

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)

15235

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

Lincoln

13 Street, Suite 1308, Denver, Colorado, 80203, appearing
for
14 Defendant Nichols.

15 * * * * *

16 PROCEEDINGS

17 (Reconvened at 1:35 p.m.)

18 THE COURT: Please be seated.

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

20 THE COURT: Yes.

21 (At the bench:)

22 (Bench Conference 147B1 is not herein transcribed
by court
23 order. It is transcribed as a separate sealed
transcript.)

24

25

15239

1 (In open court:)

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

3 THE COURT: Next witness, please.

4 MR. MACKEY: We'll call Eric Thompson.

5 THE COURT: Thank you.

6 THE COURTROOM DEPUTY: Would you raise your
right

7 hand, please.

8 (Eric Thompson affirmed.)

9 THE COURTROOM DEPUTY: Would you have a seat,
please.

10 Would you state your full name for the record
and

11 spell your last name.

12 THE WITNESS: Eric Howard Thompson, T-H-O-M-P-
S-O-N.

13 THE COURTROOM DEPUTY: Thank you.

14 THE COURT: Mr. Orenstein.

15 MR. ORENSTEIN: Thank you, your Honor.

16 DIRECT EXAMINATION

17 BY MR. ORENSTEIN:

18 Q. Good afternoon, Mr. Thompson.

19 A. Good afternoon.

20 Q. Could you tell the jury where you live, please.

21 A. Oklahoma City.

22 Q. And it appears by your uniform you're with the
Oklahoma

23 City Police Department.

24 A. Yes, I am.

25 Q. What is your rank there?

15240

Eric Thompson - Direct

1 A. I'm a sergeant.

2 Q. How long have you been with the police department?

3 A. Almost 10 years.

4 Q. Sergeant Thompson, were you on duty the morning of
5 April 19, 1995?

6 A. Yes, I was.

7 Q. And did you hear an explosion that morning?

8 A. Yes, I did.

9 Q. Can you tell the jury what you did after you heard
the
10 explosion?

11 A. Yes. I was on the 3d floor of the police station,
which is
12 approximately three blocks away from the Murrah
Building site,

13 and we ran up on the roof to see what had happened.
And we saw

14 the column of smoke going up from the area of the
Murrah

15 Building, and I immediately ran down to my scout car --
scout

16 car which was parked directly in front of the police
station

17 and drove to the west side of the Murrah Building.

18 Q. What did you see when you got there?

19 A. A lot of smoke, debris in the road, and I noticed
people

20 crawling and stumbling down the steps of the plateau
area --

21 plaza area.

22 Q. Did you try and help the people that you saw there?
23 A. Yes, I did. The first lady that came to my
attention, her
24 right arm had been broken and was hanging at a -- a
right
25 angle, and she was holding it and limping down the
steps. And

15241

Eric Thompson - Direct

1 I -- I was able to help her into the front seat of my
scout
2 car. There was another gentleman in an Army uniform,
Class A
3 or Class B uniform, and he had a -- a bleeding head
wound. And
4 I was able to place him along with two others in the
back of my
5 police car, and I immediately drove them to St.
Anthony's
6 Hospital, which is to the northwest about three blocks.
7 Q. Did you return to the scene from St. Anthony's?
8 A. Yes, I did. I unloaded these people at the
emergency room
9 at St. Anthony's and drove back to the street, back to
the bomb
10 site. And my tire on my police car hit some debris and
was
11 flattened about half a block from the northwest corner
of the

12 Murrah Building.

13 Q. Did you just leave the car there?

14 A. Pulled the car over to the side of the road, and I
ran up

15 the street to the northwest corner of the Murrah
Building.

16 Q. Now, were there a number of other people that you
tried to

17 help that day?

18 A. Yes, there were.

19 Q. I want to ask about one in particular. When you
returned

20 to the scene of the Murrah Building from St. Anthony's,
did you

21 see somebody in a window on the 3d floor?

22 A. Yes, I'd run around to the south side of the Murrah
23 Building because I knew where the day care had been,
and I saw

24 my lieutenant. And he asked me where the day care was,
and I

25 ran immediately there. And upon arriving at the south
side of

15242

Eric Thompson - Direct

1 the Murrah Building, the door that I knew that led to
the day

2 care was blocked, and there were people attempting to
get

3 rubble out of that -- that doorway. And I looked up to

my

would be 4 right, and there was a man in the window. I guess it

was in 5 the 3d floor. And a police officer, Sergeant Ed Moore,

6 the window with him, trying to help him in -- out.

7 Q. Did you go to help him?

assist 8 A. Yes, I climbed up into the window and tried to

his shirt 9 Sergeant Moore, to the best I could. The gentleman,

a very 10 was tattered. He had several cuts and scrapes. He had

11 dazed, foggy look on his expression. He was mumbling

trying to 12 incoherently. You couldn't understand what he was

leaning him 13 say, but he was grunting. And Sergeant Moore was

legs. 14 forward to try to free the debris that was holding his

holding 15 Q. Let me interrupt you there. You say something was

16 his legs. Could you describe the position he was in?

rubble at 17 A. Sergeant Moore was standing on top of all the

sight, 18 window level, so his legs were completely out of our

19 just compacted in a large amount of rubble and debris.

20 Q. He was trapped there?

21 A. Yes. He could not be lifted out.

22 Q. Did you and Sergeant Moore continue to try and free

this

23 man?

24 A. Yes. We leaned him forward to try to dig the
rubble out

25 from behind him to no avail; and when we leaned him
forward, he

15243

Eric Thompson - Direct

1 had a -- obtained a head wound at sometime, and the
scalp of

2 his head flapped forward as we leaned him forward. And
we

3 couldn't get him free from behind, so we leaned him
back. And

4 again, the -- the marble or rock was too heavy. We
couldn't

5 get him free. And he was bleeding a great amount. And

6 Sergeant Moore kept telling him to hang on, that we
were --

7 help was coming and we were going to get him out. We
tried

8 to -- for a few more minutes to free his legs that were
pinned

9 in the rubble.

10 Q. During the time -- I'm sorry.

11 A. Well, finally, after a few minutes of trying this,
he -- he

12 stopped grunting. He kind of sighed, and he stopped
moving any

pulse 13 at all. And Sergeant Moore took his pulse and found no

14 at that time.

would, 15 Q. I'd like you to take a look on your screen, if you

the 16 at Government Exhibit 1016. Does that picture depict

17 window where you were trying to help this man?

18 A. Yes.

1016, your 19 MR. ORENSTEIN: Government offers Exhibit

20 Honor.

Honor. 21 MR. TIGAR: We have an objection noted, your

22 THE COURT: Overruled. Proceed.

23 BY MR. ORENSTEIN:

photograph, 24 Q. The jury can see that. What do you see in that

25 Sergeant Thompson?

15244

Eric Thompson - Direct

to 1 A. The ledge. The slanted ledge is where I climbed up

not sure 2 aid -- to assist them. The blanket, I suppose -- I'm

the 3 when this picture was taken -- is covering the body of

behind him 4 gentleman. And Sergeant Moore had been up standing

5 in the window, and I was there on the ledge trying to
help.

6 Q. And you say the tarp is covering the body. Were
you

7 able --

8 A. I -- go ahead.

9 Q. Were you able to free the man?

10 A. No. We could not get his legs free from the amount
of

11 rubble.

12 Q. And he died there on that ledge?

13 A. Yes.

14 Q. Did you ever learn the name of the man who were
trying

15 to help that day?

16 A. Yes, later on. It was Johnny Wade.

17 MR. ORENSTEIN: Thank you.

18 I have nothing further, your Honor.

19 THE COURT: Any questions?

20 MR. TIGAR: No questions, Officer. Thank you.

21 THE COURT: You may step down. You're
excused.

22 THE WITNESS: Thank you.

23 THE COURT: Next, please.

24 MR. MACKEY: Greg Sohn.

25 THE COURTROOM DEPUTY: Would you raise your
right

15245

1 hand, please.

2 (Greg Sohn affirmed.)

3 THE COURTROOM DEPUTY: Would you have a seat,
please.

4 Would you state your full name for the record
and

5 spell your last name.

6 THE WITNESS: My name is Gregory Paul Sohn.
Last name

7 is spelled S-O-H-N.

8 THE COURTROOM DEPUTY: Thank you.

9 THE COURT: Proceed.

10 MR. GOELMAN: Thank you, your Honor.

11 DIRECT EXAMINATION

12 BY MR. GOELMAN:

13 Q. Good afternoon, Mr. Sohn.

14 A. Good afternoon, sir.

15 Q. You're here to tell us a little bit about your
wife, Vicky,

16 who died in the bombing?

17 A. Yes, sir.

18 Q. Where do you live?

19 A. I live currently in Seattle, sir.

20 Q. What do you do there?

21 A. I'm a recruiting first sergeant for the U.S. Army.
22 Q. How long have you been in the Army?
23 A. Been in the Army 17-1/2 years now, sir.
24 Q. And do you have a family?
25 A. Yes, sir, I do.

15246

Greg Sohn - Direct

1 Q. How many kids do you have?

2 A. Five children.

3 Q. Are they all your biological children?

4 A. No, sir, they are not. They are -- three are my
biological
5 children and three were hers. I mean -- correction --
two were
6 hers.

7 Q. I'm going to show you now Government Exhibit 1457.

8 MR. GOELMAN: Which I offer at this point,
your Honor.

9 MR. TIGAR: No objection, your Honor.

10 THE COURT: Received. 1457 may be shown.

11 BY MR. GOELMAN:

12 Q. Can you identify the people depicted in this
picture
13 starting with the back row, please.

14 A. Yes, sir. Of course, there's Vicky standing to the
left

15 rear. Beside my right shoulder is Jessica. And right
in front
16 of Vicky to her right front is Gregory, Jr. To his
left is
17 Steven. To Steven's left is Vicky, and to Vicky's left
is John
18 Michael.

19 Q. And can you please tell us the ages of your
children in
20 this picture.

21 A. In the picture, John is 7, Vicky is 8 -- or Vicky
is 7, and
22 Steven is 9, Greg is 12, and Jessica is 11.

23 Q. And are the three blonde children in that picture
your
24 biological children?

25 A. Yes, sir, they are.

15247

Greg Sohn - Direct

1 Q. The other two were Vicky's?

2 A. Yes.

3 Q. Where was this picture taken?

4 A. This picture was taken on vacation in Orlando at
Universal
5 Studios.

6 Q. How long before Vicky's death?

7 A. This was the summer before.

8 Q. What did Vicky do at the time of the bombing?
9 A. Vicky was an operations sergeant for the Army
Recruiting
10 Battalion on the 4th floor.
11 Q. 4th floor of the Murrah Building?
12 A. Yes.
13 Q. I want to talk a little bit about April 19th. Did
you and
14 Vicky have plans for that day?
15 A. Yes, sir, we did.
16 Q. What were those plans?
17 A. The morning of April 19, 8:30, I last talked to
her, and --
18 about 8:35. And we were discussing who was going to
pick up
19 the birthday cake. It was my son's birthday, also.
20 Q. How old was he?
21 A. He was going to be 12.
22 Q. Okay.
23 A. And she said she would pick up the cake, not to
worry about
24 it. She had already picked up the present. We got him
a
25 tackle box and fishing pole because he likes fishing.
And

15248

Greg Sohn - Direct

party 1 that -- the plan was to have a -- a family birthday

2 there.

3 Q. Was that the last time you talked to your wife?

4 A. That was the last time, yes, sir.

wife 5 Q. And later on that day, after you realized that your

sure 6 was missing in the bombing, did you make plans to make

possible? 7 that your son had as normal a birthday party as

the 8 A. Yes, I did. I -- a friend of the family picked up

I told 9 children from school and took them to their house, and

were 10 them -- told her not to let them watch TV -- rumors

were kind 11 already flying around what was going on, and the kids

birthday cake 12 of curious anyway -- and for her to get another

tell them 13 and to make this the most normal day possible and not

they 14 anything about what's happening. And as far as I know,

15 didn't at that point know anything.

them that 16 It was just -- I said, "Could you just tell

17 we've got to work late or something like that."

woman of -- 18 And she said, "That's lying." And she's a

19 that goes to church regularly, and she wasn't going to

do that;

20 but because of the situation, she says, "I just won't
tell them

21 everything." And she'll keep them away from the TV.
And they

22 went on to, my understanding, have a good birthday
party.

23 Q. Did there come a time when you decided it was
necessary to

24 talk to your kids about what had happened?

25 A. Yes. The next day, I finally had to sit down and
talk with

15249

Greg Sohn - Direct

1 them. We sat down in the living room floor at my home
and we

2 joined hands, and the chaplain was there and another
counselor

3 and some more friends of the family. And -- and they
knew

4 something was going on, but I went ahead and broke it
to them.

5 I'm not a very tactful person, I guess, sometimes, and
I was

6 told I should have broke it to them a little bit
smarter, but I

7 told them that mom is missing and she may not be coming
back.

8 But if there's any person that's going to be back
because of

that
her
through
of

9 what's going on -- I told them about the bombing at
10 time -- it was going to be her. They are going to find
11 because she's going to be the one that's going to come
12 this thing if nobody else does. She's just that kind
13 person.

that to

14 Q. What was it about Vicky that prompted you to say
15 your kids?

She's
always be
children
on one

16 A. She was -- she stood her ground. She was stubborn.
17 persistent. She always had a kind word, but she'd
18 stern if -- if you weren't straight as far as the
19 were. She tries -- or worked very hard at being a
20 perfectionist, it seemed like. And she was just rough
21 side and gentle on the other side.

told them

22 Q. What was the reaction of the five kids when you
23 that their mom might not be coming back?

all
trying to

24 A. Well, of course, it was just nothing but a -- we're
25 sitting there crying at that point, and everybody is

Greg Sohn – Direct

"Why, 1 comfort the children. I'm trying to comfort them. And
to be 2 why, why, why," is what I'm hearing. And "Are we going
coming 3 okay? Are they going to blow us up, too? And are they
4 to the house?"

5 You know, they really didn't know what was
going on at 6 that time. They just knew that there had been a
bombing and 7 mom probably wasn't going to be coming home.

8 Q. And did you reassure your children about their own
safety?

9 A. Yes, sir, I did.

10 Q. What did you tell them?

11 A. I told them that there was nothing that was going
to get 12 between me and them. And as long as they are with me,
anything 13 everything is going to be safe. I'm not going to let
14 happen to them.

15 Q. I want to talk a little bit about April 25th, six
days 16 later. Do you remember that day?

17 A. Yes, sir, I do.

18 Q. Can you tell us about that, please.

19 A. April 25th is Steven's birthday, my other boy. And
we had

possible 20 already had a birthday party there, most normal as
over and 21 considering the circumstances. The neighbor's kids
started 22 other friends of the family, and we ate cake and
got him 23 opening presents, and Steven was having a problem. We
blades. Vicky 24 some roller blades because he wanted some roller
wore out 25 and I had already talked about that anyway because he

15251

Greg Sohn - Direct

wanted to be 1 another set that was just plain roller skates and
blades, but 2 like the other kids and have the new neat roller
elbow pads 3 there's a hard plastic around the knee pads and the
4 on there and he couldn't get it open.
helping him 5 So I was on the hearth in the fireplace,
looked 6 get that open, and that's when I noticed that the -- I
better 7 out the front window. And the informing party, for
chaplain 8 words -- it's my sergeant major, my colonel and the
9 and so forth -- they are dressed up in their Class As

with the

10 good -- you know, the business-like look on their face
that I
11 know what they were coming there for. They are coming
there to
12 inform me, as they did, that they had found Vicky's
body.

13 And before they came in the door, though, I
told the

14 children to get out of the house, go out and play,
because I

15 didn't want them hearing it the way I had to hear it
just in

16 case I -- I had assumed that probably this is what I
was going

17 to hear, but it didn't really hit me like that until it
18 actually came into me.

19 Q. And did they, in fact, inform you that Vicky's body
had

20 been identified?

21 A. Yes. Yes, sir. They said they had identified her
body

22 by -- by records.

23 Q. You talked a little bit about the kind of person
that Vicky

24 was. What kind of mom was she to the -- your kids?

25 A. That's one thing I really -- I fell in love with
her right

Greg Sohn – Direct

1 off the -- the bat was because of how she was. She's
-- she's
2 so loving. She at one minute had one child on one knee
reading
3 a book to them, the other one reading a book on the
other knee,
4 and helping somebody look up a word in the -- and she's
doing
5 so many different things with the children. She was a
Brownie
6 leader. She went to the -- to -- to PTA meetings. She
went --
7 she made cupcakes and took them to the school for the
children.
8 And she participated in all kind of activities with the
9 children. She just -- she was right there to turn them
around
10 whenever they were making a mistake, too. So it was
what more
11 could you want?
12 Q. What effect has her death had on the five children?
13 A. Well, the children -- well, they have nightmares.
They
14 have been receiving counseling. They -- one of them is
15 still -- he's still peeing in his pants. He's afraid
to get up
16 sometimes at night. They have dreams. They still
17 occasionally -- the younger ones come to my bed and
sleep.
18 And -- but as far as rebounding back from something
like this,

are 19 it's -- they're -- I can't think of the word, but they
mean, they 20 very -- they come together real good after this. I
the best 21 are really working together now to make things happen
22 way they can despite the loss.

Vicky's 23 Q. Did you have a conversation with the children after
24 death about what lay before the six of you?
important 25 A. Yes. I talked to them about how it's very, very

15253

Greg Sohn - Direct

and it 1 that we bond together, tighter than we ever had been,
pretty 2 would be Vicky's wishes anyway. And I considered us
kind of 3 tight anyway, but now -- even more important now is
you 4 like me bonding my -- my little team together, I guess
other. And 5 could say, to make sure we're right there for each
6 we always had a shoulder.
phone 7 And if -- I immediately went and got a cell
once I 8 because they couldn't contact me one day from school,

girl was 9 eventually got them back into school. And because my
a hold 10 just throwing a fit at school because they couldn't get
little 11 of me. So that made communications better, also. Just
to talk 12 things like that, the insecurities where I always had
you know, 13 to them about I was going to be there. I had to keep
still 14 reassuring them because I still don't know if they --
15 if they believe it really deep in their heart. They
16 doubt things, you know.

17 Q. You and Vicky both had children from previous
marriages?

18 A. That's right.

19 Q. What was it like to merge these two families
together?

20 A. It was a -- I would call it a masterpiece of work.
21 She's -- she's very good when it came to -- she's
talking to me 22 about things, how difficult it was, and I would talk to
her 23 because the two children she had and the three that I
had, put 24 them together, they are all selfish in their own ways.
And her 25 having one boy and one girl, the girl didn't have to
share girl

15254

Greg Sohn - Direct

1 things and the boy didn't have to share boy things, so
that was
2 something to get over and get working together. And
the
3 biggest part of it was making the family feel like one
family.

4 And I would put my arms around her children, she'd put
her arms
5 around my children in the beginning; and before you
know it, it
6 was everybody was feeling like they were in the family.

And
7 one would stand up for the other. Nobody'd even
question
8 anything else.

9 Q. Did your children also bond together in the face of
10 discrimination?

11 A. Yes. And that was one of the -- I guess one of the
12 stronger things in the beginning when I lived in a town
there

13 in Oklahoma is they were called names because of their
14 backgrounds. And I had gone to the school, and some
people got

15 suspended from the bus, for riding the school bus, and
--

16 because my daughter Jessica didn't know whether to
stand up

17 or -- or -- or drop down a little bit or -- or stand up
for her

weren't 18 brother and then the brother stand up because they
several 19 biologically together. But after discrimination and
working 20 things that were being said and -- and we started
regardless of 21 together as a family, one stands up for the other
I 22 what happens. It's just like brothers and sisters now.
23 mean, there's -- they are inseparable.
each 24 Q. Did you and Vicky have a plan as far as adopting
25 other's children?

15255

Greg Sohn - Direct

adoption 1 A. Yes, sir, we did. Our plan, we started the
adoption 2 process before the bombing. In March, we started the
3 process. And 1 May, it was supposed to be finished.
4 Q. May 1, 1995?
pursued 5 A. Yes, sir. And -- and we didn't get to that. But I
wish. We 6 on with it anyway. And that was her wish. It was my
case one of 7 were a family. We were worried about legalities in
spouse be 8 us would pass or -- or something, would the other

wanted 9 able to keep the children, keep them as a family as we

10 it to be.

a stop 11 And then the bombing took place, and that put

few days 12 into that. And then I was right in the court just a

keeping 13 later, making sure that I still had those children,

guardianship, 14 them together as a family. So I was going for

months later 15 and I -- I got that. And, oh, a year and a couple

in and 16 finally, I ended up finally going through a lot of --

children. 17 out of court a lot and finally ended up adopting the

getting them 18 Finally, we got what we wanted. And I even tried

already 19 to go ahead and let her adopt them even though she had

for 20 passed, but the court couldn't find any kind of basis

really 21 that -- because that was her wish, also. And it just

and 22 wasn't complete. But it's -- we're all together now,

23 that's what's important.

have 24 MR. GOELMAN: Thank you, Mr. Sohn. I don't

25 anything else.

15256

1 MR. TIGAR: No questions, your Honor.

2 THE COURT: You may step down. You're
excused.

3 Next, please.

4 MR. MACKEY: Next, we'll call Kay Ice Fulton.

5 THE COURT: Thank you.

6 THE COURTROOM DEPUTY: Raise your right hand,
please.

7 (Kay Fulton affirmed.)

8 THE COURTROOM DEPUTY: Would you have a seat,
please.

9 Would you state your full name for the record
and

10 spell your last name.

11 THE WITNESS: Kay Ice Fulton, F-U-L-T-O-N.

12 THE COURTROOM DEPUTY: Thank you.

13 DIRECT EXAMINATION

14 BY MR. MACKEY:

15 Q. Ms. Fulton, good afternoon.

16 A. Good afternoon, Mr. Mackey.

17 Q. Where do you reside?

18 A. I live in Beaumont, Texas.

19 Q. And how long have you been in Texas?

20 A. Two months.

21 Q. Before that, did you spend a lot of your life in
Oklahoma?

22 A. Yes, I was born and raised there.

23 Q. And were you a member of a family that included
five

24 children?

25 A. Yes, sir.

15257

Kay Fulton – Direct

1 Q. Where were you in the age range?

2 A. I am the youngest.

3 Q. And what was the makeup of the rest of your
siblings?

4 A. There were four girls and one boy in my family.

5 Q. And what was that one boy's name?

6 A. Paul Douglas Ice.

7 Q. Ms. Fulton, I'm going to ask you some questions
about your

8 brother who we all understand that he died in the
Oklahoma City

9 bombing; correct?

10 A. Correct.

11 Q. Tell the members of the jury, please, a little bit
about

12 your shared youth, you and Paul, growing up in Oklahoma
City.

13 A. Paul, bless his heart, was sandwiched in between
two girls

14 on each side and he was the consummate big brother,
looking
15 over his little sisters and looking up to his older
sisters.
16 It was an ideal childhood for all of us, and we grew up
so
17 happy and such a -- a -- just a really nice family.

18 Q. After he graduated from high school, Mrs. Fulton,
did Paul
19 go on to serve in his country's military?

20 A. Yes. First, he served a short stint in the Army
reserves
21 directly out of high school. It was less than a year.

22 Q. And how long -- excuse me -- after that, did he go
into the
23 Marine Corps?

24 A. Correct. First, he went to Oklahoma City
University where

25 he got a bachelor's of science; and the day he
graduated, he

15258

Kay Fulton - Direct

1 was commissioned into the United States Marine Corps.
2 Q. And how many years did he serve in the Marine
Corps?

3 A. Active duty, it was around five or six years. With
reserve
4 service, all together, it was about 20 years he served
in the

5 Marines.

6 Q. When he retired from the Marines, was discharged,
what was
7 his rank?

8 A. He achieved the rank of lieutenant colonel.

9 Q. And during those 20 years, what sort of assignments
did he
10 carry out on behalf of the Marines?

11 A. He was primarily an intelligence officer with the
corps.

12 He served in -- he -- he was first a pilot on a -- on
the

13 Intruder aircraft, and he eventually got into the
intelligence

14 section of the Marine Corps, serving a lot of his time
in

15 Seepac, which is in Hawaii, which is where he served
the last

16 several years of his reserve duty.

17 Q. Was Paul married during his life?

18 A. Yes, he was.

19 Q. And to whom?

20 A. He was married to Faith Henson.

21 Q. At the time of his death, was he divorced?

22 A. Yes, he was.

23 Q. And how long had he been divorced?

24 A. It was several years.

25 Q. Did he have any children by that marriage?

15259

Kay Fulton - Direct

21 years 1 A. Yes, he had two daughters who are now about 18 and
2 old.

the time 3 Q. And did they live in Oklahoma City during most of
4 that he did?

5 A. Yes. Yes.

start a 6 Q. When he left the Marine Corps, did your brother
7 career in law enforcement?

And -- 8 A. First, he worked at a bank for about a year or two.

service. He 9 but he really, really strived to get government

opportunity 10 loved working for the government. And his first

business 11 was with the IRS. He had a -- an accounting and

12 background. And he became a member of the Criminal

about 13 Investigation Department of the IRS where he served for

14 four or five years.

Investigation 15 Q. And when he left the IRS and the Criminal

U.S. 16 Division of that agency, did he join service with the

17 Customs?

18 A. Correct.
19 Q. How many years had he worked as a Customs special
agent
20 before he died?
21 A. He started in May of '87. So he was with Customs
for
22 almost eight years.
23 Q. And during the course of those eight years, did you
see --
24 learn of ways that he contributed to communities as a
result of
25 his work as a Customs agent?

15260

Kay Fulton - Direct

1 A. Oh, absolutely. He -- there were a broad -- there
was a
2 broad range of cases that he worked on, anything from
-- from
3 products coming into the country illegally or anything
from
4 drugs to -- oh, goodness. It was a -- a wide range of
-- of
5 products that he worked on.
6 Q. Do you recall a particular case where he was
responsible
7 for seizing more than a million dollars in currency?
8 A. Yes. There was a bust in El Reno, which is a town
just on

part in. 9 the west side of Oklahoma City that he was -- played a
10 And since there were federal agents and the local law
11 enforcement involved in this, the town received about
half
12 of -- of what was seized in this raid. May I tell what
they
13 did with this?
14 Q. Certainly.
15 A. It was over 500,000 that the city -- \$500,000 that
the City
16 of El Reno got out of this. And with that money, they
built a
17 firing range to train their police officers on because
they
18 didn't have one. And the -- when they opened the
range, it was
19 christened the Paul Ice Memorial Range because my
brother was
20 also the firearms and physical coordinator for the
Oklahoma
21 City U.S. Customs office.
22 Q. Ms. Fulton, you told the jury that Paul had a
couple young
23 daughters at the time of his death?
24 A. Yes.
25 Q. Were they important to him?

15261

Kay Fulton - Direct

his
Son,
1 A. Oh, Paul's daughters were his world, as was all of
2 family. He -- he was the consummate family person.
3 brother, father, nephew, cousin. He loved his family.

4 Q. Ms. Fulton, I want to show you a photograph,
Exhibit 1449.

5 MR. MACKEY: And I'd offer that into evidence,
your
6 Honor.

7 MR. TIGAR: No objection, your Honor.

8 THE COURT: Received. May be displayed.

9 BY MR. MACKEY:

10 Q. And is the man in that photograph your brother?

11 A. Yes, it is.

12 Q. Do you have an idea about when that photograph of
Paul Ice
13 was taken?

14 A. It -- it was during a Christmas in -- it was --
this was
15 the Christmas of my parents' 40th wedding anniversary,
which

16 was 10 years ago. They just celebrated their 50th.

17 Q. And approximately how old is Paul in this
photograph?

18 A. He would be in his mid 30's in this picture.

19 Q. And what does he have in his hands there?

20 A. Airplanes.

21 Q. And was that a love of Paul Ice's?

he had 22 A. It was. After being a pilot in the Marine Corps,
23 several planes through the course of the years. And he
24 loved -- he loved to fly. He loved having his own
plane. And
25 just like everything else Paul did perfectly, he was an

15262

Kay Fulton - Direct

1 excellent pilot and he -- he just loved to fly. He
loved being
2 up in the air by -- by himself or with friends --
friends or
3 family.

4 Q. Ms. Fulton, was your brother a supporter of the
Special
5 Olympics?

6 A. Yes, he was. In fact, on April 18th, there was a
7 basketball game in Oklahoma City for Special Olympics
that he
8 attended. In fact, that's the last photograph we have
of him,
9 was taken at that game; and he had a lot of friends who
were
10 very active in it, and he always supported them and
went to any
11 function he could for them.

12 Q. And did you see your brother, Paul Ice, on that
day,

13 April 18th?

14 A. Yes, I did. I saw him just a few hours before the
picture
15 was taken.

16 Q. And was that the last time you saw him?

17 A. Yes, it was.

18 Q. How did you learn of the news of the bombing in
Oklahoma
19 City?

20 A. I worked downtown, and I was standing at the
window. I
21 worked three blocks south of the Murrah Building. And
when the
22 blast happened, it was so powerful that I fell to my
knees, but

23 I got up. We didn't know how bad it was because we
were on the

24 south side of the building and we didn't see the
devastation.

25 But I knew it was the federal building, and we were the
leasing

15263

Kay Fulton - Direct

1 office of the building I was in. And as soon as I
could get

2 away from my tenants, I started calling my parents to
say,

3 "Have you -- have you talked to Paul? Have you heard
from

4 him?" And so it was several hours before I could get
to them
5 and before we could even talk to anyone with Customs
6 we even knew that he was at work that day.

7 Q. How many total days did you and your mother and
father and
8 other family members wait to learn of Paul's fate?

9 A. It was eight days before they found his body.

10 Q. Ms. Fulton, I -- we've gotten something of the
flavor of
11 Paul Ice, but I'd like to ask you, if you wouldn't
mind, to
12 describe in your own words who he was and what this
community
13 lost as a result of his death.

14 A. Oh. Paul excelled at everything he did. And he
was the
15 best. He was the best brother and son and father and
Marine
16 and federal agent and man. He was deeply spiritual.

17 this country. My brother loved this country. And he
protected
18 it as a Marine and as an agent; and he was so, so proud
to be
19 able to take care of everyone in this room and everyone
in this
20 country.

21 MR. MACKEY: Thank you, Mrs. Fulton.

22 THE COURT: Any questions?

you. 23 MR. TIGAR: No, I have no questions. Thank

excused. 24 THE COURT: You may step down. You're

25 Next, please.

15264

Kay Fulton - Direct

1 MR. MACKEY: We'll call Carl Chipman.

right 2 THE COURTROOM DEPUTY: Would you raise your

3 hand, please.

4 (Carl Chipman affirmed.)

please. 5 THE COURTROOM DEPUTY: Would you have a seat,

and 6 Would you state your full name for the record

7 spell your last name.

8 THE WITNESS: Carl Chipman, C-H-I-P-M-A-N.

9 THE COURT: Proceed.

10 MR. SENDEL: Thank you, your Honor.

11 DIRECT EXAMINATION

12 BY MR. SENDEL:

Chipman. 13 Q. Would you tell us where you live, please, Mr.

14 A. I currently live in Stillwater, Oklahoma.

City? 15 Q. And where is Stillwater in relation to Oklahoma

16 A. It's about north by northeast, about an hour away.

17 Q. How long have you lived in Stillwater?

18 A. I guess now five-and-a-half years. Since '92.

19 Q. You work there in Stillwater?

20 A. Yes. I graduated from OSU in '96 and took a job in
an
21 engineering firm in Stillwater.

22 Q. You mentioned OSU. What is the full name of the
23 university?

24 A. Oklahoma State University.

25 Q. And did you lose a family member in the bombing at
the

15265

Carl Chipman - Direct

1 Alfred P. Murrah Building?

2 A. Yes, sir, I did.

3 Q. Who was that?

4 A. My father, Robert Neal Chipman.

5 Q. At the time of the bombing, how old were you?

6 A. I was 2 -- I just -- no. I was 20. I turned 21
about two
7 months later. 20.

8 Q. And at that time, in April of 1995, were you still
a
9 student in college at Oklahoma State University?

10 A. Yes. I was a junior.

11 Q. Where did your father live in April of 1995?
12 A. He lived in Edmond, Oklahoma, about 20 minutes
north of
13 Oklahoma City.
14 Q. Who did he live there with?
15 A. My mother, Gloria.
16 Q. Were there other members of your family besides
your father
17 and mother and yourself?
18 A. Yes. I have an older sister named Kathy who was
living in
19 Tokyo at the time with the U.S. Air Force and a
stepsister, my
20 sister who is the same age as I am who was living in
Norman,
21 Oklahoma, going to school at the University of
Oklahoma.
22 Q. In April of 1995, how long had your father and
mother lived
23 in the Oklahoma City area?
24 A. Seven years. Since 1988.
25 Q. Prior to moving to Oklahoma City, what did your
father do?

15266

Carl Chipman - Direct

U.S.
1 A. My father was a -- we moved there -- captain in the
2 Air Force, and he did mostly air traffic control. We

moved

3 around a lot.

4 Q. Did your father retire from the military there?

5 A. Yes, he did. Actually, he retired in '92, or right
when my

6 sister and I started college. And actually, he and my
mom also

7 started going back to college at that time, too, so
there was

8 actually four of us in college at that time. It was
pretty

9 funny.

10 Q. At the time of the bombing in April of 1995, where
was your

11 father working?

12 A. He was working at the Water Resources Board. Just
-- he

13 had just started there about three months earlier. He

14 started there in January of '95 and had been working
there for

15 a little while, and it was across the street just south
of the

16 Murrah Building, I believe.

17 Q. And what was your father doing for the Water
Resources

18 Board?

19 A. I'm not quite certain. It -- he tried to explain
it to me

20 once, but I'm an engineer and he was more of a
business-type

but I 21 person; and so he explained it to me a couple times,
22 didn't quite understand.

1995? 23 Q. Were you in Stillwater, Oklahoma, on April 19,

test, I 24 A. Yes, I was, actually. I -- I had a test that day,
25 actually, and as I was walking out the door to take the

15267

Carl Chipman - Direct

even have 1 happened to see something on the news, and I didn't
test, the 2 time to see what it was. And then when I got to the
3 professor actually told me what happened.

City? 4 Q. And told you there had been a bombing in Oklahoma

scores 5 A. Yeah. He told the whole class, actually. The test
very 6 weren't very well on that test. I think everyone was

9:30, 7 concerned. He told everyone about it. My test was at
8 and I was running late.

family? 9 Q. Later that day, did you get in contact with your

got a -- 10 A. Yeah. When I got back from my classes that day, I

"This is 11 a really frantic call from my sister saying, you know,

12 Julie. We can't get a hold of dad. We need you to get
down
13 here." And I grabbed some stuff real quick and had my
friend
14 drive me down.

15 Q. And did he drive you down to Oklahoma City?

16 A. Yeah, he did.

17 Q. What did you do when you got to Oklahoma City?

18 A. En route, I think I had a -- we stopped and called
-- or I
19 can't remember if I had a cellular phone. But en
route, I
20 found out that they had found my father and that he was
in the
21 hospital. I think it was Presbyterian in the Health
Science
22 Center. And so we changed course and we met my family
there.

23 Q. I'm going to show you a photograph we've marked as
Exhibit
24 1386. Is this your father?

25 A. Yes, sir, it is.

15268

Carl Chipman - Direct

1 MR. SENDEL: Your Honor, we're going to offer
1386.

2 MR. TIGAR: No objection, your Honor.

3 THE COURT: Received. May be shown.

4 BY MR. SENDEL:

5 Q. When you got to the hospital, who was there?

Her

6 A. My sister Julie was there. My mother was there.

there.

7 boyfriend -- I'm sorry. Julie's boyfriend, Jay, was

8 And then I was.

9 Q. Were you able to see your father?

10 A. Yeah.

able to

11 Q. Did you have -- could he talk to you? Were you

12 speak with him?

died. We --

13 A. We never talked to my father until the time he

14 he never woke up.

15 Q. How long was he in the hospital before he died?

that --

16 A. A little under two days. He came in, you know,

they

17 that day, you know, from -- they brought him there and

18 actually said when they brought him in on the
stretcher, he had

surgery,

19 put his thumb up, you know, okay. After he went into

20 he never regained consciousness.

on you

21 Q. If you would, please, tell us what impact it's had

22 to lose your father.

getting

23 A. That's a real tough one. My father and I were just

24 to the point in time where I was at the age where he
could talk

25 to me as -- as a man. I was no longer just his son. I
was no

15269

Carl Chipman - Direct

1 longer the son he was responsible for raising and
stuff. My

2 father and I were just beginning to get to the point
where we

3 could communicate as adults to each other, and it was
really

4 great. You know, it's real hard, you know.

5 My father was a very strong person. And as
always, we

6 had clashes, also, but at this point in time, he was
really

7 beginning to respect me and we were beginning to really
talk

8 about things and share and help each other out.

9 I was, you know, learning a little about his
worries

10 and fears, and he was doing likewise. And, you know,
the

11 chance that I was going to have was to have a real good
friend

12 in my father, you know. Not just my father, but also
one of my

13 good friends. And now that, I don't have.

14 Q. What effect has it had on your mother and your
sisters?

15 A. My sister, Kathy, had had a very -- her and my
father had a

16 fallout; and at the point in time, they were
reconciling and

17 they were trying to work together and rediscovering
their

18 affection and love for each other. And she, you know,

19 obviously didn't get to finish that reconciliation.
And

20 it's -- still to this day, you know, the bitterness and
anger

21 she has over it is just palpable.

22 My mother lost the hugest foundation in her
life. You

23 know, she was a lot of things, but the one big thing
she was

24 was my father's wife, and that whole identity of who
she was is

25 now gone and she's having to fill it up. I mean, for
15 years,

15270

Carl Chipman - Direct

1 she was my father's wife and our mother. And she still
has the

2 "our mother" part, but she's no longer my father's
wife. And

3 she now has to make a new identity for herself, just
out of the

the one 4 blue with no one to help her, no support. You know,
5 she loves the most is gone.

been 6 And my sister -- my other sister, Julie, she's
her 7 very strong about it. But my father, although he was
her 8 stepfather, was her daddy. And no girl likes to lose
9 daddy.

10 MR. SENDEL: Thank you, Mr. Chipman.

11 I have no further questions.

12 MR. TIGAR: No questions. Thank you.

excused. 13 THE COURT: You may step down. You're

14 Next, please.

15 MR. MACKEY: Alan Prokop.

16 THE COURT: Thank you.

please. 17 THE COURTROOM DEPUTY: Raise your right hand,

18 (Alan Prokop affirmed.)

please. 19 THE COURTROOM DEPUTY: Would you have a seat,

and 20 Would you state your full name for the record
21 spell your last name.

K-0-P. 22 THE WITNESS: Sergeant Alan A. Prokop, P-R-0-

23 THE COURTROOM DEPUTY: Thank you.

24 THE COURT: Mr. Ryan.

25 MR. RYAN: Thank you, your Honor.

15271

Alan Prokop – Direct

1 DIRECT EXAMINATION

2 BY MR. RYAN:

3 Q. Officer Prokop, where do you live?

4 A. Oklahoma City.

5 Q. What do you do there?

6 A. I am the police liaison officer for the municipal
court for
7 the Oklahoma City Police Department.

8 Q. How long have you been with the Oklahoma City
Police
9 Department?

10 A. 28 years, sir.

11 Q. Let's turn our attention to April 19. Where were
you at
12 9:00?

13 A. I was in my office located in the basement of the
municipal
14 court building, which is the building directly north of
the
15 police department.

16 Q. Tell us what happened.

17 A. Officer Ron Bell was in the office with me. He had
just

18 finished 8:00 court and had come in to complete his
paperwork
19 before he went home to sleep. He had worked all night.
Right
20 after 9:00, we heard the explosion. The building
shook. My
21 office is located in the basement. We ran upstairs to
check
22 the building and the people upstairs.
23 Q. What did you see?
24 A. The people were leaving the building, not in a
panic but
25 evacuating. We went to the north side of the building.
There

15272

Alan Prokop - Direct

1 were large picture glass windows there, and we could
see the
2 smoke and fire coming from the vicinity of the federal
3 building.
4 Q. And about what time of the morning was this?
5 A. Approximately 9, 9:00, 9:02 or 3.
6 Q. What did you do?
7 A. The doors were clogged up with people leaving the
building,
8 so Officer Bell and I ran to an auxiliary exit located
at the
9 far east side, north corner of the municipal court
building,

10 and exited the building.

11 Q. About how far was your office from the Murrah
Building?

12 A. Approximately six to seven blocks.

13 Q. And as you got outside of the building you were in,
what

14 was in the air?

15 A. The sky was black and gray. We had debris falling
in the

16 street around us, large chunks of rock, dirt. It was
smoky.

17 We could still see pages of papers. I looked down and
saw one

18 page that had the letterhead from the Social Security
19 Administration on it. And Officer Bell remarked to me
that it

20 had to be the federal building.

21 Q. What did you do?

22 A. My personal vehicle was parked in the parking lot
directly

23 north of us. Officer Bell's police car was about three
blocks

24 away, so we jumped into my personal vehicle, drove
directly to

25 the federal building. We parked the car at 4th and
Harvey,

15273

Alan Prokop – Direct

Building. 1 which would be the southwest corner of the Murrah
to help 2 Q. Tell us what you did. Take us through your efforts
3 the people that morning.
running 4 A. As we stopped and got out of the car, people were
people. 5 from the building. Bloody. Many people carrying other
I had a 6 We checked equipment. Officer Bell had a hand radio.
flashlight. At 7 small flashlight, I believe. He had a larger
8 this time, Officer Washington, a new officer,
approached us.
of us 9 He had been in district court. He ran up. The three
pair of 10 approached the south side of the building. I had one
or 11 gloves, and I asked Officer Bell if he was right-handed
12 left; and I split my gloves up, one glove each.
13 Q. What did you do next?
Building, 14 A. We approached the south portion of the Murrah
people to be 15 observed all the glass to be out of the building,
floor, 16 standing in the windows all the way to the 6th or 7th
coming 17 screaming and crying for help. We could observe smoke
falling 18 through the building. There were people staggering and

19 out of the building, walking injured. There were
civilians
20 helping other people out.
21 We approached the very south corner of the
building
22 and looked in. The entire 2d floor was devastated.
There were
23 rubbles of concrete. There was a thick smoke, a layer
of real
24 thick dust. There were sparks sparking from inside the
25 building where the electric wires were still on. I
could smell

15274

Alan Prokop - Direct

1 gas and a real strange chemical smell, sir.
2 Q. Did you do anything about the utilities?
3 A. Yes, sir. I asked Sergeant Bell to contact
dispatch and
4 tell them we needed all the utilities turned off to the
5 building as soon as possible. Requested all heavy
equipment,
6 all ambulance units and all rescue workers that the
police
7 department could send and advised them that we were in
the
8 building.
9 Q. How did you enter the building?
10 A. It was a kind -- about a 4-foot drop through a

window into

11 rubble and concrete debris, office materials. And it
was still

12 real thick, heavy dust with the electrical wires
sparking when

13 we dropped down in the building.

14 Q. Let me show you what has already been received into
15 evidence as Exhibit 1012. Can you see that photograph
on your

16 screen?

17 A. Yes, sir.

18 Q. Will you take the pen that's on the top of your
desk there.

19 Put it under your desk and show us, if you would, the
location

20 where you were able to enter the building that morning.

21 A. It was this area here. And here, sir.

22 Q. Thank you. Now, let me also show you what's been
marked

23 for identification but not received into evidence as
Exhibit

24 1500.

25 A. Yes, sir.

15275

Alan Prokop - Direct

1 Q. Can you identify that photograph.

2 A. Yes, sir. This is the -- one of the windows where
we

inside 3 entered. It shows what the debris looked like and the
4 of the building.

5 MR. RYAN: Government would offer Exhibit
1500.

6 MR. TIGAR: No objection, your Honor.

7 THE COURT: Received. May be displayed.

8 BY MR. RYAN:

9 Q. Tell the jury what they are seeing in this
photograph.

10 A. This was a window prior to the explosion. Of
course, the

11 glass is gone. You can look inside the building and
see what

12 the inside of the building looked like as we approached
the --

13 the Murrah Building itself. It was necessary to climb
up on

14 this ledge and then drop down. Inside the building,
there was

15 piles of rubble, insulation, ceiling tiles, an
occasional desk

16 or chair, and numerous body parts, sir.

17 Q. All right. Now, tell us about the first encounter
you made

18 with someone who was injured once you were inside the
building.

19 A. We could hear screams and moans from inside the
building as

20 we climbed into the building. Officer Washington
shouted to

found a 21 Officer Bell and I as we looked around that he had
called it 22 victim. We followed him towards the pit area, they
up on 23 later. And he had located a piece of concrete setting
that had 24 its edge. It would have been one of the upper floors
about 10 25 fallen into this area. Next to the ledge and down

15276

Alan Prokop – Direct

Officer 1 feet was a female. She had been crying for help.
against 2 Washington climbed down into the crevice. I leaned up
down. 3 the piece of concrete, and Officer Bell went halfway
and the 4 Officer Washington was able to free her from the rebar
then 5 debris, lift her up and hand her to Officer Bell. He
6 handed her to me, and I exited the building with her.
outside the 7 Q. What did you do with this lady once you got her
8 building?
there was 9 A. There was people still running in and out, but
this 10 not any medical personnel right up to the building at

4th and 11 point. So I carried her down the plaza to the street,
were 12 Harvey. And on the street corner there, the ambulances
I laid 13 starting to pull up and other officers were arriving.
said 14 her down on the ground, asked her if she was okay. She
asked her 15 she was dazed. I couldn't see any blood. She -- I
she began 16 her name. She told me her name was Teresa, and then
and that I 17 to cry. I told her that I needed to leave her there
shirt and 18 had to get back in the building, and she grabbed my
19 asked me not to leave.
20 And I said, "You'll be okay here."
21 And she said, "Yeah, but you won't."
22 And she was worried about me going back in the
and a 23 building. I finally convinced her that I had to leave,
back into 24 medical worker took care of her and I left and went
25 the building.

15277

Alan Prokop - Direct

1 Q. What did you do once you reentered the building?

2 A. As I entered the building a second time, there had

already

3 been some more rescue workers and a lot more civilians
showing

4 up. As I entered the building a little bit west of
where I had

5 come out with her, another rescue worker came up and
handed me

6 the body of a man. His body was ashen. His head was
back.

7 His eyes were open. He was covered with a layer of
dust.

8 There was blood running out of his mouth caked up.
There was

9 no breath, and I could find no pulse, sir.

10 Q. What did you do?

11 A. I carried him back from the building to the plaza
area.

12 And there were medical people there showing up, and I
handed

13 him off to another person who carried him to the
street.

14 Q. What did you do after that?

15 A. I reentered the building nearer what I understood
was an

16 elevator-type shaft. There was a large pile of gravel,
rubble,

17 and concrete there. As I approached that rubble, I
could hear

18 moaning and groaning. And I observed an arm and hand
to be

19 protruding from the gravel and waving back and forth.

20 Q. What did you do?

It 21 A. I took the hand and squeezed it. It squeezed back.
into the 22 appeared to be a female's hand. I traced the arm back
portion of 23 concrete, and I could observe that there was a large
tall, 24 flooring, concrete, probably 25 feet long, 12 feet
lady. 25 probably 16 inches thick to be laying on top of this

15278

Alan Prokop - Direct

was a 1 There was another piece of concrete behind it. There
As I 2 rescue worker behind the concrete working towards me.
what I 3 tried to speak to her, I could hear gurgling sounds and
4 conceived to be water running, sir.

5 Q. Was it water running?

6 A. No, sir. I became upset and shouted, "Somebody
turn the 7 water off. This lady is going to drown."

8 The rescue worker behind the concrete held his
hand up
9 and said, "Alan, it's not water. It's blood," and held
his
10 hand up for me to see.

11 Q. What did you do with respect to this lady that you

were

12 holding her hand?

13 A. I held her hand for about another three or four
minutes and

14 tried to talk to her. I prayed a little. Her hand got
cold

15 and stiff, and she quit moving.

16 Q. Did you check her pulse?

17 A. Yes, sir. I checked pulse in her wrist and up into
her

18 elbow. Her hand continued to get cold, and I could
find no

19 pulse.

20 Q. What did you do after this lady's pulse stopped
beating?

21 A. I wasn't doing real well, and I had to leave that
area. So

22 I told the other rescue workers that they needed to
come over

23 here; that there was a lady here. And I stood up and
left as

24 two other workers came over and started working in that
area,

25 and I moved in towards the interior of the building.

15279

Alan Prokop - Direct

1 Q. Are you still on this plaza level?

2 A. Yes, sir.

3 Q. Where did you move to?

4 A. As I moved into the building, there had been a lady
5 approach me and tell me that there was a day-care area
in the
6 building. I had not known that prior to this time. I
asked
7 her how many children were in the day care. She said
40 to 50,
8 and she pointed toward the west side of the building.
As I
9 moved into that building, a rescue worker came up and
handed me
10 a child and I exited the building. Because of the
interior
11 damage, it was not like anything you could imagine
inside the
12 building as that picture shows. The inside, there
would be
13 mounds of brick and rock and debris 3 or 4 feet tall,
and you
14 would crawl up over those to move over in ledges and
areas
15 where you had to walk. So we were trying to pass
victims out
16 to each other for their safety and so that more rescue
workers
17 could get through there.

18 Q. Was the baby that you were handed alive or dead?

19 A. It was not moving, and it appeared to be dead. It
had an
20 extreme wound across its forehead. It was covered with
a heavy

21 black dust. It did not cry or move.

22 Q. What did you do with this baby?

23 A. I exited the building. It was probably only 12
feet,

24 15 feet, and another rescue worker ran up to me and I
handed

25 the baby off to him.

15280

Alan Prokop - Direct

1 Q. What did you do next?

2 A. I reentered the building and got a little bit
further into

3 the interior when I was handed another baby. This
child was

4 alive, was crying and coughing. And I turned and
headed out of

5 the building with it. The child was bleeding about the
nose

6 and mouth and out of the ears, and I exited the
building with

7 that child.

8 Q. Do you know the name of that child?

9 A. No, sir.

10 Q. What did you do following that?

11 A. As I was exiting the building with this child, I
heard

12 Firemen Atchley who was the photographer, I believe,
for the

13 fire department. He had been working a little bit
further west
14 and a little bit deeper in the interior than I had been
when I
15 was handed the child. He said, "Alan, I have two
more."

16 And I said, "I'll be right back."

17 I ran out of the building with this child,
through the
18 plaza area and down towards the steps when an AmCare
worker, a
19 female, ran up to me and I handed the child off to her
and ran
20 back into the building.

21 Q. Did you go back in alone?

22 A. No, sir. As I was running back towards the
building,
23 Sergeant -- Detective Sergeant Don Hall ran up to me
and asked
24 me if I had the children. He was upset. He had just
gotten
25 there and didn't know how to get into the building.
And I told

15281

Alan Prokop - Direct

1 him there were two more in there, to follow me in, and
he
2 followed me back into the building, sir.
3 Q. And what happened once you and Detective Hall
reentered the

4 building?

Fireman

5 A. He followed me back in through the area to where

6 Atchley was kneeling down. He had uncovered these two

He was

7 children. They were laying real close to each other.

approached

8 cleaning their face and the dust off of them. As I

up and

9 him, he reached down and -- and picked the first child

Jill

10 handed it to me. That child was later identified as

11 Webber.

12 Q. What did you do with this child?

I saw

13 A. I handed it to Don Hall who was standing behind me.

injury as

14 him cradle the baby in his arms. It had a severe arm

15 well, and he headed out of the building.

16 Q. What happened next?

the

17 A. I turned back around to Atchley, and he handed me

18 second child they later identified as Brandon Denney.

19 Q. What did you do with Brandon Denney?

20 A. He said, "Look at his injuries."

sticking

21 And I looked down, and Brandon had a brick

protruding

22 out of his forehead, sir, the left side. It was

23 out, and I could see blood oozing around it. He was

bleeding

24 out of his mouth. His eyes were partially opened and
appeared

25 to be looking different directions and told me he had a
brain

15282

Alan Prokop - Direct

1 damage. I stabilized the brick with my hand, cradled
him in my

2 arms, and exited the building.

3 Q. What did you do after he exited the building?

4 A. He was whimpering, and so I ran as hard and as fast
as I

5 could directly to the -- where the ambulances had been
picking

6 up the children and the other victims at the -- the
southwest

7 corner of the building there at 4th and Harvey.

8 Q. Did you give Brandon Denney to one of the workers?

9 A. No, sir. There was an ambulance pulling out as I
10 approached that area, and I ran up and kicked the
ambulance,

11 the side of the ambulance, and it stopped. And when it

12 stopped, the back doors opened up. I climbed in the
back of

13 the ambulance, and there was a man laying on a gurney,
strapped

14 to a gurney. He had his arms across his chest. And as
I

15 climbed in the back of the ambulance, he opened his
eyes. And
16 he and I made eye contact, and he saw Brandon and
smiled at me
17 and he opened his arms, and I laid Brandon Denney on
his chest.
18 He laid his arms back around him and nodded to me, and
I
19 stepped back out of the ambulance and closed the door
and
20 watched it drive away.
21 Q. At some point that morning, were you ordered out of
the
22 building?
23 A. Yes, sir. I reapproached the building once or
twice after
24 that and helped with a few of the other bodies, and
then we
25 were ordered to leave.

15283

Alan Prokop - Direct

1 Q. Were you, yourself, injured in connection with the
things
2 that you've told us about that you did that morning?
3 A. Yes, sir.
4 Q. Were you taken to a hospital?
5 A. The next day, I was treated at the hospital, yes,
sir.

6 Q. What was -- how were you treated?

7 A. They tried doing some respiratory therapy to us for
the
8 inhalation of the concrete dust and told us we'd just
kind of
9 have to wait and see. And I had fallen several times.
They
10 did some therapy to my knees.

11 Q. Have you had nightmares since April 19th, 1995?

12 A. Yes, sir.

13 Q. What is your nightmare about?

14 A. It's the -- the fact, sir, that the people in the
15 building -- as you entered that building, you would see
dust
16 move and bodies would come out of the dust, sir. They
approach
17 us every night. I see them every night. We -- there
weren't
18 enough of us. We couldn't help. And I'm sure they
died
19 waiting for us, sir.

20 MR. RYAN: That's all I have, your Honor.

21 MR. TIGAR: No questions, your Honor.

22 THE COURT: All right. You may step down.
You're
23 excused.

24 THE WITNESS: Thank you.

25 MR. RYAN: Your Honor, at this time, we'd play
the

15284

1 video involving Brandon Denney. Exhibit 1427.

2 THE COURT: All right. You may do so. You
said this

3 is Brandon Denney?

4 MR. RYAN: Yes, your Honor.

5 (Exhibit 1427 played.)

6 MR. MACKEY: Judge, we'll call Sharon Coyne at
this

7 time.

8 THE COURT: All right. Thank you.

9 THE COURTROOM DEPUTY: Would you raise your
right

10 hand, please.

11 (Sharon Coyne affirmed.)

12 THE COURTROOM DEPUTY: Would you have a seat,
please.

13 Would you state your full name for the record
and

14 spell your last name.

15 THE WITNESS: Sharon Rose Coyne, C-O-Y-N-E.

16 THE COURTROOM DEPUTY: Thank you.

17 MS. WILKINSON: Thank you, your Honor.

18 DIRECT EXAMINATION

19 BY MS. WILKINSON:

20 Q. Good afternoon, Mrs. Coyne.

21 A. Good afternoon.
22 Q. Could you tell the jury where you live.
23 A. I live in Moore, Oklahoma.
24 Q. How old are you?
25 A. 27.

15285

Sharon Coyne – Direct

1 Q. Are you married?
2 A. I am, to Scott William Coyne.
3 Q. How long have you been married to Scott?
4 A. Six years.
5 Q. Back in April of 1995, where were you working, Mrs.
Coyne?
6 A. I worked for the Federal Court Clerk's Office,
downtown
7 Oklahoma City, for the Western District the Oklahoma.
8 Q. And how far is the federal courthouse in Oklahoma
City from
9 the Alfred P. Murrah Building?
10 A. It's directly south. It's right across the street.
11 Q. Before you started working in the Federal Court
building,
12 did you ever have any military service?
13 A. I did. I joined the Army in '89, and was
discharged in
14 '93.

15 Q. What did you do for the United States Army?

16 A. I was a Russian linguist.

17 Q. And when you and your husband moved to Oklahoma,
did you
18 talk about having a family?

19 A. We did. We had talked a little bit while we were
married,
20 but we were going to wait until we were out of school
and

21 making six digits and -- but when I got out of the
military, I

22 found out that I was pregnant. I didn't realize before
I got
23 out, so I was about three months pregnant when I got
out.

24 Q. And before your baby was born, did you express to
your

25 husband whether you wanted a boy or a girl?

15286

Sharon Coyne - Direct

1 A. No. I -- not to him. You know, everybody wants a
healthy

2 baby; and secretly, I think most men want little boys
and most

3 women want little girls. So I did the right thing and
I told

4 everybody I wanted a healthy baby. And he had decided
that we

5 wouldn't find out the sex of the child at the

ultrasound. And

6 I wanted a girl so badly that I decided it would be a
boy, so

7 that I could get ready and I would be, you know,
excited about

8 a little boy. So I convinced myself, my husband, his
family,

9 my family, that it would be a boy. And we purchased
boy things

10 and --

11 Q. And did you have a baby on February 9, 1994?

12 A. I did.

13 Q. And what kind of baby did you have?

14 A. I had -- well, I have to tell you first that it was
not

15 just go in and have this child. I mean, I had a
perfectly

16 healthy pregnancy and got in there that day, and there
were

17 some complications. And they had to do an emergency
cesarean

18 section. But when I got in there that morning, the
woman --

19 the nurse who had hooked me up to, you know, the heart
monitors

20 and the fetal heart monitor had said, "It looks like
it's going

21 to be a little Valentino. Really wanted a girl.
Hadn't had a

22 girl yet this morning, but we can do all boys today."
So it

23 just kind of confirmed that I was -- what I already had

24 convinced myself of, and that's that it would be a
little boy.

25 And --

15287

Sharon Coyne - Direct

1 Q. What happened after the cesarean?

2 A. The anesthesiologist told my husband -- he said,
"Well you

3 need to tell your wife --"

4 THE COURT: I don't understand the relevancy
of this

5 part of it.

6 MS. WILKINSON: It gets to some of the
impacts, your

7 Honor.

8 THE COURT: Move ahead.

9 MS. WILKINSON: Yes.

10 BY MS. WILKINSON:

11 Q. Mrs. Coyne, did you have a little girl --

12 A. I had a little girl.

13 Q. -- on February 9? What was her name?

14 A. Her name is Jaci Rae, Jaci Rae Coyne.

15 Q. And when you worked at the federal courthouse,
where was

16 Jaci Rae during the day?

17 A. She was in the day-care across the street. She had

been

18 over there for about three weeks.

19 Q. That's the day-care center in the Alfred P. Murrah?

20 A. Alfred P. Murrah.

21 Q. And was she killed on April 19, 1995?

22 A. Yes, she was.

23 Q. How old was she when she died?

24 A. She was 14 months, 10 days.

25 Q. Could she talk at the time?

15288

Sharon Coyne - Direct

1 A. A little bit. She said "Mama" and "Dada."

2 Q. What kind of little girl was she?

3 A. Physically, she was about 20 to 25 pounds. She had
big

4 blue eyes. She looked just like her daddy except for
without

5 the beard. Very little hair. Jaci was kind of a ham.
She

6 liked to be in front of the camera. She liked to be
held by a

7 lot of people. It didn't matter who. Anybody. She
was a very

8 friendly little girl. She was never shy, not a day in
her

9 life.

10 Q. Let me have you look at Government's Exhibit 1534,

which we

11 will introduce into evidence.

12 MS. WILKINSON: We move 1534, your Honor.

13 THE COURT: Have any objection?

14 MR. TIGAR: No objection, your Honor.

15 THE COURT: All right. Received. May be
shown.

16 BY MS. WILKINSON:

17 Q. Is this Jaci?

18 A. Jaci in her raspberry picture.

19 Q. And how old was she when this picture was taken?

20 A. It was shortly before the bombing. She was about a
year

21 old.

22 Q. On the morning of April 19, 1995, were you in your
office

23 in the federal courthouse?

24 A. I was. I was a file clerk.

25 Q. Did you feel the explosion?

15289

Sharon Coyne - Direct

1 A. I did. I heard it. I felt it. Didn't know what
it was.

2 Knew there was, to my knowledge, not ever an earthquake
in

3 Oklahoma, so I was very confused about what had
happened.

4 Q. Did you attempt to find Jaci?

5 A. I did. My co-workers and I were all led out of the
6 building and looked across the street. You could see
the south
7 side of the building, which has the plaza, right there
in front
8 of us. And then on either side of the plaza are the
stair --
9 steps that go all the way up to the top of the plaza,
which was
10 the second floor, which is where Jaci was.

11 And we walked out and had gone on the west
side and
12 up, and I didn't think there was anything wrong. I
mean, I had
13 heard this explosion. I saw all the black smoke. But
when I
14 got up to the plaza, I just saw people walking outside
who were
15 injured, but they were walking on their own. They were
16 coherent. I -- and I just didn't think there was
anything
17 wrong.

18 Q. Did you have any idea about the damage to the front
of the
19 Murrah Building?

20 A. No. Not till way later that night.

21 Q. You didn't find Jaci that day, did you?

22 A. No.

23 Q. And did you -- did your husband eventually convince

you to

24 go home that evening?

25 A. He did. We had gone to the First Christian Church
and

15290

Sharon Coyne - Direct

And it 1 waited and filled out paperwork for the ME's office.

side of 2 was there that I had seen on the television the north

there 3 the building, and it was there that I had decided that

the 4 was a remote possibility that Jaci could still be in

yet. 5 building; that they just hadn't been able to find her

concern 6 Q. And that evening when you went home, what was your

7 about Jaci?

and we 8 A. The First Christian Church was on the north side,

van, and we 9 lived on the south side; and so we were in my mom's

correlation with 10 were driving. And the way the highway sits in

And we 11 the Murrah Building, you could kind of see down there.

And I 12 were driving on the highway, and it was all lit up.

13 thought that Jaci was still in the building. And

because it

going 14 had happened at 9:00 and it was almost 9 when we were

and it 15 home that night, I knew that she was in a dirty diaper

news that 16 had begun to rain. And they had kept saying on the

thought 17 maybe there was a little pocket or something. And I

hungry 18 that maybe she was exposed to the rain and that she was

and she 19 and that she wanted me. She had mommy-itis really bad,

just 20 really wanted to be around me all the time. And I was

21 afraid they wouldn't get her out that night.

about 22 Q. Mrs. Coyne, how long did you have to wait to hear

23 your daughter?

24 A. Seven days.

bit 25 Q. Now, if we could, could you tell the jury a little

15291

Sharon Coyne - Direct

and if 1 about how you've been impacted by losing your daughter

memories 2 you could start about -- with telling them about the

3 that you have of your daughter today.

4 A. I have -- I have lots of good memories of Jaci.
They have
5 sustained me since I've had to accept that she's not
going to
6 be back. And I had hoped all of the good memories
would get me
7 through.

8 I have one memory of Jaci with my husband and
I. We
9 live in a very tiny house; and we were in the kitchen
and we
10 were making dinner one night, and we had blocked off
the
11 kitchen area for Jaci to not be able to get in there
because it
12 was a ceramic floor and we didn't want her to fall and
hit her
13 head. Anyway, it was kind of warm in the house; and
she had
14 taken -- we had taken off her shirt and her pants so
she was
15 basically roaming around with just her diaper on, you
know.
16 And my husband and I were in the kitchen making dinner,
and she
17 started giggling. And so Scott went out there, and he
said --
18 he said, "Sharon, you have to come here and see this."
And
19 she's still giggling; and so I poked my head around the
corner,
20 and there she stands. She has figured out how to get
her

the 21 diaper off, and she's walking around totally naked with
happy as 22 diaper sticky stuck to her hand. And she's just as
23 she can be.

help me 24 So memories like that really have been able to
end 25 quite a bit, except for that the end of memories always

15292

Sharon Coyne - Direct

1 with a vision that I can't seem to get out of my head.
as you 2 Q. Mrs. Coyne, is that a vision that you had as soon
3 realized that Jaci was stuck in the building?
week 4 A. It was about a week after -- yeah. It was about a
was -- 5 after the bombing, and it was out of nowhere. And it
I'm just a 6 it's not prompted by anything, except for maybe that
end 7 sick person. My memories all start good, and then they
8 with me -- and it happens very quickly -- hearing the
falling, and 9 explosion. And then my mind imagines the building
head from 10 then I see Jaci and her hair is kind of stuck to her
she's got 11 the blood. Her eyes are open. And she's naked. And

12 on just her diaper, and it's -- it's totally filled
with blood,
13 and there's shards of glass all over her skin. And
she's
14 looking at me. And it won't go away.
15 Q. Mrs. Coyne, is that a picture that you've tried to
get out
16 of your mind?
17 A. Yeah.
18 Q. Were you allowed to see your daughter, or did you
see your
19 daughter before you buried her?
20 A. No. But I was -- no. I was very lucky. I got to
hold
21 Jaci before -- Jaci was wrapped up, and I got to feel
of her
22 and she was all there. And even though she was in a
body bag
23 and she was totally wrapped, I still got to hold her
three
24 times before.
25 Q. You don't know if this vision that you have is how
she

15293

Sharon Coyne - Direct

1 actually was?
2 A. No.
3 Q. Now, have you and your husband talked about having

other

4 children?

5 A. We have. It's taken until this year for us to
decide that

6 we were ready to move on to something like that. But
you know,

7 I had wanted a girl so badly. I wanted --

8 MR. TIGAR: Objection to this, your Honor.

9 THE COURT: Overruled. You may continue.

10 THE WITNESS: I had wanted the relationship
with my

11 daughter to be the same relationship that I have with
my mom.

12 And I wanted for there to be this mom-daughter
friendship that

13 develops. And even though my husband didn't agree with
me, I

14 had decided that she would be all I had. I didn't want
any

15 more kids after her. She made my entire life complete,
and she

16 filled any hole I had left. And now it's just gone.

17 BY MS. WILKINSON:

18 Q. By losing her, do you have any fear about how you
would

19 feel about having another child?

20 A. I'm afraid that -- initially, I was afraid that any
child I

21 had, I would compare to Jaci. And I was always afraid
that I

22 wouldn't love that child as much or that I would resent

that

23 child for having a life when the one that I loved first
didn't.

24 And now I'm afraid if I have a little boy, because I
wanted a

25 girl so badly, that I wouldn't love it. And I know
that's not

15294

Sharon Coyne – Direct

1 rational. If you lose your child, it consumes your
life. And

2 I want it to go away, and it won't.

3 MS. WILKINSON: Thank you very much, Mrs.
Coyne.

4 THE COURT: Do you have any questions?

5 MR. TIGAR: No questions. Thank you.

6 THE COURT: You may step down. You're
excused.

7 Members of the jury, we'll take our afternoon
recess

8 at this time. And again, of course, during the time of
the

9 recess, please continue as you have at all recesses,
avoiding

10 discussion about the matters that you're hearing; and
keep open

11 minds. Remember that, as I said before, you're hearing
one

12 aspect of the matter, one of the factors that you may
consider.

minds 13 There's more to be heard before you even in your own
14 begin to make a judgment. So please do not discuss
anything in 15 connection with this matter, and avoid anything outside
of the 16 evidence. You're excused.

17 20 minutes.

18 (Jury out at 3:04 p.m.)

19 MR. TIGAR: May I approach, your Honor?

20 THE COURT: Yes.

21 (At the bench:)

22 (Bench Conference 147B2 is not herein transcribed
by court 23 order. It is transcribed as a separate sealed
transcript.)

24

25

15300

1 (In open court:)

2 THE COURT: We'll be in recess. 20 minutes.

3 (Recess at 3:08 p.m.)

4 (Reconvened at 3:28 p.m.)

5 THE COURT: Be seated, please.

6 (Jury in at 3:29 p.m.)

7 THE COURT: Next, please.

8 MR. MACKEY: Your Honor, we'll call Mr.
William
9 Titsworth.

10 THE COURT: All right.

11 THE COURTROOM DEPUTY: Raise your right hand,
please.

12 (William Titsworth affirmed.)

13 THE COURTROOM DEPUTY: Would you have a seat,
please.

14 Would you state your full name for the record
and

15 spell your last name.

16 THE WITNESS: William Edward Titsworth,
17 T-I-T-S-W-O-R-T-H.

18 THE COURTROOM DEPUTY: Thank you.

19 DIRECT EXAMINATION

20 BY MR. ORENSTEIN:

21 Q. Good afternoon, Mr. Titsworth.

22 A. Good afternoon.

23 Q. Would you tell the jury, please, where you live.

24 A. I live in Great Bend, Kansas.

25 Q. And is that where you're from originally?

15301

William Titsworth - Direct

1 A. No, sir, it's not. I'm from Clayton, Oklahoma.

2 Q. What do you do for a living these days?

3 A. After the military, I worked for the Union Pacific
4 Railroad.

5 Q. And what do you do for the railroad now?

6 A. Foreman for a section maintenance gang.

7 Q. When did you start with that?

8 A. September of '96.

9 Q. Are you married, sir?

10 A. Yes, sir, I am.

11 Q. What's your wife's name?

12 A. Gloria.

13 Q. Do you call her Chrissy?

14 A. Yes, sir, Chrissy.

15 Q. When you married Chrissy, did she have some
children?

16 A. Yes, sir, she did. She had two daughters.

17 Q. What were their names?

18 A. Katie and Kayla.

19 Q. Were you and Chrissy and Katie and Kayla all
together in

20 the Murrah Building on April 19, 1995?

21 A. Yes, sir, we were.

22 Q. Was your wife and was Katie injured that day?

23 A. Yes, sir, they were. Both of them.

24 Q. Did you sustain some permanent injuries that day?

25 A. Yes, sir, I did.

15302

William Titsworth - Direct

1 Q. Did Kayla die that day?

2 A. Yes, sir.

3 Q. Mr. Titsworth, you told us that you joined the
railroad in

4 '96 after some time in the military. Can you tell the
jury

5 what branch of the service you were in.

6 A. I was in the United States Army.

7 Q. How long had you been in the Army at the time you
ended

8 your career there?

9 A. 9 years, 11 months and 16 days.

10 Q. Is that a career for you? Were you planning to
make it a

11 career?

12 A. Yes, sir.

13 Q. Did you leave your position in the Army because of
your

14 injuries?

15 A. Yes, sir, I did.

16 Q. When you left the Army, what was your rank?

17 A. Sergeant E5.

18 Q. And in what parts of the world did you serve your
country

19 in the Army?
20 A. I spent two tours in Korea and three different
assignments
21 in the States, Fort Dix, New Jersey; Fort Riley, Kansas
and
22 Fort Sill, Oklahoma.
23 Q. Where were you stationed in April of 1995?
24 A. Started out the first part of April in Fort Riley,
Kansas.
25 Q. And did you request a transfer?

15303

William Titsworth - Direct

1 A. Yes, I did.
2 Q. Why did you do that?
3 A. Basically to get away from the field time there at
Fort
and
4 Riley. We were gone two entire months out of the year
5 spent a lot of time in the field.
6 Q. What did you not like about the field time?
7 A. It was time away from the family.
8 Q. And was your request for a transfer granted?
9 A. Yes, sir, it was.
10 Q. Where were you transferred to?
11 A. To the Oklahoma City recruiting battalion in the
federal

12 building.

13 Q. That's in Oklahoma City?

14 A. Yes, sir.

15 Q. Were you satisfied when you found out that's where
you'd be

16 transferred to?

17 A. Yes, sir, I was.

18 Q. What did you think about that?

19 A. I thought that was great. I mean it was a new
start for me

20 and my family, plus I was going to get to go home.

21 Q. When were you supposed to report for duty in
Oklahoma City?

22 A. My actual reporting date was 1 May.

23 Q. And did you ask to report earlier than that?

24 A. Yes, sir, I did.

25 Q. What was the reason for doing that?

15304

William Titsworth - Direct

1 A. To go ahead, get to the recruiting battalion, sign
in, and

2 instead of burning up leave days to sign out on
permissive TDY,

3 to move my household goods from Fort Riley to Oklahoma
City.

4 Q. You threw in some military terms in there.

5 A. I'm sorry.

find a

6 Q. Was the basic idea that you'd have some time to

7 place to live?

8 A. Yes, sir.

9 Q. When did you arrive in Oklahoma City?

10 A. The evening of the 18th of April.

11 Q. What did you do when you arrived?

in the

12 A. Picked up a newspaper initially to look for houses

13 area.

14 Q. Did you -- did you and your family go on a little

car trip

15 that night?

16 A. Yes, sir. After looking in the newspaper, we drove

around

17 Oklahoma City, we drove by the federal building.

18 Q. To see where you were going to work?

19 A. Yes, sir.

19,

20 Q. Let me ask you to tell us about the next day, April

Murrah

21 1995. Did you go to the recruiting station in the

22 Building that day?

23 A. Yes, sir. We went to the recruiting battalion. We

got to

24 the federal building about 8:30.

25 Q. Who was with you when you went there that morning?

William Titsworth - Direct

1 A. My wife, Chrissy, and Katie and Kayla.

2 Q. I'd like to show you --

3 MR. ORENSTEIN: And, your Honor, I'll offer
4 Government's Exhibit 1437.

5 MR. TIGAR: No objection, your Honor.

6 THE COURT: Received, may be shown.

7 BY MR. ORENSTEIN:

8 Q. Mr. Titsworth, would you walk us through this
photograph

9 and tell the jury who they're looking at.

10 A. Yes, sir. It's a picture of myself, my wife,
Chrissy, and

11 Katie and Kayla.

12 Q. Chrissy is on the right-hand side of the picture?

13 A. Yes, sir. That's Chrissy on the right. The bottom
middle

14 is Kayla, and the upper middle is Katie.

15 Q. And how old on April 19 were Katie and Kayla?

16 A. Three and five.

17 Q. Katie was the older one?

18 A. Yes, sir.

19 Q. Now, these were Chrissy's children, not yours. Is
that

20 right?

21 A. That is correct, sir.

knew 22 Q. Had you become close with them in the time that you
23 Chrissy?
following 24 A. Yes, sir. I was supposed to adopt them the
25 month.

15306

William Titsworth - Direct

Murrah 1 Q. Why did you bring your family with you to the
2 Building that day?
the 3 A. Well, you move an entire family when you move in
shared 4 military. It's not just one person that goes. It's a
5 experience.
battalion 6 Q. When you arrived at the battalion, the recruiting
7 at the 4th floor that morning, what did you do?
up there 8 A. Initially, we met the secretaries that were lined
or the 9 in the hallway; and Sergeant Evans, the PAC supervisor
took me 10 administrative supervisor who was going to be my boss,
office. 11 around and introduced me to other people there in the
while you 12 Q. Did someone find something for the girls to do

13 were being shown around?

14 A. Yes, sir. Another sergeant in there had given them
some
15 toys to play with while I was being escorted around.

16 Q. Do you remember the explosion?

17 A. Yes, sir, I do.

18 Q. What do you remember happening after the explosion?

19 A. I remember everything going black. It felt like
the back
20 of my head was on fire. I kept waiting for somebody to
turn
21 the lights back on. I thought maybe the power went out
in the
22 building or something.

23 I felt something warm and wet on my hands. It
scared
24 me. I tried to stand up. I thought I was sitting
down, but I
25 couldn't move. After that, I just got more scared and
started

15307

William Titsworth - Direct

1 pushing. I got to the point where I could push, and I
could
2 see a slight crack of light. I could see the top of
the
3 federal building. I seen nothing but black smoke.

4 I finally got out from under what I was under,

and I

5 looked across the room and I seen my wife screaming,
"Where is

6 Kayla, where is Kayla, where is my baby?"

7 Q. You saw your wife.

8 A. Yes, sir.

9 Q. Did you find Katie?

10 A. I don't remember exactly what -- where Katie came
into

11 play; but about that time, I somehow got to my feet,
and then

12 Katie was with Chrissy at that time.

13 Q. Was your wife telling you anything about her
condition?

14 A. No, sir, not at that time.

15 Q. Did you see what condition she was in?

16 A. No -- all I seen at that point is she was scared.
She was

17 screaming. It wasn't really making any sense at that
point.

18 Q. Did you know at that point the extent of your own
injuries?

19 A. No, sir, I didn't.

20 Q. You saw your wife and Katie. You couldn't find
Kayla.

21 What did you do?

22 A. We were told to get out of the building. Sergeant
Evans

23 told my wife to get me out of the building.

24 My wife carried Katie and led me out -- out of

that

25 room to the back side of the building.

15308

William Titsworth - Direct

wife 1 Q. Once you got out of the building, did you and your
2 continue to look for Kayla?

hollered 3 A. Yes, sir. Once we got to the sidewalk, Chrissy
4 out, "There goes my baby," and pointed towards the
ambulance 5 and told me to go look.

and 6 I ran and banged on the door of the ambulance
7 looked inside the ambulance, and I seen a small child;
but it 8 wasn't Kayla. The only way I could recognize that it
wasn't 9 was by the tennis shoes.

looking 10 Q. Why were you not able to tell any other way than by
11 at the shoes?

12 A. The baby was burned.

13 Q. After chasing down that ambulance, what did you do?

was, and 14 A. I made my way back to the sidewalk where Chrissy
15 Chrissy said that her ear was hurting.

16 I went over and tried to move her hair, and I

see the

17 blood just coming down on the right side of her head.

18 Q. Do you know what had happened to your wife's ear?

19 A. Yes, sir. She lost about a quarter-inch -- inch-
and-a-

20 quarter section of her ear that was completely severed
through

21 here and just hanging off the side.

22 Q. Did she go through some operation to try and
reattach that?

23 A. Yes, sir, she did. They reattached it at the
hospital

24 there.

25 Q. Was your daughter, Katie, injured at all?

15309

William Titsworth - Direct

1 A. Yes, sir. She received minor injuries, really.
She had

2 two pieces of glass. One was wedged in her cheek and
one on

3 the top of her head.

4 Q. You told us that you were injured. Were you taken
to the

5 hospital?

6 A. Yes, sir, I was.

7 Q. And did you lose consciousness after you arrived at
the

8 hospital that morning?

9 A. After I was at the hospital, I remember a lady
saying,
10 "This is going to hurt a little bit." And after that,
I don't
11 remember anything.

12 Q. That was Wednesday morning, the 19th?

13 A. Yes, sir.

14 Q. When did you wake up?

15 A. I'm not for sure. It was sometime either Friday
night or
16 early Saturday morning, I woke up in the hospital
there.

17 Q. Do you know where you were in the hospital?

18 A. I was on the 10th floor of University Hospital.

19 Q. You were in the intensive care unit?

20 A. That was after the intensive care unit.

21 Q. Can you tell the jury the extent of your injuries?

22 A. Yes, sir. I got a piece of my skull that's
missing, a
23 little bit bigger than a 50-cent piece.

24 I had a major nerve on the left side of my
face that
25 was severed.

15310

William Titsworth - Direct

1 I have no feeling in three fingers on my right
hand.

2 And there is a lot of bad headaches.

3 Q. What kind of treatment did you receive while you
were at
4 the hospital?

5 A. I went through three major surgeries, one for a
collapsed
6 lung, one to remove a large piece of glass that was
wedged
7 through my neck and throat, and then another to remove
bone
8 fragments and glass from my skull.

9 Q. Are there still to this day glass fragments above
and below
10 your skull?

11 A. Yes, sir.

12 Q. After a time, you were released from the hospital.
Is that
13 right?

14 A. Say again, sir?

15 Q. After a time, you were released from the hospital.
Is that
16 right?

17 A. Yes, sir. I was released.

18 Q. When you were released, had all of your injuries
healed
19 yet?

20 A. Not healed, no, sir.

21 Q. I'd like to show you --

22 MR. ORENSTEIN: And, your Honor, I will offer

23 Government's Exhibit 1436.

24 MR. TIGAR: No objection, your Honor.

25 THE COURT: Received, may be displayed.

15311

William Titsworth - Direct

1 BY MR. ORENSTEIN:

2 Q. Mr. Titsworth, would you tell the jury what they're
looking
3 at in this photograph.

4 A. That's a picture that was taken Monday evening at
the
5 hospital -- at the hospital -- at the motel across from
6 University Hospital.

7 Q. That was after you had been released?

8 A. Yes, sir.

9 Q. Did you have any difficulties when returning back
to a
10 normal life just in terms of the physical injuries you
had
11 sustained?

12 A. Yes, sir, I did.

13 Q. Can you tell the jury about that.

14 A. Like I said, for a long time I had some real bad
headaches

15 and sharp pains that shot through my body. Besides the
fact of

these 16 just going to work and looking at people, you know, and
they 17 people wanted to talk to me or say something to me but
18 were afraid to.

19 Q. Did you have any trouble eating?

20 A. Yes, sir, I did for about three weeks.

21 Q. What was that a result of?

for that 22 A. I lost a little bit of weight. That was about it
23 one.

24 Q. Did you have trouble with muscle control?

having 25 A. Yes, sir. When I got out the hospital, I was

15312

William Titsworth - Direct

about it 1 problems with my right hand; and I didn't really think

glass and I 2 at the time, but I reached down trying to pick up a

I 3 couldn't get my hand to close. It just went straight.

4 couldn't move my hand at all.

5 Q. I'm sorry. Go ahead.

my neck 6 A. And as far as eating, the nerve that was severed in

things 7 and throat -- I'd literally be eating something, and

8 just come running out the side of my mouth.

9 Q. How long did that go on for?

10 A. It went on for about 3 or 4 months.

11 Q. You told us that you eventually left the Army
because of

12 your injuries. What was it about your injuries that
caused you

13 to leave the Army?

14 A. The military would no longer let me do PT.

15 Q. Let me interrupt you there. What is PT?

16 A. I'm sorry. Would not let me do physical training.
I

17 couldn't go outside and do pushups. I couldn't run.

18 As far as military duty itself, I couldn't
wear a

19 Kevlar helmet, which is the helmet required for the
battle

20 dress uniform.

21 Q. Why were you unable to wear a Kevlar helmet?

22 A. Because of the weight on top of my head and the way
the

23 helmet sit, it laid right across the hole in my head.

24 Q. You told us part of your injuries is a piece of
your skull

25 is missing.

15313

William Titsworth - Direct

1 A. Yes, sir.

2 Q. Is that still true?

3 A. Yes, sir, it is.

4 Q. Did you ultimately take a medical discharge from
the Army?

5 A. Yes, sir, I did.

6 Q. Had you expected that the Army would be your
career?

7 A. Yes, sir. I already put almost 10 years in it. I
wasn't

8 about to quit.

9 Q. What did that do to your feelings about yourself?

10 A. Lowered them quite considerably.

11 Q. As a result of your injuries during the bombing, do
you

12 also have scars to this day?

13 A. Yes, sir, I do.

14 Q. Your right side -- the right side of your face is
to the

15 jury. Are most of the scars on the left side of your
face and

16 neck?

17 A. Yes, sir. Back of my head, left side of my head,
and left

18 side of my neck.

19 Q. Would you please turn to the jury so they can see
how

20 scarred that is.

21 Mr. Titsworth?

22 A. I'm sorry.

23 Q. Thank you.

24 You told us that you and your wife were
looking for

25 Kayla. Did you ever find her?

15314

William Titsworth - Direct

1 A. No, sir. We didn't. We didn't even find out that
she was
2 deceased until Saturday morning in the hospital.

3 Q. Would you tell the jury what kind of person Kayla
was.

4 A. She was wonderful. Kayla was my little helper.
Like I

5 said, it's noted that I was in the process of adopting
them.

6 She wasn't my natural daughter; but when Katie and
Kayla came

7 into my life, Katie knew who her father was. Kayla was
still

8 at the age that she really didn't have quite an
understanding

9 of what was going on; so to Kayla, I was her father.
You know,

10 Kayla did everything with me.

11 Traditionally on holidays, I cook the turkey.
She's

12 the one that's in there with me. If I'm working on the
car,

13 working on the truck, whatever, she was the one that
was right

14 there with me.

15 Q. You told us that you were in the process of
adopting Kayla

16 and Katie. Did you eventually adopt Katie?

17 A. Yes, I did. I adopted Katie on May 19.

18 Q. Were you allowed to adopt Kayla?

19 A. No, sir, I was not.

20 Q. Would you tell the jury the impact that Kayla's
death has

21 had on you and on your marriage to Chrissy and on your
family.

22 A. It's more than three or four times caused me and
Chrissy to

23 discuss divorce. There has been a lot of mental abuse
between

24 the two of us, pushing the blame off on each other.

25 It's just within the past few months with me
and my

15315

William Titsworth - Direct

1 wife being to the point where we can communicate.

2 Q. What has Kayla's death, the injuries that you and
Katie and

3 Chrissy all sustained -- what has that done to Katie?

4 A. Initially, it set her back almost to a baby stage.
She

5 quit doing things around the house. She had no urge to
go to 6 school, no urge to be around people.

7 This past year in school, she started to excel
a 8 little bit, and the teachers are coming home -- or
teachers 9 ain't coming home, but the teachers are saying she's
doing a 10 lot better in school. But it's taking this long for
her to do 11 well in school.

12 Q. Has Katie ever expressed any guilt about the
bombing?

13 A. Yes, sir, she did. Right after the bombing, we
went to my 14 mom's house in Clayton, Oklahoma, and Katie announced
to me and 15 Chrissy that she killed her sister. And we asked her
why. And 16 she said, "I stepped on an electrical cord that set the
bomb 17 off."

18 I guess at the point when the bomb exploded,
there was 19 an extension cord that was going across the floor, and
she 20 stepped on it right at the time of impact. And she
thought 21 that she set the building -- or she set the bomb off
that 22 exploded in the building.

not
23 Q. Have you had trouble convincing her that she was
24 responsible for her sister's death?
25 A. Yes, sir. And it took a lot more than just me and
Chrissy.

15316

William Titsworth - Direct

1 She's been through three different counselors since
that time,
2 and only within the last eight or nine months has she
not
3 spoken of that.

4 MR. ORENSTEIN: Thank you, Mr. Titsworth.

5 That's all I have, your Honor.

6 THE COURT: Questions?

7 MR. TIGAR: No questions. Thank you.

8 THE COURT: You may step down. You're
excused.

9 THE WITNESS: Thank you.

10 MR. MACKEY: Call Mr. Gary Campbell.

11 THE COURTROOM DEPUTY: Raise your right hand,
please.

12 (Gary Campbell affirmed.)

13 THE COURTROOM DEPUTY: Would you have a seat,
please.

14 Would you state your full name for the record
and
15 spell your last name.

16 THE WITNESS: Gary Campbell, C-A-M-P-B-E-L-L.

17 THE COURTROOM DEPUTY: Thank you.

18 MR. MACKEY: Thank you, your Honor.

19 DIRECT EXAMINATION

20 BY MR. MACKEY:

21 Q. Good afternoon, Mr. Campbell.

22 A. Hello.

23 Q. Where do you live?

24 A. Currently in Fort Worth, Texas.

25 Q. How long have you lived in Fort Worth?

15317

Gary Campbell - Direct

1 A. Two weeks.

2 Q. Before that, where did you live?

3 A. Sherman, Texas.

4 Q. Lived there many years?

5 A. Yes. Almost 20.

6 Q. When did you and your family first settle in
Sherman,
7 Texas?

8 A. 1978.

9 Q. And at that time, what did your family consist of?

10 A. I had a wife, two daughters and a son.

11 Q. What were the names of your children?

12 A. Kimberly, Raymond and Cynthia.

13 Q. Were Kimberly and Raymond children from your wife's
14 previous marriage?

15 A. Yes, they were.

16 Q. And was Cindy a daughter to you and your wife?

17 A. Yes.

18 Q. Was Cindy killed in the bombing in Oklahoma City on
19 April 19?

20 A. Yes, she was.

21 Q. How old was Cindy at that time?

22 A. 26 years and 4 days.

23 Q. At the time that Cindy was 18 years of age, Mr.
Campbell,
24 did you and your wife divorce?

25 A. That's right.

15318

Gary Campbell – Direct

would
1 Q. And what decision did Cindy make as to where she

2 spend her time?

3 A. Cindy decided to stay with me in Texas at that
time.

4 Q. How long did the two of you reside either in the
same home

5 or in the same city before April of '95?

6 A. About six years.

Campbell 7 Q. During those six years, Mr. Campbell, did Cindy

8 finish her education?

9 A. Yes.

10 Q. Where did she go?

11 A. She graduated from Sherman High School that same
year, in

12 '87; and then she went to Community College in Sherman.
And

13 she graduated from there and then went to Baylor
University in

14 Waco, Texas.

15 Q. What degree did she obtain from Baylor?

16 A. She had a degree in political science.

17 Q. During those years, the late teens, early 20's, did
you

18 notice Cindy Campbell to be an interested young woman
in the

19 affairs of other people?

20 A. Cindy was a very caring person and put others
before

21 herself and did many things to help.

22 Q. What kinds of organizations was she an active part
in in

23 those years?

24 A. She was in the Big Sister program in college; and
25 throughout high school, she worked at the local Girls
Club.

15319

Gary Campbell – Direct

years as 1 Q. Were those interests that she pursued in later
2 well?

juvenile 3 A. Yes. As she graduated from Baylor, she became a
4 probation officer in Sherman.

there in 5 Q. How many years did she work as a probation officer
6 Sherman?

7 A. Approximately two-and-a-half years.

Cindy 8 Q. And over time, Mr. Campbell, did you learn that
9 Campbell had made a difference to youths that she
counseled as 10 a probation officer?

11 A. Yes.

12 Q. Would you describe what you know.

came up 13 A. On two separate occasions, mothers and individuals
14 to me and expressed the fact that Cindy had indeed made
a 15 difference in their -- their son or daughter's life and
helped 16 them turn it around.

had 17 Q. Do you recall an occasion where one youth that she
18 counseled came back to the probation officer and

reported --

19 A. That's right.

20 Q. -- his success? Could you tell us that story?

21 A. Her boss related this story to me and others. We
set up a

22 small scholarship fund for Cindy at the high school,
and her

23 boss at the probation is the one that gives the
scholarship or

24 makes the award.

25 And he always relates a story about Cindy,
talks about

15320

Gary Campbell - Direct

1 her. And the story this last May was the fact that a
young man

2 came in the probation office, was not dressed as most
kids that

3 come to the probation office are dressed. He was very
neatly

4 dressed, had on white shirt and a tie. And he walked
in and he

5 said, "I want to see Cindy Campbell."

6 And the secretary got her boss. He came out
and he

7 said, "Well, Cindy is no longer here."

8 And he said, "Well, I need to tell Cindy that
I made

9 it." He said, "Thanks to her, I have a wife, a son, I

I 10 graduated from high school, and I have a good job. And

11 wanted Cindy to know."

12 Q. Did Cindy love her work as a juvenile probation
officer?

13 A. Very much. Very much. She spent -- spent many
nights

14 riding with the local police, making sure that her kids
were on

15 curfew; that they were in fact at home. She spent many
hours

16 at the high school roaming the halls, making sure that
her

17 kids, as she called them, were, in fact, in class and
at

18 school.

19 Q. When she left her job as a probation officer, what
new

20 career did she start?

21 A. She became a Secret Service agent.

22 Q. And approximately when was that?

23 A. Her initial training, I believe, started in
September of

24 1993.

25 Q. And how did that come about that she became a
Secret

15321

Gary Campbell - Direct

1 Service agent?

2 A. One of her kids had written a letter threatening
the life
3 of the President. And as part of her duty, she
reported that
4 to the Secret Service in Dallas.

5 They subsequently came up to interview the
young man,
6 in the course, interviewed Cindy to find out more about
him and
7 his family and at that time asked her if she'd be
interested in
8 coming to Dallas to visit their offices. And from
that, it led
9 to their requesting her to make application to the
Secret
10 Service.

11 Q. Did you and your daughter talk about the decision
that she
12 was to make about leaving work as a probation officer
--

13 A. Yes.

14 Q. -- and moving into the Secret Service?

15 A. We did. And we struggled with it. She liked what
she was
16 doing so much. And -- but then on the other hand, she
saw it
17 as a once-in-a-lifetime opportunity to do something
that few
18 people get the honor and privilege to do.

19 Q. When Cindy first became a Secret Service agent, did
she

20 have to take a long training course?

21 A. Yes. It was almost a year.

22 Q. And was there anything in the course of that
training that

23 changed her life?

24 A. Very much so. She met her future husband, Ron
Brown,

25 during the training.

15322

Gary Campbell – Direct

1 Q. And was Mr. Brown also a Secret Service agent?

2 A. Yes.

3 Q. When were Cindy and Ron Brown married?

4 A. They were married March 11, 1995.

5 Q. Approximately five weeks before the bombing?

6 A. That's correct.

7 Q. At the time of the bombing, where was Cindy
8 Campbell-Brown's station with the Secret Service?

9 A. Oklahoma City.

10 Q. And where was Agent Brown's?

11 A. He was stationed in Phoenix, Arizona, at that time.

12 Q. Given that the two agents were married, had any
request

13 been made that they be relocated to the same city?

14 A. Yes. In fact, it had already been approved. They

were in

15 the process of being transferred to Washington, D.C.

16 Q. Do you know when their report date was for joining
together

17 in Washington, D.C.?

18 A. It was like within 30 days, I believe. They were
-- they

19 were to leave the week following the bombing for their
first

20 house-hunting trip; and normally once you find a home,
it's

21 fairly quickly after that.

22 Q. Mr. Campbell, did your daughter on many occasions
express

23 her care and concern and love for you?

24 A. Yes. Cindy and I had a very special relationship
and I

25 think sometimes very unique. I know at her wedding,
our dance

15323

Gary Campbell - Direct

1 was "You Are the Wind Beneath My Wings," and she played
that or

2 chose that because that's how she felt about me. But
when I

3 danced with her, I knew Cindy -- this is about you and
what you

4 do for me. And that's the relationship that we had.

5 Q. As her father, were you concerned as she launched a

career

6 with the Secret Service that she would be out of touch;
that

7 you might not know where she was or what she was doing?

8 A. Yes. I always worried about where she was; and
that was

9 kind of an inside joke because when she chose to live
with me,

10 she said, "Dad, what are the rules?"

11 And I said, "I have one rule." I said, "You
let me

12 know where you are."

13 So the last Christmas, my present was a map on
the

14 wall with red and blue pins, the red pins for Cindy,
the blue

15 pins for Ron; and a pin was placed in every city that
they went

16 to. And she said, "Dad, now you'll know where I am all
the

17 time."

18 Q. Mr. Campbell, was your daughter a woman with quick
wit and

19 a sense of humor?

20 A. Yes, she was.

21 Q. And did she sometimes combine that quality with her
care

22 and concern for her mother?

23 A. Yes. In fact, the Christmas present to her mother,
the

24 fact that her mother had moved from Texas and had not

had the

25 opportunity to visit her at Baylor or see the campus --
she and

15324

Gary Campbell - Direct

1 her roommate made a video where her roommate held the
camera

2 and knocked on the door, and Cindy did the, "Hello,
Mom, come

3 on in." And they took a tour of the campus, went to
the

4 cafeteria, had lunch, did the whole thing. It was
really cute

5 and meant a lot to her mother.

6 Q. At one point in the video, did they show some
footage of

7 the library there at Baylor?

8 A. Yes. And Cindy was always an overachiever, and it
was so

9 unlike her. And they were standing in front of the
library --

10 or Cindy was, and said, "Mom, they tell me this is the
11 library."

12 Q. Did you travel from Sherman, Texas, to Oklahoma
City the

13 weekend of April 8 and 9 of 1995?

14 A. Yes, I did.

15 Q. And why did you do that?

16 A. It was an early birthday celebration. Cindy's
birthday was
17 the 15th of April, and she was going to Phoenix to be
with Ron
18 and celebrate her birthday and Easter, so I went up a
week
19 early to take her out to dinner and celebrate her
birthday.
20 Q. Did you and your daughter visit the offices of the
U.S.
21 Secret Service in downtown Oklahoma City that weekend?
22 A. Yes, we did.
23 Q. Describe to the jury what happened.
24 A. We went to dinner. We went up to the offices, and
Cindy
25 being a new agent was just so proud of what she was
doing. And

15325

Gary Campbell – Direct

1 we went through the other agents' offices as their
doors were
2 opened. And she pointed out, "This is Alan Whicher's
office,
3 Mickey Maroney, Don Leonard,'s," etc. and pointed out
their
4 plaques and mementos that they had collected over the
years.
5 And she was just so excited that one day, she said,
"Dad I'll
6 have mementos like this and have been to the places

that these

7 fellows have been."

8 Q. At that point in time, Mr. Campbell, had you met or
talked

9 to any of the fellow Secret Service agents that Cindy
was

10 assigned to in Oklahoma City?

11 A. Yes. I had met most of them briefly, just mainly
to say

12 hello and who I was and to visit with a little bit.

13 Q. And what was your reaction about the corps of
people

14 assigned to that office there in Oklahoma City, as a
father?

15 A. I was very pleased. I felt Cindy had a group of
surrogate

16 fathers, if you will, seasoned veterans that would show
her the

17 ropes, take care of her, and make sure that she got off
to a

18 good start as a Secret Service agent.

19 Q. Mr. Campbell, how did you first learn of the
bombing in

20 Oklahoma City?

21 A. A friend of mine called me at work and told me that
he had

22 heard a building had been bombed in Oklahoma City. He
was not

23 sure if it was a federal building or a state building.
And he

24 was not sure of what building Cindy worked in, but he
was

25 concerned and thought that I should know.

15326

Gary Campbell – Direct

1 Q. And after learning that in fact it was your
daughter's

2 building, did you travel to Oklahoma City?

3 A. Yes. I went home -- well, I called some friends
and went

4 home and put some belongings together and drove to
Oklahoma

5 City.

6 Q. When were you notified as Cindy's father of her
death?

7 A. It was April 20, around 7 p.m.

8 Q. Mr. Campbell, could you tell the jury in your own
words who

9 Cindy Campbell-Brown was as you knew her?

10 A. Cindy was a very loving, caring person, one that
put others

11 before her.

12 She was a super sister, a super daughter. She
enjoyed

13 life to the fullest.

14 She was one, I felt, that had made a
difference based

15 on what people have told me. And she's one that I feel
that we

16 will all miss because I feel like she's -- she would

have made

17 a bigger difference had she lived.

18 Q. Could you describe the relationship that Cindy had
with her

19 sister or -- excuse me -- sister, Kimberly, and her
brother,

20 Greg?

21 A. It was, I would say, probably best of all, a mutual
22 admiration society. They were very close in age.
Kimberly

23 tended to be very smart, very artistic and athletic.

24 My son was very athletic, a marine. And Cindy
drew

25 her strengths, her athleticism and love for athletics
and that

15327

Gary Campbell - Direct

1 side from her brother; and yet the academics and I
guess

2 ambition from her older sister, the push to be the best
that

3 she could.

4 Q. And do you know that each of those siblings miss
Cindy?

5 A. Very much so. And it's -- it's never been this is
my

6 stepsister, this is my stepbrother. We were all
together from

7 such an early age, and in the family we tried to make

no

8 difference as to stepchildren, etc.

If you 9 And I think -- that made a bond between them.

their 10 would ask them -- and I know that, you know, that's

looked out 11 sister, not their stepsister. It was neat. They

argued, 12 for each other. They took care of each other. They

13 never fought; but it was special.

jury 14 Q. Speaking for you, Gary Campbell, could you tell the

15 the impact of your daughter's death on you.

try to 16 A. I've cried about that, trying to think what I would

into words. 17 have people understand. It's very difficult to put

alone, you 18 Having been divorced and living basically

next 19 always have someone that you look to to push you to the

20 level or to encourage you, the one you do things for.

lost her, 21 And Cindy was that part of me. And when I

things that 22 I've just -- everything is kind of hollow now. The

so 23 come just don't mean the same, because she was always

you were 24 excited to share things, so excited to hear about what

25 doing, so excited to say, "Way to go, Dad." And now

that's not

15328

Gary Campbell – Direct

1 there. And so I don't know; it's very difficult. It's
just an

2 empty feeling.

3 Q. Mr. Campbell, let me ask you to take a look,
please, at

4 Government's Exhibit 1171A.

5 MR. MACKEY: Which we move into admission.

6 MR. TIGAR: No objection, your Honor.

7 THE COURT: Received, may be shown.

8 BY MR. MACKEY:

9 Q. Mr. Campbell, is this the daughter who died on
April 19,

10 1995?

11 A. Yes, it is.

12 MR. MACKEY: Nothing else.

13 THE COURT: Any questions?

14 MR. TIGAR: No questions, your Honor.

15 THE COURT: You may step down. You're
excused.

16 Next, please.

17 MR. MACKEY: Your Honor, we'll call Barb
Trent.

18 THE COURTROOM DEPUTY: Would you raise your
right

19 hand, please.

20 (Barbara Trent affirmed.)

21 THE COURTROOM DEPUTY: Would you have a seat,
please.

22 Would you state your full name for the record
and
23 spell your last name.

24 THE WITNESS: Barbara Jean Trent, T-R-E-N-T.

25 THE COURTROOM DEPUTY: Thank you.

15329

1 THE COURT: Ms. Wilkinson.

2 MS. WILKINSON: Thank you, your Honor.

3 DIRECT EXAMINATION

4 BY MS. WILKINSON:

5 Q. Good afternoon, Ms. Trent.

6 Could you tell the jury where you live now.

7 A. Harrah, Oklahoma.

8 Q. And where is that in relationship to Oklahoma City?

9 A. 45 minutes east.

10 Q. Are you married?

11 A. Uh-huh.

12 Q. What's your husband's name?

13 A. Roy.

14 Q. Could you tell the jury how old you are, please.

15 A. 34.

16 Q. And could you share with them a little bit about
your

17 family, how many sisters you have?

18 A. I have three older sisters, 40, 44 -- I mean 43 and
44.

19 Q. Are you the baby of the family?

20 A. Yeah.

21 Q. And could you tell the jury your parents' names.

22 A. Dr. Charles and Jean Hurlburt.

23 Q. Were your parents killed in the bombing of the
Murrah

24 Building on April 19, 1995?

25 A. Yes, they were.

15330

Barbara Trent - Direct

1 Q. How old were your parents when they died?

2 A. My father was 73 -- excuse me -- and my mom was 67.

3 Q. Was he the oldest, your father, the oldest victim
--

4 A. Yes.

5 Q. -- of the Murrah Building bombing?

6 Could you share with the jury a little bit
about who

7 your parents were. Start with your dad. Where was he
born and

8 what was his background?

9 A. My dad was born in Africa, and his parents were
10 missionaries. And he was raised there, five brothers
and three
11 sisters -- they were raised there.

12 He came to the States to Wheaton, Illinois,
when he
13 was 24, and he went to school there, got a degree in
dentistry.

14 Q. Did he graduate from Wheaton College?

15 A. Yes.

16 Q. And did he go on to dental school at the University
of
17 Illinois?

18 A. Yes.

19 Q. Did he meet someone at Wheaton College?

20 A. Yes. He met my mother. She grew up in Decatur,
Texas, and
21 then went to Wheaton, Illinois; and she became a nurse,
22 so . . . And they met there, and after a few years got
23 married.

24 Q. And you said you had an older sister who is
approximately

25 44? Is that right?

15331

Barbara Trent - Direct

1 A. Uh-huh.

2 Q. What's her name?

3 A. Betty Palmer.

4 Q. And after she was born, did your parents decide to
become
5 missionaries themselves?

6 A. Yes. My mom and dad, after they were married,
after they

7 had my two oldest sisters, went back to Africa to be
medical

8 missionaries, my dad to do dental work and my mom as a
nurse.

9 They were there about five years. My next sister, next
in age

10 to me, was born there.

11 Then they came back to Illinois, and that's
where I

12 was born, in Naperville.

13 Q. Now, your older sister you said was Betty.

14 A. Correct.

15 Q. And then your next sister is 43?

16 A. Is Dawn, Dawn Basher.

17 Q. And she was born also before your parents went to
Africa?

18 A. Yes, in Illinois.

19 Q. And your third sister's name?

20 A. Sherry Elliott, and she was born in Africa.

21 Q. Where in Africa did your parents serve?

22 A. The Belgian Congo.

23 Q. Do you know what kind of medical missionary work
they did?

24 A. Medical -- basically medical, doing medical
missions.

25 Q. When your father came back, did he develop a
private

15332

Barbara Trent - Direct

1 practice?

2 A. He did for a while in Illinois. And then he became
a

3 professor at one of the universities in Illinois. Then
from

4 there, we -- when I was age 6, we moved to Birmingham,
Alabama,

5 and that's where he got his master's degree in
radiology.

6 Q. Did he then become a dental radiologist?

7 A. A dental radiologist.

8 Q. And was that his specialty from that time on?

9 A. Yes.

10 Q. Now, when your folks lived in Birmingham, do you
recall how

11 long they lived there?

12 A. Three years.

13 Q. And did they develop relationships with some of the

14 community members there in Birmingham?

15 A. Yes. Shades Mountain Bible Church that they went
there.

16 And I'm -- I can't recall with my age all the other
events my

17 mom was involved in.

18 Q. Does your sister live in Alabama now?

19 A. She does now.

20 Q. After your parents were killed, did some of those
people in

21 Birmingham express some of the good deeds that your
parents had

22 done in that community?

23 A. Yes. They all pitched in, and my sisters came down
about

24 two days after the bombing and they helped watch --
helped them

25 with their kids; and they all pitched in. And a lot of
them

15333

Barbara Trent - Direct

1 knew Mom and Dad well, so they were trying to help us
as much

2 as they could.

3 Q. After your folks left Birmingham, where did they
move?

4 A. To Oklahoma City.

5 Q. Is that where they resided until they were killed?

6 A. Yes.

7 Q. Do you remember what -- approximately what year
they moved

8 to Oklahoma City?

9 A. I can't.

10 Q. Was it around 1973?

11 A. Yeah. It's -- they were there for 23 years.

12 Q. Are you a little nervous?

13 A. Yes, I am. Sorry.

14 Q. There is water there, if you --

15 A. I'm sorry.

16 Q. -- if you want to help yourself.

17 Now, when your father moved to Oklahoma City,
did he

18 teach, or did he develop a private practice?

19 A. No, he became a dental radiologist at the OU Health
Science

20 Center.

21 Q. Did your mother work?

22 A. She did. She worked at Deaconess Hospital as an
RN.

23 Q. Where is Deaconess Hospital?

24 A. In Oklahoma City.

25 Q. For how many years did your mother work as a nurse
at

15334

Barbara Trent - Direct

1 Deaconess?

2 A. 23 years.

3 Q. Was she working there at or around the time of her
death?

4 A. Yes. She was working part-time, and I was also
working

5 there. I've been there 10 years.

6 Q. Tell the jury what you did.

7 A. I'm an RN -- after my mother -- became a nurse.
And I

8 worked there with her. We worked on separate floors,
but we

9 worked there together.

10 Q. Now, tell the jury a little bit about your routine
of how

11 often you saw your mother in those days and months
before the

12 bombing at Deaconess Hospital.

13 A. Well, I never -- I didn't live with them in their
home, but

14 I never lived out of state away from them. And we were
very,

15 very close. I saw Mom -- she worked part-time at that
time.

16 I'd go up and see her at lunch or eat lunch with her;
or after

17 work, I'd go over after work to their house. I had my
own key,

18 go over there on the weekends, you know. We were just
really

19 close. We did a lot.

20 Q. Now, while your mother worked part-time, did your
father
21 come to a point in his career where he retired from
teaching?
22 A. He did. He retired in 1989. And at that time,
Mom's --
23 when she became 65, she had to work less because of
Social
24 Security, but she was still working part-time.
25 Q. Did your father do volunteer activities after that
time?

15335

Barbara Trent - Direct

1 A. He and Mom -- he and Mom did a lot together, and
Mom got
2 them involved with training with the Red Cross; and
they were
3 doing that for a full year before they were killed.
They were
4 actually being trained for emergencies to help out, so
they
5 were going through all the training classes.
6 Q. How long was that training?
7 A. For a year. They had done that for a full year.
8 Q. Let's turn to April 19, 1995. Were you at work in
9 Deaconess Hospital on the morning of the bombing?
10 A. Yes. I work in an outpatient surgery area, but our
area is
11 a central area where when there are any disasters, they

will

12 come through our area.

that

13 And so we are kind of the triage area. And

-- there

14 morning, we heard a major thump, and we thought it was

we

15 were some -- there was some construction going on, and

looked on

16 thought something had happened upstairs. And then we

17 TV and we saw the Murrah Building.

believe that

18 Q. Now, at that point, did you have any reason to

19 your parents were in the Murrah Building?

and so

20 A. I thought my mom would be called in to come help,

21 I --

22 Q. Did you worry about her that morning?

our

23 A. Not -- my husband was trying to get hold of all of

24 family members just to make sure. I didn't think any

and I

25 different. When she didn't come in after a few hours

15336

Barbara Trent - Direct

Dad were

1 didn't hear from her, it was just assumed that she and

were doing;

2 helping with the Red Cross because that's what they

3 and so I thought, okay, they're helping with the Red
Cross and
4 they're down there helping people out. So I just
figured she'd
5 call me later.

6 Q. Did you hear from her that evening?

7 A. No, and we called them and called them. I started
getting
8 a little worried, but I thought it couldn't be.

9 So I called the church, because I thought they
10 probably went on there from -- to choir practice.

11 And the man that answered the phone couldn't
tell me
12 if they were. And I thought, okay, they're probably
still out
13 helping; and so my husband called through the night.

14 I called from 2 a.m. in the morning on. Then I started
15 worrying and I called the house. And I thought, well,
they're
16 out there helping, but Mom will for sure -- it was just
strange
17 that she didn't call me because she'd always call me
with

18 anything. She'd call just to check on me.

19 Q. Did you have to go work that morning on April 20?

20 A. I went to work at 6 a.m., and I thought for sure
she would
21 call me.

22 Q. Why did you think she would call you at work?

she 23 A. I thought, okay, she's going to let me know because
going to 24 didn't want to wake me up through the night, and she's
to be at 25 call me and let me know she's coming home -- I'm going

15337

Barbara Trent - Direct

Daddy 1 work -- and let me know -- I mean, you know, make sure
friend 2 everything's okay and that she's okay and that she and
couldn't, so 3 had been helping. And at 9:00, I was waiting; and a
And I let 4 from their church was trying to help find them and
5 I decided to leave work and go over to their house.
6 myself in.

7 Q. What did you find?

problems and a 8 A. I thought for sure -- my dad had some heart
to see 9 pacemaker -- I thought, okay, I'll check in the cabinet
helping, 10 if there is -- his heart pills, because if he's there
the 11 then he'll have his heart pills with him. So I opened
sank. 12 cabinet, and his heart pills were there; and my heart

13 And I spotted a folder by the phone, and I rapidly went
through
14 it. And I opened the middle that said, "If you have
any
15 questions about your Social Security, please come to
the Alfred
16 P. Murrah Federal Building."

17 And then I called my sisters and I went
frantic. I
18 called my sisters; and they said, "Oh, Barb, you know,
you
19 know, everything -- it's fine. Nothing is wrong."

20 And I called my husband, and he left to go up
and
21 look. So he went downtown. And he went to the Red
Cross,
22 because I had called the Red Cross and they had said a
lot of
23 people had been volunteering to help but weren't signed
in.

24 Q. Were you trying to see if your parents had been
volunteers
25 at the Red Cross?

15338

Barbara Trent - Direct

1 A. Yeah.
2 Q. Did there come a time, Mrs. Trent, when you learned
that
3 your parents' car was found in the vicinity of the
Murrah

4 Building?

FBI
5 A. That day when I went to their house at 4 p.m., the
6 called and said that their van was found in the -- on
that
7 block in the crime scene.

8 Q. Did you later learn that both of your parents had
gone down
9 to Social Security that morning?

10 A. Yes. We figured that where one was, the other --
they
11 always did everything together. So we didn't know.

May 4,
12 after two-and-a-half weeks, the -- until when they
stopped the
13 final search. They were -- with the last group to be
found.

14 So we didn't know that whole time. We assumed that
that's
15 where they were because their van was down there; and
then they
16 found them, found their bodies that day.

17 Q. So you were told on May 4 about --

18 A. Yes.

19 Q. -- the identification of your parents?

20 A. Yes.

21 Q. Could you tell us a little bit about what type of
person
22 your mother was.

23 A. Absolutely wonderful. My parents were so loving,

and they

told us 24 brought us up in a Christian home; and they not only

And my 25 they loved us all the years growing up, they showed it.

15339

Barbara Trent - Direct

1 Mom constantly told me how proud she was.

go see 2 And just the little memories I have: When I'd

want you 3 her on the floor after work, she'd take me and say, "I

one of the 4 to meet one of my patients." And she'd pull me into

daughter." 5 rooms with the patients, and she said, "This is my

me, and 6 And she just got a big smile like she was so proud of

7 it just made me feel so good, those memories.

8 Q. Was she an outgoing person?

people, 9 A. She was very outgoing, very hospitable to other

her 10 always giving. She would after work go spend time with

she was 11 patients. So many times she was late -- growing up --

patients and 12 late getting home because she'd go sit with her

many 13 spend time talking to some of the people. I've had

Mom and 14 patients later on that have told me that they remember
she had 15 how she took care of their husband dying and how much
16 meant to them.

17 Q. What kind of person was your father?

18 A. He was very -- the gentlest, kindest man you'd ever
meet.

19 An example of how other people thought of him: A
friend of

20 mine went to a dentist and she asked, "You know Charles
21 Hurlburt? You know, he worked at the dental school."

10 22 He goes, "Why, yes, I had worked with him for
23 years."

24 And it wasn't a name I recognized. And upon
talking
-- they 25 about Dad, he cried and had to leave the room. Daddy

15340

Barbara Trent - Direct

And 1 all loved Dad. He was just -- he just loved people.

2 they -- at the dental school, they had a scholarship
for a

3 student that showed qualities like Dad that had made
good

4 grades and yet was kind to other people.

5 Q. Could you tell the jury what kind of impact it's
had on you

6 personally to lose both of your parents?

7 A. Personally, my parents were truly some of the
finest people

8 and the biggest support of my life. And I have missed
them

9 very, very, very much.

10 It's been very hard for me in the realms of
working.

11 I tried to go back to my job; and I worked for six
weeks, and

12 then the stress became incredible with trying to make
critical

13 decisions in the area that I work. It was hard -- it
was very

14 stressful to make those decisions, so I decided to take
a

15 leave.

16 Q. Did you see an impact on the patients you were
treating

17 because of your condition?

18 A. No. I continued to do my job well, but I felt that
I was

19 too stressed to make those kind of decisions. And I
didn't

20 want to -- I didn't want to -- I did not want to be a
negligent

21 nurse.

22 And so I took a leave, and then I went part-
time, and

23 I've been part-time since. And I'm -- I am hoping to

go back

24 full-time soon. I'm -- I'm starting to come around
finally and

25 would like to go back full-time, but it's -- up to this
time, I

15341

Barbara Trent - Direct

1 have been -- had trouble with physical illness.

2 Q. Have you had respiratory problems?

3 A. My asthma. I've been in the hospital with severe

4 respiratory problems due to -- and my doctors have even
said,

5 "This is all due to your being stressed. Your immune
system is

6 down."

7 Q. In the hospital in Deaconess -- are you there part-
time

8 now?

9 A. Yes.

10 Q. Do you engage in disaster drills?

11 A. Yes.

12 Q. And has there been an impact on you due to the loss
of your

13 parents and how you carry out your role in disaster
drills?

14 A. That is very hard. We've had quite a few disaster
drills

15 since this has all happened so we could be well-

equipped next

16 time it does; but every time they have one, it does --
it

17 really -- it upsets me. It really does. And it's hard
to

18 think when that happens because I just flash back. And
I have

19 to just leave what I'm doing and go get myself together
and

20 let -- sometimes let the other nurses handle it,
although it is

21 just a drill. I don't feel equipped at this point to
handle

22 that.

23 Q. Do some of your -- do you have any children, Mrs.
Trent?

24 A. No, I don't.

25 Q. Do some of your sisters have children?

15342

Barbara Trent - Direct

1 A. They all have three kids apiece.

2 Q. I'd like to show you Government's Exhibit 2223 --

3 MS. WILKINSON: Which we would offer into
evidence.

4 MR. TIGAR: No objection, your Honor.

5 THE COURT: Received, may be shown.

6 BY MS. WILKINSON:

7 Q. Tell the jury who is in this picture, Mrs. Trent.

Phillip. 8 A. That's my mom and my dad and my little nephew,

9 Q. Whose son is he?

10 A. Sherry.

11 Q. Could you tell the jury the impact on the rest of
your

12 family, your sisters and your nieces and nephews, the
impact

13 that the loss of your parents has had on them.

14 A. It's been hard on all of them and even my nieces
and

15 nephews, their grandchildren -- they -- my parents
really,

16 really got to know their grandkids. They spent a lot
of time

17 with them. Whenever they'd baby-sit for my sisters --
although

18 my sisters are out of state now, at different times in
their

19 life, they did live in Oklahoma. And my mom and dad
spent a

20 lot of time with the kids and -- and it was just fun,
because I

21 remember when they would take care of them, they just
didn't

22 push them to the side and make them watch TV. They
spent their

23 days doing things for the kids. I mean their whole
day, they

24 did things that the kids would enjoy. They really
focused,

25 they really focused on the kids to make them feel

important.

15343

Barbara Trent – Direct

1 Q. Finally, Mrs. Trent, could you express to the jury
the

2 impact on the community of losing your parents.

3 A. There were -- there have been many -- my mom and
dad were

4 involved in many different activities in the church, in

5 helping, volunteering with the Red Cross, at the
hospital, you

6 know, just different areas that they knew people.
There have

7 been many people that have come up to me after all this
and

8 said how much they loved Mom and Dad.

9 They named the -- the nurses loved Mom so
much, they

10 named one of the day rooms where they put the patients
in the

11 "Hurlburt Hospitality Room," because that was what they
thought

12 of Mom. They really loved Mom and her hospitality, and
-- she

13 cared. She had people over to the house a lot. She
cared

14 about individual people. She did a lot for people.
Always at

15 different holidays, she always had people over because
she

16 didn't want people to be left out if they didn't have a
place
17 to go. She had gifts for them. She remembered people,
she and
18 Daddy together, so . . .

19 MS. WILKINSON: Thank you very much, Mrs.
Trent.

20 No further questions, your Honor.

21 THE COURT: Any questions?

22 MR. TIGAR: No, no questions, your Honor.

23 THE COURT: You may step down. You're
excused.

24 Next?

25 MR. MACKEY: We'll call Mr. Michael Reyes.

15344

1 THE COURT: Thank you.

2 THE COURTROOM DEPUTY: Would you raise your
right

3 hand, please.

4 (Michael Reyes affirmed.)

5 THE COURTROOM DEPUTY: Would you have a seat,
please.

6 Would you state your full name for the record
and

7 spell your last name.

8 THE WITNESS: Michael Reyes, R-E-Y-E-S.

9 THE COURTROOM DEPUTY: Thank you.

10 DIRECT EXAMINATION

11 BY MR. MACKEY:

12 Q. Good afternoon, Mr. Reyes.

13 A. Hi.

14 Q. Tell the jury, please, where you live.

15 A. I live in Bethany, Oklahoma.

16 Q. Is that near Oklahoma City?

17 A. It's a suburb.

18 Q. How old are you?

19 A. 33.

20 Q. And how long have you lived in Oklahoma City or the
area?

21 A. 20 years.

22 Q. What's your educational background?

23 A. I have a degree in accounting from Oklahoma State

24 University.

25 Q. And when was that awarded?

15345

Michael Reyes – Direct

1 A. 1989.

2 Q. Mr. Reyes, for whom do you presently work?

3 A. I work for the Department of Housing and Urban
Development.

4 Q. And how long have you worked for HUD?

5 A. Nine years.

6 Q. What's your current assignment or duty?

7 A. I'm a housing specialist in the single-family
division at

8 HUD. We basically work with FHA loans.

9 Q. Mr. Reyes, I want to direct your attention now to
April 19,

10 1995, and ask if you were working in the Murrah
Building on

11 that day.

12 A. Yes, I was.

13 Q. Let me show you Government's Exhibit 952G. It's
already

14 admitted into evidence.

15 You see that before you?

16 A. Yes, sir.

17 Q. Is that an accurate floor plan of the HUD work area
on the

18 7th floor in the Murrah Building?

19 A. Yes, sir.

20 Q. Mr. Reyes, if you take your pen -- it's the one
with the

21 cord to -- yes. Reach down beneath the surface and
press on

22 the monitor. Mark an X where your work station was on

23 April 19, 1995.

24 A. I didn't mean to -- I mean it to be farther to my
left.

25 Q. You can press the button and try one more time.

15346

Michael Reyes - Direct

1 So space was tight and you were sitting on the
ledge.

2 Is -- let me ask this way, Mr. Reyes. How far from the
south

3 wall was your desk?

4 A. About 4 feet.

5 Q. At 9:02 on April 19, 1995, were you sitting at your
desk?

6 A. Yes, sir.

7 Q. Tell me what happened.

8 A. I was working on my files and the power went off.
I
9 thought that was very strange because the power had
never gone

10 off before. And then I started to hear a rumbling
sound, and I

11 thought that perhaps we were experiencing an
earthquake, even

12 though Oklahoma really doesn't get earthquakes.

13 So I knew that people in earthquakes usually
hide

14 under things, so I thought I'd jump under my desk. And
when I

15 went to do that, the floor wasn't there. And I was in
a

16 head-first dive, in a free fall. And I knew at that

time that

17 I had maybe 5 seconds to live.

18 Q. Were you thinking to yourself, Mr. Reyes, about
your

19 condition and the dangers you were experiencing at that
moment?

20 A. I was saying to myself that I did not want to die
and that

21 this wasn't real, but -- in my mind, I knew I was about
to die.

22 Q. Go ahead.

23 A. I was going to hit bottom somewhere and that would
be it.

24 Q. Do you remember striking bottom?

25 A. I don't actually remember striking bottom.

15347

Michael Reyes - Direct

1 Q. What do you remember next?

2 A. The next thing I remember is I'm in a position --
in a

3 crouched position up to my waist in rubble and my arms
are kind

4 of tangled in the -- the steel supports for the
temporary walls

5 on the 3d floor.

6 Q. Mr. Reyes, when you landed on the 3d floor after
your fall

7 from the 7th floor, did you see other persons around
you?

That 8 A. I saw about six people that worked in that office.

9 was the office of Health and Human Services.

10 Q. And did some of those people immediately come to
your aid?

11 A. As -- the first thing I remember is that a man
said, "Is

12 everyone all right?"

13 And I said, "Help me."

14 And he was surprised to see me. He asked
where I came

15 from, and I said the 7th floor.

16 He said, "Oh, my God." And he said, "Stay
there.

17 We'll clear a path to get to you." And they did that.

18 Then they took me -- I was very bloody, and
they took

19 me over to the wall and had me lean against a bookcase
while

20 they worked on getting an escape path out of the
building.

21 Q. What was your physical condition? What injuries
have you

22 suffered as a result of that fall?

23 A. I had a pretty good gash right here on my left
temple, left

24 part of my chin, my right eye. I had a pretty good
gash on my

25 wrist. I didn't know it at the time, but two bones in
my

15348

Michael Reyes - Direct

1 pelvis had separated.

2 My right leg from mid thigh down was a
complete
3 bruise. My lower lumbar area was a complete bruise,
and I had
4 pockmarks all over my face and my legs. I had a gash
on each
5 shoulder blade. That's about all I can think of.

6 Q. In time and with the help of others, were you able
to get
7 out of the Murrah Building that morning?

8 A. Yes.

9 Q. And how exactly did you do so?

10 A. The people from Health and Human Services decided
that the
11 best way to get out would be to climb out on the ledge
on the
12 3d floor and work our way down onto the plaza level,
which is
13 one floor lower. And so they had someone try it first
to see
14 if it would work. And they said if that worked, you're
going
15 next.

16 And I said, "I don't think I can do that."

17 And they said, "Well, you have to."

18 So I tried it, and that's how I got onto the

plaza,

19 and then people helped me over to 4th and Harvey to a
triage

20 area.

21 Q. Mr. Reyes, let me show you Government's Exhibit
968, which

22 is already in evidence.

23 With the same pen, could you illustrate for
the jury

24 where exactly it was that you fell from the 7th to the
3d floor

25 on that photograph.

15349

Michael Reyes – Direct

1 A. This is the 7th-floor area right here, and this is
about

2 the 3d-floor area, so I fell like that pretty much.

3 Q. Mr. Reyes, do you know of any other person inside
the

4 Murrah Building that was above the 4th floor and fell
that

5 survived other than you?

6 A. One person.

7 Q. How long were you in the hospital, Mr. Reyes?

8 A. 24 hours.

9 Q. And after your release, did you stay at home then
to

10 recover from your own injuries?

11 A. I went to my parents' house.

12 Q. Mr. Reyes, on April 19, 1995, were you the only
Reyes that

13 was employed and working at HUD?

14 A. No. My father worked there, also.

15 Q. What was his name?

16 A. His name was Antonio Reyes.

17 Q. And on what floor in that same building did Mr.
Antonio

18 Reyes work?

19 A. He worked on the 8th floor.

20 Q. After you had escaped the building that morning and
were

21 laying on the gurney which you described, do you
remember

22 inquiring about your father?

23 A. Yes. A lady from work found me and she asked if I
was

24 okay.

25 And I asked about my father, and I asked if
she had

15350

Michael Reyes - Direct

1 seen him.

2 And she said, "No, but do you realize what the

3 building looks like?"

24 joined the Navy when he was 18.

a lot of 25 He retired from the Navy. He had a lot of --

15351

Michael Reyes - Direct

when he 1 awards and honors during his service in the Navy. And

2 retired, he came to work for HUD.

3 Q. How many total years did he serve in the U.S. Navy?

4 A. 26.

5 Q. And what was the nature of his assignments?

6 A. The majority of the time, he was stationed on naval
7 vessels. The last was the aircraft carrier U.S.S.

He 8 Independence. He had been on submarines, destroyers.

9 participated in the Cuban Missile Crisis.

10 Q. In 1977, was he assigned while still in the Navy to
11 Oklahoma City?

12 A. Yes.

13 Q. To do what?

14 A. He was transferred to the Navy recruiting office in
15 Oklahoma City.

16 Q. At that time, what did the Reyes family consist of?

17 A. My mom and dad and my older sister.

18 Q. And what's her name?

19 A. Dahua Northrup.
20 Q. And your mother's name?
21 A. Dora Reyes.
22 Q. After working for a few years there in Oklahoma
City, did
23 he receive an assignment outside of Oklahoma City?
24 A. Yes. He was -- received orders to report to the
U.S.S.
25 Independence based in Virginia.

15352

Michael Reyes - Direct

1 Q. And when he left to honor those assignments, what
did the
2 rest of the Reyes family do?
3 A. We stayed put. We were just going to keep our life
in
4 Oklahoma. He would be back in 18 months.
5 Q. And he returned?
6 A. And he returned.
7 Q. And the four of you then continued residing in
Oklahoma
8 City?
9 A. (Witness nods head.)
10 Q. How does your mother make a living?
11 A. She's a self-employed CPA.
12 Q. And your sister?

13 A. She's a special education teacher in Kansas.

14 Q. Mr. Reyes, could you tell the members of the jury
how long

15 your father worked in the public sector -- that is, for
HUD or

16 other federal agencies -- after his retirement from the
Navy?

17 A. 11 years.

18 Q. Was that all in Oklahoma City?

19 A. Yes.

20 Q. In the course of that time, did he receive various
honors

21 and awards that you can speak to as a result of that
service?

22 A. Yes. In 1993, he was awarded employee of the year
from the

23 Federal Executive Board in Oklahoma City.

24 Q. Was your father also active in various community

25 organizations in Oklahoma City?

15353

Michael Reyes - Direct

1 A. Yes.

2 Q. What were some of those?

3 A. Some of those. He was active with the Eagle Ridge
4 Institute, which is a nonprofit organization that helps

at-risk

5 teenagers and young adults to learn life skills and to
better

6 themselves.

Federal
7 He was on the board of directors of the
8 Employees Credit Union, which is a volunteer post; and
he was
9 also very much involved with the Latino Community
Development
10 Agency, which is another nonprofit organization in
Oklahoma
11 City.

12 Q. Were children and futures of children important to
your
13 father?

14 A. Absolutely.

15 Q. How did he demonstrate that to you?

Institute
16 A. He spent a lot of time both at the Eagle Ridge
17 and at the Latino Community Development Agency to help
18 children, because he felt that through education and
mentoring
19 that since children were our future that that would
better the
20 world when they grew up.

21 Q. Mr. Reyes, let me show you at this time
Government's
22 Exhibit 1462 that I'll now offer.

23 MR. TIGAR: No objection, your Honor.

24 THE COURT: 1462 is received, may be shown.

25 BY MR. MACKEY:

15354

Michael Reyes - Direct

1 Q. Mr. Reyes, let's start with yourself on the far
left-hand
2 corner of that exhibit, and tell the members of the
jury by
3 name the persons shown in that photo.

4 A. Okay. The far left is me.

5 The upper, going clockwise, at the top, that's
my
6 father.

7 And then my mother on the right, and my sister
at the
8 bottom.

9 Q. How old was Tony Reyes at the time of his death?

10 A. He was 55.

11 Q. Now some two-and-a-half years later, Mr. Reyes,
could you
12 describe to this jury what impact his death at that age
has had
13 upon your mother.

14 A. Well, the first thing that comes to mind is they
had
15 already begun outlining what they were going to do in
16 retirement. They had built a house north of Oklahoma
City out
17 in the country that they were going to live out their
lives in,

the house 18 and one of the first major things my mom did was sell
by 19 because it's not something that she could take care of
20 herself. So she moved into a smaller house.

doesn't 21 She doesn't have her best friend anymore. She
and she 22 have someone to travel with or to visit relatives with,
lot of 23 doesn't have someone living in the house that can do a
live 24 the handyman stuff around the house. That's me, but I
25 30 miles away.

15355

Michael Reyes - Direct

death 1 Q. How about for your sister? What does your father's
2 mean?

meant 3 A. Well, she's a self-proclaimed daddy's girl, and Dad
4 everything to her, plus the fact that she has two small
at 5 children; and my parents made it a point of seeing them

don't 6 least once a month to watch them grow up, and now they
to take 7 have their grandfather. And it's not as easy for Mom
8 care of the grandchildren once a month.

9 Q. And for you? What has it meant the most?

10 A. I don't have anyone that I can turn to for advice
very

11 easily, especially at work.

12 Q. Was your father a friend?

13 A. Absolutely.

14 Q. And an advisor?

15 A. Yes.

16 MR. MACKEY: Thanks, Mr. Reyes.

17 MR. TIGAR: No questions, sir. Thank you.

18 THE COURT: You may step down. You're
excused.

19 Next, please.

20 MR. MACKEY: Yes, your Honor. We'll call Mr.
Lyle

21 Cousins.

22 THE COURTROOM DEPUTY: Raise your right hand,
please.

23 (Lyle Cousins affirmed.)

24 THE COURTROOM DEPUTY: Would you have a seat,
please.

25 Would you state your full name for the record
and

15356

1 spell your last name.

2 THE WITNESS: My name is Lyle Marshall

Cousins, Jr.,

3 C-O-U-S-I-N-S.

4 THE COURTROOM DEPUTY: Thank you.

5 THE COURT: Proceed.

6 MR. ORENSTEIN: Thank you, your Honor.

7 DIRECT EXAMINATION

8 BY MR. ORENSTEIN:

9 Q. Good afternoon, Mr. Cousins.

10 Where are you from, sir?

11 A. Oklahoma City.

12 Q. How long have you been living in Oklahoma City?

13 A. About -- totally about 10 years.

14 Q. Where did you grow up?

15 A. In -- born and raised in -- around Flint, Michigan,
and

16 Houston for a few years and then Oklahoma City.

17 Q. What do you do for a living, sir?

18 A. I drive a truck locally in Oklahoma City.

19 Q. Before that, were you an over-the-road trucker?

20 A. Yes.

21 Q. Mr. Cousins, are you married?

22 A. No.

23 Q. Have you been married?

24 A. Yes.

25 Q. Who were you married to?

Lyle Cousins - Direct

1 A. Kim Cousins.

2 Q. Did she die in the bombing in Oklahoma City?

3 A. Yes, she did.

4 Q. When she died, where was your wife working?

5 A. She worked for the Department of Housing and Urban
6 Development.

7 Q. And that was your wife, Kim?

8 A. I beg your pardon?

9 Q. Your wife's name was Kim?

10 A. Was Kim, right.

11 Q. When you met Kim -- when did you meet Kim, first of
all?

12 A. I met her at church. It was my first day attending
Sunday

13 school at a church I had just joined about a month
prior, and

14 we had joined the church about the same time. And I
seen her

15 the first day I went to Sunday school.

16 Q. And how did you meet your future wife?

17 A. We were both real shy. It was kind of difficult,
and we

18 met at the Christmas party -- or we actually started
talking to

19 each other at a Christmas party that year.

enter 20 Q. When Kim entered your life, did someone else also
21 your life?
22 A. Yes. She had a son named Corey.
23 Q. How old was Corey?
24 A. At the time, he was 8.
25 Q. And did Corey have a dad that he knew?

15358

Lyle Cousins - Direct

1 A. No.
2 Q. Kim had been raising him on her own?
3 A. Right.
4 Q. How did you get to know Kim?
5 A. Just through church activities and mainly working
with her
6 son in a church missions program on Wednesday nights.
And I
7 used to have a lot of trouble with her son, so I would
talk to
8 her after church to try to get her son straightened
out.
9 Q. And you told us that you were both shy people; but
after
10 you had worked with her son for a while, did you
eventually ask
11 Kim out?
12 A. Yeah, I asked her out, and she turned me down.

13 Q. Did you eventually win her over?

14 A. Yeah, because she had a boyfriend; but she said if
she ever
15 got rid of him, she'd let me know.

16 Q. How long did it take till she let you know?

17 A. That was on Wednesday night, and then she called me
Friday

18 and asked me to come to one of her son's soccer games.

19 Q. Mr. Cousins, when did you marry Kim?

20 A. On June 25, 1994.

21 Q. Now, in the time that you had been dating her, had
you
22 gotten to know her son, Corey?

23 A. Yes.

24 Q. What did he call you during that time?

25 A. He just called me "Lyle."

15359

Lyle Cousins - Direct

1 Q. Once you got married, did he decide to call you
something
2 else?

3 A. Yeah. He called -- he tugged on my tux at the
wedding day

4 and he said -- he looked up and said, "Now I can call
you Dad."

5 Q. After you married Kim, did you and she talk about
having

6 children of your own?

7 A. Yes, we did.

8 Q. What did you decide?

9 A. It was -- within just a few months before the
bombing, we

10 started discussing having another child; and her
sisters and my

11 sisters all have boys, and we really wanted to have a
little

12 girl and were talking about having a child then.

13 Q. Did you have different ideas about when you'd go
about

14 doing that?

15 A. Yeah. I wanted to start right away. I would --
when I

16 would see her take her birth control pill, I would try
and talk

17 her out of taking it; and she would always come back
with a

18 comment that she had plenty of time because a friend of
hers

19 that she worked with, Linda Florence, was 40 when she
had her

20 first child, so she said she had plenty of time.

21 Q. Let me ask you some questions now about April of
1995. How

22 did you and your wife spend the weekend before the
bombing?

23 A. We had taken a church youth group out to a small
town in

24 western Oklahoma on a fishing trip. It was a small
church

probably 25 camp. They had some nice little ponds, and we took

15360

Lyle Cousins - Direct

high and 1 about 20 of the boys in the youth group, mostly junior
2 high school boys.

3 Q. And you had all gone fishing together?

4 A. Yes.

still in 5 Q. Were the fishing poles that you and your wife used
6 the truck after you got back?

7 A. Yeah. We left them in the back of my Blazer.

your 8 Q. Let me ask you about the 19th of April. How did
9 morning start that day?

up. I 10 A. I got up at 6:00. That was my normal time to get

wasn't 11 had to be to work at 7, and I got myself ready. And I

some chest 12 feeling very well. I had a little sinus problem and

to work 13 congestion, and -- but I was going to go ahead and go

14 anyway.

ready, 15 Sometime while I was in the bathroom getting

16 Corey had got out of the bed and got in bed with Kim.

And I --

17 about 6:25, I walked in and -- in the bedroom and I
kissed her,

18 told her I loved her; and she just said "Yeah, yeah,
yeah."

19 And as I walked back out in the living room,
the phone

20 rang; and it was work saying it was a slow day and that
I

21 didn't need to come in if I wanted to stay home. And I
said I

22 did. Being that I was feeling bad, I went and took a
shot of

23 NyQuil and went back, got back in bed with Kim and
Corey.

24 Q. Did Kim get up a little later?

25 A. Yeah. I think around a little after 7, she got up
and

15361

Lyle Cousins - Direct

1 began to get ready and get Corey ready for school. And
I'm not

2 exactly real positive what time she left, because by
that time

3 the NyQuil was starting to work and I was kind of in a
groggy

4 kind of stage, but I was just aware of her in the room
and

5 getting ready.

6 Q. Did you have a conversation before she left the

house?

7 A. Yeah. She told me before she left -- she said she
wasn't

8 coming home tonight; that she'd see me in church, to
just meet

9 her there because we went to church every Wednesday
night.

10 She --

11 Q. Go ahead.

12 A. She just told me she wouldn't come home -- she
wasn't

13 coming home; and she reached down and she kissed me and
told me

14 she loved me.

15 And I just said, "Yeah, yeah, yeah," like she
did to

16 me.

17 Q. Later that morning, did you receive a call?

18 A. Yeah. A little after 10, our church secretary
called and

19 asked me if I had been watching TV.

20 Q. Had you been?

21 A. No. I was sleeping.

22 Q. So what did you do?

23 A. I turned the TV on while I was still on the phone
with her,

24 and I just -- I couldn't register what I was seeing
because she

25 had already told me that there had been a bombing
downtown and

15362

Lyle Cousins - Direct

1 that it was the building where Kim worked. And when I
looked
2 at the building, I realized it was the building, but I
didn't
3 think it was as bad as it was, except I seen the first
news
4 picture was a picture of the back of my Blazer with the
fishing
5 poles sticking out, and I could tell the window was
blown out
6 of it and it looked like it was on fire.
7 Q. As the day went on, did you get more news about
whether
8 your wife had gone to work that day?
9 A. Yes, I did.
10 Q. How did you learn about that?
11 A. I knew by the timing and everything that she had to
be
12 there, and I talked to some other employees that made
it out
13 and that said that they thought she was there but that
nobody
14 would say for sure or not whether they seen her inside
or
15 outside the building afterwards and kind of kept up
hope all
16 day long till that evening, one of her co-workers, Rita
Cruz --

during 17 she had been missing for quite some time, and sometime
And her 18 that afternoon they had found her and got her home.
shortly 19 and her husband came to my house; and she told me just
20 before 9, like 8:55, that she had seen Kim at her desk.
21 Q. That was April 19?
22 A. Right.
your 23 Q. How long did it take before you knew for sure that
24 wife had been found and identified?
25 A. It was 10 days. It was the following Friday.

15363

Lyle Cousins - Direct

and your 1 Q. Tell the jury what those 10 days were like for you
2 son, Corey.
it was 3 A. It was really excruciating. I told a lot of people
and it 4 sometimes -- some of the most hurting times of my life,
because of 5 was also some of the most spiritual times of my life
best 6 my church family spending so much time with me and my
7 friends just hanging with me the whole time.
8 And it was just really difficult for me and

especially

9 Kim's mom.

those 10 Q. Did you have a conversation with Kim's mom during
11 days about what would happen with Corey?

Thursday 12 A. Yeah. It was the second night of the bombing,

coming 13 night. We were resigned to the fact that Kim was never

there 14 home again and that she was in heaven, and I just --

and I 15 was -- the apartment was just full of people, and her

I looked 16 were in our own little world sitting on the sofa. And

17 at her and said, "What happens to Corey now?"

was all 18 And she said, "Well, he's your son"; and that

19 she said to me.

20 Q. And has he been your son ever since?

21 A. Yes.

that his 22 Q. After 10 days, did it fall to you to tell Corey

23 mother had died?

school on 24 A. Yes, I did. I told him after he got home from

difficult things 25 that Friday. I guess that was one of the most

Lyle Cousins – Direct

1 I ever done in my life. That was just right near the
top.

2 Q. How has Corey dealt with the death of his mother?

3 A. He's actually -- recently, he's dealt really well
with it.

4 At first he was just like me. He would have a bad day
and a

5 good day and break down a lot. It seemed like the days
that I

6 was having struggling would be the days that he would
comfort

7 me; and when he was struggling, I would comfort him.

8 Q. Mr. Cousins, I'd like you first to take a look at
your

9 screen.

10 MR. ORENSTEIN: If I could show Mr. Cousins
and offer

11 into evidence Exhibit 2208.

12 MR. TIGAR: No objection, your Honor.

13 THE COURT: Received, may be shown.

14 BY MR. ORENSTEIN:

15 Q. Mr. Cousins, would you tell the jury who that is.

16 A. That's my wife, Kim Cousins.

17 Q. Will you tell the jury who Kim Cousins was.

18 A. She just was -- you know, after the bombing, me and
her dad

19 sit around and we was describing to ourselves and what
she

20 meant to us; and he just -- he summed it up for me.
She was
21 just class, I mean just a classy woman. She just --
she was
22 the most beautiful person I've ever known. And I used
to -- I
23 just couldn't believe that a big, dorky guy like me
ended up
24 with somebody like that.
25 Q. I'd like to ask you, Mr. Cousins, about the effect
your

15365

Lyle Cousins - Direct

1 wife's death has had on you after 10 months of being
married to
2 her and two-and-a-half years later.
3 A. It's tough being the mom and the dad all of a
sudden when
4 you hadn't even been a dad for very long to start with.
And my
5 biggest struggles have just been with Corey and trying
to do
6 the things his mom did for him and like being part of
the PTA
7 at school and trying to make his life as normal as
possible and
8 keep him busy. And it's meant a lot of sacrifices as
far as
9 I'm concerned for me, because he's like the most
important

10 thing in my life.

11 Q. You told us that you're a truck driver.

12 A. Uh-huh.

13 Q. Are there times when you drive a truck that you
think about

14 your wife?

15 A. Yeah.

16 Q. What do you say when you're driving a truck home
thinking

17 about her?

18 A. Yeah. There was many a times driving home at night
I would

19 just thank God -- I know this is a joke -- "Just let
her be

20 home when I get there."

21 Q. I'd like you to think about a time about a year
after you

22 got married. Did there come a time when you decided to
take

23 off your wedding ring?

24 A. Yeah. It was June of '95. We were married on June
25, and

25 it just happened that on June 25 of '95 that I was
taking Corey

15366

Lyle Cousins - Direct

1 down to see his grandparents. And we went to -- we met
in

Oklahoma City 2 Ardmore, Oklahoma, which is about halfway between
really 3 and Dallas. And none of us, me or her parents -- had
then we 4 even dawned on us that that was our anniversary. And
way. 5 talked about it. I don't know; God worked it out that

together on 6 But it ended up that we could kind of have a time
difficult 7 that day that we didn't even realize it would be as
left, I 8 as it was. We stayed and ate together; and when we
9 went home and I spent my anniversary at the cemetery.

which had 10 Q. Did you take off your ring and put it with hers
11 been recovered?

12 MR. TIGAR: Objection, your Honor.

13 THE COURT: Sustained.

your 14 MR. ORENSTEIN: That's all I have. Thank you,
15 Honor.

excused. 16 THE COURT: You may step down. You're

17 MR. TIGAR: No questions.

recess 18 THE COURT: Members of the jury, we'll take a
remind you 19 here at this point. And, of course, it's my duty to
and also 20 that you are going to hear more than what you've heard

when we 21 to remind you of some of the things that I said to you
sentencing 22 started yesterday morning with respect to the
in 23 hearing and then the factors that have to be considered
the 24 making a decision and the process that is involved in
25 decision.

15367

information 1 And of course, in these two days, the
But there 2 that's been provided to you has focused on one area.
explain 3 are many other things that you must consider, as I will
to you 4 to you in detail when it comes time to turn this over
5 for a decision with respect to sentencing.

minds, 6 So please, of course, continue to keep open
here among 7 avoid discussion of the matters under consideration
about 8 yourselves and with all other persons, and be careful
9 anything that you read, see, and hear, to avoid being
hear in 10 influenced by something other than what you see and

will 11 this room, realizing that the questions to be answered
to you in 12 have to be answered on the basis of what is presented
13 this courtroom.

14 So you're excused now till 8:45 tomorrow
morning.

15 (Jury out at 5:00 p.m.)

16 MR. TIGAR: May I approach, your Honor?

17 THE COURT: Yes.

18 (At the bench:)

19 (Bench Conference 147B3 is not herein transcribed
by court 20 order. It is transcribed as a separate sealed
transcript.)

21

22

23

24

25

15377

1 (In open court:)

2 THE COURT: We're in recess till 8:30 tomorrow
3 morning.

4 (Recess at 5:08 p.m.)

5 * * * * *

6 INDEX

Page	Item
	8 WITNESSES
	9 Eric Thompson
15239	10 Direct Examination by Mr. Orenstein
	11 Greg Sohn
15245	12 Direct Examination by Mr. Goelman
	13 Kay Fulton
15256	14 Direct Examination by Mr. Mackey
	15 Carl Chipman
15264	16 Direct Examination by Mr. Sengel
	17 Alan Prokop
15271	18 Direct Examination by Mr. Ryan
	19 Sharon Coyne
15284	20 Direct Examination by Ms. Wilkinson
	21 William Titsworth
15300	22 Direct Examination by Mr. Orenstein
	23 Gary Campbell
15316	24 Direct Examination by Mr. Mackey
	25

15378

1 Barbara Trent

15329

2 Direct Examination by Ms. Wilkinson

3 Michael Reyes

15344

4 Direct Examination by Mr. Mackey

5 Lyle Cousins

15356

6 Direct Examination by Mr. Orenstein

7 PLAINTIFF'S EXHIBITS

Withdrawn

8 Exhibit Offered Received Refused Reserved

9 1016 15243 15243

10 1171A 15328 15328

11 1386 15268 15268

12 1427 15284

13 1436 15310 15310

14 1437 15305 15305

15 1449 15261 15261

16 1457 15246 15246

17 1462 15353 15353

18 1500 15275 15275

19 1534 15288 15288

20 2208 15364 15364

21 2223 15342 15342

22 * * * * *

23

24

25

15379

1 REPORTERS' CERTIFICATE

2 We certify that the foregoing is a correct
transcript from

3 the record of proceedings in the above-entitled matter.
Dated

4 at Denver, Colorado, this 30th day of December, 1997.

5

6

Paul Zuckerman

7

8

Bonnie

Carpenter

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25