tell whether it was Timothy McVeigh?
22 A. Yes.
23 Q. How could you tell?
24 A. He's easy to spot.
25 Q. Was it Timothy McVeigh?

9340

Roger Moore - Direct

1 A. No.
2 Q. Why wasn't it?
an Irish 3 A. He wasn't 6' 2". He wasn't light-complected like
4 person, and he wasn't slender.
5 Q. Would you have rec -- did you recognize Mr.
McVeigh's

6 voice?

7 A. Would I?

8 Q. Yes.

9 A. Yes.

Timothy 10 Q. And did the robber's voice sound anything like

11 McVeigh's voice?

12 A. No.

held a 13 Q. So you never believed Mr. McVeigh was the man who

14 shotgun to you; is that right?

15 A. Absolutely not.

Honor. 16 MS. WILKINSON: No further questions, your

17 THE COURT: Mr. Tigar.

18 CROSS-EXAMINATION

19 BY MR. TIGAR:

20 Q. Good afternoon, Mr. Moore.

21 A. How do you do.

appointed 22 Q. My name is Michael Tigar. I'm one of the lawyers

23 to help out Terry Nichols.

24 A. I understand.

Lauderdale; 25 Q. You first met Mr. McVeigh at a gun show in Ft.

Roger Moore – Cross

1 is that correct, sir?

2 A. That's correct.

3 Q. And he had -- he was dressed in full Desert Storm
uniform;

4 correct?

5 A. Yes.

6 Q. Was it your understanding that he was no longer in
the

7 military?

8 A. Yes.

9 Q. Is it unusual for veterans to dress up in their
full parade

10 uniform at gun shows?

11 A. I don't know the law on that.

12 Q. Not whether it's legal or not, but is it unusual,
in your

13 experience, to see people manning tables or personning
tables,

14 I guess we should say --

15 A. In full uniforms?

16 Q. Yes, full.

17 A. It's not at the Soldier of Fortune.

18 Q. Now, you talked about the Soldier of Fortune. What
is the

19 Soldier of Fortune show in Las Vegas?

20 A. It's a -- basically a combination parts show, trade
show.

21 Most of the new manufacturers from the United States
are there,
22 with booths, big booths: Smith & Wesson, Ruger,
Winchester,
23 Colt, and the rest of them. Some foreign. This time
we had
24 one from Brazil. We've had them from Israel. And then
there's
25 smaller tables where people have used -- there's
ammunition

9342

Roger Moore - Cross

1 tables where they have also used collectors' items like
2 90-millimeter casings. A lot of collectors and
different odds
3 and ends. And then usually at the back of the show
they have a
4 military-vehicle display, which is put on by the
Arizona
5 Military Vehicles Collectors Association.

6 Q. And what does the term Soldier of Fortune refer to?

7 A. Probably a merc.

8 Q. What's a merc?

9 A. Mercenary.

10 Q. And are there discussions at this show of becoming
a
11 mercenary or how to be one?

12 A. No.

13 Q. Is there literature available at these shows about
how to
14 be a mercenary?
15 A. No.
16 Q. And that was what you told us earlier, that
discussion of
17 politics is discouraged?
18 A. Right.
19 Q. Is that correct?
20 A. That's correct.
21 Q. Even though discussion of politics is discouraged,
would it
22 be fair to say that those attending have a certain
political
23 view, predominantly?
24 A. More than 50 percent?
25 Q. Sure.

9343

Roger Moore – Cross

1 A. No.
2 Q. Now, when you saw Mr. McVeigh there in Ft.
Lauderdale, you
3 bought some things from him; correct?
4 A. Yes, that's right.
5 Q. And how long was it that you spoke to him before
you asked
6 him if you could share a table at the Dinner Key show?

7 A. I didn't ask him that the first time.

8 Q. This was the second time you came back?

9 A. It's a small show. You walk around it three or
four times

10 before you leave so that you don't miss something.

11 Q. So on your second time at Mr. McVeigh's table, you
asked

12 him that; is that correct?

13 A. No, I asked him where he was going next. He said
Dinner

14 Key in Miami.

15 Q. And then when did you ask him about sharing a
table?

16 A. I said, "How did you get a table there?"

17 He said, "I rented it a long time ago."
That's a

18 difficult show to get in.

19 Q. That was my next question. Why is that a difficult
show to

20 get into?

21 A. Because it's a show down in the Cuban area, and a
lot of

22 people go to that show, and it's limited space.

23 Q. Now, you had lived in Florida for many years;
correct?

24 A. Right.

25 Q. You had five boat businesses; right?

Roger Moore – Cross

1 A. Right.

Florida
2 Q. And so you're pretty well-known businessman in the
3 community; correct?

4 A. I wouldn't say that. I tried to keep a low
profile, and I
5 worked 90 hours a week, so I didn't know anything but
the
6 suppliers.

7 Q. And so you were -- were you surprised that this
young
8 soldier had been able to get a table at the Dinner Key
gun
9 show?

10 A. Yes.

11 Q. And you asked him if he would share it with you?

12 A. Yes, I did. I said, "If you have any space, could
I borrow
13 half a table?"

14 Q. Why did you select him to share space with?

15 A. I didn't know anybody else that had a table.

16 Q. What was it you wanted to sell?

17 A. Just some stuff I had in the garage that was old
military
18 stuff.

19 Q. What old military stuff was that?

20 A. Canteens, ammo boxes, a few parts, an M-16 barrel.

21 Q. Now, it was after that that Mr. McVeigh -- you
invited him

22 to your farm; is that correct?

23 A. No, we didn't invite him to the farm until he was
at Tulsa.

24 Q. Now, how many people have visited your farm there
on your

25 invitation since you've bought it?

9345

Roger Moore - Cross

1 A. You mean both farms?

2 Q. No, the new farm first.

3 A. New farm. Four or five.

4 Q. So would you say it's pretty rare to -- for you to
invite

5 somebody to come and share your hospitality there
overnight?

6 A. It would be unusual.

7 Q. You go to -- how many gun shows a year did you go
to in

8 1993?

9 A. Myself or Karen?

10 Q. Yourself.

11 A. The two in Ft. Lauderdale, two in Florida; Tulsa;
Knob

12 Creek twice; and the Soldier of Fortune.

13 Q. That was all that you went to?

14 A. Yep.

15 Q. She went to many more; is that correct?

16 A. Twice as many.

17 Q. Now, the business that you have with Ms. Anderson
is called

18 the American Assault Company; is that correct?

19 A. Yes.

20 Q. Is that a partnership?

21 A. It's really nothing.

22 Q. Well, how -- what dollar volume of business did the
nothing

23 do in 1993?

24 A. 65,000.

25 Q. And was that your gross sales or profit?

9346

Roger Moore – Cross

1 A. Gross sales.

2 Q. Now, you testified earlier that you're in the habit
of

3 traveling with large amounts of cash; correct?

4 A. I didn't say that.

5 Q. Are you in the habit of traveling with large
amounts of

6 cash?

7 A. What is a large amount of cash?

cash? 8 Q. Are you in the habit of traveling with \$50,000 in

9 A. No.

10 Q. About how much cash do you travel with?

11 A. Coming up here right now, today, at this place?

12 Q. On average.

13 A. 1500.

you 14 Q. You said in direct examination that when traveling,

15 might decide to buy something, such as a horse trailer;

16 correct?

17 A. Right.

horse 18 Q. Do you carry enough money so that if you saw a

19 trailer that you like, you can buy it?

20 A. That's right.

21 Q. How much is a horse trailer?

22 A. 2- to 3,000.

wanted 23 Q. You said that you carry enough money so that if you

home? 24 to buy a motor home, you could. How much is a motor

25 A. 10-, 15,000. But you don't --

9347

Roger Moore - Cross

1 Q. Pardon me?

if you 2 A. You don't have to pay for it all at once. I'm sure
a 3 put a \$5,000 deposit, they'd give you time to send them
4 cashier's check.

what you 5 Q. You said that you cannot get credit cards; is that
6 said?

7 A. Yeah. That's right.

business, you 8 Q. Have you -- as a result of your Florida boat
9 have substantial securities accounts, do you not, sir?

10 A. Yes.

correct? 11 Q. They -- in the several millions of dollars;

12 A. That's right.

things 13 Q. Have you never received from a bank one of those
14 that say, "Congratulations, Mr. Moore, you're
preapproved for a

15 credit card"?

16 A. Lately.

direct 17 Q. So -- and -- on what did you base your statement on
18 examination that you can't get a credit card?

holding 19 A. I went to Barnett Banks, which is the largest bank
they 20 company in Florida. They advertised in the paper that
there, 21 wanted new credit card people. My wife and I went up

22 and we were turned down.

23 Q. Did you give them a net-worth sheet?

24 A. Yes, I did. And I told them they could call the
brokerage

25 house and that we had a \$250,000 house paid for and we
owed no

9348

Roger Moore – Cross

1 money and I had never borrowed money. And he said,
"You have
2 no credit. I can't give you that."

3 Q. So that's your one -- that's the only experience
you had of
4 attempting to get a credit card?

5 A. That's right.

6 Q. Now, you also said that you have an insurance man
from
7 State Farm Insurance in Florida?

8 A. Uh-huh.

9 Q. Now, what's that person's name?

10 A. I don't remember right now. He's deceased. He had
a heart
11 attack about three years ago.

12 Q. And your testimony is that you asked some insurance
agent

13 whether you should get a floater policy on your
firearms;

14 right?

15 A. Right. In Florida.

16 Q. In Florida. And did he tell you how much it would
cost to

17 have a floater policy on your firearms?

18 A. Yes.

19 Q. About 1 percent?

20 A. \$2700.

21 Q. Do you know what that is as a percentage of the
value that

22 you were talking about?

23 A. 6, 7.

24 Q. And did this insurance agent then tell you that you
25 shouldn't buy this policy?

9349

Roger Moore – Cross

1 A. No. He said, "Here is the" -- he gave me the
pluses and

2 minuses.

3 Q. And did this insurance agent tell you that he was
afraid

4 that people that worked for his company might tell
somebody

5 that you were insured so that you would be robbed and
killed?

6 A. He said it's a possibility.

7 Q. And did you continue to carry insurance with this

company

8 that had people in it that their own agents said might
rob and

9 kill you?

10 A. I've been with State Farm Mutual since I was 16
years old.

11 Q. And you're still with them?

12 A. Yes.

13 Q. Have you ever, after the event that you've talked
about

14 today, filed a lawsuit against State Farm for
malpractice in

15 advising you to be underinsured?

16 A. No. And I probably wouldn't. I've seen enough of
17 courtrooms right now.

18 Q. Is this your first experience in court, sir?

19 A. That's right.

20 Q. Now, you told us that -- excuse me.

21 On October -- excuse me. Talking about --
November

22 the 5th, 1994, is the date we're talking about. You
said you

23 got up, what, about 8, 8:15 in the morning?

24 A. 8:30.

25 Q. And you confronted somebody with -- as you walked

9350

Roger Moore - Cross

1 outside -- right -- or somebody confronted you?

2 A. Yes.

3 Q. And this -- this person that you saw was wearing a
ski

4 mask; is that right?

5 A. That's right.

6 Q. And was that person dark-complected?

7 A. I would say no. I'd say it maybe had some suntan.

8 Q. Do you remember being interviewed by the Federal
Bureau of

9 Investigation on the 28th of April, 1995, in Hot
Springs,

10 Arkansas?

11 A. If that was the first date they came, that was --
that

12 would be the right date.

13 Q. Did you -- do you remember telling the agents at
that time

14 that the robber appeared to be dark-complected?

15 A. No, I can't say that I remember that.

16 MR. TIGAR: D810.

17 BY MR. TIGAR:

18 Q. Show you the report of interview and ask you if --
just to

19 look there and see if that refreshes your recollection.
I

20 understand that's not your document, sir.

21 A. Where are we?

22 Q. Right there, sir.

23 Does that refresh your recollection that you
told the

24 agents --

25 A. I think there's a difference between dark-
complexioned and

9351

Roger Moore - Cross

1 having a little suntan.

2 Q. I understand there's a difference, sir. My
question is:

3 Did you tell the agents that the person was dark-
complexioned?

4 A. If that's the interview that the agents typed.

5 Q. My question is: Do you remember telling them that
the

6 person was dark-complexioned?

7 A. No.

8 Q. Now, you told us that the person appeared to have a
beard;

9 is that right?

10 A. Yes, sir.

11 Q. Did you -- did the hair of the person come
underneath the

12 mask?

13 A. The mask was tucked in the jacket -- the collar of
the

14 shirt.

15 Q. Now, you also told us about being wrapped up in
duct tape;

16 correct?

17 A. Yes.

18 Q. Now, where was this penknife that you were able to
free

19 yourself with?

20 A. On the table, glass table right next to the couch.

21 Q. Now, was that penknife in plain sight?

22 A. Yes.

23 Q. Was it open?

24 A. Yes.

25 Q. And after the -- this person left the house, how
long did

9352

Roger Moore - Cross

1 you wait before you reached for the penknife?

2 A. First thing I did was raise my eyes 'cause I could
see

3 under the duct tape and I wanted to make sure nobody
was

4 standing in the doorway with a shotgun. When I
determined I

5 couldn't see anybody, then I tried to get to the
penknife.

6 Q. Now, you had heard the sliding door of your van
close;

7 correct?

8 A. That's right.

9 Q. You had heard another door of your van close;
correct?

10 A. The driver's door.

11 Q. How did you know it was the driver's door?

12 A. It took the guy that long to walk around the van.
I could

13 hear him walk around the van.

14 Q. So you surmised it was the driver's door; correct?

15 A. The van was up against the house, so he had to walk
around

16 the back.

17 Q. You didn't -- so you didn't see anybody, and then
you used

18 the penknife; correct?

19 A. Right.

20 Q. Now, it was your plan to chase the robber in a
vehicle;

21 correct?

22 A. That's right.

23 Q. Now, later on that day, sir, you went to your van,
did you

24 not?

25 A. Yes.

serial
1 Q. And you looked in there for a list of weapons with
2 numbers; correct?
3 A. That's correct.
4 Q. And it wasn't there, was it?
5 A. No.
6 Q. You had placed a list of weapons with serial
numbers in
7 your van; is that your testimony?
8 A. We had done that when we moved from the other farm.
9 Q. Now, in that place where the list with serial
numbers was
10 kept, there was also some cash; right?
11 A. Right.
12 Q. And was the cash still there?
13 A. The cash was laying on the middle of the floor with
all the
14 keys, next to the driver's seat.
15 Q. So the cash was not where you'd left it; it had
been taken
16 out of the hiding place, left on the floor. And only
the list
17 with the serial numbers was gone; is that your
testimony?
18 A. That is.
19 Q. Now, who owned these weapons, sir?
20 A. I owned all but the ones that are registered in
other
21 people's names: My wife and Karen.

22 Q. Now, you did have insurance, did you not?

23 A. Homeowner's.

24 Q. You had a regular homeowner's policy that covered
your home

25 for fire and related kinds of incidents; correct?

9354

Roger Moore – Cross

1 A. Lawsuits.

2 Q. Lawsuits. And the -- your house is, what, about
1800

3 square feet?

4 A. Approximately.

5 Q. And we've seen pictures of it. It's a frame house;
and

6 what was the replacement cost insurance for the
homeowner's

7 part of the policy?

8 A. Somewhere around 85,000.

9 Q. And in addition to that, you had contents
insurance;

10 correct?

11 A. Yes.

12 Q. And on -- as of November the 5th, 1994, the
contents

13 insurance was \$63,000; correct?

14 A. If that's what you say. I don't know the exact
amount.

15 Q. Do you know that it was about \$60,000?
16 A. It's usually a percentage of what the house is
worth.
17 Q. I'm asking you, sir -- I understand -- I'm asking
you, sir,
18 for your recollection. Do you recall now what the
amount of
19 contents insurance was that you had?
20 A. I do not. I know that it's more than 50 percent.
21 Q. Now, there came a time, sir, when you went to
Washington,
22 D.C.; is that correct?
23 A. That's right.
24 Q. Oh, let me ask you: Do you recall making a claim
-- the
25 amount of the claim you made with the insurance company
for the

9355

Roger Moore - Cross

1 property?
2 A. You mean on the theft?
3 Q. Yes.
4 A. I made a claim on the theft. Not for the amount.
5 Q. Yes.
6 A. Because they don't pay the amount. I made a claim,
and
7 they required a police report of what I turned in.

made a 8 Q. Right. Do you remember telling the FBI that you

9 claim for \$59,000?

10 A. No.

11 Q. Were you with Mr. Spivey when he added up the
amount that

12 you claim to have lost?

13 A. I was with Mr. Spivey. I don't know if he added it
up or

14 not. It was already added at the bottom.

15 Q. Did you ever see his report that he made adding up
the

16 loss?

17 A. I don't remember.

18 Q. Do you remember telling the FBI that you made a
claim for

19 \$59,000 on the property?

20 A. I don't remember.

21 Q. Now, you did go to the FBI headquarters in
Washington,

22 D.C., on the 4th of May; correct?

23 A. If that's the date I flew in, yes.

24 Q. And at that time you identified a number of weapons
as

25 belonging to you; correct?

1 A. That's correct.

2 Q. Did you identify any of the weapons as belonging
either to

3 Ms. Anderson or to your wife, Carol Moore?

4 A. No.

5 Q. Carol Moore is your wife?

6 A. Correct.

7 Q. You've been married how long?

8 A. Since 1955.

9 Q. And the deed in your house that lists you as
brother and

10 sister in Arkansas is in error; is that correct?

11 A. That's correct.

12 Q. Now, what is Ms. Anderson's relationship to you,
sir?

13 A. She works -- she runs the farm for us when we're
not there

14 and when we're there.

15 Q. Is she your girlfriend?

16 A. You could say that.

17 Q. I'm asking you, sir, is she your girlfriend?

18 A. Yes, sir.

19 Q. And is this an intimate relationship?

20 A. Yes, sir.

21 Q. Now, after this person left your house, you went to
the

22 neighbors'; is that correct?

23 A. After I determined they were home.

24 Q. And that's the Powells?

25 A. Yes.

9357

Roger Moore – Cross

1 Q. Now, at that time Mr. Powell was not there;
correct?

2 A. Correct.

3 Q. And you testified on direct examination that you
called the
4 sheriff's office immediately; correct?

5 A. Correct.

6 Q. Now, do you remember being interviewed by Mr.
Spivey?

7 A. Yes.

8 Q. And you told Mr. Spivey that you did not call the
insurance
9 company first; is that right?

10 A. I made a mistake. We had a little bit of a
friction about

11 him being an adjuster, and he just rubbed me the wrong
way, and

12 I got a little bit rattled.

13 Q. Now, he made a tape recording of your conversation,
did he

14 not, sir?

15 A. Yes, sir.

sheriff 16 Q. And do you remember being asked, "So you called the

17 from their house?

18 "Answer: Yeah.

19 "Question: You called the sheriff's
department?"

20 "Answer: I didn't call the sheriff, no. The
first

21 person I called, I called Bill Stoneman.

22 Do you remember telling him that?

23 A. No. But if I said the first time I called the
sheriff's

24 department, then I called the sheriff's department."

25 Q. I beg your pardon?

9358

Roger Moore - Cross

1 A. You said in there -- you read that -- please reread
that.

2 Q. Uh-huh.

3 "Question: So you called the sheriff from
their

4 house?

5 "Yeah.

6 "Question: You called the sheriff's
department?"

7 A. Let's stop right there.

8 Q. Uh-huh.

9 A. He said, "Did you call the sheriff's department
from your

10 house?" Yes, I called the sheriff's department.

11 Q. And that's true, isn't it, you did call the
sheriff's

12 department?

13 A. I certainly did.

14 Q. Now, is it also true that the first person you
called was

15 Bill Stoneman?

16 A. I'm not sure of that.

17 Q. Now, on direct examination, you said that you
called the

18 sheriff first and then somebody else; correct?

19 A. Yeah.

20 Q. Well, isn't it a fact, sir, that when Mr. Powell
came home

21 from where Mrs. Powell had gotten him, he said, "Have
you

22 called the sheriff?" and you said, "No," and he said,
"Don't

23 you think you better do it?" and then you called the
sheriff?

24 Isn't that what happened?

25 A. He didn't come home for a hour and a half, so I
don't know

1 how -- in fact, he didn't come to his house. He came
to my
2 house -- by that time, there were already five
sheriff's cars
3 already there.

4 Q. The question is: Isn't it a fact, when Mr. Powell
came to
5 the house, he said, "Have you called the sheriff?" and
you
6 said, "No, I haven't," and then he said, "Hadn't you
better do
7 it?" and then did you it? Yes or no.

8 A. No.

9 Q. Now, you said that Mr. Spivey rattled you; is that
right?

10 A. No, he rubbed me the wrong way.

11 Q. Sir, he came out to your house on what date?

12 A. I really don't know. I think it's listed there. I
think
13 it's the 16th.

14 Q. 16th. So that would have been 11 days after the
incident;
15 correct?

16 A. Uh-huh.

17 Q. Now, you understood that his job was there to
adjust the
18 claim; correct?

19 A. Uh-huh.

20 Q. Well, what was it that he said that rubbed you the
wrong

21 way?
22 A. They're not too happy with settling claims. And he
just
23 had a tone of voice I didn't like 'cause I was already
robbed
24 of 60,000. I knew I wasn't going to get hardly even
25 10 percent, so I didn't think they should act like that
when

9360

Roger Moore - Cross

1 I'm paying them insurance.
2 Q. Well, was he rude to you, sir?
3 A. I would say so.
4 Q. Did he express hostility?
5 A. Yes.
6 Q. Did he express suspicion?
7 A. I don't know about that, but I know that Carol --
Karen got
8 into an argument with him about it.
9 Q. What did Miss Anderson and the insurance adjuster
say in
10 this argument?
11 A. I have no --
12 MS. WILKINSON: Objection.
13 THE WITNESS: I have no idea.
14 MS. WILKINSON: I think he's answered.

15 BY MR. TIGAR:

16 Q. Was that outside your presence?

17 A. Yes.

18 Q. Now, at some point during the day, then, the
sheriff's

19 people came; is that correct, sir?

20 A. To my house?

21 Q. Yes, to your house.

22 A. I don't remember that.

23 Q. At some point, were you interviewed by the
sheriff's

24 officers on the 5th?

25 A. Yes.

9361

Roger Moore – Cross

1 Q. Where did that interview take place?

2 A. Starting at Mr. Powell's.

3 Q. Did it continue at your house?

4 A. Yes.

5 Q. And did you tell the sheriff's officers that the
person who

6 had confronted you was between 5-foot-11 and 6 feet
tall and

7 weighed 185 pounds?

8 A. I think there was a range on the weight.

9 Q. My question, then, is, sir: As you remember it,

isn't it a

10 fact that you told them that the person was between 5'
11" and

11 6 feet and 185 pounds?

12 A. I can't recall that.

13 Q. Now, this person you say confronted you, dragged
you a part

14 of the way; is that right?

15 A. Yes.

16 Q. How much did you weigh at that time?

17 A. 215.

18 Q. 215 pounds?

19 A. Yes.

20 Q. And how far did this person drag you?

21 A. 7 feet. On carpet.

22 Q. Now, on direct examination, you said that when you
came out

23 of the house, you saw this person and it was a horrible

24 picture; correct?

25 A. That's true.

9362

Roger Moore – Cross

1 Q. Now, in your van that day, did you have a
publication that

2 had a horrible picture on it?

3 A. I didn't consider it a horrible picture. It meant

no harm

4 to me.

D1549,

5 Q. Going to show you what's been marked as Defendant's

seat of

6 and ask you if that's a picture that you had on the

7 your van on that day?

8 A. I did not.

9 Q. Did you have that in your van that day?

10 A. I had that in my van. Not in plain sight.

11 Q. But that's -- that was your publication; correct?

12 A. No.

a while?

13 Q. Was it a publication that had been in your van for

14 A. I picked it up at a gun show.

Honor.

15 MR. TIGAR: All right. We offer it, your

16 MS. WILKINSON: No objection.

17 THE COURT: Is it D15 --

18 MR. TIGAR: D1549, your Honor.

19 THE COURT: All right. It's received.

20 BY MR. TIGAR:

to the

21 Q. Does that look like the person that you described

22 police as having robbed you?

23 A. No.

24 Q. Do you see a black ski mask?

25 A. Yes.

Roger Moore - Cross

1 Q. Do you see the ski mask tucked into the collar?

2 A. Yes.

3 Q. Now, you see signs like Waco veteran and ATF;
correct?

4 A. I can't read those. I see ATF. I didn't see --

5 Q. The person who you say confronted you didn't have
any

6 badges on; correct?

7 A. Didn't have any black suit on, either.

8 Q. Okay. From the neck up, does that look like the
person

9 that you told the police had robbed you?

10 A. They all look similar with black ski masks.

11 Q. My question is: From the neck up, does that look
like the

12 person that you said robbed you?

13 A. The picture's not clear enough to see a beard
growth.

14 Q. Now, you told us earlier that the ski mask -- that
the

15 person had hair around the opening of his mouth;
correct?

16 A. Correct.

17 Q. And you said that he had at least a one-inch full
growth;

18 is that what --

19 A. It appeared that on the chin, there was a one-inch
full
20 growth.

21 Q. So that when you said earlier that it was about a
half an
22 inch, in fact, it was, according to you, about an inch;
is that
23 correct?

24 A. It could be an inch on the chin, and it could be a
half
25 inch around the mouth.

9364

Roger Moore - Cross

1 Q. And this person that you say confronted you had a
long,
2 elongated head; correct?

3 A. Correct. That could account for the beard on the
chin.

4 Q. Now, at what time of day did you unlock the door
and go
5 outside?

6 A. 9:15.

7 Q. 9:15. Did you tell the sheriff's officers who
responded
8 that it was at 8:30?

9 A. I have no idea.

10 Q. You don't remember?

11 A. No.

12 Q. Now, you did talk to Mr. Powell when he got back;
is that

13 right, sir?

14 A. You mean over to my house?

15 Q. No, when Mr. Powell got back to the house, to the
Powells'

16 house.

17 A. I recall him coming over to my house when we were
over

18 there with the sheriff's department.

19 Q. Now, let's be clear about the relationship. The
Powells

20 are your neighbors; correct?

21 A. Correct.

22 Q. You trust them to look after your property when
you're not

23 there; correct?

24 A. On the outside.

25 Q. All right. And the Powells are -- Miss Verta
Powell; is

9365

Roger Moore - Cross

1 that right?

2 A. I don't know her name. They called her "Pudge."

3 Q. She's known as "Pudge"; right?

4 A. That's a nickname.

5 Q. That's her nickname, and that's Mrs. Powell;
correct?

6 A. Yes.

7 Q. And you went over there at sometime in the morning
of 5th;

8 correct?

9 A. Correct.

10 Q. And you told her that you had been robbed by more
than one

11 person, didn't you?

12 A. No. I said, "I've had an armed robbery. I need to
use the

13 phone."

14 Q. Is it your testimony that you did not tell Mrs.
Powell,

15 known as "Pudge," that you'd been robbed by more than
one

16 person?

17 A. Yes.

18 Q. Okay. Did you then use the telephone immediately?

19 A. Yes. As soon as I looked up the number off a book.

20 Q. And did you talk low to someone and explain what
had

21 happened in the robbery?

22 A. I tried not to disrupt her. She was fiddling
around with a

23 VCR in the living room.

24 Q. Who did you talk to?

25 A. Sheriff's office.

9366

Roger Moore – Cross

and
1 Q. Isn't it a fact, sir, that you called Mr. Stoneman
2 talked low and explained what had happened in the
robbery?

3 A. I don't remember talking low.

described
4 Q. Isn't it a fact that you called Mr. Stoneman and
5 what happened in the robbery before you called the
sheriff's
6 office?

7 A. I don't think so.

8 Q. Now, do you remember talking to Mr. Lance Powell
that day?

9 A. Is that the son?

10 Q. Well, he was born in 1969.

11 A. Must be a son.

12 Q. Do you remember talking to Lance that day?

13 A. No. He came in and made a statement to the law-
enforcement
14 officials.

15 Q. Do you remember telling Mr. Moore -- excuse me --
16 Mr. Powell that there were at least two individuals who
robbed
17 you because you saw one and heard another one?

18 A. No.

19 Q. Do you deny that you told Mr. Lance Powell that
there were

20 at least two individuals who robbed you because you saw
one and

21 heard another one?

22 A. I never talked to the son.

23 Q. Now, was one of the people that you asked to help
you

24 investigate this matter someone named David Wegner?

25 A. Might have been. But he lives in Tulsa. He could
have

9367

Roger Moore – Cross

1 been of very little help.

2 Q. Now, in March, 1994, was Mr. Wegner assisting you
at your

3 table at the Tulsa gun show?

4 A. He assists Karen whenever she's up there.

5 Q. Did Mr. McVeigh show up on that occasion?

6 A. Wouldn't be March. That would be April.

7 Q. Whenever the Tulsa gun show was in 1994, did Mr.
McVeigh

8 show up?

9 A. Yes.

10 Q. And did you introduce Mr. McVeigh to Mr. Wegner?

11 A. I have no idea.

12 Q. What name was Mr. McVeigh using at that time?
13 A. McVeigh.
14 Q. Now, did you talk to Mr. Wegner about this incident
of
Tulsa gun 15 April -- November of 1994 with Mr. Wegner at the 1995
16 show?
17 A. I think you're off a year.
18 Q. Well, the episode took place in November of 1994;
correct?
19 When was the next Tulsa gun show after that?
20 A. April of 1994.
21 Q. April 19 -- is April, 1994, after November of 1994?
Isn't
22 the next one 1995?
23 A. April of 1995, yes.
24 Q. 1995.
25 A. But the previous question you asked about April of
1994.

9368

Roger Moore - Cross

1 Q. I apologize for mixing up --
2 A. It was April of 1993 when he was at the first Tulsa
gun
3 show.
4 Q. Let's clear that up. Is it your testimony, sir,
that

5 Mr. McVeigh did not attend the Tulsa gun show with you
in 1994?

6 A. Which one?

7 Q. How many spring gun shows are there in Tulsa, sir?

8 A. Two.

9 Q. Was Mr. McVeigh with you at either of the two
spring gun

10 shows in Tulsa in 1994?

11 A. No.

12 Q. Do you remember ever introducing Mr. Wegner to Mr.
McVeigh?

13 A. No. I'm never -- I'm rarely at the booth.

14 Q. Testimony -- is it your testimony that you did not
15 introduce Mr. McVeigh to Mr. Wegner?

16 A. Yes.

17 Q. Now, now going to the spring of 1995: Did you see
18 Mr. Wegner in the spring of 1995 at a gun show in
Tulsa?

19 A. See him every time. He used to be head of security
for the
20 state fairgrounds.

21 Q. And did you tell Mr. Wegner that you were convinced
that
22 McVeigh masterminded the robbery?

23 A. No.

24 Q. Do you deny telling him that you were convinced
that

25 Mr. McVeigh masterminded the robbery?

Roger Moore – Cross

1 A. I'd like you to rephrase the question.

2 THE COURT: Well, is there something you don't
3 understand about the question?

4 THE WITNESS: Yes. It's a yes-and-no
question, and

5 I'd like to say that I might have told him that there
was a
6 possibility but not that I absolutely knew one way or
another.

7 I didn't know.

8 BY MR. TIGAR:

9 Q. All right -- that's -- let me not be unfair to you,
sir.
10 By that time, you -- in 1995, the spring of 1995 -- had
you had

11 any discussion with the FBI about this investigation?

12 A. Which investigation?

13 Q. The investigation of the events of November 1994.

14 A. Yes.

15 Q. Now, did you say to Mr. Wegner in words or
substance that

16 you thought Mr. McVeigh might have masterminded the
robbery?

17 A. Probably.

18 Q. Now, in addition to mentioning Mr. McVeigh's name,
you

19 mentioned the name of a man named Trickel to
authorities;
20 correct?
21 A. They asked for people that had been at the house.
22 Q. And Mr. Trickel was just someone who had been at
the house;
23 correct?
24 A. Yes; correct.
25 Q. He's not someone with whom you discussed politics
and the

9370

Roger Moore – Cross

1 patriot movement, was he?
2 A. No.
3 Q. He's just a dealer; correct?
4 A. He's an ammunition manufacturer.
5 Q. Now, you also enlisted the aid of a man named
Charles
6 Abeyta in Muskogee; correct?
7 A. Yes. Karen did.
8 Q. And that was a contact made by Ms. Anderson;
correct?
9 A. Yes.
10 Q. And did you direct her to make that contact?
11 A. No.
12 Q. Did you discuss with Miss Anderson investigating

the Ft.

13 Smith, Arkansas area?

14 A. Yes.

15 Q. And did you believe that that was a likely place to
look

16 for evidence concerning this episode?

17 A. They had a car tag. When they ran it down their
NCIC, it

18 turned out to be a vacant lot.

19 Q. Did you believe that this was a likely place to
investigate

20 this episode, regardless of how it turned out?

21 A. All places would be likely places, including Ft.
Smith.

22 Q. And did your view that this would be a likely place
have

23 anything to do with the proximity of Ft. Smith to
Elohim City?

24 A. I don't know where that is. I've never been there.

25 Q. Now, sir, in the letter that was read . . . do you
remember

9371

Roger Moore – Cross

1 writing to the Fifty Caliber magazine about this
episode?

2 A. Yes.

3 Q. Now, did you believe that law enforcement had done
an

4 adequate job investigating this matter?

5 A. Which law enforcement?

6 Q. Arkansas law enforcement.

7 A. No.

8 Q. Now, on November the 5th, 1994, did you go to the
local

9 insurance agency in your community?

10 A. I don't know what day it was.

11 Q. Do you remember sometime within the next few days
after the

12 5th, going to the insurance agency in your community?

13 A. It would be a logical step.

14 Q. Did you meet there someone named Ms. Dana Priddy, a
Insurance

15 customer service representative for the Farmers
16 Group?

17 A. I don't know that. The head of the agency is Jan
Dies.

18 Q. Yes. The agency is Jan Dies; correct?

19 A. Right.

20 Q. Did you meet someone other than Miss Dies and
describe what

21 had happened to you?

22 A. If she wasn't at the office, I would describe it to
the

23 other lady.

24 Q. Now, did you tell her that you believed that the
federal

25 government was involved?

Roger Moore – Cross

- 1 A. No.
- 2 Q. Did you tell her that "they came in wearing ski
masks while
- 3 I was in my living room"?
- 4 A. No.
- 5 Q. Do you deny saying "they came in"?
- 6 A. Yes.
- 7 Q. Do you deny saying that it happened while it (sic)
was in
- 8 your living room?
- 9 A. Yes.
- 10 Q. Did you tell that person that you were tied up with
duct
- 11 tape but managed to free yourself by cutting the duct
tape with
- 12 a knife from the kitchen?
- 13 A. No.
- 14 Q. Did you tell that person whether you had been bound
with
- 15 anything other than duct tape?
- 16 A. I can't remember.
- 17 Q. Approximately November 18, 1994, did you telephone
the Jan
- 18 Dies insurance agency? This would be after Mr. Spivy
came to

19 you.

20 A. I would have no idea.

with 21 Q. Did you become an -- you testified you were angry

22 Mr. Spivy; correct?

-- I 23 A. No; we had a little bit of a friction. I couldn't

24 wouldn't call it angry.

the 25 Q. Did you call -- the question is, sir: On November

9373

Roger Moore - Cross

insurance 1 18th, 1994, at 11:45 a.m., did you call the Jan Dies

2 agency and demand that Miss Priddy put Jan Dies on the

insurance 3 telephone immediately or you would come to the agency

4 and smear her all over the counter?

5 A. I deny that.

insurance 6 Q. Did you discuss with the people at the Jan Dies

not done 7 agency your dissatisfaction that the -- Mr. Spivy had

8 what you thought was an adequate job of investigating?

9 A. He did an adequate job. He was rude.

into your 10 Q. You remember telling Mr. Spivy that someone broke

11 house?
12 A. Being caught outside with a shotgun is not a break-
in.

13 Q. That's not my question. Did you remember telling
Mr. Spivy
14 that someone broke into your house?

15 A. No.

16 Q. Did you discuss -- do you remember discussing with
Miss
17 Dana Priddy in the insurance agency the percentage of
your
18 recovery that you might receive from the insurance
company?

19 A. Not really.

20 Q. Uh-huh. Do you remember expressing anger to Miss
Priddy or

21 Ms. Dies -- excuse me -- with Miss Priddy that you
would not be

22 fully compensated by the insurance company for the loss
you

23 were claiming?

24 A. I knew I wouldn't be fully compensated.

25 Q. Uh-huh. My question, sir, is: When you were told
you

9374

Roger Moore - Cross

1 would not -- Did they tell you that you would not be
fully

2 compensated?

I 3 A. I don't remember that. It's common knowledge that
that you 4 wouldn't -- I've known that since I was 20 years old
5 wouldn't be compensated without a rider.

anger 6 Q. Sir, my question is: When did you express upset or
7 about the fact you wouldn't be fully compensated to the
8 personnel at the Dies insurance agency?

9 A. I didn't.

10 Q. Now, do you remember on the 5th of November meeting
11 Corporal Ronald Karchevski?

12 A. Local police or state police, State of Arkansas
police?

13 Q. Either State of Arkansas or Garland County,
whatever law 14 enforcement officer first arrived.

15 A. You mean on the robbery date?

16 Q. Yes, sir.

17 A. I don't remember the name.

18 Q. Did you -- do you remember a police officer coming
in and 19 greeting you while you were talking on the telephone at
the 20 Powells' residence?

21 A. I only remember a police -- a sheriff's officer
driving up.

22 Q. All right. When the sheriff's officer drove up, do
you

time? 23 remember that you were talking on the telephone at that

24 A. May have been.

sheriff's 25 Q. Do you remember giving the telephone to the

9375

Roger Moore - Cross

whoever 1 officer who arrived so that that officer could talk to

2 it was you were talking with?

3 A. No, sir.

and 4 Q. What -- during the time you were at the Powells'

who was 5 talking on the telephone, were you talking to a person

6 then in the state of California?

7 A. No, sir.

the Powell 8 Q. Did you tell the officer that someone had called

9 residence looking for you?

10 A. I don't remember that.

Powell 11 Q. Do you deny, sir, that someone called you at the

morning? 12 residence looking for you while you were there that

13 A. I don't remember that.

correct? 14 Q. You don't remember whether it happened or not;

I 15 A. No. That's an hour after a robbery with a shotgun.
16 wasn't in very good humor.
17 Q. Now, when you left your house on that morning, sir,
were
18 you wearing the same trousers that you had worn when
you met
19 this individual you've told us about?
20 A. No.
21 Q. Isn't it a fact, sir, that you rolled down an outer
pair of
22 trousers and showed what you said were the trousers you
had
23 been wearing to Corporal Karchevski of the Garland
County
24 Sheriff's Department?
25 A. I might have put on another pair over them.

9376

Roger Moore – Cross

Detective 1 Q. Now, do you remember also speaking that day to
2 Sergeant Shelby Terry of the Garland County Sheriff's
3 Department?
4 A. He was the lead investigator.
5 Q. And did you tell Detective Sergeant Terry that you
felt
6 there were at least two suspects involved?
7 A. No.

8 Q. Do you deny that you told him that there were at
least two

9 suspects involved?

10 A. Yes.

11 Q. Now, sometime after this event, do you remember
speaking of

12 it to a man named Rodney Bowers?

13 A. Read the name again.

14 Q. Rodney Bowers, a reporter for the Arkansas Democrat
15 Gazette?

16 A. Oh, okay. It's possible.

17 Q. Do you remember?

18 A. No, I don't know the name. But the Arkansas
Gazette did

19 bug us.

20 Q. Okay. Did you speak to Mr. -- do you remember
speaking to

21 a Gazette reporter over the telephone?

22 A. It's possible.

23 Q. Uh-huh. And do you remember telling the reporter
that the

24 guy had been standing there since dawn; they could
determine

25 that?

1 A. Yes.

2 Q. All right. And what was it that led you to say
that one
3 could determine that the guy had been standing there
since
4 dawn?

5 A. At the time, before this happened, there was about
3 inches
6 of grass at that spot. And by standing there that
amount of
7 time, changing from one foot to the other, the grass
had been
8 pushed down into the mud, and there was a hard mud spot
about
9 24 inches in diameter where the person had been
standing.

10 There was no grass left.

11 Q. The Powells have a dog, don't they, sir?

12 A. Yes.

13 Q. Combination pit bull and something else?

14 A. No.

15 Q. What is it?

16 A. It's just an old red dog, about 15 years old, tired
as
17 hell.

18 Q. Does it bark?

19 A. Only when there's people around on the property.

20 Q. Hmm. Did the dog bark that night, sir?

21 A. Yes. That's what Powell said.

the dog 22 Q. Is it your testimony that the Powells told you that

23 barked?

24 A. About a week later.

testimony 25 Q. I want to be sure about this, sir: It is your

9378

Roger Moore – Cross

during that 1 that the Powells told you that the dog had barked

2 time? Correct?

3 A. At that night, Friday night?

4 Q. Yes, that night, sir.

5 A. Yes.

Democrat 6 Q. Now, going back to the reporter for the Arkansas

doing 7 Gazette, do you remember telling him: "Whatever I was

8 for the FBI is F-blank up because they blew my cover"?

time for 9 MS. WILKINSON: Your Honor, could we have a

10 when this conversation occurred?

11 MR. TIGAR: Yes, sir.

12 THE COURT: Yes. All right.

13 BY MR. TIGAR:

was that 14 Q. Do you remember when it -- do you remember when it

15 you spoke to the reporter from the Arkansas Democrat
Gazette?

16 A. No.

17 Q. Was it sometime in 1995?

18 A. I think they called half a dozen times.

19 Q. Okay. Was the first time that they called after
this whole

20 business had begun to be in the papers, after the
bombing of

21 the Murrah Building?

22 A. No.

23 Q. Is that the first time?

24 A. They called right after the robbery.

25 Q. Okay. Well, now -- then let me ask you: Do you
remember

9379

Roger Moore - Cross

1 having a conversation with Mr. Bowers or a Mr. Whiteley
from

2 the Arkansas Democrat Gazette sometime in the middle of
1995?

3 A. No.

4 Q. Do you remember -- You do remember interviews with
the

5 reporters; correct?

6 A. After the robbery.

7 Q. After the robbery. Do you remember interviews with
the

1995? 8 Arkansas Democrat Gazette reporters sometime in June of

the 9 A. No. We decided not to talk to any reporters after

10 first 30 days.

11 Q. Is it your testimony that you did not have a
telephone

12 interview with Mr. Rodney Bowers of the Arkansas
Democrat

13 Gazette anytime between May 1 and June 22, 1995?

14 A. I can't recall that.

15 Q. Do you remember ever saying to Mr. Rodney Bowers or
any

F-blank 16 other reporter: "Whatever I was doing for the FBI is

17 up because they blew my cover"?

18 A. Absolutely not.

19 Q. Do you deny, sir, having ever said to any reporter
words

20 in -- that statement in words or substance?

21 A. No.

22 Q. You do deny it?

23 A. I do deny it.

24 Q. Have you ever been an agent of the Federal -- an
operative

25 of the Federal Bureau of Investigation?

Roger Moore – Cross

1 A. Or any other federal agency. No.

2 Q. Now, the voice that you say you heard that morning
was real
3 deep; is that correct?

4 A. They changed their voice and dropped it an octave,
about
5 like mine is getting now.

6 Q. All right, sir. My question is -- please have a
drink of
7 water, and then I'll put my question.

8 The voice was real deep; correct?

9 A. That's right.

10 Q. Mr. Moore, would it be best if we asked the Judge
to take
11 our afternoon recess right now?

12 A. Keep going.

13 THE COURT: Yes.

14 THE WITNESS: It's the Judge's court.

15 BY MR. TIGAR:

16 Q. Now, Mr. McVeigh came to the ranch sometime in the
summer
17 of 1994; correct?

18 A. Yes.

19 Q. And he discussed that he was living in caves in the
Kingman
20 area to save money and learn survival techniques;
correct?

21 A. Practice survival techniques.

he was 22 Q. Practice survival techniques. What did he tell you
23 practicing them for?
24 A. He never mentioned that. I thought he was nuts.
25 Q. And did you, in your American Assault Company --
did you do

9381

Roger Moore – Cross

1 business with people that identified themselves as
2 survivalists?
3 A. No.
4 Q. You were aware of survivalist techniques?
5 A. Correct.
6 What are techniques?
7 Q. Well, you know about -- you sell items that people
can use
8 for camping; correct?
9 A. Yes.
10 Q. You know how people can avoid being spotted by
satellites;
11 correct?
12 A. We never sold space blankets until this year.
13 Q. So -- but you do know about that; right?
14 A. Uh-huh.
15 Q. And at gun shows, are there a lot of things sold
that are

16 survivalist-type items?

17 A. Certain gun shows.

18 Q. Did you participate with Ms. Anderson in
correspondence

19 with a man named Steve Colbern?

20 A. No.

21 Q. Have you ever spoken to Mr. Colbern?

22 A. Yes.

23 Q. On the telephone?

24 A. On the telephone.

25 Q. Have you ever written to Mr. Colbern?

9382

Roger Moore - Cross

1 A. No.

2 Q. Were you discussing with Mr. Colbern anything to do
with

3 Mr. McVeigh?

4 A. No.

5 Q. Were you discussing things that Mr. Colbern was
ordering?

6 A. I had nothing to do with mail order.

7 Q. What was the topic of your discussion with Mr.
Colbern?

8 A. I wanted --

9 MS. WILKINSON: Objection, your Honor --
excuse me.

10 THE COURT: Overruled.

11 You may answer. You may answer.

12 THE WITNESS: I wanted to know what he did for

a

13 living and what area he worked in.

14 BY MR. TIGAR:

15 Q. Did you relay that information to Ms. Anderson?

16 A. Yes.

17 Q. Now, you said that the person that you confronted
that day

18 said to you, "Don't worry about the guns, they're going
to

19 gangs"; correct?

20 A. Correct.

21 Q. Now, the guns that were taken were mostly long
guns;

22 correct?

23 A. Correct.

24 Q. Now, how many firearms did you have in the living
room area

25 where you were in the duct tape?

9383

Roger Moore – Cross

1 A. Two.

2 Q. And one was a firearm that was right next to your
lounge

3 chair; correct?

4 A. On the other side.

5 Q. Pardon me?

6 A. On the other side.

7 Q. Now, was it in a closed container or an open
container?

8 A. Closed.

9 Q. A box?

10 A. A Xerox box.

11 Q. And why -- what do you mean by a "Xerox box"? A
cardboard

12 box?

13 A. One that holds 10 reams of Xerox paper.

14 Q. And it had its cover --

15 A. Right there, behind you.

16 Q. Oh.

17 A. A box that size.

18 Q. Box like I'm showing the jury?

19 A. Right.

20 Q. That can hold 10 reams of paper?

21 A. Right.

22 Q. Did the -- This person that you saw in the ski
mask: Did

23 that person look in that box?

24 A. I was blindfolded.

25 Q. You didn't know?

Roger Moore – Cross

- 1 A. No.
- 2 Q. Oh. When you -- for a part of the time, you had a
jacket
- 3 over your head; is that right?
- 4 A. When I was laying on the floor.
- 5 Q. And then you did not have a jacket over your head;
right?
- 6 A. Right.
- 7 Q. You had duct tape around your eyes; right?
- 8 A. Across my eyes.
- 9 Q. Across your eyes. And you were in a seated
position on the
- 10 floor; is that right?
- 11 A. Yes. Right.
- 12 Q. And when you looked your head up, you were able to
see; is
- 13 that correct?
- 14 A. If you wanted to do that.
- 15 Q. Well, you wanted to do that after the person left;
correct?
- 16 A. Right.
- 17 Q. Now, you said that you could hear footfalls;
correct?
- 18 A. Right.
- 19 Q. So you knew that somebody was, you said, walking
around

20 your house; right?

21 A. Making trips.

22 Q. Uh-huh. Now, how much of your house floor is
carpeted?

23 A. The entire house. Except for the kitchen.

24 Q. Didn't you say on direct examination that it was
easy to

25 hear footfalls because there were wood floors and you
could

9385

Roger Moore - Cross

1 hear the footsteps?

2 A. Yes.

3 Q. So is it your testimony that the carpet is over the
wood?

4 A. Yes.

5 Q. Now, you told us that for a time, you had police
ties on;

6 correct?

7 A. Yes.

8 Q. Now, police ties are things that are like the
plastic wire

9 ties or cable ties -- correct? They're just stronger?

10 A. They're stronger.

11 Q. Uh-huh. And at some point, you say you asked the
person to

12 do something about those because they were tight. Is

that your

13 testimony?

14 A. I told him my hands -- I couldn't not feel my hands
any

15 more; I had a blood sugar problem. That's all I said.

16 Q. And then the suspect, the person, instantly just
went snip-

17 snip; correct?

18 A. That's right.

19 Q. And did you see what the snip-snip was with? Did
you see

20 what tool was used?

21 A. No. My face is on the floor.

22 Q. All right. And at that -- it was at that point you
say the

23 person got you into a seated position, or did you get
yourself

24 into a seated position?

25 A. He got a hold of the back of my collar and turned
me over

9386

Roger Moore - Cross

1 and dragged me 6 foot over to the couch.

2 Q. Dragged you 6 feet, leaned you against the couch?

3 A. Yes.

4 Q. At that point that that person leaned you against
the

5 couch, how far away from you was this open penknife?

6 A. 2 1/2 feet.

7 Q. On the table right by the couch; correct?

8 A. I'm still blindfolded.

9 Q. I understand your testimony, sir. Was it right by
the

10 couch where you were, the table?

11 A. 2 1/2 feet.

12 Q. Now, you asked the person if they were Feds; right?

13 A. Yeah.

14 Q. Now, did there ever come a time during this whole
15 episode --

16 A. I said that in singular.

17 Q. Pardon me?

18 A. I said that in singular.

19 Q. You asked the person?

20 A. "Are you a Fed?"

21 Q. Okay. Do you remember telling the FBI that you
asked them

22 if they were feds?

23 A. I might have.

24 Q. All right. And by "they," did you mean singular?

25 A. Yes.

1 Q. Now, did there ever come a time during this whole
encounter
2 in which the person said: "I'm tired; I'm going to
untie you
3 now; would you please help me load some of these guns"?

4 A. Absolutely not.

5 Q. And you're smiling at me, sir. Has someone told
you that
6 somebody once said that the intruder did that?

7 A. Run that by me again.

8 Q. Have you ever heard that version that was in my
question?

9 A. No.

10 Q. Never heard it before today?

11 A. No.

12 Q. Now, before today, you have met with the Government
13 lawyers; is that correct?

14 A. Yes.

15 Q. On how many occasions have you met with the
Government
16 lawyers?

17 A. In the United States?

18 Q. Yes, in the United States. Have you met with them
outside
19 the United States?

20 A. No, I just wondered if you wanted it here or
elsewhere.

21 Q. All right. I didn't -- I didn't understand your
response,

22 sir.

any 23 Yes: How many times have you met with them in

24 place.

25 A. Twice in Oklahoma City.

9388

Roger Moore – Cross

testimony? 1 Q. Now, was that in preparation for your grand jury

2 A. Yes. Once.

3 Q. Once in preparation for your grand jury testimony?

4 A. Once for grand jury testimony.

correct? 5 Q. So that would have been before August of 1995;

6 A. Oh, certainly.

7 Q. And then when was the other time in Oklahoma City?

8 A. Just to go over everything from start to finish.

9 Q. In December of 1995?

10 A. That's right.

11 Q. And then how many times in Denver?

12 A. Three.

13 Q. Well, did you meet with them in July of 1996?

14 A. Maybe August.

August, 1996? 15 Q. Well, did you meet with them in both July and

16 A. It's possible.

17 Q. So that would be twice?

18 A. Yes.

19 Q. And then did you meet with them again in November
of 1996?

20 Sir -- May I approach, your Honor?

21 THE COURT: Yes.

22 BY MR. TIGAR:

23 Q. I know this is not your document, sir; but I'm
going to

24 show you this and ask you if that refreshes your
recollection

25 as to the occasions upon which you met with Government
counsel.

9389

Roger Moore - Cross

1 A. It could be. I lost track. I've met with FBI and
2 attorneys so many times, I couldn't tell you.

3 Q. When you say with "FBI and attorneys," you mean
with

4 Government attorneys; correct?

5 A. And then FBI individually.

6 Q. Yes. You have never met with Mr. Nichols'
attorneys;

7 correct?

8 A. No.

9 Q. Now, you did meet --

longer. I 10 MR. TIGAR: Your Honor, I will be a while
11 don't know when your Honor wants to take a break.
12 THE COURT: We're about halfway in the
afternoon, so
13 we will break.
14 You may step down, Mr. Moore.
15 Our 20-minute recess. Members of the jury, we
will at
16 this time take our usual recess, which will be for the
usual
17 period of time, with the customary cautions regularly
given of
18 please avoid discussion of the case or even thinking
about it
19 yourselves in your own minds, remembering that we've a
ways to
20 go and you'll hear a lot more than what you've heard
now and
21 that you have to wait until you hear it all until you
draw any
22 inferences or conclusions in your mind. And of course
continue
23 to avoid anything outside the evidence.
24 You're excused now, 20 minutes.
25 (Jury out at 3:15 p.m.)

1 THE COURT: Recess, 20 minutes.

2 (Recess at 3:15 p.m.)

3 (Reconvened at 3:35 p.m.)

4 THE COURT: Please be seated.

5 MR. TIGAR: Does your Honor prefer that I get
standing

6 at the lectern to save time?

7 THE COURT: I don't have a preference.

8 (Jury in at 3:36 p.m.)

9 THE COURT: Please resume the stand, Mr.
Moore.

10 Mr. Tigar, you may continue.

11 MR. TIGAR: Thank you.

12 BY MR. TIGAR:

13 Q. Mr. Moore, you did have an interview, did you not,
on

14 October 10, 1995, with a Mr. Richard Reyna?

15 A. Yes.

16 Q. And --

17 A. At the Soldier of Fortune?

18 Q. Yes, sir.

19 A. Yes.

20 Q. That was in Las Vegas, Nevada?

21 A. Yes.

22 Q. And Mr. Reyna introduced himself to you as an
investigator

23 for the Timothy McVeigh defense team. Do you remember
that?

24 A. Yes.

25 Q. And do you remember telling him repeatedly in that

9391

Roger Moore – Cross

1 interview that you would do nothing to hurt Timmy?

had no

2 A. No. I said I couldn't do anything to hurt him. I

3 evidence to hurt him in a trial.

to

4 Q. And you expressed your desire that that be conveyed

5 Mr. McVeigh's lawyer; correct?

nothing.

6 A. Yeah. I didn't want to be called as a witness for

prosecution

7 Q. Right. And do you remember saying that "The

have

8 better not count on me for very much because I will not

even

9 much to say because I don't know anything. I cannot

10 identify who it was that robbed me"?

11 A. That's true.

the

12 Q. Did you tell Mr. Reyna that you had no insurance on

13 property that was stolen?

14 A. No.

15 Q. You deny that?

16 A. Yes, I do.

ruined 17 Q. Did you tell Mr. Reyna that the robbery absolutely
18 you?
didn't 19 A. No. It might have ruined the business, but it
20 ruin -- it didn't ruin me financially.
fair to 21 Q. Because your net worth is substantial. Is that
22 say?
23 A. I'm retired.
dollars. 24 Q. You have a securities account in the millions of
25 Correct?

9392

Roger Moore - Cross

1 A. I think that's a little overstated.
in 2 Q. You have a securities account over seven figures --
3 seven figures. Correct?
4 A. Yes.
were glad 5 Q. And do you remember saying to Mr. Reyna that you
the day 6 the FBI did not execute a search warrant at your home
you had 7 after the Oklahoma City bombing because at that time
Davidian 8 more weapons in your home than were found in the

9 compound in Waco, Texas?

10 A. Run that by me again.

11 Q. Did you tell Mr. Reyna in words or substance that
you were

12 glad the FBI did not execute a search warrant at your
residence

13 the day after the Oklahoma City bombing because at that
time

14 you had more weapons in your home than were found at
the

15 Davidian compound in Waco, Texas?

16 A. That would be an error.

17 Q. You deny saying that to Mr. Reyna?

18 A. Yes. That would -- never mind.

19 Q. Yes, sir?

20 A. Never mind.

21 Q. Did you want to add something to that?

22 A. Then I'd have to have more weapons than I had
robbed from

23 me.

24 Q. Yes. That was my question, sir. You deny saying
that to

25 Mr. Reyna?

9393

Roger Moore - Cross

1 A. Yes.

Colbern. 2 Q. Now, before the break, we were talking about Mr.

3 Do you remember that?

4 A. Yes.

Colbern in 5 Q. And did you and Ms. Anderson attempt to put Mr.

6 touch with Timothy McVeigh?

7 A. I did not.

put 8 Q. Do you deny that you and Ms. Anderson attempted to

9 Mr. McVeigh in touch with Mr. Colbern?

10 A. I did not.

this 11 Q. Do you remember testifying before the grand jury in

12 matter?

13 A. No.

and 14 Q. Do you remember being called down to Oklahoma City

15 administered an oath and testifying before 23 citizens?

16 A. Certainly.

questions and 17 Q. And do you remember being asked the following

line 6? 18 being -- and making the following answers, page 50,

19 "Question: Just very briefly, can you" --

a moment 20 MS. WILKINSON: Your Honor, could I just have

21 to look at --

transcript 22 THE COURT: Yes, you may, if you have a

23 there.

24 MR. TIGAR: I'm going to go down through 20.

25 MS. WILKINSON: Thank you. From line 6?

9394

Roger Moore – Cross

1 MR. TIGAR: Line 20. 6 to 20.

2 THE COURT: Do you have it?

3 MS. WILKINSON: Yes, your Honor.

4 THE COURT: All right. You may proceed.

5 BY MR. TIGAR:

6 Q. "Question: Just very briefly, can you describe
that to the

7 grand jury?

8 "Answer: Karen was talking to Steve Colbern
one day,

9 and she said he was the type of guy that used to come
out of

10 somewhere. I never did know where he worked. He would
never

11 tell us that. He always talked to us on the phone. He
seemed

12 to be kind of a loner. And she said he liked to do
desert

13 maneuvers; and she said, 'I know somebody else in
Kingman that

14 likes to do the same thing.'

15 "Question: And who was that?

16 "Answer: That was Tim McVeigh.
17 "Question: And did you folks put them in --
kind of
18 in communication with each other through --
19 "Answer: We attempted."
20 Do you remember being asked those questions
and making
21 those answers?
22 A. Yes. When you say "we," that's probably the
pivotal point.
23 Q. You said "we." Is that correct, sir?
24 A. I've said "they" a lot of times in the robbery,
when I
25 meant one, just accidentally.

9395

Roger Moore – Cross

1 Q. So your testimony is that when you said "we" to the
federal
2 grand jury, you meant "she"?
3 A. Yes.
4 Q. Now, you mentioned that the first time you saw Mr.
McVeigh,
5 he had a pile of those red books; correct?
6 A. Yes.
7 Q. And those red books were The Turner Diaries; right?
8 A. Right.

9 Q. And that's the book that everybody hates; right?

10 A. Well, I don't think the people that buy them hate
them, but

11 I don't think the general public cares for them.

12 Q. You told the grand jury that's the book that
everybody

13 hates. Do you remember that?

14 A. Yes.

15 Q. Have you ever read that book?

16 A. No.

17 Q. Did Mr. McVeigh urge you to read the book?

18 A. Yes.

19 Q. And you started?

20 A. Read 30 pages.

21 Q. Now, were you with Ms. Anderson when she was asked
by the

22 FBI in late April of 1995 whether she knew Steve
Colbern?

23 A. What location would that be?

24 Q. That was in Hot Springs, Arkansas, sir.

25 A. At what location?

9396

Roger Moore - Cross

1 Q. At the FBI office.

2 A. We were never -- we were never questioned together.

3 Q. Do you remember having a conversation with Ms.

Anderson

4 about the FBI asking her if she knew Steve Colbern?

5 A. It's possible.

6 Q. My question, sir, is do you remember having a
conversation

7 with Ms. Anderson about the FBI asking her if she knew
Steve

8 Colbern?

9 A. Yes, sir.

10 Q. And did she tell you in that conversation that they
had

11 asked her about Mr. Colbern?

12 A. Yes, sir.

13 Q. Did she say that she had denied knowing him?

14 A. No.

15 Q. Did you talk to her about going to the FBI and
correcting

16 anything that she had said about Mr. Colbern?

17 A. No.

18 Q. Now, you mentioned that Mr. McVeigh had said to you
that

19 Russian vehicles were being stored in Mississippi?

20 A. Yes, sir.

21 Q. And did he tell you where these vehicles were in
his view?

22 A. Saucier, Mississippi.

23 Q. Did he tell you that they were in plain sight on
Highway 49

24 running from Gulfport to Hattiesburg?

25 A. Yes, sir.

9397

Roger Moore – Cross

1 Q. About 35 miles north of Gulfport?

2 A. Something like that.

3 Q. Did he tell you -- had you ever seen pictures of
that

4 location?

5 A. Did he ask me or tell me?

6 Q. No, had you ever seen pictures of that location?

7 A. Yes.

8 Q. And did you see pictures of a building with the
sign Aromar

9 on it?

10 A. Yes.

11 Q. And when you went looking to see if there were
Russian

12 vehicles, is that the location that you went to?

13 A. I never went.

14 Q. Did you ever go looking for -- to see if there were
Russian

15 vehicles?

16 A. At that location?

17 Q. At any location.

18 A. At the northern bases in 1993.

right? 19 Q. And you never went to Mississippi to look. Is that

20 A. No. Absolutely not.

Priddy, 21 Q. Now, before the break I was asking you about Ms.

ever 22 the person at the Jan Dies insurance agency. Did you

23 display a badge?

24 A. No.

25 Q. To one of the employees there?

9398

Roger Moore – Cross

1 A. No, sir.

2 Q. Do you deny that?

3 A. Yes, sir.

shouldn't 4 Q. Do you deny displaying a badge and saying, "I

5 show you that"?

6 A. No, sir.

7 Q. No. Do you deny that?

8 A. Yes.

9 Q. Now, in an attempt to investigate this matter, you
10 contacted Chief John Brown; is that correct, sir?

the few 11 A. I did no investigation on this matter other than

12 weeks that I had before I left for Florida.

13 Q. Did you contact a man named John Brown?

14 A. No.

"this
15 THE COURT: Are we talking -- when you say
16 matter," are you talking about the November 5?

17 MR. TIGAR: Yes. The November 5 matter.

18 BY MR. TIGAR:

19 Q. In connection with the November 5 matter, did you
speak to

20 a man named John Brown of the Alexander Police
Department in

21 Arkansas?

22 A. No, sir.

23 Q. Have you ever spoken to a man named John Brown
concerning

24 an investigation of the November episode?

25 A. Not to the best of my recollection.

9399

Roger Moore - Cross

1 Q. Can you remember ever telling anyone that you
suspected

2 that the Garland County, Arkansas sheriff's deputies
had

3 removed the list of guns and serial numbers from your
van?

4 A. It's possible.

5 Q. Sir, I'm asking for your best recollection. Do you
ever

6 recall telling anyone that you suspected that the
Garland --

7 Now, you live in Garland County; correct?

8 A. Yes.

9 Q. And these troopers that came there are Garland
County

10 troopers; correct?

11 A. True.

12 Q. Do you remember ever telling anyone that you
suspected the

13 Garland County troopers having removed the list from
your van?

14 A. It's possible.

15 Q. All right. And can you remember to whom you told
that, if

16 you did?

17 A. I certainly cannot.

18 Q. All right. Now, do you -- was it the Garland
County

19 sheriff's people who had told you to put the list
inside your

20 van?

21 A. No.

22 Q. Do you remember ever telling anyone that it was at
the

23 suggestion of the Garland County troopers or sheriff's

24 department that you put the list inside your van?

25 A. No.

Roger Moore - Cross

1 Q. Now, you wrote a letter to the Fifty Caliber
machine-gun
2 magazine; correct, sir?
3 A. The club, yes.
4 Q. What is that magazine called?
5 A. I really don't know. I don't subscribe to it.
6 Q. I'm going to place up what's been identified -- or
in
7 evidence rather as D1647.
8 Now, who composed that letter, sir?
9 A. I can't tell you. Usually, I dictate these
letters, so I
10 don't know whether I composed it or I dictated it or
somebody
11 else did.
12 Q. Showing you, sir, the last page of D1647, is that
your
13 signature?
14 A. Certainly.
15 Q. Now, looking back here to page -- the first page --
do you
16 see that -- you say, "The perpetrator then dragged
victim into
17 living room"?
18 A. Uh-huh.
19 Q. Is that the way you remember it now, sir?

I was
of that
letter is

20 A. No. But it doesn't matter to them how it happened.
21 just interested in the two guns. They didn't print any
22 anyway.
23 Q. I understand they didn't print it, sir. This
24 dated December 1, 1994; correct?
25 A. Yes.

9401

Roger Moore – Cross

1 Q. You sent it to the magazine because you wanted it
2 published; correct?
3 A. Uh-huh.
4 Q. You wanted to send a "sorry note for gun
collectors";
5 right?
6 A. Right.
7 Q. You're telling us that "the perpetrator then
dragged victim
that
my
be

8 into living room" is not something that occurred; is
9 right?
10 A. From where I crawled in to where I wound up flat on
11 face, it would have been a 2- or 3-foot drag. It could

12 possible.

13 Q. But it's different from the version that you now
remember;

14 correct?

15 A. No.

16 Q. And then you have, "Victim said, 'Down the hall in
the
"Down the
17 bedroom in the filing cabinet.'" You didn't tell us
you'd
18 hall in the bedroom in the filing cabinet" as words
19 spoken when you testified on direct examination, did
you, sir?

20 A. Where is this, please.

21 Q. Pardon?

22 A. Where is this, please.

23 Q. Last of the paragraph where my finger is: "Victim
24 said . . ."

25 A. Uh-huh.

9402

Roger Moore - Cross

1 Q. Do you see that, sir?

2 A. Uh-huh.

3 Q. My question is this is not consistent with the
version that
4 you gave us on direct examination, is it?

5 A. You're right. I told him it was on the computer

desk in

6 plain sight.

7 Q. Now, this paragraph you were shown before: "Our
main

8 concern is to find the perpetrator so we could
determine

9 whether this had something to do with law enforcement
or a

10 patriot group or a professionally possibly retired SEAL
or

11 Special Forces person." Correct?

12 A. Correct.

13 Q. What did you mean by "patriot group"?

14 A. Militia group. Militia groups are normally
underfunded,

15 and 77 guns would help a great deal.

16 Q. And you're familiar with militia groups, are you,
sir?

17 A. No, I am not. I've never attended a militia
meeting.

18 Q. Have you had a business relationship at any time
with the

19 head of the Montana militia, known as MOM?

20 A. I have visited them on one occasion by accident.

21 Q. And when was that that you visited them by
accident?

22 A. The summer of '93.

23 Q. Were you with Ms. Anderson?

24 A. Yes.

25 Q. Now, you state that "law enforcement cooperation at

this

9403

Roger Moore – Cross

1 point has been extremely limited." Is that a true
statement?

2 A. Yes.

3 Q. After the bombing of the Murrah Building, the FBI
came to

4 see you quite a bit. Is that correct, sir?

5 A. Yes, sir.

6 Q. And did there come -- excuse me. Did there come a
time

7 when they stopped talking to you?

8 A. They advised us they were finished with us about
the 15th

9 of June and said they would appreciate if we would go
on a

10 vacation.

11 And I said, "That's great. I want to go to
the fly-in

12 at Oshkosh, Wisconsin. Never been there, and I'll see
you."

13 Q. Did you identify that time as approximately the
time that

14 Michael Fortier made his plea bargain that they stopped
15 interviewing you?

16 A. No. I paid no attention to what he did.

17 Q. Do you remember telling an investigator for Mr.

McVeigh

18 that the FBI conversation stopped at about the time
that

19 Michael Fortier made his plea bargain?

20 A. No.

21 Q. Do you remember ever telling any investigator that
the

22 conversation stopped at about the time that Michael
Fortier

23 made his plea bargain?

24 A. No.

25 Q. Earlier we were talking about your having gone to
FBI

9404

Roger Moore – Cross

1 headquarters in Washington, D.C., to identify firearms
as

2 yours. Remember that, sir?

3 A. Certainly.

4 Q. And on that occasion, do you remember identifying
as yours

5 a .22 long-rifle caliber, Ruger Model 10/22, Serial No.
6 114-36756?

7 A. No. I said it might -- it looks exactly like mine.
I

8 couldn't possibly tell you. The gun is only worth
\$125. There

9 is thousands of them out.

\$100,
with the
a lot
Anderson
gun
fact
as
which I've
D.C.?

10 Q. Isn't it a fact, sir, that you -- gun's only worth
11 you say?
12 A. \$125. If it had a scope, 175.
13 Q. Now, and that's -- most of the guns on the list
14 exceptions that you noted are the sorts of guns you see
15 at gun shows, a lot manufactured; correct?
16 A. Explain that again, please.
17 Q. Most of the guns on your list that you and Ms.
18 made are the sorts of things that are commonly sold at
19 shows; correct?
20 A. Not all of them. Not even half of them.
21 Q. All right. My question is, then, sir: Isn't it a
22 that on the 4th of May, 1995, you positively identified
23 belonging to you the Ruger -- the serial number of
24 just read.
25 A. At the J. Edgar Hoover Building in Washington,

9405

Roger Moore - Cross

1 Q. Yes, sir.

2 A. No, I did not.

3 Q. You deny having positively identified. Is that
correct?

4 A. That's correct.

5 Q. Do you remember being present there with Special
Agent

6 Jessie?

7 A. Yes. He took me there.

8 Q. Did you also look at a 7.62 by 39-millimeter Ruger
Mini-30,

9 Serial No. 189-57425?

10 A. I might have looked at a Mini-30. I can't tell you
the

11 serial numbers. I didn't bother to look at any of the
serial

12 numbers.

13 Q. Did you positively identify weapons on that date as
14 belonging to you?

15 A. The gas gun, the Winchester commemorative gold-
plated gun,

16 and the custom .308 that I had the stock carved for on
a Mauser

17 action.

18 Q. Those are the only three weapons that you remember
having

19 positively identified that day?

20 A. Positively identified?

21 Q. Yes, sir, positively identified.

22 A. I probably identified the .30-06 Remington 700 with

the

23 carved sling.

Ruger 24 Q. Let me ask you, sir: Did you positively identify a

25 7.62 by 39-millimeter?

9406

Roger Moore - Cross

1 A. That would be impossible.

22 2 Q. And you said you did not positively identify the .

testimony? 3 long-rifle Ruger 10/22; correct? Is that your

4 A. Yes.

name did 5 Q. Now, during your contacts with Mr. McVeigh, what

6 he use?

7 A. At what time?

8 Q. At any time during the time that you knew him.

Arizona, 9 A. It was "Tim McVeigh" until he was in Kingman,

he 10 maybe three or four months; and then he wrote and said

mail to 11 wanted to change his name to "Tim Tuttle," address the

12 "Tim Tuttle."

13 Q. Now, from that time forward, what -- did you ever

Arizona 14 communicate with him at any address other than Kingman,

15 address?

16 A. None.

17 Q. And that was always the Stockton Hill Road address?

18 A. I think so.

19 Q. That is, did you --

20 A. I did not address the letters.

21 Q. Okay. Did -- Ms. Anderson addressed all the
letters?

22 A. Yes.

23 Q. And how many letters did you write to Mr. McVeigh
from the

24 time that you first met him in Ft. Lauderdale until the
last

25 letter, one that you were asked about on direct
examination?

9407

Roger Moore - Cross

1 A. Probably between seven and nine.

2 Q. And were all of those addressed by Ms. Anderson?

3 A. They -- I might have addressed a couple, but I
would have

4 had to got the address from her. I wouldn't remember
that.

5 Q. Did you write "burn" on the bottom of all the
letters?

6 A. No.

7 Q. Does Ms. Anderson write "burn" on the bottom of all

her

8 letters, to your knowledge?

9 A. Well, I wasn't there for four months. I wouldn't
have any

10 idea how to tell you that.

11 Q. On every letter that you have observed her write,
does she

12 write "burn"?

13 A. No.

14 Q. Now, have you had an opportunity to discuss with
15 Ms. Anderson your recollections of the events of
November,

16 1994?

17 A. You mean the robbery?

18 Q. The events -- I understand that you believe -- you
say it's

19 a robbery, sir. I'm asking you about the events of
November,

20 1994. Yes. Have you had an opportunity to discuss
that with

21 Ms. Anderson at any time?

22 A. We discussed it at great lengths for months.

23 Q. When is the last time that you discussed it?

24 A. Oh, up until now off and on.

25 Q. Did you discuss it with her last evening?

1 A. No.

2 Q. Did you see her last evening?

3 A. Yes.

4 Q. Did you discuss the fact that she'd been a witness?

5 A. I knew she'd been a witness.

6 Q. Did you discuss with her the fact that she had been
a
7 witness?

8 A. I don't understand that. If I knew she'd been a
witness,
9 why would I --

10 Q. Did you discuss with her what had happened to her
in court?

11 A. No, I did not. We were advised not to.

12 Q. All right. And you obeyed that admonition;
correct?

13 A. I certainly did.

14 Q. Now, did -- would it be fair to say that Mr.
McVeigh had
15 very defined political views?

16 A. Yes.

17 Q. And how would you describe those views?

18 A. Focused, radical.

19 Q. Radical in what sense?

20 A. Against the federal government.

21 Q. And did he have views against the federal
government's
22 views on gun control?

23 A. Not near as much as he had views on the BATF.
24 Q. And did you agree with his views on gun control?
25 A. Not entirely.

9409

Roger Moore – Cross

1 Q. Did you agree with the assault-weapon ban?

2 A. I don't think they banned anything that made any
3 difference.

4 Q. Did Mr. McVeigh have views about racial matters?

5 A. Not to the best of my knowledge.

6 Q. Did you ever hear him express his views on race
relations
7 in the United States?

8 A. He had a book, if you can call that a view. I
don't know

9 if he had the book to sell or to read. It was called
White
10 Power.

11 Q. Having a book is not any evidence that he believed
or
12 didn't believe something in it, would you say, sir?

13 A. That's correct.

14 Q. Now, by the way, you had a filing cabinet -- some
15 two-drawer filing cabinets at home; correct?

16 A. Three of them.

that
17 Q. Now, did you have one that had a label on the front
18 said "Cam 2 racing gasoline"?
19 A. Yes.
gasoline"
20 Q. Where -- what did that mean, that "Cam 2 racing
21 label on your file cabinet?
boat for
22 A. That is a decal they gave me when I built a racing
23 Benihana restaurants. I have a Benihana jacket, also.
from
24 Q. How does racing gasoline in your knowledge differ
25 ordinary gasoline?

9410

Roger Moore - Cross

1 A. It's higher octane.
2 Q. And do you have to buy it at some special place?
3 A. I don't know where they buy it.
build
4 Q. Now, when you were building these boats, did you
5 racing boats?
6 A. We built four.
boats?
7 Q. And would they be described as high-performance
8 A. Top-performance boats, unlimited.
9 Q. All right. You built them. Right?
10 A. We did not build the boat itself. The hull.

11 Q. You built the hull?
12 A. Bertram built the hull called a "38 Mopi." They
brought it
13 up to our shop on a trailer and left it there, and we
put in
14 the mechanical, the flaps, the steering and all the
rest of the
15 stuff.
16 Q. Did you put in the engine?
17 A. Yeah.
18 Q. And these were engines that ran as (sic) high-
performance
19 gasoline?
20 A. Yes.
21 Q. And did you ever go to a place where you watched
this boat
22 perform?
23 A. You mean in a race?
24 Q. No, out on the water.
25 A. I rode in one once.

9411

Roger Moore – Cross

1 Q. Your boat facilities were down on the east coast of
2 Florida?
3 A. Yes, Ft. Lauderdale.
4 Q. In the Lauderdale area. And you were involved in

building

that 5 fiberglass boats of various kinds at various times. Is

6 right?

7 A. Right.

McVeigh 8 Q. Okay. Now, you testified you got a letter from Mr.

Arkansas home 9 sometime in January -- or a letter came to your

10 sometime in January of 1995. Is that correct?

11 A. That's what Karen said.

12 Q. And after -- you saved that letter. Correct?

13 A. I can't tell you.

14 Q. But you've seen the letter; correct?

found that 15 A. I don't know. There is only one letter that we

16 we gave to the FBI, and I don't know what date it is.

first 17 Q. I'm going to place on the displayer here just the

ask you 18 page of what's been received as Government's 1746 and

letter that 19 if that refreshes your recollection that that was a

20 came to your Arkansas address from Mr. McVeigh.

21 A. Looks good.

letter; 22 Q. All right. By that you mean it looks like that

23 correct?

24 A. It looks like that letter.

letter? 25 Q. When is the first time you actually saw that

9412

Roger Moore – Cross

1 A. Have to be when I came up in the end of March.

2 Q. March of '95?

3 A. Yeah.

Anderson 4 Q. Now, after -- and Ms. Anderson -- excuse me -- Ms.

5 had saved this letter?

back 6 A. She must have. I think we found that letter in the

7 pocket of the van stuffed away.

8 Q. And when did you find it?

9 A. On the way back from Knob Creek.

10 Q. Is it March of '95?

11 A. Yeah. No, April.

12 Q. April of '95?

13 A. Uh-huh.

correct? 14 Q. But before the bombing of the Murrah Building;

15 A. Yes.

you 16 Q. Now, is it your memory, sir, that Mr. McVeigh wrote

17 another letter after this one?

18 A. Probably.

19 Q. Well, when you say "probably," what causes you to
hesitate?

20 A. Well, I'd have to read that whole letter and then I
could

21 tell whether I advised her to write him back. If
that's the

22 letter about him being in the car accident --

23 Q. Yes, sir.

24 A. -- then I asked -- I had her write him back.

25 Q. And you -- did it help you to remember that you had
her

9413

Roger Moore - Cross

1 write him back by reading the letter Government's
Exhibit 2104

2 that you wrote to him?

3 A. I don't know what that is.

4 Q. Well, do you remember reading -- Ms. Wilkinson or
5 Government Counsel reading aloud for the jury the
letter that

6 you wrote to Tim, the letter that ends "burn"?
Remember that?

7 A. Yeah.

8 Q. And that letter is a response to some letter other
than the

9 one I just showed you; correct?

10 A. Certainly.

11 Q. All right. And the letter to which it is a

response is one

12 that you remember getting after -- or excuse me -- that
you

13 remember having sent after the McVeigh letter to you
that I

14 just had you look at. Correct?

15 A. There was --

16 MS. WILKINSON: Can I object, your Honor?

17 THE COURT: Well, I'm confused about the
question.

18 MR. TIGAR: Well, I'm confused by my own
question,

19 your Honor, so I'll ask it again.

20 BY MR. TIGAR:

21 Q. Mr. McVeigh wrote you in January; correct?

22 A. I guess so.

23 Q. All right. Then -- and soon after that letter got
there,

24 Ms. Anderson called you up and read the letter to you;
correct?

25 A. Probably.

9414

Roger Moore - Cross

1 Q. And then you asked her to write him back; correct?

2 A. Yes.

3 Q. Now, the letter that you asked her to write him
back: She

4 didn't keep a copy of; correct?

5 A. You mean make duplicates?

6 Q. Yes.

7 A. We don't make duplicates of any letters.

8 Q. After you asked her to write him back, did he write
you

9 again?

10 A. Yes.

11 Q. And when did that next letter come?

12 A. Middle of March.

13 Q. Do you remember where it came from?

14 A. Most of them came from Kingman.

15 Q. Did you ever get a letter from Mr. McVeigh other
than from

16 Kingman, Arizona?

17 A. Not that I recall.

18 Q. And did you ever write to him anyplace other than
Kingman,

19 Arizona?

20 A. Never.

21 Q. Now, did you discuss with the FBI the fact --
excuse me.

22 Did you discuss with the FBI your contention
that

23 someone had stolen the serial numbers of the weapons?

24 A. Yes.

25 Q. And did you tell the FBI that anybody robbing you
wouldn't

Roger Moore – Cross

1 know where the numbers were?

2 A. Not unless they were a psychic.

3 Q. And yet the numbers were missing when you got to
your van;

4 correct?

5 A. May I get in a point?

6 Q. Well, I'm afraid that all you can do, sir, is
answer the

7 questions that I'm asking.

8 A. Yes, they were missing.

9 Q. Now, did -- were you concerned in the spring of
1995 with

10 the allegation that money that had been derived from

11 weapons that had been taken from your house had been
used to

12 finance the robbery -- finance the bombing of the
Murrah

13 Building?

14 A. If that was the case.

15 Q. Do you remember saying to an investigator who
interviewed

16 you that it doesn't fit in that they bought the bomb
with it

17 because the stuff was bought before the robbery?

18 A. The newspapers reported that.

19 Q. Uh-huh. And do you remember making that conclusion
that it

20 didn't fit in?

21 A. What? Explain that again.

22 Q. Do you remember telling an investigator that it
doesn't fit

23 in that someone would have used this robbery to finance
a

24 bombing because, according to the papers, everything
had been

25 bought?

9416

Roger Moore – Cross

1 A. The ammonium nitrate was bought supposedly,
according to

2 the papers, in September or October.

3 Q. But you had no personal knowledge; right?

4 A. No.

5 Q. Now, you said that in direct examination that Mr.
McVeigh

6 had access to the house all the time he was there;
correct?

7 A. Well, I never saw him go in my bedroom; but when
you're out

8 feeding the animals or you're in the shower, that takes
20

9 minutes out of the day.

10 Q. And in addition to the time when Mr. McVeigh was

there when

11 you were present, you know that he was there at a time
when you

12 were not present. Correct?

13 A. Yes. You mean during the winter?

14 Q. Yes.

15 A. Yeah.

16 Q. And you were aware, also, that Mr. McVeigh's habit
was to

17 just walk around and help himself to anything he
wanted;

18 correct?

19 A. That's correct.

20 Q. Now, you wanted to help Mr. McVeigh with his gun
show

21 business, didn't you, sir?

22 A. No. I didn't know he was in the gun show business.
He was

23 selling off his surplus stuff.

24 Q. Well, you knew that he traveled to gun shows.
Correct?

25 A. Well, he was nearly out of stuff when he left
Tulsa.

9417

Roger Moore – Cross

1 Q. You had seen -- you met him at a gun show; right?

2 A. Uh-huh.

right? 3 Q. You went to Dinner Key with him at a gun show;

4 A. Uh-huh.

5 Q. He shared a table with you at Tulsa; correct?

6 A. Karen let him put some stuff on about 3 feet of the
table
7 and he sold most of it. I figured that was the end of
it.

8 Q. Well, isn't it a fact, sir, that you heard Mr.
McVeigh say
9 that he was going to make a loop; that is to say, he
was going
10 to go to Arizona and then he was going to wind up
through these
11 other places you told us about on direct examination
and wind
12 up back at his father's home in New York? You remember
telling
13 me that, don't you?

14 A. Yes, I do.

15 Q. And you sat around with maps and tried to tell him
how to
16 do it and where to go, didn't you?

17 A. I certainly did.

18 Q. Now, sir, was it McVeigh's habit when he wrote to
you to
19 write "burn" on his letters?

20 A. He started that in '95.

21 Q. On the letter that you -- that I just showed you a
few
22 minutes ago, which is Government's Exhibit 1746 --

thank you,

23 Ms. Goodman -- does he write "burn" on the bottom of
that?

24 A. No.

25 Q. He writes, "Careful and watch your back." Correct?

9418

Roger Moore - Cross

1 A. That's right.

2 Q. Now, sir, did you have a list of people at your
home that

3 you were going to give to law enforcement if you ever
got in

4 trouble?

5 A. Absolutely not.

6 Q. Now you're smiling, sir, when you make that answer;
7 correct?

8 A. Yes.

9 Q. Or when you heard the question. Have you ever
heard that

10 someone had said that you had done that?

11 A. No. But the FBI knows what I think about snitches.

12 Q. What do you think about snitches?

13 MS. WILKINSON: Objection, your Honor.

14 THE COURT: Overruled.

15 THE WITNESS: Well, they had one at Ruby
Ridge, and

and it 16 they spent an awful lot of money to get a guy in jail;

shotguns. 17 cost them an awful lot of money for \$400 worth of

up there 18 And they spent three years with a government informant

kind of 19 trying to talk the guy into building them. It seemed

20 dumb.

21 BY MR. TIGAR:

22 Q. And you've told the FBI this?

23 A. Yeah.

Waco? 24 Q. Did you also have a view about the FBI's conduct in

think 25 A. I think if they want to serve a search warrant, I

9419

Roger Moore – Cross

person, 1 anybody in the room that had -- that was a reasonable

has 2 they could have served the search warrant. The sheriff

3 indicated that a number of times.

Waco? Is 4 Q. Do you disagree with what the Government did in

5 that your testimony?

6 A. I think a prudent person would.

7 Q. And you consider yourself a prudent person?

8 A. Yes.

9 Q. Now, this American Assault Company that you have:
When did
10 that acquire the name "The Candy Store"?
she name
11 A. Somebody at a gun show that Karen was at suggested
12 it "The Candy Store." I was not there.

13 Q. Okay. And did you acquiesce in or agree with that
decision
14 to call it "The Candy Store"?
15 A. You mean on her volition?
16 Q. Yes.
17 A. Doesn't matter to me.
18 Q. Now, whose business is that, hers or yours?
19 A. Half and half.
20 Q. And do you split the profits?
21 A. No.
22 Q. How are the profits accounted for and reported?
23 A. I do it.
24 Q. And do you keep records of the orders that are made
-- that
25 are filled and who bought things and to whom they were
sent?

9420

Roger Moore – Cross

1 A. Yes.

2 Q. And how long are those records kept?

3 A. Three or four years.

4 Q. Is it your testimony, sir, that you keep your
records for

5 three or four years?

6 A. Yes.

7 Q. And in addition to these records that you keep
three or

8 four years, do you also keep a journal; that is to say,
an

9 accounting-type journal?

10 A. They're all kept in a book, spiral book, for the
year.

11 Q. And it's on that basis that you report -- you
report as a

12 sole proprietor, then?

13 A. Yes.

14 Q. And you report as a d/b/a, doing business as, on
Schedule

15 C. Correct?

16 A. Yes.

17 Q. You report your doing business as American Assault
Company?

18 A. Yes.

19 Q. And The Candy Store?

20 A. We don't use "The Candy Store." That's like a -- a
21 nickname.

22 Q. And when you send out your -- when you put ads --
excuse

23 me -- in magazines, do you -- Do you put ads in
magazines?

24 A. Shotgun News.

25 Q. Do you use the name "The Candy Store" in those ads?

9421

Roger Moore - Cross

1 A. We haven't put ads in the Shotgun News for over a
year.

2 Q. When you were putting ads, did you use the name
"The Candy
3 Store"?

4 A. I can't recall because I don't put in the ads.

5 Q. Ms. Anderson takes care of the day-to-day conduct
of the
6 business; is that right?

7 A. She takes care of the paperwork.

8 Q. In addition to selling ammunition, is there
anything else
9 that American Assault Company sells?

10 A. Flares. Some parts -- we don't advertise parts.

11 pyrotechnics, parachute flares, road flares for people
that

12 have trouble on the road, and distress flares for
people that

13 are hiking that have smoke on one end and a flare on
the other,

14 so at night they can use the flare and in daytime they
can use

15 the orange smoke.
16 Q. Now, in addition to the things you sell through
American
17 Assault Company during the 1990's, did you and Ms.
Anderson

18 sell other things?

19 A. Not -- I didn't.

20 Q. Did you sell beginning in, say, 1987, down to
November of

21 1994 -- did you ever sell books?

22 A. Yeah.

23 Q. Did you sell or offer to sell pornographic tapes?

24 A. I didn't.

25 Q. Did you ever offer to sell to a federal agent 10

9422

Roger Moore - Cross

1 pornographic tapes for \$10 apiece?

2 A. It's possible.

3 Q. And when you say "it's possible," does a
recollection come

4 into your mind?

5 A. That's nine years ago.

6 Q. Would it refresh your recollection if I suggested
this took

7 place -- might take place in Utah?

8 A. Yeah. I know what took place in Utah. I know what

took

9 place in Utah.

sell

10 Q. I understand, sir. Did you at any time offer to

11 pornographic tapes to a federal agent in 1988?

12 A. I do not recollect. I was not up there to sell

13 pornographic tapes. I was up there to sell ammunition.

law

14 Q. Now, you told us that after the robbery, you were

15 interested in making a list that you could provide to

remember

16 enforcement and to the insurance authorities. Do you

17 that?

18 A. You mean a list of the things that were stolen?

were

19 Q. Yes. A list of things that you were claiming that

20 stolen.

21 A. Yes.

still have

22 Q. Do you remember, sir, being shown -- perhaps you

it

23 it up there -- Government's Exhibit 1739. Do you have

24 there?

it is. I

25 A. I don't know. It would be better to tell me what

9423

Roger Moore - Cross

1 don't know --

2 Q. It is a list dated November 13.

3 MR. TIGAR: May I approach, your Honor?

4 THE COURT: Yes.

5 THE WITNESS: Is that it?

6 BY MR. TIGAR:

7 Q. Yes, sir. Going to Government's Exhibit 1739, I'm
going to

8 place this up here. Do you see this Item 9, large,
unopened

9 UPS boxes containing tracer ammo?

10 A. Yes.

11 Q. Now, whose ammo was that?

12 A. I paid for it.

13 Q. And was that ammo in connection with American
Assault

14 Company?

15 A. Yes.

16 Q. Now, American Assault Company was a business that
you were

17 conducting out of your home; correct?

18 A. Yes.

19 Q. Now, you had homeowner's insurance; correct?

20 A. Yes.

21 Q. Did you have business insurance?

22 A. No.

23 Q. Now, was that ammo that had been received -- was
that ammo

24 that had been received from Mr. Strommen?

25 A. Yes, sir.

9424

Roger Moore – Cross

1 Q. Was it the ammo that had just been received from
2 Mr. Strommen?

3 A. Several days.

4 Q. And did you, in fact, call Mr. Strommen to get a
duplicate
5 copy of the invoice?

6 A. I did not.

7 Q. Did you cause that to be done?

8 A. I didn't cause it to be done. I don't take care of
the
9 paperwork.

10 Q. Do you know that a duplicate copy of the invoice
was
11 obtained?

12 A. No, I do not.

13 Q. I'm going to show you what's been received in
evidence as

14 Defendant's 1201. And I ask you, sir, if you've ever
seen that
15 before?

16 A. No.

17 MR. TIGAR: Has that not been received, Ms.

Hasfjord?

18 THE COURTROOM DEPUTY: No, it has not.

19 THE COURT: Oh, yes, I think it has.

20 MR. TIGAR: Perhaps under a Government number,
your

21 Honor. Let me show it to --

22 MS. WILKINSON: I believe it's been admitted
under a

23 Government number -- it was a defense number?

24 MR. TIGAR: To clarify, if I've not done so,
may I

25 offer D1201.

9425

Roger Moore - Cross

Honor. 1 MS. WILKINSON: We have no objection, your

2 THE COURT: All right. It's received. I know
we've

3 seen it before.

4 MR. TIGAR: Thank you, your Honor.

5 BY MR. TIGAR:

6 Q. Mr. Moore, do you ever remember seeing that before?

7 A. No, I don't.

8 Q. So do you know of any other ammunition in a box
other than

9 the ammunition that had been received from Mr.
Strommen?

10 A. Would you leave that up there for a moment, please.

11 Q. Yes, sir.

12 A. Pardon? Now, repeat the question.

13 Q. Do you know of any other ammunition in a UPS box --

14 A. Two boxes.

15 Q. Okay. Do you know of any ammunition other than
large,
16 unopened UPS boxes, other than the Strommen ammunition?

17 A. No.

18 Q. And are you able -- do you have as you sit there
any
19 explanation for the disparity between the \$925 on the
invoice
20 and the \$945 on the list?

21 A. No, other than when we made up the list, we didn't
have the
22 invoice.

23 Q. The list is dated the 13th. Is that correct?

24 A. I don't know. I don't have a copy of the list.

25 Q. See that: "Revised 11-13"?

9426

Roger Moore - Cross

1 A. Yes.

2 Q. Invoice is dated the 7th. Is that correct? Is
that right?

3 A. Yeah. But that's when he made it up in Wisconsin.
That

4 doesn't mean we had it in our possession.

personal

5 Q. I understand. And you don't know of your own

with

6 knowledge, do you, what conversation Ms. Anderson had

7 Mr. Strommen about that matter; is that correct?

8 A. That's correct.

you were

9 Q. Sir, towards the end of your direct examination,

Do you

10 shown a copy of a letter that you sent to Mr. McVeigh.

11 remember that?

12 A. Yes.

you were

13 Q. Before I ask you that, sir, isn't it a fact that

14 not robbed on the 5th of November, 1994? Yes, or no?

15 A. We were robbed on the 5th of November, 1994.

worked out a

16 Q. Isn't it a fact, sir, that you and Mr. McVeigh

would

17 plan to get these guns out onto the market and you

from

18 collect whatever you could for the insurance company --

19 the insurance company? Is that a fact, or not?

20 A. No.

21 Q. You deny that?

22 A. I deny that.

23 Q. Sir.

24 Now, you testified on direct examination that

you had

25 received a -- that you had sent a letter to Mr.
McVeigh;

9427

Roger Moore - Cross

1 correct?

2 A. Correct.

3 Q. And you said that the letter was designed to try to
get

4 Mr. McVeigh to come and visit you. Is that right?

5 A. Right.

6 Q. I'm going to place up on the screen what has been
received

7 in evidence as Government's Exhibit 2104.

8 Sir, in calendar 19 -- well, does American
Assault

9 Company still operate?

10 A. To get rid of the balance of the inventory because
the

11 shows are very slow.

12 Q. And what is it that causes sales to be slow?

13 A. Approximately two weeks before the November
election in

14 1994, when most of the gun people that came to gun
shows were

15 told by the media that the Republicans were going to
sweep the

16 Congress and the Senate, everybody said, "huh," took a

deep

17 breath and said, "We don't have to worry about
stockpiling

18 stuff anymore because there is not going to be any more
gun

19 laws." And the shows absolutely dropped free fall with
no

20 parachute.

21 Q. And when was it that the shows free fell with no
parachute?

22 A. Two weeks before the election, when it was obvious
that the

23 Republicans were going to win the House and Senate.

24 Q. So you thought that the gun show business was going
to turn

25 south and get bad; is that right?

9428

Roger Moore – Cross

1 A. Every time you went to one, that's what happened.

2 Q. And your sense that the gun show business was about
to go

3 bad was formed in late October, 1994. Is that right,
sir?

4 A. Yes, sir.

5 Q. And was it your sense that the market value of
items that

6 were being sold at gun shows would diminish?

7 A. Only the ammunition and parts went down, not the
guns. The

8 guns have gotten higher.

9 Q. So that if you were going to make any money in this
10 business, selling guns was going to be the better way
to do it
11 than selling ammo. Is that right?

12 A. I don't need the money.

13 Q. My question was if one was going to make money in
this
14 business, best way to do it was to sell guns and not
ammo;
15 correct?

16 A. Right now, nobody is making money.

17 Q. My question, sir, is in October of 1994, a prudent
business
18 person would conclude that the way to make money was
going to
19 be selling guns and not ammo; isn't that right?

20 A. We didn't realize this had happened for the first
four or
21 five months. It didn't happen immediately. It started
then.

22 Q. But didn't you say a moment ago, sir, that gun
dealers had
23 anticipated this result and began to do so shortly
before the
24 election?

25 A. Gun purchasers.

Roger Moore – Cross

1 Q. Pardon me?

2 A. The people that come to gun shows, not the dealers.

3 Q. And the dealers, of course, would feel the effect
of it;

4 correct?

5 A. I would so -- I would think so, although there is
more gun

6 shows now than there ever was.

7 Q. We're talking about the feeling at that time.

8 Sir, looking now at Government's Exhibit 2104,
you

9 said, "I'm reading your letter and answering it
question for

10 question." See that, sir?

11 A. Yes, I do.

12 Q. Now, "No. 1, since the robbery, we are phasing out
of this

13 activity."

14 You're telling him that you're phasing out of
the sale

15 of ammunition. Is that your testimony?

16 A. That's right.

17 Q. And the reason you're phasing out of the sale of
ammunition

18 is that the ammunition business is not so good.
Correct?

19 A. That's right.

20 Q. The predictions that people had made there towards

the end

21 of October of 1994 had begun to come true; correct?

22 A. Right.

23 Q. And this fact that the ammunition business was
going down

24 and -- was a fact that you had shared with Mr. McVeigh
before

25 this time; is that right?

9430

Roger Moore - Cross

1 A. Before which time?

2 Q. Before you wrote him this letter.

3 A. No. This is the first time I've told him that.

4 Q. You corresponded with Mr. McVeigh every few months.
Is

5 that correct?

6 A. To the best of my ability.

7 Q. Is it your testimony that you never had any
correspondence

8 with Mr. McVeigh about what was happening to the
ammunition

9 business before this letter?

10 A. Not to the best of my knowledge, or I wouldn't have
to

11 write this.

12 Q. You say, "Since November election, mail order is
off

dealers 13 80 percent. Some shows are off 50 to 75 percent. All

14 are getting creamed."

that 15 Now, by that you mean ammunition dealers. Is

16 your testimony?

17 A. Everybody.

18 Q. Did you mean -- that included gun dealers?

19 A. Yes.

correct? 20 Q. Now, "No more money": That's the same thought;

don't have 21 A. That means that customers that come into shows

22 the money.

"-- N.O.W. 23 Q. Now, you say, "See what the --" New World Order,

24 has done to our dollars." Correct?

25 A. Uh-huh.

9431

Roger Moore - Cross

have to 1 Q. You say, "83 yen from 144 two years ago." Did you

2 look those figures up?

3 A. I play the stock market. It's 125 today.

4 Q. The yen?

5 A. Yes.

6 Q. So you knew at the time you wrote this what had

happened in

7 the international markets; correct?

8 A. Uh-huh.

9 Q. And you were concerned, were you not, about the
impact of

10 the United States politics or policies on international
11 markets; correct?

12 A. No. I thought McVeigh would like to see that.

13 Q. And it's your testimony, sir, that you were not
concerned

14 with the impact of United States policies on
international

15 markets?

16 A. Doesn't bother my stock market playing at all.

17 Q. And is it your testimony that "plan is to bring the
country

18 down" was just puffing? Is that your testimony?

19 A. That's my testimony.

20 Q. "Have a few more things happen, then offer the 90
percent a

21 solution." Now, what does that mean?

22 A. It's in a number of books that are in the library,
been

23 used over the years for the last thousand years. I
can't

24 pronounce it exactly. It's like the Hegelian
principle:

25 Create a problem, offer a solution, get the people to
accept

Roger Moore - Cross

1 it.

2 Q. What is "offer the 90 percent a solution"? Who are
the

3 90 percent?

4 A. The working class.

5 Q. And who are the 10 percent that are going to be
offering

6 this solution?

7 A. People with big money.

8 Q. And did you think that -- that this notion would
appeal to

9 Mr. McVeigh?

10 A. That's what he talked about.

11 Q. And who were the people with big money that you
talked

12 about with Mr. McVeigh?

13 A. We never named any names.

14 Q. Well, what kinds of people were they with big
money?

15 A. You want me to tell you what I think?

16 Q. Yes. Well, I want you to tell me what you were
trying to

17 convey with this language that you used here, sir.

18 A. Do that again, please.

19 Q. Would you please tell me what you meant by "then
offer the

the 20 90 percent a solution." Who was going to be offering
21 solution?
22 A. The government.
23 Q. Pardon me?
24 A. The government.
were you 25 Q. Okay. And who were the 10 percent? What groups

9433

Roger Moore – Cross

1 referring to?
like that 2 A. People don't have to worry about things, people
3 own Microsoft that have \$34 billion.
owned 4 Q. So you were worried about Mr. Gates, people that
5 Microsoft. What other groups of people?
6 A. I don't think --
hadn't 7 Q. You had read the literature about the 10 percent,
8 you, sir?
9 A. Pardon?
10 Q. You had read literature about the 10 percent?
11 A. No, I hadn't.
percent 12 Q. You had talked to Mr. McVeigh about who the 10

13 were, hadn't you, sir?

14 A. No, I had not. I don't know if it's 7 percent or

15 15 percent or what it is.

16 Q. So your testimony is that you just chose 90 percent
because

17 you thought that was a convenient number; correct?

18 A. That's right.

19 Q. All right. And your testimony is that you never
read or

20 heard Mr. McVeigh talk about who the 10 percent were?
Is that

21 your testimony?

22 A. Yes.

23 Q. Now, "Better red than dead": Had you heard that
before?

24 A. You hear that everywhere.

25 Q. All right.

9434

Roger Moore - Cross

1 A. From the last -- ever since McCarthy was
prosecuting

2 people.

3 Q. And had you heard Mr. McVeigh say that?

4 A. I'm not sure. If I can remember -- if I could
remember

5 everything he said, I'd be a genius.

6 Q. Well, you were trying in this letter to say things

that

7 would appeal to him. Correct?

8 A. You're right.

9 Q. And the things you were putting in the letter to
try to

10 appeal to him were things that were based on what he
told you;

11 correct?

12 A. Based on things I thought he would like.

13 Q. And what you knew he would like was based on what
he had

14 told you and what you saw him read; correct?

15 A. I didn't see him read anything.

16 Q. Except firearms magazines?

17 A. That's right.

18 Q. And, of course, he urged you to read things, did he
not?

19 A. He urged me?

20 Q. Yes.

21 A. He only urged me to read The Turner Diaries. In
fact, he

22 didn't give it to me. He gave it to Karen.

23 Q. Your testimony therefore is that you do not -- that
you

24 just don't remember where you got the phrase "better
red than

25 dead," other than you just thought he would like it;
correct?

Roger Moore - Cross

1 A. Right.

2 Q. Now, you then say, "Please remember I have a few
more years
3 of experience plus 7 --" years "-- 7 in AF and 40 years
of
4 shooting." Now, that's just a true statement about
your
5 experience; correct?

6 A. Well, it's a little exaggerated on the shooting. I
haven't
7 been target-shooting for five years.

8 Q. Then you say, "Not much product to build no sales."
9 Correct?

10 A. Yes.

11 Q. "This is the only course, but the important thing
is to be
12 as effective as possible." Right?

13 A. Right.

14 Q. Now, is it your testimony that -- let's see -- "the
15 important thing is to be as effective as possible"
refers to
16 the sales business?

17 A. No, it refers to literature and informing people.

18 Q. I see. So you were telling McVeigh that the
important
19 thing is to be as effective as possible in a political
sense?

20 A. Right.

21 Q. All right.

22 A. Just like the survival meeting they had here in
Denver this

23 weekend.

24 Q. So you're telling -- is it your testimony, sir,
that you

25 were telling Mr. McVeigh that he should stand on street
corners

9436

Roger Moore - Cross

1 and pass out literature?

2 A. No.

3 Q. You didn't think that would appeal to him, did you?

4 A. No.

5 Q. You were telling him he should be effective to
accomplish

6 the things that he wanted to accomplish; correct?

7 A. People go -- people at gun shows do rent tables and
hand

8 out free literature.

9 Q. My question, sir, is you were telling him that you
thought

10 that it was important for him to be as effective as
possible to

11 achieve what he wanted to achieve; correct?

12 A. Yes.

13 Q. Now, you say, "I know of no people that are
interested in
14 this plan." Correct?
15 A. Uh-huh.
16 Q. Now, is it your testimony, sir, that that has to do
with a
17 plan about solving the events of November 5, 1994? Is
that
18 your testimony?
19 A. And the rest of the robberies that occurred in
Topeka and
20 Oklahoma in which there was rewards offered for it.
21 Q. And you say, "Even Special Forces people probably
wouldn't
22 tell us, as the" -- and I can't read the next word.
23 A. I probably can't either.
24 Q. -- "as the attitude of trust is now gone mostly"?
Is that
25 probably what that word is?

9437

Roger Moore - Cross

1 A. Something like that.
2 Q. Shall we zoom in and see if we can see it.
3 Can you tell what that word is?
4 A. It's "attitude."
5 Q. Now, this is your handwriting; correct?

6 A. Yes. When I'm in a hurry, I scribble.

7 Q. And you say, "After all this time, I can't believe
you say
8 I drive you batty." Had he said that you drive him
batty?

9 A. He told Karen that.

10 Q. All right. And ". . . as I've calmed down, you
must be
11 getting more hyper." Right? Now, was he hyper?

12 A. Every time I saw him, he got worse.

13 Q. And how did he get worse? In what ways did he get
worse,
14 as you observed him every time you saw him?

15 A. He was more antsy; and the last time he was there,
he was
16 out in the driveway with his Mini-30. And he was
filling his
17 clips, and he was putting them in the gun and cranking
them
18 out, making sure they feed; and I said, "What in the
hell are
19 you doing?"

20 He said, "I'm making sure the bullets feed."
21 I said, "You're dropping them on the ground.
Why
22 don't you put a blanket down?"

23 He's dropping them right in the gravel. That
didn't
24 make sense to me.

25 Q. Now, is that the only thing you had ever see him
done (sic)

Roger Moore – Cross

of his? 1 that you thought reflected this hyper, antsy behavior

around Knob 2 A. Running around the Soldier of Fortune, running

for four 3 Creek, which is an extremely interesting place to go

And 4 or five days, and not staying and didn't buy anything.

the 5 Karen told me that he was hyper when he was there in

6 winter.

the 7 Q. In the next paragraph, you say, "We must track down

and 8 robbers to know when and who saw and took certain stuff

been 9 also to be able to determine how far our security has

10 compromised." Correct?

11 A. Right.

referred to 12 Q. And you testified on direct that the "security"

13 not having a security system on the farm. Correct?

since the 14 A. Right. I'm tired of carrying a gun to the farm

or when 15 robbery happened, out to feed the horses every morning

16 I'm home alone. I'm tired of having all the lights on

and 10

17 loaded guns in the house.

18 Q. You didn't have a security system in November of
'94;

19 correct, sir?

20 A. That's right.

21 Q. You didn't have any gun safes; correct, sir?

22 A. If you had a gun safe and a gentleman was there
with a

23 shotgun and he said, "What's in your safe?"

24 "Guns."

25 "Open the safe or I'll blow your head off."

9439

Roger Moore – Cross

1 Q. You would have opened it?

2 A. Yeah. So what good is a safe?

3 Q. My question is, sir, is you didn't have a gun safe;
right?

4 A. No.

5 Q. And according to you, you knew exactly by 11:30 on
the 5th

6 of November, 1994, how far your security had been
compromised

7 with respect to the guns in your house, didn't you,
sir?

8 A. Yes.

9 Q. Well, then, will you tell the jury why you're

writing

10 Mr. McVeigh to try to find out how far your security
has been

11 compromised?

I'm

12 A. I'm trying to get him back to the farm. That's all

(sic)

13 trying to do is get him back to the farm so we can set

14 him down and talk to him about the robbery.

15 Q. And it's your testimony that that's all that means?

16 A. That's right.

17 Q. About the security being compromised. Okay.

last

18 You say you got two super leads at Tulsa show

19 week; right?

20 A. Yes.

several

21 Q. Then you say, "Even if I wanted to and didn't have

on."

22 problems that you don't know about and I can't write

are some

23 Now, on this second page of the letter, there

24 lines skipped. You see that, sir?

25 A. Yes.

9440

Roger Moore – Cross

sometimes

1 Q. Now, is that your habit in writing letters, to

2 skip lines?

3 A. Yes. When I'm in a hurry, I do that. When I'm in
a hurry,

4 I leave off words. I write phrases rather than
complete

5 sentences.

6 Q. And you say, then, "Karen is not interested in the
7 slightest at this point." Correct?

8 A. Correct.

9 Q. And is it your testimony that that has strictly to
do with

10 not interested in pursuing this investigation?

11 A. Right. She's pursued it all winter, and she's
tired of it.

12 Q. You say, "She met a couple of Special Forces
Vietnam" --

13 what does that "L Recon" mean?

14 A. Long-range reconnaissance.

15 Q. "And they have convinced her to put it" off?

16 A. "Put it out of her mind and forget about it and
have fun."

17 Q. "I personally think each time you were here that
you got

18 the wrong impression." Correct?

19 A. That's what it says.

20 Q. Now, when was the last time before you wrote this
letter

21 that he had been at the farm?

22 A. May of '94.

Correct? 23 Q. So obviously, that's before November of '94.
24 A. Certainly.
25 Q. So this cannot refer to his having got the wrong
impression

9441

Roger Moore - Cross

1 about the events of November, '94. Correct?
2 A. No. You mean the robbery?
3 Q. Yes.
4 A. No.
5 Q. Now -- well, then, what was it that you were
telling him he
6 got the wrong impression about when he was at the farm?
7 A. My attitude.
8 Q. And what attitude was that that you thought you
needed to
9 correct his impression about?
10 A. I just wasn't as interested in running around and
doing all
11 the stuff as he was.
12 Q. Now, in May of 1994, he -- what was he interested
-- the
13 last time he visited the farm, what was he interested
in
14 running around and doing that you weren't so interested
in

15 running around and doing?
16 A. Well, on the way to Florida every year, back and
forth,
17 I'm -- I come pretty close to Saucier, Mississippi,
twice a
18 year. It hasn't interested me enough to stop down
there and
19 look at 300 Russian vehicles supposedly.

20 And when he was there in May of '94, that's
where he
21 was going first; so I'd say he's a little more hyper
than I am.

22 Q. All right. So when you say that you think "each
time you
23 were here that you got the wrong impression," you're
telling
24 him that he got the wrong impression about how much you
were
25 interested in trying to figure out if there were
Russian

9442

Roger Moore - Cross

1 vehicles parked down in Saucier, Mississippi. Is that
your
2 testimony?

3 A. I'm not going to get him to the farm if I keep
alienating
4 him.

5 Q. Then you say, "I'm the serious patriot. Karen is
not

6 interested." Correct?

7 A. Same premise.

8 Q. And it's your testimony that you did not regard
yourself as

9 a serious patriot in the way that Mr. McVeigh did? Is
that

10 your testimony?

11 A. You're right.

12 Q. And was it true that Karen is not interested at
all?

13 A. She's gotten to that point.

14 Q. Was she a serious patriot at some earlier time?

15 A. Only because we were probably roommates. She
didn't like

16 this at all.

17 Q. All right. And were you a serious patriot?

18 A. I hadn't seen anything that everybody was talking
about;

19 and I've said to the FBI, "Till I see it, I don't
believe it."

20 Q. Did you regard yourself as a serious patriot?

21 A. How serious?

22 Q. Well, what set of views did you have that you
identified

23 with being a patriot?

24 A. If you look at the dictionary thing up on a
patriot, that's

25 anybody that reveres their country and their flag.

Roger Moore – Cross

banking 1 Q. And did your patriot views include views about the

2 system?

3 A. No.

4 Q. Did it include views about the monetary system?

5 A. No.

administration? 6 Q. Did it include views about the Clinton

7 A. I'm not happy about Clinton.

8 Q. Did it include views about race relations?

9 A. I'm not worried about that at all.

10 Q. Did it include views about gun control?

11 A. Only if they start registering guns.

12 Q. Did it include views about the behavior of the FBI?

13 A. I've never met the FBI prior to this.

Ruby 14 Q. You certainly had views about the FBI's conduct at

15 Ridge, did you not, sir?

farm to 16 A. No. At that time, we were transferring from one

hole 17 the other, and I was out putting posts in with a post-

Ruby Ridge 18 digger and putting up fence; and I never knew about

first 19 until Arlen Specter held hearings on them. That's the

Ridge. 20 time on television I had seen anything about Ruby
about 21 Q. At the time you wrote this letter, you had views
22 that; correct, sir?
23 A. Ruby Ridge?
24 Q. Yes.
25 A. It's over and done with.

9444

Roger Moore – Cross

share 1 Q. Is it your testimony, sir, then, that you did not
2 these views with Mr. McVeigh?
3 A. Yes.
pissed at 4 Q. Now, you've testified on direct that "She's even
5 me for taking night-vision photos and sending them in
to 6 right-wing magazines" -- you never did that?
7 A. Right.
8 Q. You were just telling a story?
9 A. You're right.
what's 10 Q. Now, then, you say "Anxious, watch out for" -- and
11 the next word there?
12 A. "Radiation."

13 Q. Isn't that word "revelation"?

14 A. No. "Radiation."

15 Q. Do you remember telling the FBI on April 28, 1995,
that the

16 word was "revelation"?

17 A. No.

18 Q. And then you talk about --

19 A. What would "revelation" mean pertaining to the New
World

20 Order? To you?

21 Q. Sir, I didn't write Mr. McVeigh a letter.

22 A. Okay. I'm telling you it's "radiation."

23 Q. All right. And I'm asking you whether you told the
FBI

24 something different.

25 A. I have no idea. I've talked to so many FBI people
that I

9445

Roger Moore - Cross

1 could -- I just don't have any idea.

2 Q. Then you talk about virus spray. Now, have you
ever come

3 in contact with virus spray, sir?

4 A. No. Hope I don't.

5 Q. And "all other kinds of --" some kind of "electron
6 mind-altering devices"; right?

7 A. Right.

8 Q. Now, you say, "You need some space blankets to keep
out of
9 satellite eyes." Did you ever talk to Mr. McVeigh
about the
10 idea of needing space blankets to get -- to keep out of
11 satellite eyes?

12 A. No.

13 Q. Is it your testimony, sir, that you never heard Mr.
McVeigh
14 refer to the need to use those space blankets?

15 A. He did maneuvers in caves south of Kingman, so if
you're in
16 a cave, you don't need a space blanket.

17 Q. And when was that conversation about caves in
Kingman, sir?

18 A. Several times.

19 Q. Several times he said that he liked to hang out
there in
20 the desert?

21 A. That's right.

22 Q. Did he ever tell you the name of anybody who might
drive
23 him out to the desert?

24 A. Why wouldn't he drive himself?

25 Q. Did he ever tell you that he drove himself?

Roger Moore – Cross

1 A. No.

2 Q. All right. Did he describe in any detail his being
out

3 there in the desert in the caves?

4 A. Said the only thing that brought him back down was
when he

5 ran out of water.

6 Q. He wanted to go, so --

7 A. I don't know whether that's true or not. That was
in the

8 letter.

9 Q. You don't have any of those letters, do you, sir?

10 A. No, I don't. If I did, the FBI would have them.

11 Q. Then you say, "Let's let May go. If you want,
write when

12 you move or have news"; correct?

13 A. Uh-huh.

14 Q. What did you mean, "Let's let May go"?

15 A. This last letter he indicated that he could
possibly come

16 the first part of May.

17 Q. Can you remember as close as you can? What did he
say

18 about coming the first part of May?

19 A. That's all he said.

20 Q. What; that "Can I come by and see you the first
part of

21 May?"

22 A. "I might be able to make it the first part of May."

23 Q. And then you say, "My best." Right?

24 A. Wouldn't you always to somebody you were trying to
get to
25 your farm?

9447

Roger Moore - Cross

1 THE COURT: He's just asking you a question if
that's
2 what you said.

3 THE WITNESS: That's what I said. It's a
plain cite.

4 BY MR. TIGAR:

5 Q. And then the word "burn."

6 Can you remember ever having used the word
"burn" on
7 any letter --

8 A. I used --

9 Q. -- that you sent before this one?

10 A. I think I used it one other time.

11 Q. And when was the one other time that you used the
word
12 "burn"?

13 A. After the robbery.

14 Q. And to whom was that letter addressed?

15 A. McVeigh.

16 MR. TIGAR: May I have a moment, your Honor?

17 THE COURT: Yes.

18 BY MR. TIGAR:

19 Q. This letter that I've just been showing you, sir:
Do you
20 know how that letter came into the Government's
possession?

21 A. I would assume --

22 Q. No, please don't assume. Because -- do you know of
your
23 personal knowledge?

24 A. Have they personally told me how they got a hold of
it?

25 Q. Yes.

9448

Roger Moore - Cross

1 A. No.

2 Q. So you don't know of your personal knowledge how
that
3 letter got into the Government's possession. Correct?

4 A. No.

5 Q. Now, the letter that you sent -- or excuse me --
that you

6 received from Mr. McVeigh: They got that because you
and

7 Ms. Anderson turned it over to the FBI. Is that right?

8 A. The one letter they have?

9 Q. Yes.

10 A. Yes.

11 MR. TIGAR: Thank you, your Honor. I have
nothing
12 further.

13 THE COURT: Ms. Wilkinson.

14 MS. WILKINSON: Just one question, your Honor.

15 THE COURT: All right.

16 MS. WILKINSON: I need to correct that, your
Honor.

17 While I was standing here watching Mr. Tigar, I thought
of two.

18 MR. TIGAR: I didn't hear that, sorry.

19 MS. WILKINSON: I thought of two questions.

20 THE COURT: Two questions.

21 MR. TIGAR: Oh, I see. Thank you, your Honor.

22 REDIRECT EXAMINATION

23 BY MS. WILKINSON:

24 Q. Mr. Moore, you were asked by Mr. Tigar whether you
ever
25 made any agreement with Mr. McVeigh to give him your
guns and

9449

Roger Moore – Redirect

1 have them sold. Did you ever do that?

2 A. Never.

3 Q. Would you ever do that?

4 A. No.

5 MS. WILKINSON: No further questions, your
Honor.

6 THE COURT: All right. Is this witness now to
be
7 excused?

8 MS. WILKINSON: He is.

9 MR. TIGAR: Your Honor, we have a subpoena out
for

10 Mr. Moore. In light of the extensive cross-
examination, it's

11 doubtful that we will need him in our case; but we
cannot

12 excuse him at this point.

13 THE COURT: Well, he can go home.

14 MR. TIGAR: Yes, of course, your Honor,
because the

15 defense case won't be for quite some time.

16 THE COURT: All right. You're excused then
for now.

17 You can go home, but you're subject to a subpoena, so
you have

18 to be able to respond to that if you're notified to
return.

19 Understand?

20 THE WITNESS: Yes.

21 THE COURT: You can leave.

22 And of course, you understand that means
you're still

23 under the restriction about talking about your
testimony with

24 any other person. You understand that?

25 Okay. And we're going to let you go --

9450

1 You can leave, Mr. Moore.

2 We're going to let you go early today, members
of the

3 jury, rather than start another witness; so please, of
course,

4 follow the cautions regularly given. And, you know, we
kind of

5 joke about it, but it's pretty important to a fair
trial that

6 you keep open minds; that you remember there is a lot
yet to be

7 heard. And so don't discuss anything about this case
with

8 anyone, including other jurors, and be careful about
all of the

9 things that you read, see, and hear to avoid anything
that

10 could influence you in the decisions to be made in this
case.

11 You're excused now until 8:45 tomorrow
morning.

12 (Jury out at 4:59 p.m.)

13 THE COURT: Yes, Mr. Mackey?

approach 14

MR. MACKEY: I have one matter I'd like to

15 the bench on.

16 THE COURT: All right. Sure.

17 (At the bench:)

court 18 (Bench Conference 80B1 is not herein transcribed by

transcript.) 19 order. It is transcribed as a separate sealed

20

21

22

23

24

25

9457

1 (In open court:)

2 THE COURT: All right. We'll recess, 8:45.

3 (Recess at 5:05 p.m.)

4 * * * * *

5 INDEX

Page 6 Item

7 WITNESSES

8 Roger Moore
9 Direct Examination Continued by Ms. Wilkinson
9304
10 Cross-examination by Mr. Tigar
9340
11 Redirect Examination by Ms. Wilkinson
9448

12 PLAINTIFF'S EXHIBITS

13	Exhibit	Offered	Received	Refused	Reserved
Withdrawn					
14	2104	9328	9329		

15 DEFENDANT'S EXHIBITS

16	Exhibit	Offered	Received	Refused	Reserved
Withdrawn					
17	D1201	9424	9425		
18	D1549	9362	9362		

19 * * * * *

20
21
22
23
24
25

9458

2
transcript from

We certify that the foregoing is a correct

Dated

3 the record of proceedings in the above-entitled matter.

4 at Denver, Colorado, this 18th day of November, 1997.

5

6

7

Paul Zuckerman

8

9

Kara Spitler

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

