

1 and given to you to correct?

2 A. Yes. Uh-huh.

3 Q. And then you would make changes, corrections, send it  
4 back, then they would send you another draft, correct?

5 A. Yes.

6 Q. But the writing itself is not your writing?

7 A. No.

8 Q. And the writing reflects what the agents --

9 THE COURT: Excuse me. The writing meaning  
10 typewritten or handwritten?

11 MR. DAAR: Excuse me. Good point. Thank you.

12 Q. The typewritten portion of the 20-page document was not  
13 typed by you, and is not your actual words, correct?

14 A. No, sir. But I do have my own original that I have at  
15 home of my own handwritten notes.

16 Q. Okay.

17 A. With regard to everything that has been typed out for the  
18 government, I just don't have them currently with me.

19 Q. So are you using the Government's version of what you  
20 told them to help refresh your recollection?

21 A. It's not a version. It's the actual truth.

22 Q. Okay. The Government's -- well, it's the Government's  
23 written words expressing what they believe that you said?

24 A. Yes, sir.

25 Q. Okay.

1           For the purpose of this examination I would like you  
2 to just turn it over for a moment and try to answer the best  
3 you can without it. If you would need to consult it you will  
4 be able to.

5 A.       It may be a little bit longer.

6           THE COURT: Hold on a minute.

7           MR. HANKINSON: Judge, I don't think counsel can  
8 restrict a witness from refreshing her recollection.

9           THE COURT: I don't believe so either. He can ask  
10 her to --

11 Q.       Okay. Let me request this. If you need to look at your  
12 notes, could you just advise us that you do have that need,  
13 we'll give you the opportunity?

14 A.       No problem.

15 Q.       This business of importing marijuana and hashish is a  
16 complicated business; isn't that correct?

17 A.       Very complicated.

18 Q.       And unlike traditional businesses, there is not contracts  
19 or addresses or businesses visits or appointments or anything  
20 of that nature; is that correct?

21 A.       Yes, sir. As a matter of fact, it's just on a handshake.

22 Q.       Okay. And that is because it's illegal, right?

23 A.       Yes, sir.

24 Q.       Okay. Now, you used the word project. It was my  
25 understanding that the word project describes when a group of

1 people come together, and at least in this case, agree to do  
2 some kind of importing of marijuana or hashish into some  
3 country; is that fair?

4 A. Yes, it is very fair.

5 Q. And the project, once it was -- everybody reaches a place  
6 that they want to go forward, represents an agreement between  
7 all of the people in the project, correct?

8 A. Yes, it does.

9 Q. Some projects are planned, but they never reach the stage  
10 of being agreed upon?

11 A. Yes, that is very true.

12 Q. But the projects that did go through in this case  
13 represent an agreement by the people within that project to do  
14 that project?

15 A. Yes.

16 Q. We've also heard the term proposal. Now, proposal would  
17 be when one party to this potential project would come forward  
18 and present to the other members a service, if you will, a  
19 proposal to offload, for example; is that correct?

20 A. Yes.

21 Q. Or a proposal to purchase and distribute. Someone might  
22 come to the meeting, say, well I'm going to sell ten pounds, if  
23 it's -- ten tons -- if it's delivered to Montreal at this  
24 price.

25 A. Yes.

1 Q. That would be another example of a proposal?

2 A. Yes.

3 Q. So different people with different needs and different  
4 abilities would come together and exchange proposals, correct?

5 A. That's correct, yes.

6 Q. And then if the various proposals were accepted, there  
7 would be an agreement and the project would try to go forward?

8 A. It would try to go forward, yes.

9 Q. Now, there are many different roles within the various  
10 parties who agree to a project, correct?

11 A. Yes, there are.

12 Q. One role, at least in projects that we've heard about,  
13 seems to be what we call what I would call the source and the  
14 ship. In other words, it seems that the one party would be  
15 able to get the product from the source country, and put it on  
16 a freighter, and get the freighter somewhere in the ocean; is  
17 that correct?

18 A. Yes, it is.

19 Q. From that point, there is sort of another breakdown,  
20 which would be the person charged with getting the product from  
21 the freighter to the country in which it's going to be  
22 distributed; is that correct?

23 A. Yes, it is.

24 Q. And that would be called the offload, correct?

25 A. Yes.

1 Q. Then there is sort of a third area, which would be the  
2 distribution and the sale within the country that everything is  
3 brought to, correct?

4 A. Yes. Every situation is separate.

5 Q. Okay. And then, after the load is brought in and sold,  
6 there is a subsequent almost backwards motion of the money  
7 going back through the various parties, correct?

8 A. Yes.

9 Q. In other words, the person in charge of offloading it  
10 would flow through them and back to the person that arranged  
11 the source and the supply, correct?

12 A. Yes.

13 Q. Now, within the world that you were in, Mr. Duboc in  
14 every instance was the source; is that fair?

15 A. Yes. It is fair, very.

16 Q. And in every instance, Mr. Duboc is the one that got the  
17 product from the source country, arranged for a freighter and a  
18 crew and arranged for that boat to be somewhere in the ocean,  
19 correct?

20 A. Yes.

21 Q. And financing means he had the wherewithal to pay the  
22 people that were giving him the product, pay the captain, the  
23 freighter, and sometimes he'd loan money to the people in the  
24 offloading so that they could purchase infrastructure like  
25 ships or trucks to unload; is that fair?

1 A. Yes. It is very fair. To the point where he'd bring  
2 forward so much money in order to get a project complete he'd  
3 do anything. Money was not an issue with him.

4 Q. So he had the money and contacts, relatively easy access  
5 to large amounts of product, correct?

6 A. Yes.

7 Q. His problem was finding people to buy it, distribute it,  
8 and offload it, correct?

9 A. Yes.

10 Q. I mean that is why he always had a boat on the water but  
11 nowhere for it to go?

12 A. Correct. Yes.

13 Q. And so as a businessman he was constantly trying to  
14 develop new sources for offloading, new sources of  
15 distribution?

16 A. Yes.

17 Q. And as a businessman he'd fund offloaders and  
18 distributors to help them help him?

19 A. Yes, he would.

20 Q. Now, in the time that you knew Mr. Duboc, he worked with  
21 many different offload groups, correct?

22 A. Yes. But I was not aware of who else he worked with,  
23 only currently with myself or Gary Vance.

24 Q. Okay. But you are aware through talking to people that  
25 he had worked with other distributors?

1 A. Oh, yes.

2 Q. Now, certainly in the course of your testimony, we  
3 have -- I've wrote down about 25 different names that have come  
4 up of people that have been at one time or another used by  
5 Mr. Duboc so that he could sell his product.

6 A. Yes.

7 Q. Correct?

8 A. Yes.

9 Q. Now, Mr. Duboc also had at least five or six different  
10 suppliers, correct?

11 A. I don't know that information. But probably.

12 Q. Have you heard of the name N-A-D-I-N?

13 A. Yes, I have.

14 Q. Was that one of Mr. Duboc's suppliers?

15 A. Yes.

16 Q. Have you heard the name R-S-Z-A-K?

17 A. Yes, I believe he is Pakistani or one of those countries.

18 Q. Okay. And they were -- to your understanding --  
19 Mr. Duboc's suppliers?

20 A. Yes.

21 Q. You've heard the name Mr. Sea, S-E-A?

22 A. No.

23 Q. Okay. Mr. Kiat, K-I-A-T?

24 A. No.

25 Q. Mr. Hameed, H-A-M-E-E-D?

1 A. That sounds familiar, yes.

2 Q. Does that sound like another one of Mr. Duboc's  
3 suppliers?

4 A. Yes. Foreign Pakastani name. That is where the hash  
5 comes from.

6 Q. So when the various parties and the potential products  
7 come together to meet, the various parties would discuss  
8 quantity, correct?

9 A. Yes.

10 Q. They would discuss location?

11 A. Yes.

12 Q. They would discuss manner of delivery, correct?

13 A. Yes.

14 Q. They would discuss the price of the product, correct?

15 A. Yes.

16 Q. And they would discuss what percent or share or fee each  
17 party would get, correct?

18 A. Yes.

19 Q. In some instances people would be paid a set amount, like  
20 the Nelsons were promised a million by you if they drove the  
21 trucks in '87. That would be an example?

22 A. Yes.

23 Q. Other times people were given a percent. I would give  
24 you 20 percent of the product if you offload it for me?

25 A. Yes.



1 Q. Everyone would have to come together and agree. And once  
2 that occurred the project would go forward?

3 A. Yes. Everyone would agree in different entities.

4 Q. And one of your roles oftentimes was the projects you  
5 worked on was to sort of bring all of those loose ends  
6 together?

7 A. Yes, sir.

8 Q. Now, you used the word once or twice company, to mean a  
9 business. You have referred to, at one point to Duboc's  
10 company. Then at one point you said our company. You  
11 corrected yourself and said Duboc's company?

12 A. Yes, I did, real quick.

13 Q. Company is really just a code word like project so you  
14 can talk about the illicit business of Mr. Duboc without saying  
15 drug importation network; is that correct?

16 A. Yes, it is.

17 Q. There is no actual company, is there?

18 A. No.

19 Q. There are no employees, are there?

20 A. No, there are not.

21 Q. There is no board of directors meetings?

22 A. No, there are not.

23 Q. So the word company is just a code word?

24 A. Yes, it is.

25 Q. Okay. Now, again, you should feel free to look at your

1 notes at any time. But if you can answer our questions without  
2 them, I'd like to try that.

3 A. I'll try hard.

4 Q. Going back to the '87 load, that did get through. In  
5 that particular load, you testified that you saw Al Madrid in a  
6 pickup truck with John Knock; is that correct?

7 A. Yes, sir.

8 Q. You have no personal knowledge as to what Mr. Madrid was  
9 doing there, or whether he was involved or not?

10 A. I cannot say that. I do not know. I was assuming -- if  
11 he is with John Knock that he is going to work on the project.

12 Q. Other than the fact that he was with John Knock, you have  
13 no personal knowledge that he was involved?

14 A. No. I did not at that time.

15 Q. He wasn't at any of the meetings?

16 A. Never.

17 Q. His name had never come up with respect to this project  
18 before that?

19 A. No.

20 Q. Were you aware in 1987 the drug laws in the United States  
21 changed significantly?

22 A. No, I was not.

23 Q. Calvin Robinson gets busted in 1988, correct?

24 A. Yes.

25 Q. Do you recall what the tonnage was?

1 A. Approximately 55 or 57 tons.

2 Q. Now, you indicated that the captain, Mr. Robinson, got  
3 life, correct?

4 A. Yes, sir.

5 Q. Do you understand that that was life without the  
6 possibility of parole?

7 A. Yes. He was a three-time offender. That is why he got  
8 life. He had participated in other illegal activities.

9 Q. Were you aware that in 1988, depending upon the quantity  
10 of contraband one with no prior record could get life?

11 A. No, I did not.

12 Q. Were you aware then of what was called the sentencing  
13 guidelines?

14 A. No, I was not. I had no clue.

15 Q. You are aware now on it?

16 A. I'm very aware now. Thank you.

17 Q. Thank you.

18 The fact that the captain got life was known to you  
19 and others that had been involved in those various projects,  
20 correct?

21 A. Yes.

22 Q. And is it fair to say that it shocked everybody?

23 A. Yes, it did.

24 Q. Because those -- at least had you ever considered if you  
25 get caught you could get life?

1 A. Yes, I had.

2 Q. Did you consider it before the captain had been arrested?

3 A. No.

4 Q. So the captain's arrest caused you to reflect what could  
5 happen to you if you brought marijuana or hashish into the  
6 United States?

7 A. Very much. Very much, so.

8 Q. Were you aware around the time the captain got life that  
9 the laws in Canada were significantly less serious than the  
10 laws of the United States?

11 A. No.

12 Q. Did you become aware of that at a later time?

13 A. Yes, when I lived in Canada.

14 Q. Now, as far as you know, from your personal knowledge, my  
15 client, Albert Madrid, after the captain got life, never worked  
16 on a single project again in the United States of America. Is  
17 that fair?

18 A. Yes, it is very.

19 Q. Now, my client, according to your testimony, was involved  
20 in an importation of hashish into Vancouver in the summer of  
21 1992, correct?

22 A. Yes.

23 Q. You referred to it as Al Madrid's project, correct?

24 A. Yes.

25 Q. The reason you referred to it as Al Madrid's project is

1 because on one end Duboc is behind every project, but one thing  
2 that changes from project to project is the distributor,  
3 correct?

4 A. Yes.

5 Q. So one way to identify which particular project it is by  
6 naming the distributor, correct?

7 A. Yes.

8 Q. So when you said Al Madrid's project, a more accurate  
9 description would be that was Claude Duboc's importation in  
10 which Al Madrid was the offloader; is that fair?

11 A. Yes, it is.

12 Q. So Al Madrid didn't own all of the product?

13 A. No, he did not. As a matter of fact, I didn't know  
14 anything more about Al Madrid until I moved into Canada, and  
15 then when I was in his attorney's office, with Al Madrid, Ken,  
16 Larouge, Marshall Way and myself, I then learned that he was  
17 the one that was working on that project. I had never heard  
18 anything more about him.

19 Q. I'm not Al Madrid's Canadian attorney, nor was it in my  
20 office?

21 A. No, you are an American attorney.

22 Q. Now, going back to the 1992 hashish load, were you aware  
23 that the product in that case was stamped grand finale?

24 A. No, I was not.

25 Q. Were you aware that that was intended to be Mr. Madrid's

1 last project?

2 A. No, I was not. But I would believe that he was not  
3 interested in working.

4 Q. Now, Al Madrid gets arrested that summer, correct?

5 A. Yes.

6 Q. He is taken into custody but he eventually gets bail?

7 A. What I understand.

8 Q. You met him. He is out on bail is your understanding?

9 A. Yes.

10 Q. Now, Claude Duboc had a very strict rule. And that was  
11 that he'd never work with anybody that had flies on them,  
12 correct?

13 A. Yes.

14 Q. Now, the word flies means that they have been identified  
15 and/or arrested by law enforcement, correct?

16 A. Yes.

17 Q. Now, Mr. Madrid had been identified and arrested by law  
18 enforcement, correct?

19 A. Yes.

20 Q. To your knowledge, Mr. Duboc would never ever work with  
21 Mr. Madrid again?

22 A. Yes, that is very correct.

23 Q. Now, you had periodic contact with my client, Mr. Madrid,  
24 from the time you arrived in Vancouver basically until he was  
25 arrested off and on, correct?

1 A. Yes.

2 Q. And he, to your knowledge, confided in you, correct?

3 A. Yes.

4 Q. And he trusted you, correct?

5 A. Yes, he did.

6 Q. From your knowledge, other than my client finishing  
7 selling the remaining portion of the load that didn't get found  
8 in Vancouver, did he ever work on any project again?

9 A. No. As a matter of fact, Al Madrid was very upset when  
10 he would hear that Roger Darmon, which is another partner of  
11 Claude Duboc, when Claude Duboc and Roger Darmon would come in  
12 Canada. I had spent a little time with Al Madrid. And Al  
13 Madrid was irate, yelling screaming saying, oh, my God, they  
14 are in Canada. They are putting another project together.

15 He -- if he could have probably choked Roger Darmon  
16 and Claude he probably would have. He was so upset that  
17 they -- he knew if they were in town they were putting another  
18 project together. Al Madrid did not want to see another  
19 project. He did not want to do, like myself, another project.  
20 He was very irate.

21 Q. When you say choke, you mean that figuratively or  
22 literally?

23 A. Literally. I remember him yelling and screaming that  
24 they are in town, they are going to put another project  
25 together. He didn't want anything to do with it. He had

1 gotten busted and he knew what reality was, like myself.

2 Q. Now, Al Madrid and Marshall Way and yourself collected  
3 Claude Duboc's money from the load that Al was busted on,  
4 correct?

5 A. Yes.

6 Q. And that process kind of wound through '92 and about half  
7 of '93, correct?

8 A. Yes.

9 Q. Once that was finished -- and you were probably more of  
10 Claude Duboc's representative than anybody, including Marshall  
11 Way or Al Madrid?

12 A. Yes, I was.

13 Q. You were there to look out for Claude Duboc's interest to  
14 make sure that Claude Duboc got this money?

15 A. Yes. Because John was not working, nor was Al.

16 Q. Just like he did with Rogerson, you were there to make  
17 sure that Duboc got his bread?

18 A. Yes.

19 Q. Now, once that part of this operation was shut down,  
20 i.e., collecting Duboc's money from that load, Al never did  
21 another thing?

22 A. No, he did not.

23 Q. Now, Claude Duboc was not let us say even slowed down by  
24 the fact that those people had been arrested, was he?

25 A. Claude Duboc had absolutely no intentions of ever slowing



1 down. He wanted to continue the work. I do know for a fact  
2 that John Knock and Al Madrid didn't want anything to do with  
3 him. They were upset when they would hear that there was  
4 another project. I know Al Madrid for sure was very upset.

5 Q. Now, Claude having lost one offload distributor,  
6 Mr. Madrid --

7 A. Yes.

8 Q. -- was now more desperate than ever, correct?

9 A. Yes, he was very much so.

10 Q. Hence we get the boats on the water and hence we get the  
11 pressure on you?

12 A. The pressure came right onto me; on my head, yes.

13 Q. Okay. So at this point, and I'm talking now sort of  
14 after the arrest of Al Madrid in Vancouver, Ken Cowles, Al  
15 Madrid, and Berger, again the people that were involved in that  
16 load out of the organization, they are out of working with  
17 Claude Duboc?

18 A. Yes, they are.

19 Q. And some other people are -- have agreed to work with  
20 Claude Duboc on a new project such as yourself, Berger, Blue,  
21 Buxton, Dr. Mike?

22 A. Yes. At this point in time, the two people that were  
23 taking over was Claude Duboc and Roger Darmon, the two  
24 Frenchmen. And I would have to include Raymond Newbell.

25 Q. That is a new name, Raymond Newbell.

1           Now, when Claude was organizing the double load, the  
2 green marijuana to California and the hashish to Vancouver, he  
3 specifically became angry about the fact that Madrid might have  
4 found out from either you or Marshall Way?

5       A.     Yes, he did. He did not want Al Madrid to know that I  
6 was involved or anyone was involved in the new hashish project  
7 that I worked on, and the marijuana project. Because, that  
8 means that he is bringing in another load, and Al Madrid didn't  
9 want to have anything to do with it.

10    Q.     Okay.

11           Now, Sonia Vacca was one of the money carriers,  
12 correct?

13    A.     Yes, she was.

14    Q.     And Sonia Vacca is kind of a fancy woman, but does not  
15 have a background like yourself or many of the other people in  
16 this organization; is that fair?

17    A.     That is very fair.

18    Q.     She kind of was born of -- a better term rank amateur?

19    A.     Very much so.

20    Q.     Is that a fair characterization?

21    A.     That is.

22    Q.     And she was at -- her skills were adequate at couriering  
23 money first class to Hong Kong in a fancy suitcase, but that  
24 was about it?

25    A.     That is it.

1 Q. Now, did you have any knowledge that Claude Duboc in his  
2 desperation to find offloaders had somehow become involved with  
3 Sonia Vacca?

4 A. I did not know. That is how desperate he was to find new  
5 people to work with.

6 Q. Did you know that Sonya Vacca was trying to put together  
7 an offload?

8 A. No, I had no idea. If he was working with Sonya Vacca he  
9 was desperate.

10 Q. Now, you had an agreement in 1993 to work two projects  
11 with Claude Duboc, correct?

12 A. Yes.

13 Q. You agreed with Claude Duboc to do your various duties  
14 with respect to marijuana and with respect to hashish, correct?

15 A. Yes.

16 Q. Did you have an agreement with Claude Duboc to work with  
17 Sonia Vacca and this offload group that he was putting  
18 together?

19 A. I had no clue. No.

20 Q. Was that part of your agreement with Claude Duboc?

21 A. No, it was not.

22 Q. Had you known about this planned operations?

23 A. No. Claude Duboc kept everything very separated and very  
24 quiet. So if I was working on a project, he'd not let Al  
25 Madrid know. He'd not let anybody else know. If someone else

1 like Sonia Vacca, he'd probably not let her know that I was  
2 putting the project together for him.

3 Q. So as far as your knowledge goes, Claude Duboc was  
4 engaged in a separate project that he was attempting to set up,  
5 based on Vacca's; proposal to him; is that fair?

6 A. Yes, it is.

7 Q. Now, you understood that Mr. Madrid is being charged with  
8 entering into a conspiracy that included the acts in  
9 Gainesville -- Gainesville sorry -- or dealing -- involving  
10 Sonia Vacca and Agent Lilley?

11 A. No, I did not know.

12 Q. You did not realize that that is the charge that my  
13 client is facing?

14 A. At that time I did not know.

15 Q. Do you realize that now?

16 A. Yes, I do.

17 Q. Now, did you realize or did your attorney inform you when  
18 you started talking to Mr. Seigal in '96 that you, Julie  
19 Roberts, could be charged here under the same theory that they  
20 are charging Mr. Madrid here?

21 A. No, he did not inform me.

22 Q. In your plea agreement, did you or your attorney  
23 negotiate with the Northern District of Florida, to say, you  
24 know, I'll help you, but please don't charge me with a  
25 conspiracy with Sonya Vacca and Claude Duboc in Gainesville?

1 A. No.

2 Q. Did my client join this proposed project here in  
3 Gainesville?

4 THE COURT: I sustain the objection. She doesn't  
5 know.

6 Q. To her knowledge?

7 A. No.

8 MR. HANKINSON: Objection, Your Honor. I would move  
9 to strike, Your Honor.

10 THE COURT: Grant.

11 Q. Now, after Mr. Madrid ceased being involved in any of  
12 this illegal business, he remained in contact with you,  
13 correct?

14 A. Can you repeat that, please?

15 Q. After around mid '93 that Mr. Madrid is finished selling  
16 the load of Duboc's that got caught, the money is all given to  
17 the right people and he has stopped working, correct?

18 A. Yes.

19 Q. Now, he stays in contact with you, nonetheless from that  
20 point until the point that he was arrested, correct?

21 A. Yes. I think basically we were the last people out on  
22 the street. That is why he kept in contact with me.

23 Q. Okay. So he was in contact with you based on friendship,  
24 correct?

25 A. Yes.

1 Q. It wasn't about money?

2 A. It was not about money, no.

3 Q. And it wasn't about any business interests?

4 A. Absolutely not.

5 Q. As a matter of fact, the two of you rarely ever talked  
6 about business, it was kind of a forbidden subject?

7 A. Yes.

8 Q. Now, you eventually became romantically involved with  
9 Mr. Madrid, correct?

10 A. Yes.

11 Q. And my client hoped that some day you would quit  
12 everything, and you would meet him somewhere, maybe Mexico, the  
13 two of you would have a family and live out your lives quietly  
14 and peacefully and legally for the rest of the days?

15 A. Yes. As a matter of fact at one point in time, again I  
16 will repeat that out of all of those men that I've worked with  
17 over the years, Al Madrid is the only man that told me to my  
18 face, Julie if you need to turn yourself in for you and your  
19 daughter, please do it. I hold no regrets.

20 Q. When he said that he wasn't just thinking of your  
21 surrendering yourself, but he knew that included potentially  
22 sitting in a courtroom and testifying as you are?

23 A. Yes. He was the only one that was very sincere. He  
24 also wants to change his life.

25 Q. Now, back in the '93 period, it was around that time

1 somewhere in '93, maybe early '94, that you decided enough of  
2 my helping Duboc, I'm going to take some money out of this  
3 deal, correct?

4 A. Yes.

5 Q. And you had actually discussed that with Mr. Madrid?

6 A. I pretty much tried to keep things to myself. But I  
7 needed someone to talk to.

8 Q. And so you told Mr. Madrid that you were considering  
9 keeping money that you got that was earmarked for Duboc,  
10 correct?

11 A. Yes.

12 Q. And Mr. Madrid told you, help yourself?

13 A. Yes.

14 He said, think about yourself, Julie.

15 Q. Mr. Madrid was certainly not protecting Claude Duboc's  
16 interests, was he?

17 A. No, he was not. He didn't want anything to do with him.

18 Q. Now, when you described on direct at some point there was  
19 a meeting between you, Rogerson, and also Al Madrid, correct?

20 A. Yes.

21 Q. And that meeting occurred sometime in early '94?

22 A. Yes.

23 Q. Do you know where?

24 A. In a Chinese food restaurant.

25 Q. Just as fancy as the other one?

1 A. Yes.

2 Q. And at this point, it was relatively early in what we'll  
3 call the payback schedule that Mr. Rogerson owed Mr. Duboc?

4 A. Yes.

5 Q. And it certainly had not become of any critical nature,  
6 correct?

7 A. No.

8 Q. Now, you actual asked Al at almost the last minute could  
9 you come along, correct?

10 A. Yes, that is very correct.

11 Q. And Al hardly even know what it was about until you  
12 briefed him on the way there?

13 A. That is very true.

14 Q. And Al came along with you because of his friendship to  
15 you, correct?

16 A. Yes, he did.

17 Q. Not to help Mr. Duboc, not as a member of some  
18 conspiracy?

19 A. No, absolutely not.

20 Q. He came as someone who was concerned with you and that  
21 wanted to help you?

22 A. He was concerned for me.

23 Q. And because you asked?

24 A. Because I asked for him to be there.

25 Q. Now, in your direct you talked about the fact that there



1 was some words by either Knock or Madrid that kind of elicited  
2 to maybe the IRA backing up someone?

3 A. Yes.

4 Q. Do you have any recollection now of what my client, not  
5 either John or Al, but what Al said?

6 A. He might have said -- I'm not clear on this, that -- I'm  
7 really not sure.

8 Q. Okay. If you don't know what he said then you can say I  
9 don't know what he said.

10 A. I believe if he had said that there was a Irish Republic  
11 Army behind Claude's -- behind Claude, he was saying that to  
12 Dr. Mike, just as kind of a scare tactic.

13 Q. But you are not even sure he said that?

14 A. No, I'm not even sure.

15 Q. Now, certainly Dr. Mike never felt threatened by Al, did  
16 he?

17 A. No, not at all.

18 Q. And we know that because we all listened to the  
19 conversation that took place two years later in '96?

20 A. Yes.

21 Q. Now, at that point, he is owed 20 million dollars for two  
22 years, a little more serious, right?

23 A. Yes.

24 Q. Now, do you remember -- in that conversation I believe  
25 that Al is referred to as Blank?

1 A. Yes.

2 Q. And do you recall that Mr. Rogerson asked you, well when  
3 are you going to get married to that guy?

4 A. Right.

5 Q. And you said it seems like you are going to get married.  
6 Do you remember that?

7 A. Yes, I do.

8 Q. And then he says: He seems like a nice guy. Isn't that  
9 what Mr. Rogerson said?

10 A. That is very true. Yes.

11 Q. So Mr. Rogerson was not threatened by Al Madrid, was he?

12 A. No, he wasn't.

13 Q. Everything that you have told me in this examination has  
14 been the truth?

15 A. Yes, it has been.

16 Q. And nobody has threatened you in any way or put any  
17 pressure on you to say what you said?

18 A. No.

19 MR. DAAR: Thank you.

20 THE COURT: Redirect.

21 MR. HANKINSON: Thank you, Your Honor.

22 REDIRECT EXAMINATION

23 BY MR. HANKINSON:

24 Q. And in fact along those lines, you would like to help out  
25 Mr. Madrid, wouldn't you, Ms. Roberts?

1 A. I hope that he gets a light sentence. And why it is,  
2 because he like myself did our duty and we were -- I became  
3 more in -- excuse me, I became more of putting projects  
4 together, but as I learned more and more about Al, Al was a  
5 worker like myself and he was not Claude Duboc or John Knock.

6 Q. He was a worker in the drug business?

7 A. Yes, he was.

8 Q. Okay. And you would like to put in a good word for him  
9 here, that is essentially what you have done through his  
10 attorney, right?

11 A. Yes.

12 Q. And in fact you met with his attorney on three different  
13 occasions to talk to him and talk to him about what you knew,  
14 right?

15 A. Yes, sir.

16 Q. And you knew you didn't have to do that?

17 A. Yes, I did.

18 Q. That was totally voluntarily?

19 A. Yes, it was.

20 Q. And in fact you gave him copies of every document that  
21 you had that related to this case?

22 A. Yes. I have given every agent and every attorney  
23 documents of absolutely everything that I have to keep  
24 everything open here. Nothing is hidden.

25 Q. And you -- you referred earlier to some documents that

1 may have gotten kind of confused. You were asking about some  
2 notes that you had. Were those some of the documents that you  
3 turned over to Mr. Madrid's attorney?

4 A. Yes.

5 Q. And those were documents that related to the forfeitures  
6 in this case?

7 A. Yes, sir.

8 Q. Okay. So you shared copies of those with him?

9 A. I shared everything that I had copies of.

10 Q. Now, along the lines of what Mr. Daar's attorney was  
11 asking you, has this office, the Northern District of Florida  
12 prosecutor's office, ever pressured you to try to say anything  
13 in particular?

14 A. No. I would have to honestly say that through my course  
15 from the day that I turned myself in to the United States, that  
16 all of the government agencies and government agents have been  
17 very diplomatic with me, very nice. As a matter of fact, I  
18 enjoyed working with Greg Small, the agent that I worked with  
19 for two years. Everyone has been great.

20 Q. And those -- in these meetings with everybody, has it  
21 been a give and take, and you told them just what you were  
22 thinking?

23 A. Absolutely. With everybody.

24 Q. Now, Mr. Kennedy suggested that you were up here trying  
25 to say what the prosecutors would like to hear. Do you recall

1 those questions?

2 A. Yes, I recall. And I feel that he is very wrong. I have  
3 been very honest. The government has been very honest. The  
4 attorneys have been very honest. Everyone has been very  
5 up-front and honest here.

6 Q. Has anybody even suggested that it would be good to lie?

7 A. Absolutely not.

8 Q. Now, are you -- you are not a stupid person. You could  
9 come up with a story that would more directly implicate John  
10 Knock, couldn't you?

11 A. Oh, of course I could.

12 Q. All right. And, in fact, in -- in the spring of '93, you  
13 met in Vancouver with John Knock and Claude Duboc; did you not?

14 A. Yes, I did, sir.

15 Q. That would be very easy for you to say that there were  
16 extensive discussions of the planning of the 1993 loads;  
17 wouldn't it?

18 A. Yeah, I have never been a liar. I was never taught to be  
19 a liar. My mother was a very honest woman, thank God.

20 Q. Did you have discussions at that point with Mr. Knock  
21 about the 1993 importations in -- in Vancouver in the spring of  
22 '93?

23 A. No. No.

24 Q. Now, there was some suggestion by the defense attorney  
25 for Mr. Knock that you were concerned about being charged here

1 in this district. Has anybody from my office ever suggested  
2 that charges were being considered against you?

3 A. No, never.

4 Q. And included in the documents that you gave to Mr. Darr  
5 was a copy of your presentence report, which is basically a  
6 confidential document all about you, right?

7 A. Yes, sir.

8 Q. And you voluntarily gave that to him?

9 A. I voluntarily gave that to him, yes.

10 Q. Understanding that he may use that against you to  
11 cross-examine you?

12 A. Sure. Yes.

13 Q. Were you aware that he was going to share that with  
14 Mr. Knock's attorney?

15 A. No. Oh, yes, I was. He did inform me. He actually  
16 asked me if he could share this information with John Knock's  
17 attorney. And I said, yes.

18 Q. Now, let's go back to the first boat load that we talked  
19 about in 1987, the RUBY R load.

20 You had indicated that you got into this with Gary  
21 Vance, right?

22 A. Yes.

23 Q. And between you and Gary Vance, you know who was  
24 basically in charge in the '87 RUBY R load?

25 A. Gary Vance. I was his girlfriend.

1 Q. You did assist him in some ways?

2 A. Yes, I did.

3 Q. But primarily he was the one that was calling the shots?

4 A. Yes.

5 Q. For the offload business?

6 A. Yes, he was.

7 Q. Do you know whether he got any money beyond the money  
8 that you received from the Knock-Duboc organization?

9 A. He definitely did not, because any time he received money  
10 from John Knock, I was present.

11 Q. The three million dollars that went into the Patrick  
12 Conlan account, whose money was that?

13 A. That was Gary's, not mine.

14 Q. Now, there was a little bit of confusion at one point. I  
15 think you were referring to a Tom Vance and it got -- it got a  
16 little bit confused. The Tom Vance that you were referring to  
17 about bringing Mr. Robinson and Mr. Lyttle into this, who were  
18 you referring to when you said Tom there?

19 A. Gary Vance.

20 Q. Okay. Now, there is a Tom Vance. That is the son of  
21 Gary Vance, right?

22 A. Yes, sir.

23 Q. Okay. Just to keep things clear, let's talk about the  
24 father as Gary Vance and the sons as Dan and Tom Vance.

25 A. Yes.

1 Q. Are you the mother to Tom and Dan Vance?

2 A. No.

3 Q. Okay. So they were Gary Vance's children by a separate  
4 wife?

5 A. Yes, sir.

6 Q. Okay. And you indicated that Gary Vance was the one that  
7 insisted that they be involved.

8 A. He definitely insisted. It was very upsetting.

9 Q. Did you consider it your place to override what their  
10 father had said?

11 A. Excuse me? I'm not understanding that.

12 Q. In terms of Gary Vance, the father insisted that they be  
13 involved.

14 A. Yes.

15 Q. As the stepmother, I guess is that how we characterize  
16 it?

17 A. Girlfriend.

18 Q. Okay.

19 A. They didn't want me.

20 Q. You weren't even married to Gary Vance?

21 A. No.

22 Q. So you really had no relationship there. Did you  
23 consider it your place to override their father's insistence  
24 that Tom and Dan be involved in this drug load?

25 A. Yes. As a matter of fact I tried to talk the boys out of



1 it. But they were too pressured from the father.

2 Q. Okay. There were -- there was discussion, and I think  
3 perhaps it got a little bit confused. Let's talk about  
4 instances where you were collecting money for the Knock-Duboc  
5 organization.

6 Because I think in some instances we started talking  
7 about dollars, then we may have repeated those dollars. It  
8 made us sound like we were doubling up on those. If we could,  
9 let's go with the -- the first instance. I think you told us  
10 where it was simply the collecting of money after the '87 load  
11 which was the Australian load, right?

12 A. Yes.

13 Q. Okay. And I believe you previously indicated that that  
14 was in late '91 that you were collecting the money. You were  
15 in Hong-Kong and were receiving money?

16 A. Yes.

17 Q. During that period of time?

18 A. Yes.

19 Q. Okay. And do you recall about how much you received  
20 during that time frame?

21 A. In Hong-Kong?

22 Q. Right.

23 A. Approximately it was either two or three million.

24 Q. And at some point in time you indicated that you had  
25 received \$24 million dollars Australian, right?

1 A. Yes, I did, sir.

2 Q. And when was that?

3 A. In Singapore. I just have to look at the year.

4 Q. Sure.

5 A. It was in 1991.

6 Q. All right. And I believe you have indicated that in  
7 December of '92, the -- the second load proposed Australian  
8 load but went to Amsterdam was seized, right?

9 A. Yes, sir.

10 Q. And then after that you got involved on a couple of  
11 occasions collecting money in Canada?

12 A. Yes, I did.

13 Q. Okay. And the first one of those was I think in  
14 Vancouver, correct?

15 A. Yes.

16 Q. And when was that?

17 A. In 1993.

18 Q. Okay. Early 1993?

19 A. Yes.

20 Q. Okay. And I think that you had indicated the other day  
21 that went on for about six months, correct?

22 A. Yes.

23 Q. And were you able to say how much was collected during  
24 that period of time?

25 A. From the hashish load?

1 Q. Uh-huh.

2 A. Thirty million Canadian.

3 Q. Now, there was a -- there was also an instance where you  
4 were collecting money in Montreal. Now, it was my  
5 understanding that Montreal is when you collected this 30  
6 million Canadian?

7 A. Yes.

8 Q. Maybe I'm confused.

9 A. No. In Montreal, Canada is where I collected the 30  
10 million dollars cash.

11 Q. Okay.

12 A. Canadian.

13 Q. And that was a subsequent collection, right, from  
14 Vancouver?

15 A. Yes.

16 Q. Okay. So that probably is confusing you. Collecting the  
17 money in Hong-Kong in '91?

18 A. Yes.

19 Q. And then in early '93, you were collecting money in  
20 Vancouver?

21 A. Yes.

22 Q. And then in late '93, you went to Montreal, and you were  
23 collecting money in Montreal?

24 A. Yes.

25 Q. Right?

1 A. Yes.

2 Q. And in terms of the '93 load into Seattle, Washington,  
3 and that was later seized in California, you had indicated that  
4 you were aware that Marshall Way got \$200,000, correct?

5 A. Yes, sir.

6 Q. And how were you aware of that?

7 A. He had received 200,000 from the Doctor. And I also  
8 think, which I forget, I think that I had given him another  
9 200,000 from Barry.

10 Q. Okay. And who is Barry?

11 A. Barry Allen.

12 Q. So?

13 A. Again we had met at a Marriott Hotel in San Francisco.

14 Q. So how much money do you think Way got total that you are  
15 aware of?

16 A. 400,000 to give to Claude Duboc.

17 Q. And 200,000 of it was from Barry?

18 A. Barry Allen.

19 Q. And Barry Allen was working with whom?

20 A. Dr. Mike and Rich.

21 Q. And that money, you were present when that money was  
22 delivered to him?

23 A. Yes, I was. It was in the Marriott Hotel. The hotel was  
24 registered under my name.

25 Q. Okay. And now, if I understand you, you think there is

1 another 200,000 dollars that was given to Marshall Way?

2 A. Doctor Mike, Barry Allen.

3 Q. Okay. So how is the 200,000 from Dr. Mike given to  
4 Marshall Way?

5 A. Cash.

6 Q. Okay. And where -- were you present at that?

7 A. Yes.

8 Q. Where was that?

9 A. Marriott Hotel. I might be a little confused.

10 Q. Okay. You look like you are a little confused on that.

11 A. Because it's easy to get confused. I remember meeting  
12 Barry Allen in Southern California. And I picked up 200,000.

13 Q. Okay.

14 A. Okay. Then on another instance I did not pick it up from  
15 Dr. Mike in the Marriott motel, it was from Barry Allen again.  
16 200,000. It was not from Dr. Mike.

17 Q. Okay. I think I'm confused now. So tell us what money  
18 you are aware of going to Marshall Way?

19 A. Okay. 200,000 from Barry Allen which was given to  
20 myself. And 200,000 when Barry Allen and myself were in a  
21 hotel room in the Marriott Hotel.

22 Q. So as to whether it's one or two separate things?

23 A. It's very hard.

24 Q. You are a little confused?

25 A. Yes.

1 Q. Okay. Fair enough.

2 And the last time that you were involved in  
3 collections is in -- starting in '94 when you are trying to  
4 collect the 20 million dollars from Dr. Mike, Mr. Rogerson,  
5 correct?

6 A. Yes.

7 Q. Now, you indicated that you delivered a million dollars  
8 to Mr. Berger Canadian, a million dollars Canadian to the  
9 Nelsons, and \$400,000 U.S. to the Nelsons, correct?

10 A. Yes, sir.

11 Q. And where did you get that money from?

12 A. From Dr. Mike.

13 Q. And where did you get that?

14 A. I received it in Palm Springs, California.

15 Q. And so that was the money from Dr. Mike to those people  
16 for their assistance in the '93 marijuana loads?

17 A. Yes. He was aware of it.

18 Q. Well, he was more than aware of it, he had gotten some of  
19 the marijuana, hadn't he?

20 A. Yes, he did.

21 Q. In fact, he got about 5,000 pounds of the marijuana?

22 A. Yes.

23 Q. Now, you were asked about your taxes. And you indicated  
24 that you had arrived at some figure that you had profited about  
25 a million and a half that you were going to have to declare on

1 your taxes?

2 A. Somewhere around there. I haven't sat down and looked  
3 over all of my documentation. It scares me. But I have  
4 acknowledged with Internal Revenue Service, Mr. and Mrs. Purdy,  
5 they are tax accountants, have acknowledged with the Internal  
6 Revenue Service, this year I will be filing my taxes.

7 And, as a matter of fact, before we started this  
8 whole trial, I asked Mr. Hankinson if I could have  
9 documentation with regards to all of the figures so I can bring  
10 out everything in front for the Internal Revenue Service.

11 Q. Okay. How did you arrive at that estimate, the million  
12 and a half?

13 A. I'm just assuming that I received cash on the 14th from  
14 John Knock, there is a million dollars through various bank  
15 transfers, from Claude Duboc into my personal accounts or  
16 overseas under various alias names, that comes out to  
17 approximately a million and a half, two million. I really  
18 don't know until I get to that phase.

19 Q. So that is a work in progress?

20 A. Excuse me?

21 Q. So that is a work in progress?

22 A. That is my next obstacle course, yes.

23 Q. But you intend to declare and pay taxes on what you made  
24 in the drug business?

25 A. Yes, I do.

1 MR. HANKINSON: If I might approach, Your Honor.

2 THE COURT: Surely.

3 Q. I think Mr. Knock's attorney had asked you about a  
4 statement that you made that was in a packet of materials that  
5 he was given. Have I put part of that statement in front of  
6 you?

7 A. Yes, you have, sir.

8 Q. And did you give a copy of that to Mr. Daar previously?

9 A. Yes, I did.

10 Q. Okay. And those are documents that you gave to law  
11 enforcement back in 1996?

12 A. Yes.

13 Q. It is a little hard to read. There is a date written in  
14 the top left-hand of that statement. And part of it is cut  
15 off.

16 Can you tell us roughly when that statement was  
17 offered?

18 A. I think that it was September of 1993. I'm not sure.

19 Q. Well, September of '93 you would still have been  
20 involved --

21 A. I'm sorry. It had to have been right before I turned  
22 myself in. So it was probably in '97.

23 Q. So you turned yourself in in February of '96?

24 A. Sorry.

25 Q. We have established that?



1 A. All of those years. It would be '95.

2 Q. September of '95?

3 A. Yes.

4 Q. I mean you can read the September part, but you can't  
5 tell us what year it was?

6 A. It was '95.

7 Q. All right. And I have highlighted portions of that  
8 statement. Would you just read the -- the part I highlighted?

9 A. Okay. It says: To whomever it may concern. This is --  
10 this is a list of names which will be helpful in solving the  
11 Claude Duboc case and international criminals John Knock, owner  
12 and part owner of the organization.

13 John Knock has been retired for several years.  
14 Finish off with the -- John Knock and Roger Darmon are  
15 presently hiding in France. Every month I have phone contact  
16 with them. The next call is September 20th and October 1st, to  
17 arrange a meeting or dinner in France. I cannot wait any  
18 longer or I will lose contact with both of them.

19 Q. Okay. Those comments were -- you were going to help law  
20 enforcement locate them, correct?

21 A. Yes.

22 Q. And did you do so?

23 A. Yes, I did. I did, sir.

24 Q. All right. Now, you indicated in that statement that  
25 John Knock has been retired for several years. What did you

1 mean by that?

2 A. I meant that I had no inclination or clue, and I had  
3 heard through other people that he didn't want anything to do  
4 or work with Claude Duboc.

5 Q. Okay. But before you -- well -- about the time of Claude  
6 Duboc's arrest, Claude Duboc told you something else, didn't  
7 he?

8 A. Yes, he did, sir.

9 Q. Remind us about the phone conversation that you had with  
10 Claude Duboc just before he was arrested?

11 A. I was in Mexico. And Claude Duboc had told me that he  
12 was on the run from American authorities. He was in Thailand  
13 with his -- one of his Thai wives. And he had said that if  
14 anything happened to me he was going to go to Hong-Kong the  
15 next day. If anything happens to me that John Knock will take  
16 over.

17 Q. Okay. But then within a day or two you had conversation  
18 with John Knock, correct?

19 A. Yes, I did.

20 Q. And did he confirm that he was taking over the  
21 collections of the money?

22 A. Yes. He confirmed that he was taking over the  
23 collections of the 20 million, that I would receive at some  
24 point in time from the Doctor

25 Q. Okay. And between March of '94 and when Mr. Knock was

1 arrested in April of '96, were you having periodic contact with  
2 Mr. Knock?

3 A. Yes, I did.

4 Q. And in those contacts was the discussion about how things  
5 were progressing on collecting the money?

6 A. Yes.

7 Q. And during the course of those conversations, was -- was  
8 Mr. Darmon ever, Roger Darmon, was he ever involved in those  
9 conversations?

10 A. Yes. At one point in time when I was talking to John  
11 Knock in France at a phone booth, he was in a park. Roger  
12 Darmon was present. And, as a matter of fact, I had talked to  
13 him on two different occasions when I had made separate calls.

14 Q. Sorry?

15 A. He also wanted that money too.

16 Q. That is Roger Darmon?

17 A. Yes.

18 Q. And in the -- in the transcript we saw today, there was a  
19 discussion -- there was a taped statement about getting his --  
20 I forget your terminology -- maybe it was partner or associate  
21 to pick up the company paycheck. Do you remember that  
22 reference?

23 A. Yes.

24 Q. What were you referring to there?

25 A. The 20 million.

1 Q. Okay. And who was the associate that you were suggesting  
2 that maybe could pick up the -- help pick up the 20 million  
3 dollars?

4 A. Roger Darmon.

5 Q. Had you discussed with Mr. Knock getting Darmon to be  
6 involved in picking up the portion of the 20 million dollars or  
7 the 20 million dollars?

8 A. No. He wanted to keep him separate at that point in  
9 time.

10 Q. Okay. So you had discussed it or you had not discussed  
11 it? I'm sorry.

12 A. Okay. Yes. I did discuss it with John. John at that  
13 point in time did not want Roger Darmon involved in the  
14 collection of the 20 million. I guess he wanted it for  
15 himself.

16 Q. Did he indicate why he didn't want him involved?

17 A. No, he did not.

18 Q. Now, did -- did Knock ever talk directly with Dr. Mike?

19 A. No.

20 Q. Did he encourage your efforts at the collection from  
21 Dr. Mike?

22 A. Yes, he did.

23 Q. And did he offer to send assistance in those collections?

24 A. Yes, he did.

25 Q. What was the nature of the assistance that he offered?

1 A. He said that he'd have a -- a group of people from  
2 Montreal help me assist in collecting the 20 million.

3 Q. And you also indicated that Al Madrid went with you on  
4 one occasion to talk with Dr. Mike?

5 A. Yes, sir.

6 Q. And as -- it is a little foggy, but as best you recall,  
7 Mr. Madrid made some reference to the organization has contacts  
8 with the IRA?

9 MR. DAAR: Objection.

10 THE COURT: Overruled. Go ahead.

11 Q. That organization has some contact with the IRA, is that  
12 what I understand you to say?

13 A. Yes. He was just using that as a tactic to scare  
14 Dr. Mike.

15 Q. Okay. And what -- whether or not it actually scared him,  
16 it was intended to try to speed up with the process, wasn't it?

17 A. Yes.

18 Q. I mean, you weren't just saying that just to be expending  
19 air?

20 A. No. Absolutely not, sir.

21 Q. There was some questions about forfeitures and what you  
22 have forfeited or not forfeited. Do you have any drug proceeds  
23 left that have not been forfeited the U.S. government?

24 A. Zero.

25 Q. And I believe you indicated that you are running a

1 business. How did you get that business started?

2 A. Yes. I have three private loans for that business.

3 Q. Okay. And pursuant to your plea agreement, were you  
4 required to forfeit all of your drug proceeds?

5 A. Yes.

6 Q. And you've done so?

7 A. Yes, I have, sir.

8 Q. There were questions about Calvin Robinson getting life,  
9 a life sentence and whether that startled you, I guess, or  
10 scared you to some extent, right?

11 A. Yes.

12 Q. When did you find out about Calvin Robinson getting a  
13 life sentence?

14 A. This was probably about a year after he got arrested.

15 Q. Which would have been when?

16 A. Excuse me, sir? Oh, probably about 1990.

17 Q. And you continued to be involved after that; did you not?

18 A. Yes.

19 Q. Okay. And certainly Claude Duboc continued to be  
20 involved after that?

21 A. Yes, he did.

22 Q. Roger Darmon continued to be involved after that?

23 A. Yes.

24 Q. And, in fact, after that, John Knock was involved in  
25 helping you try to collect money?

1 A. Yes, he was.

2 Q. So despite the fact that it may have been startling?

3 A. We kept going.

4 Q. You kept going?

5 A. We kept going.

6 Q. And, in fact, Mr. Madrid was involved after that time,  
7 right?

8 A. Yes, he was, sir.

9 Q. And a fellow named Ricard Buxton, Wizard, he was involved  
10 for many years; was he not?

11 A. Yes, he was.

12 Q. And continued to be involved up and through the '90s?

13 MR. DAAR: Objection, beyond the scope.

14 THE COURT: Well, it's leading.

15 MR. HANKINSON: I'll rephrase the question.

16 Q. Well, when did you know that Richard Buxton was first  
17 involved?

18 MR. DAAR: Objection, beyond the scope.

19 THE COURT: Overruled.

20 A. When he approached Gary in re. the possibility of putting  
21 a project together with Claude and John Knock.

22 Q. And when was that?

23 A. Sorry for the years. There is just too many years here.

24 In 1985, 1986, approximately.

25 Q. And when was Buxton last involved that you know about?

1 A. When he assisted me in picking up the three million  
2 dollars from Gary Vance's boys.

3 Q. When was that?

4 A. Approximately July or August of 1988.

5 Q. So whether he was involved in the loads after that you  
6 are not aware?

7 A. I'm not aware of.

8 Q. But he was certainly involved back in 1985?

9 A. Yes, he was.

10 Q. Now, you had indicated that Claude Duboc tended to keep  
11 things secret from various people, right?

12 A. Yes.

13 Q. So if -- if he was working with one offload crew -- would  
14 he necessarily tell the other offload crew that he is involved?

15 A. No, he'd not.

16 Q. If he was dealing with Sonya Vacca as an offloader, is he  
17 necessarily going to tell you that?

18 A. No.

19 Q. Is he necessarily going to tell you what Mr. Madrid is  
20 doing?

21 A. No.

22 Q. Or vice-versa? Would he tell Mr. Madrid what you are  
23 doing?

24 A. No.

25 Q. The -- let's -- I want to clarify the timing that you



1 talked about, you trying to collect money from Dr. Mike. The  
2 20 million dollars. And you indicated that on at least one  
3 occasion, Mr. Madrid participated in that with you.

4 Was that before or after Claude Duboc's arrest?

5 A. After.

6 Q. So if Mr. Duboc was arrested in March of '94, it was  
7 after that date?

8 A. I believe so.

9 Q. Okay. And there was discussion about you taking some of  
10 the Duboc money, the five million dollars that was sent to  
11 Morocco. And I think Mr. Daar elicited from you that Madrid  
12 had encouraged you to do that, right?

13 A. Yes.

14 Q. And when was that? In terms of Mr. Duboc's arrest, when  
15 was that?

16 A. Afterwards.

17 Q. And at that point, in fact, did you know that Mr. Duboc  
18 was cooperating against you?

19 A. No, I did not.

20 Q. When did you find out that Duboc was cooperating?

21 A. Yes, we did find out, I believe through -- the Nelsons  
22 had told me that he was cooperating, I think.

23 Q. So when you decided to take Claude Duboc's five million  
24 dollars -- with Mr. Madrid's encouragement -- that is after you  
25 knew that Mr. Duboc was in custody and cooperating against you,

1 right?

2 A. Yes, sir.

3 Q. I believe Mr. Darr elicited from you that at some point  
4 in time you were romantically involved with Mr. Madrid?

5 A. Yes.

6 Q. And, in fact, discussed marijuana?

7 A. Uh-huh. Yes.

8 Q. And you certainly didn't come in here to try and do  
9 unfair prejudice to Mr. Madrid, did you?

10 A. No.

11 Q. And did you come in here to try to unfairly accuse John  
12 Knock of things he didn't do?

13 A. No.

14 Q. You've done the best that you could to tell the truth?

15 A. To the best of my ability, yes.

16 Q. And let me just get one last thing clear. There has been  
17 discussion about Duboc arranging the source and providing the  
18 money. Back in 1987, when you were dealing with Knock and  
19 Duboc, how did you understand their respective roles?

20 A. They were both -- Duboc and John Knock were the two  
21 people that were running this whole company.

22 Q. Okay. Did you know what -- did they have it  
23 compartmentalized as to who was supposed to do what?

24 A. I didn't know then. But definitely Claude is the  
25 financier.

1 Q. And did you -- later as through the years found out what  
2 Mr. Knock's role was? If Duboc was the financier, what was  
3 Mr. Knock's role?

4 A. He was the one pretty much working with the people that  
5 would put the projects together.

6 Q. Logistics?

7 A. I don't know.

8 Q. Okay. The hands-on work?

9 A. Hands-on work. Yes.

10 MR. HANKINSON: If I can have just a moment, Your  
11 Honor.

12 THE COURT: Uh-huh.

13 MR. HANKINSON: That is all that I have, Your Honor.

14 THE COURT: Thank you, ma'am.

15 MR. DAAR: May this witness be subject to recall,  
16 Your Honor?

17 THE COURT: You may step down subject to recall.

18 You folks can go to lunch. One o'clock, please.  
19 Remember not to discuss the case among yourselves or with  
20 anyone.

21 (Jury out.)

22 MR. HANKINSON: Could we let her remain for a second.  
23 We need to discuss something related to her so I think she  
24 probably needs to hear what is said.

25 May I proceed?

1 THE COURT: Sure.

2 MR. HANKINSON: I understood Mr. Daar to say he  
3 wanted the witness to stay subject to recall. Certainly if  
4 they want to recall her in their case, that is fine.

5 But I don't think it's reasonable to leave  
6 Ms. Roberts here for two weeks while we finish our case. So  
7 what I want to do is allow her to leave. If they want to make  
8 transportation arrangements to pay her way back, that is up to  
9 them. But I don't think it is reasonable to make her stay here  
10 for two or three weeks while we finish up our case.

11 MR. DAAR: Your Honor, we wanted her available.  
12 Absent the ability to re-cross, sometimes there are things that  
13 we want to bring in our case when we put our case on. I  
14 certainly don't want to keep her here for two weeks, especially  
15 given the break.

16 If she would be willing to make herself available, we  
17 would make the arrangements.

18 THE COURT: You all just give her some notification  
19 and arrange for her to get here.

20 MR. DAAR: Okay.

21 THE COURT: Or whatever is required; housing and so  
22 forth. Thank you, ma'am.

23 What does your afternoon look like?

24 MR. HANKINSON: We've got a good one planned.

25 THE COURT: How long are we working? Do you have

1 enough for all afternoon?

2 MR. DAVIES: Maybe not. The next witness my direct  
3 will take an hour, an hour and a half.

4 THE COURT: Okay. Who is it?

5 MR. DAVIES: Marshall Way.

6 THE COURT: Thank you all.

7 MR. HANKINSON: Is there some time that you are  
8 needing to be finished by, Your Honor?

9 THE COURT: I don't need to be. Just whenever we are  
10 through I'm leaving town.

11 MR. HANKINSON: Okay.

12 (Recess taken.)

13 THE COURT: Got a note from a juror. If you all want  
14 to come up it might be easier. Really involves Mr. Daar. All  
15 of you.

16 It says, unfortunately I now realize I may have  
17 worked on a case involving Randy Daar. When Ms. Roberts said  
18 Randy, a light came on and it started coming back to me.

19 I worked as a private investigator for Virginia  
20 Snyder of Delray Beach. And I believe the case was for Judge  
21 question mark. I can't recall for sure if this is the case.  
22 This was around 85, '86. And I believe we met in person maybe  
23 two times.

24 I have not had any contact with Mr. Darr since that  
25 time. And as you can see, barely remember him.

1           This is assuming that it's the same person. I can't  
2 say for sure. Mr. Daar would have known me as Diane Darby.

3           I have not told my fellow jurors, and do not feel  
4 this in any way will affect my impartiality. Quite frankly,  
5 I'm shocked at this revelation and sincerely wish I had  
6 realized this during voir dire.

7           I apologize for any disruption or inconvenience this  
8 may cause. Diane Craig.

9           MR. DAAR: Small world. Especially for me being  
10 3,000 miles away.

11          MR. HANKINSON: Can we talk this over?

12          THE COURT: Uh-huh.

13          MR. HANKINSON: Judge, the government's position  
14 would be to ask that she be stricken. Although what she says  
15 doesn't give ground for cause, that would come up, you know,  
16 prior, it certainly would have been a significant factor in our  
17 exercise of peremptory challenges.

18          And as the Court is aware, you know, we had  
19 peremptory challenges left. And, you know, I don't say with a  
20 hundred percent certainty, but I think that would have  
21 certainly been something that concerned us and may well have  
22 been a -- something we would have exercised peremptory  
23 challenges, having had personal contact with one of the defense  
24 attorneys is, you know, a significant factor, I think,  
25 particularly in a professional capacity relating to apparently

1 a criminal case, I would assume; is that correct?

2 MR. DAAR: That's correct.

3 Well, to respond. From my perspective, Your Honor,  
4 one, obviously, the -- whatever memory I have is worthless.  
5 But, whatever memory she has is very, very, very slight memory,  
6 with days of sitting looking at me in the courtroom, listening  
7 to voir dire, it's only now that this ancient memory is  
8 triggered.

9 She was a minor participant in that investigative  
10 agency. And the main investigator was Virginia Snyder. I  
11 worked extensively with and maybe met this woman once or twice.  
12 Certainly there is no evidence whatsoever that there is any  
13 bias or inability for her to do her job as a juror. If we go  
14 back to now -- to what in terms of how challenges get  
15 exercised, we can't go back there now. It is not fair. We  
16 can't start selecting the jury again.

17 THE COURT: Government.

18 MR. KENNEDY: I concur with Mr. Darr. I think the  
19 woman has expressed herself honestly, from an honest  
20 recollection. And this will not affect her in any way. If you  
21 have any doubt about that, Judge, I simply commend you talking  
22 to her in camera to satisfy yourself of that.

23 MR. HANKINSON: Judge, I'm not -- I'm not suggesting  
24 that she has expressed bias. I think she has said that she is  
25 not. But it's something that she didn't reveal, you know, and

1 I'm not suggesting with any ill motives. Apparently it's just  
2 something that didn't hit her until now.

3 But I'm concerned that she might at this point, based  
4 on her prior professional work, view herself as an ally of  
5 Mr. Daar's based on the fact that they had been, you know,  
6 working together before.

7 And, you know, that is something that we didn't know  
8 when we were picking the jury. We now know it, and I think,  
9 you know, it's appropriate to let her go. And we've got four  
10 alternates -- we picked four alternates because things happen  
11 during the course of the trial. And I just think, you know,  
12 pretty confident that we -- she'd not be on this jury had we  
13 known that at the time.

14 MR. DAAR: Your Honor, it's pretty clear, and I don't  
15 think anyone is disputing the fact that she did not know nor  
16 did she withhold any information during the voir dire process.  
17 She gave honest answers. She said that she was a private  
18 investigator. She said that she worked on cases and the  
19 prosecutor knows that private investigators work on the defense  
20 side of cases. They had that information. And they chose to  
21 leave her on the jury.

22 Now, she has revealed this in a prompt manner. She's  
23 stated absolutely that it would have no influence. There is no  
24 cause, Your Honor.

25 In order to remove this juror, there would have to be



1 cause. And you would have to feel this revelation would in  
2 some way prejudice the government or the Government's case.

3 I mean, I think the government perhaps or the Court  
4 could voir dire her in camera out of the presence of the other  
5 jurors and satisfy themselves that that brief contact in 1986  
6 or 1987 doesn't have an affect on her ability to remain an  
7 impartial juror.

8 THE COURT: Any additional?

9 MR. HANKINSON: No, sir.

10 THE COURT: Take a couple of minutes.

11 (Brief recess taken.)

12 THE COURT: Be seated, please. Any additional  
13 argument by anyone?

14 MR. HANKINSON: No, sir. Your Honor.

15 MR. DAAR: No, Your Honor.

16 MR. KENNEDY: No, thank you, sir.

17 THE COURT: I'm of the opinion that there is  
18 insufficient basis to remove her at this time, even though the  
19 government did not have the opportunity to exercise one of  
20 their peremptory challenges.

21 The case law I found says that is not sufficient at  
22 this stage of the proceedings absent an actual showing of  
23 cause. Now, if you wish to bring her in and we make inquiry  
24 beyond her note, that is fine with me too. We'll give you that  
25 opportunity.

1 MR. HANKINSON: No, sir. I'd rather leave it alone.

2 THE COURT: Does the defense wish to make an inquiry  
3 of the juror?

4 MR. DAAR: No, Your Honor.

5 MR. KENNEDY: No, Your Honor.

6 THE COURT: Then we are ready to go. Jury in,  
7 please.

8 (Jury in.)

9 THE COURT: You folks just be seated, please.  
10 If you would call your witness.

11 MR. DAVIES: Marshall Way.

12 (Witness sworn.)

13 THE CLERK: Please be seated.

14 For the record please state your name and spell your  
15 last name.

16 THE WITNESS: My name is Marshall Way. W-A-Y.

17 DIRECT EXAMINATION

18 BY MR. DAVIES:

19 Q. Mr. Way, would you please tell the ladies and gentlemen  
20 how old you are?

21 A. I'm 53.

22 Q. What is your level of education?

23 A. I have one year of college.

24 Q. Where are you from?

25 A. Philadelphia.

1 Q. Were you charged with intent to distribute marijuana and  
2 money laundering?

3 A. Yes.

4 Q. Where were you prosecuted for those crimes?

5 A. In San Francisco.

6 Q. And did you enter a plea agreement?

7 A. Yes, I did.

8 Q. Did your plea agreement require that you testify  
9 truthfully about your prior drug trafficking and who you were  
10 involved with?

11 MR. DAAR: Objection.

12 THE COURT: Sustained at this stage.

13 Q. What were the terms of the plea agreement?

14 A. That I --

15 MR. DAAR: Objection.

16 A. Testify as to my prior activities, if necessary.

17 Q. What sentence did you receive on your case?

18 A. I spent 17 months in jail; a year of house arrest.

19 Q. Pursuant to your plea agreement, did you also forfeit  
20 your drug-related assets to the government?

21 A. I did.

22 Q. Are you working now?

23 A. Yes, I am.

24 Q. Would you tell the jury where you are working.

25 A. I work for a health and social services agency in

1 California.

2 Q. What do you do?

3 A. They call it special projects. I'm kind of a  
4 jack-of-all-trades in the office.

5 Q. Do you know John Knock?

6 A. I do.

7 Q. Do you see him here in court?

8 A. I do.

9 Q. Would you point him out for the record, please?

10 A. He's at the table over there.

11 Q. Which end of the table?

12 A. He is in the middle.

13 Q. Is he wearing the tie?

14 A. No.

15 MR. DAVIES: Your Honor, would the record reflect  
16 that the witness identified John Knock.

17 Q. Would you tell the ladies and gentlemen of the jury when  
18 you met Mr. Knock?

19 A. Sometime in the early '70s.

20 Q. Where did you meet John Knock?

21 A. Somewhere in Marin County, California.

22 Q. Where is Marin County in California?

23 A. Just north of San Francisco.

24 Q. What was your relationship with him when you met him then  
25 in the '70s.

1 A. Just a casual associate.

2 Q. Do you know who Richard Ezidro is?

3 A. I do.

4 Q. Do you know if Mr. Ezidro and Mr. Knock knew each other?

5 A. I believe that they did.

6 Q. Was Mr. Ezidro involved in narcotics?

7 A. I believe he was.

8 Q. Were you selling any drugs back then?

9 A. I was.

10 Q. What type?

11 A. Marijuana.

12 Q. What quantities were you selling back then?

13 A. Probably ten, twenty pounds.

14 Q. Did there come a time when you were involved in  
15 trafficking drugs with John Knock?

16 A. There did.

17 Q. And when was that?

18 A. Probably in the mid or so '80s.

19 Q. Where was that?

20 A. In Marin County, California.

21 Q. What did you do with John Knock in relation to drug  
22 activity in Marin County in the mid '80s?

23 A. I received some marijuana from him and sold it.

24 Q. And how did it come about that you started doing that  
25 with him?

1 A. I ran into him one day and asked him if he had any work  
2 for me.

3 Q. What did he tell you?

4 A. He said, yes.

5 Q. And he started supplying you with marijuana that you  
6 sold?

7 A. That's correct.

8 Q. What quantities were you selling to John Knock back then  
9 in marijuana?

10 A. I think it was about 500 pounds or so.

11 Q. How would you get marijuana from Mr. Knock? Would you  
12 explain to the jury how that would work.

13 A. He delivered it to me.

14 Q. Where would he make the deliveries to you?

15 A. To his storage space out there.

16 Q. Do you remember what type of vehicle he was driving back  
17 then?

18 A. Pickup truck.

19 Q. Would you pay him for the marijuana when he delivered it  
20 to you?

21 A. I received it on credit.

22 Q. So once you sold it you had to pay John Knock what you  
23 owed him?

24 A. That's correct.

25 Q. And for about how many seasons did this go on that you

1 got marijuana in those quantities from John Knock and sold it  
2 for him in Marin County?

3 A. Maybe only one, possibly two.

4 Q. Did you stay in touch with John Knock after that?

5 A. Yes, I did.

6 Q. And what was the nature of you-all's relationship?

7 A. We were casual friends.

8 Q. Did there come a time after that time in Marin County  
9 when you were involved again with Mr. Knock in trafficking  
10 drugs?

11 A. Yes, there was.

12 Q. Approximately when was that?

13 A. In the latter '80s.

14 Q. What was that about? Tell the jury what happened that  
15 time.

16 A. Similar situation. I ran into him. I asked him if he  
17 knew of any work that I could get. And he said yes.

18 Q. And what happened after that?

19 A. I went up to Vancouver and picked up a quantity of  
20 hashish.

21 Q. Mr. Way, do you know who Al Madrid is?

22 A. I do.

23 Q. Do you see Al Madrid here in court?

24 A. I do.

25 Q. Would you identify him for the record, please?

1 A. He's at the end of the table.

2 Q. Is he wearing a tie?

3 A. No. He is not.

4 MR. DAVIES: Would the record reflect that the  
5 witness identified Al Madrid.

6 THE COURT: Yes.

7 Q. Was Al Madrid around with John Knock during this time  
8 period?

9 A. I had seen them together, yes.

10 Q. Would you describe the area you said John Knock sold you  
11 hash in Vancouver? Would you describe the area where you went  
12 to him to get the hashish?

13 A. It was a rural area north of Vancouver.

14 Q. Can you describe the housing or the structure that -- the  
15 area where you got hashish from John Knock?

16 A. It was a small farm type property.

17 Q. About how much hashish did you get from Mr. Knock?

18 A. Approximately a dozen pounds.

19 Q. Sorry?

20 A. Approximately a dozen pounds.

21 Q. And in this rural area where you got it from Mr. Knock,  
22 were there any other people around Mr. Knock when he gave you  
23 the hashish to sell?

24 A. There were a couple of older gentlemen.

25 Q. Did you ever get their names?



1 A. No, I did not.

2 Q. Was this the same arrangement? You didn't pay for the  
3 hashish when you got it, but after you sold it you had to pay  
4 Mr. Knock?

5 A. That's correct.

6 Q. Did you sell that thousand pounds of hashish?

7 A. I did.

8 Q. Do you recall who you sold it to?

9 A. To a man I knew, Eric.

10 Q. How did you know Eric?

11 A. From the area where I lived in Marin County.

12 Q. Did you have any more dealings with John Knock up in the  
13 Vancouver area?

14 A. No, I did not.

15 Q. Do you know any places where Mr. Knock had residences  
16 back then at that time?

17 A. Certain period of time he was living in Sonoma County,  
18 California, which was just north of Marin. And at some point  
19 he had moved to Hawaii.

20 Q. Did he have a house in Hawaii that he lived in?

21 A. I believe so, yes.

22 Q. After getting the hashish from John Knock in Vancouver in  
23 the late '80s, did you keep in touch with John Knock after  
24 that?

25 A. I did.

1 Q. What was the nature of your relationship with him?

2 A. Casual friendship.

3 Q. Was there ever a time after that that you were involved  
4 in collecting drug money at John Knock's request?

5 A. There was.

6 Q. When was that?

7 A. That was in late 1992.

8 Q. Well, how did that start up that you got involved in  
9 collecting the money at John Knock's request?

10 A. Once again I called on John and asked him if he knew of  
11 any work that I could get.

12 Q. Where was this?

13 A. This was in Hawaii.

14 Q. Do you recall what island?

15 A. It was on Oahu.

16 Q. The state of Hawaii is actually several different  
17 islands?

18 A. That's correct.

19 Q. Okay. So you go over to see John Knock in Oahu?

20 A. That's correct.

21 Q. Ask him if he had any work?

22 A. Yes.

23 Q. And what happened?

24 A. He said no, he didn't. He was no longer in the business.

25 Q. And what happened after that?

1 A. A week or two later he called me and told me there was a  
2 possibility that he could find some work for me.

3 Q. Did he say why he could find work for you?

4 A. He just mentioned that someone had had a problem and  
5 there was an opening for a job.

6 Q. And where was this that he had this conversation with  
7 you? Was it on Oahu?

8 A. No, it was on the Island of Kauai.

9 Q. Is that where you were vacationing?

10 A. Yes, it was.

11 Q. So he tracked you down and came to where you were  
12 vacationing and said that he might have work for you?

13 A. That's correct.

14 Q. Did John Knock explain what your role would be with  
15 regard to that work?

16 A. He told me I would be collecting money.

17 Q. Did you have any conversations with Mr. Knock about  
18 whether you wanted to do that right away or not?

19 A. I asked him if it would be possible to put it off a week  
20 or so, two, so I could be around for my son's birthday.

21 Q. When is your son's birthday, by the way?

22 A. August 3rd.

23 Q. And when you told Mr. Knock you would like to put it off  
24 for a week or two so you could be around your son's birthday,  
25 what did Mr. Knock say?

1 A. He said he thought that would be all right.

2 Q. After you all agreed to that, did Mr. Knock direct you to  
3 go anywhere?

4 A. Yes. I was directed to go to Montreal.

5 Q. Did you go up to Montreal?

6 A. I did.

7 Q. And what happened -- and when did you get up to Montreal?

8 A. Approximately late August.

9 Q. What happened when you got up to Montreal?

10 A. I met a couple of Canadian gentlemen who I spoke of  
11 collecting money with, and they gave me a cellular phone.

12 Q. What names did those two folks go by?

13 A. Louis and Snake.

14 Q. Once they gave you the cell phone, did you get any calls  
15 on your cell phone?

16 A. Yes. I immediately started receiving calls from  
17 Mr. Duboc.

18 Q. Do you know his first name?

19 A. Claude.

20 Q. What would Claude Duboc call you about?

21 A. He instructed me how I was to go on the collection of the  
22 money.

23 Q. Did Claude Duboc have any people helping him that you  
24 dealt with with regard to the money collection?

25 A. Yes, he did.

1 Q. Who was that?

2 A. Roger Darmon.

3 Q. Who was actually bringing you the money that you  
4 collected?

5 A. Workers of the two fellows I initially met.

6 Q. And then who were you -- what were you doing with the  
7 money?

8 A. I was turning it over to Mr. Darmon.

9 Q. Where would you turn the money over to Mr. Roger Darmon  
10 at?

11 A. In a hotel room.

12 Q. Just describe for the jury how that would work? How  
13 would it go that you would meet with Mr. Darmon and turn the  
14 money over to him?

15 A. He'd book a room in a hotel, usually one that had  
16 underground parking so I could enter underneath and go straight  
17 to his room and just hand off the money to him.

18 Q. When you got the money before you delivered it to  
19 Mr. Darmon, when you got it from the workers of Louis and the  
20 other fellow, would you count the money?

21 A. No, I did not.

22 Q. You just turned it over to Mr. Darmon and left it for him  
23 to make sure that it was accurate?

24 A. That's correct.

25 Q. Did Claude Duboc and you ever discuss money couriers or

1 when money couriers would need to be there to pick up the  
2 money?

3 A. Yes.

4 Q. You would. Would you tell the jury how that would work?

5 A. He would call me on the cellular phone and tell me when  
6 the couriers would arrive.

7 Q. Claude Duboc would?

8 A. Yes.

9 Q. Go ahead.

10 A. And then I would get in touch with the people who had the  
11 money and make arrangements for them to deliver it normally the  
12 very day I needed it.

13 Q. And how big -- or what was this money contained in when  
14 you got the money and then you delivered it to Mr. Darmon?

15 A. Usually came in cardboard boxes. And I transferred it  
16 into luggage to take to the hotel.

17 Q. How much luggage would you take to Mr. Darmon?

18 A. One or two large bags.

19 Q. Just approximately, how much would they weigh? How much  
20 weight are we talking about of money?

21 A. Sometimes they were pretty heavy. 70, 80 pounds on  
22 occasion.

23 Q. After you had been dealing with Roger Darmon, did there  
24 come a time when you started dealing directly with the money  
25 couriers?

1 A. Yes.

2 Q. And how did that come about?

3 A. Claude called me and told me that Roger was unavailable  
4 and would I mind handing the money off directly to the  
5 couriers.

6 Q. What did you say?

7 A. I agreed.

8 Q. And who did you start dealing with after that?

9 A. A woman by the name of Sonia Vacca.

10 Q. Once you started dealing with Sonia Vacca, did you have  
11 any more dealings with Roger Darmon?

12 A. Almost never after that.

13 Q. Where would you deliver money to Sonya Vacca?

14 A. The same type of arrangement. Hotel rooms.

15 Q. Same type of quantities?

16 A. Yes.

17 Q. During the -- you said you went to Montreal to collect  
18 this money and to deliver it to Roger Darmon and then later  
19 Sonia Vacca. Did you stay in Montreal the whole time?

20 A. No, I actually based myself out of Toronto.

21 Q. Why did you do that?

22 A. The gentleman I met in Montreal thought it would be a  
23 safer, neutral ground to do the money transfer.

24 Q. So most of this money collection that you have been  
25 describing when you transferred it to Roger Darmon and Sonya

1 Vacca, most of it happened in Toronto?

2 A. That's correct.

3 Q. During the time that you were in Montreal and Toronto,  
4 approximately how much money did you deliver to Roger Darmon  
5 and Ms. Vacca?

6 A. I think it was in the vicinity of 17 or 18 million  
7 dollars.

8 Q. About what time of year did you finish up collecting the  
9 money in Toronto?

10 A. Somewhere around Christmas of '92 or early January of  
11 '93.

12 Q. Did you get paid for the work you did collecting the  
13 money and transferring it to the couriers?

14 A. I did.

15 Q. And how -- would you explain to the jury the  
16 circumstances of how you got paid?

17 A. I collect the money in New York.

18 Q. Who directed you to go to New York?

19 A. It was Claude, I believe.

20 Q. So you go to New York and then how was it that you got  
21 paid in New York?

22 A. I met a man at a restaurant in New York, and handed me  
23 the money.

24 Q. When you say New York, the State or New York City?

25 A. It was New York City.



1 Q. And do you know the name of the man, or at least what he  
2 went by, that gave you the money?

3 A. He was known as K.C.

4 Q. And how much money did K.C. give you?

5 A. I think it was in the vicinity of 350, maybe 400 thousand  
6 dollars.

7 Q. Did you ever collect money and deliver it to couriers in  
8 another city?

9 A. Yes, I did.

10 Q. How did that come about?

11 A. Claude contacted me when the job in Toronto was about at  
12 its end, and asked me if I would be willing to do a similar  
13 thing in Vancouver.

14 Q. Did Claude Duboc give any more information about the  
15 operation in Vancouver, how it was running or anything like  
16 that?

17 A. Not really.

18 Q. Did you agree to go to Vancouver?

19 A. I did.

20 Q. And when you got to Vancouver, what happened?

21 A. I was instructed to meet Al Madrid at a lawyer's office  
22 in Vancouver.

23 Q. And did you meet Al Madrid at the lawyer's office?

24 A. I did.

25 Q. Was there anybody from the organization -- I don't mean