

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF FLORIDA  
GAINESVILLE DIVISION

THE UNITED STATES OF AMERICA,

Plaintiff,

vs.

JOHN KNOCK and  
ALBERT MADRID,

Defendants.

---

Docket No. 94CR1009MMP

Gainesville, Florida  
May 5, 2000  
9:00 a.m.

VOLUME 4

TRANSCRIPT OF THIRD DAY OF JURY TRIAL  
WHEN HEARD BEFORE THE HONORABLE SENIOR UNITED STATES  
DISTRICT COURT JUDGE MAURICE M. PAUL, AND A JURY.

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THE COURT: Good morning everyone. Welcome back.

(Jury in.)

Mr. Kennedy, we need the witness, please, sir.

If you just have a seat, please, ma'am. You are still under oath.

THE WITNESS: Yes.

THE COURT: And Mr. Kennedy.

CROSS-EXAMINATION.

MR. KENNEDY: Thank you, Your Honor.

Q. Good morning, Ms. Roberts.

A. Good morning.

Q. If I understand you correctly, yesterday you said that for all of your crimes, you were facing life imprisonment; is that correct?

A. Actually, yes, that's correct. But I'm facing anywhere from ten years to life.

Q. And where are you facing the ten years to life?

A. In the Northern District -- excuse me. In the Northern District of California.

Q. I'm sorry. I thought you had already been sentenced there?

A. Yes, I am sentenced there.

Q. And when you were sentenced there, you were given five years probation; were you not?

1 A. Yes, I was.

2 Q. And have you served a day in jail?

3 A. No, I have not.

4 Q. And as far as you know, are you -- do you intend to serve  
5 any time in jail?

6 A. No. Not as long as I continue to cooperate with the  
7 government in an honest form.

8 Q. You still have -- well, strike that.

9 So the ten to life that you had faced in California  
10 actually has been resolved as a result of your plea deal there;  
11 has it not?

12 A. Yes, it has.

13 Q. So you are no longer facing life in prison because of  
14 your deal?

15 A. As long as I continue to cooperate with the government.

16 Q. Understood. You're also facing, though, if you don't  
17 cooperate with the government, a potential prosecution; are you  
18 not?

19 A. Yes, I am.

20 Q. So you are trying as hard as you can to cooperate with  
21 the government; are you not?

22 A. Yes, I am.

23 Q. And you could, in fact, if the prosecutor's decide that  
24 they don't believe what you testified to, you could in fact be  
25 charged with perjury; could you not?

1 A. Yes, I could.

2 Q. So in addition to your cooperation with the prosecutors,  
3 you are very careful, are you not, to say things that they  
4 believe to be the truth?

5 A. Yes, I am. The lifetime of experience.

6 Q. Have you had -- other than this career in criminality,  
7 have you ever had a legitimate job?

8 A. Yes, I have.

9 Q. When was that?

10 A. That was while I was married for nine years to Allen  
11 Beatty. We were in the construction trade.

12 Q. That was back in the '70s; was it not?

13 A. Yes, that was.

14 Q. Since the '70s have you made money from any legitimate  
15 enterprise, exclusive of course, of the boutique that you are  
16 running, the boudoir boutique that you are running now?

17 A. No.

18 Q. And am I right that you began using marijuana at the age  
19 of 13?

20 A. No. You are very wrong.

21 Q. When -- you did use marijuana; did you not?

22 A. Yes, I did.

23 Q. When did you start using it?

24 A. I started using marijuana when I was the age of probably  
25 15.

1 Q. And you were married when you were 16?

2 A. 16 until the age of 25.

3 Q. And that was Allen Beatty?

4 A. That was Allen Beatty.

5 Q. And Allen Beatty, as I understand it, is the father of  
6 your daughter who is also named Julie?

7 A. Yes.

8 Q. And how old is Julie now?

9 A. She is 23 years old.

10 Q. And so when was she born?

11 A. In 19 -- I'm a little blank right now. 1977.

12 Q. To your knowledge was your father ever engaged in drug  
13 dealing?

14 A. Oh, yes, he was.

15 Q. Well, to your knowledge was your mother ever engaged in  
16 drug dealing?

17 A. No. Absolutely not.

18 Q. Was your father at all abusive to you?

19 A. Excuse me?

20 Q. Abusive.

21 MR. HANKINSON: Objection.

22 THE COURT: Hold on. I sustain that. Let's move on.

23 A. No, he wasn't.

24 THE COURT: Ma'am.

25 THE WITNESS: Sorry.

1 Q. In high school, did you deal any drugs?

2 A. In high school? Yes.

3 Q. Would that include bennies or Benzedrine and reds or  
4 barbiturates?

5 A. Yes.

6 Q. Did it include any other drugs?

7 A. No, it didn't.

8 Q. At some point you left your husband Allen Beatty. Was he  
9 also a drug dealer?

10 MR. HANKINSON: Objection as to relevance, Your  
11 Honor.

12 THE COURT: Sustained.

13 Q. You -- at some point you left Allen Beatty and went to  
14 live with a Charles Johnson; did you not?

15 A. Yes, I did.

16 Q. Mr. Johnson was a drug dealer; was he not?

17 A. Yes, he was.

18 MR. HANKINSON: Objection, relevance, Your Honor.

19 THE COURT: Yes.

20 MR. KENNEDY: I'll approach.

21 THE COURT: We are interested in whatever period of  
22 time is covered by this indictment.

23 MR. KENNEDY: We are getting to that.

24 THE COURT: Well, get to it. And don't -- we don't  
25 want life history here. So I sustain the objection. You put



1 dates with it.

2 MR. KENNEDY: I understand, Your Honor.

3 Q. Well, let's go to the mid '80s. You ultimately left  
4 and -- Mr. Johnson -- and went to -- began living with Gary  
5 Vance, who I believe is also known as Tommy Smith; is that  
6 correct?

7 A. That's correct.

8 Q. And Mr. Vance, as you have told us, was, in fact, a drug  
9 dealer?

10 A. Yes, he was.

11 Q. And you involved yourself in his drug dealing; did you  
12 not?

13 A. Yes, I did.

14 Q. I believe you talked about a couple of airplane loads of  
15 marijuana coming out of Columbia, correct?

16 A. Correct.

17 Q. You at one time went to Columbia; did you not?

18 A. I went to Columbia probably on three different occasions.

19 Q. And each one of those occasions was to organize  
20 importation of drugs into the United States?

21 A. No, it was not, sir.

22 Q. What was it for?

23 A. A visitation to go see his brother.

24 Q. See whose brother?

25 A. Gary's brother.

1 Q. How many loads came into the United States from Columbia  
2 on which you worked?

3 A. One.

4 Q. And how much marijuana was -- was it marijuana?

5 A. Yes, it was.

6 Q. How much marijuana was on that load?

7 A. Approximately 14 tons.

8 Q. And what was the value of that, to your knowledge?

9 A. I have no idea.

10 Q. It was sold; was it not?

11 A. Yes, it was.

12 Q. You helped sell it?

13 A. Absolutely not.

14 Q. Mr. Vance sold it all himself?

15 A. No, he did not.

16 Q. How was it sold?

17 A. It was sold through Steve Herd.

18 Q. But you and Mr. Vance received some money for your  
19 efforts at smuggling it into the country; did you not?

20 A. One million dollars.

21 Q. Then in '97, excuse me -- then in '87, there was a 30-ton  
22 hash load aboard the RUBY R, which you helped organize,  
23 correct?

24 A. Yes.

25 Q. And as a result of that, you were owed 13 million

1 dollars, if I understood?

2 A. Approximately, yes.

3 Q. But you were actually only paid 4 million; is that  
4 correct?

5 A. Four or five million by the time I received my one  
6 million.

7 Q. So you are owed 8 to 9 million on that load?

8 A. Yes.

9 Q. Then in November of '87 Gary Vance was arrested, correct?

10 A. Yes.

11 Q. The next criminal enterprise you engaged in was to help  
12 organize a load aboard the INTREPID VENTURE with Calvin  
13 Robinson, correct?

14 A. That is not correct. I did not help. The only  
15 participation I had was introducing both -- to both parties.

16 Q. All right.

17 A. I had no participation in it.

18 Q. And you received no money for it?

19 A. I received no money for it.

20 Q. And was that the case out of which Calvin Robinson got a  
21 life term in prison?

22 A. Yes, it is. He had a three time -- he was a three time  
23 offender.

24 Q. After '88 as I understand your testimony, you went --  
25 during the years of '89 and '90 you were essentially in Europe;

1 is that correct?

2 A. Yes, I was.

3 Q. And during that time, I believe you said that Claude  
4 Duboc put \$500 thousand into an account for you in Luxembourg?

5 A. Yes.

6 Q. And also ultimately 3 million dollars was put into the  
7 Patrick Conlan Foundation in Luxembourg?

8 A. Yes.

9 Q. Patrick Conlan Foundation. Was that something to which  
10 you had any control or access?

11 A. I had no access to that at all.

12 Q. In '91, I gather while you are still in Spain, Mr. Duboc  
13 contacted you and began to pressure you to come back and go to  
14 work in the drug smuggling business; did he not?

15 A. Yes, he did.

16 Q. And he was somewhat persistent in putting that pressure  
17 on you?

18 A. He was consistently persistent.

19 Q. You didn't have to give in, did you?

20 A. No, I did not.

21 Q. Why did you?

22 A. Why?

23 Q. Why did you give in to this pressure?

24 A. Why did I? Because I felt very obligated to him for the  
25 kind things that he had done for myself.

1 Q. Those kind things involved primarily money; did they not?

2 A. Yes, they did.

3 Q. Millions of dollars?

4 A. Not millions of dollars. Basically a general education  
5 for my daughter. A very good one.

6 Q. He wanted you to get back the old crew that you had used  
7 back in the RUBY R days of 1987; is that right?

8 A. Yes.

9 Q. But you did not want to do that, did you?

10 A. No, I did not.

11 Q. And tell us -- tell the jury why you didn't want to try  
12 to recruit this old crew from '87?

13 A. Why? Because I have completely interrupted those  
14 people's lives. They -- a few of them have gone to jail. And  
15 I knew at the time if I involved those people in this, the  
16 project would have gotten busted. This means everyone goes to  
17 jail. And it was upsetting to me in the sense that -- I knew  
18 at some point in time that all of this would come to a final  
19 end and all of us would be facing prison sentences.

20 Q. And among those people in '91 you did not want to involve  
21 again in criminality was Mr. Berger and the Nelsons; was it  
22 not?

23 A. Yes.

24 Q. But then if I understand you, in '93, actually you did  
25 re-engage Mr. Berger and the Nelsons in the smuggling venture;

1 did you not?

2 A. Yes.

3 Q. But any way, back to '91.

4 The plan of Mr. Duboc, as I understand it, was to  
5 bring in a load into Canada and eventually to Australia; is  
6 that correct?

7 A. Yes.

8 Q. And that is where this individual named Blue came on to  
9 the scene, right?

10 A. Yes.

11 Q. And how did -- did you recruit Blue?

12 A. I did not recruit Blue. Excuse me. I'm sorry. Yes, I  
13 had talked to Blue with regards to coming on to this project.

14 Q. So is it fair to say that you recruited Blue?

15 A. Yes, it is.

16 Q. And, in fact, there was, in '91, a load in which you had  
17 some participation of hashish that came into Canada; was there  
18 not?

19 A. Yes.

20 Q. And also there was a load that came into Australia,  
21 correct?

22 A. Yes.

23 Q. And the load that came into Australia you collected  
24 approximately 24 million dollars Canadian -- excuse me 24  
25 million dollars Australian; did you not?

1 A. Yes, I did.

2 Q. Did you collect any money Canadian for the Canadian load  
3 that came in in '91?

4 A. 30 million.

5 Q. 30 million Canadian?

6 A. Uh-huh.

7 Q. Then in the summer of '92, you testified about a load of  
8 hashish coming in to -- again into Canada, Vancouver British  
9 Columbia; is that correct?

10 A. Yes.

11 Q. Do you remember the tonnage on that one?

12 A. Approximately 30 tons.

13 Q. And do you remember how much money you collected with  
14 reference to that?

15 A. This is -- excuse me. We are referring to the Canada  
16 load?

17 Q. Summer of '92 specifically Ms. Roberts.

18 A. I just got a check -- I've just got to check the year on  
19 that. Excuse me.

20 Q. Please.

21 A. I believe that was in '93.

22 Q. All right. In '92, were there any loads, to your  
23 knowledge, of hashish smuggled into Canada?

24 A. In '92? No.

25 Q. Would it help you if I suggested to you that in '92,

1 there was arrests in Canada that included Mr. Madrid, I  
2 believe, and Mr. Cowles?

3 A. I had no idea that load came into Canada.

4 Q. And in the fall or winter of '92, there was a --  
5 approximately 30 tons of hashish smuggled into or attempted to  
6 be smuggled into Amsterdam; is that correct?

7 A. Excuse me. What year was that?

8 Q. I'm speaking of the fall and winter of '92.

9 A. No. That was '91.

10 Q. So Amsterdam was '91.

11 A. July, August of 1991.

12 Q. To your knowledge, then, were there any smuggling  
13 ventures into Canada or Amsterdam or Australia in the calendar  
14 year of '92?

15 A. Yes. In 1992, December 13, 30 tons was seized in  
16 Amsterdam.

17 Q. And you had helped participate in the organization of  
18 that smuggling venture; had you not?

19 A. No, I did not.

20 Q. Did you have any role in it?

21 A. Yes, I did.

22 Q. What was your role?

23 A. My role was to keep the -- between Claude Duboc and  
24 myself, and Blue from Amsterdam, my participation there was to  
25 let each party know when the mother ship bumped and the



1 offloading ship bumped and let Claude Duboc know when the  
2 product would arrive in Amsterdam. I would call immediately.

3 Q. And you were doing that, making those efforts, because  
4 you expected to be paid; did you not?

5 A. Yes, I was.

6 Q. And what was your expectation with respect to payment for  
7 the Amsterdam load?

8 A. Whatever Claude wanted to pay me.

9 Q. It could again run into millions; could it not?

10 A. Possibly.

11 Q. Now, let's go to the summer of '93. And as I understand  
12 your direct testimony, there were actually two loads on the  
13 water as Mr. Duboc used to say; is that correct?

14 A. Yes.

15 Q. One load of hashish destined for Canada, correct?

16 A. Sir, I think we are talking about 1992.

17 Q. Sorry. I had '93 in my notes.

18 A. Okay. Just one moment, please.

19 Q. Certainly. Take your time.

20 A. You are talking about the load that arrived in Amsterdam?

21 Q. No. We've covered that one.

22 A. Okay.

23 Q. Now let's move on to '93.

24 A. Uh-huh.

25 Q. As I understand your testimony, and please correct me if

1 I'm wrong, if I understood your testimony in the summer of '93,  
2 there were two loads being planned. One was a hash load into  
3 Canada for which you recruited Dr. Mike, and then there was a  
4 load of marijuana to come into Seattle in the summer of '93.

5 A. Yes.

6 Q. Okay. With reference to the hash to go into Canada, that  
7 was approximately 30 tons; was it not?

8 A. Yes.

9 Q. And did you collect any money with reference to that  
10 hash?

11 A. 30 million Canadian.

12 Q. With reference to the -- the marijuana into the USA, into  
13 Seattle, that was the -- I believe you said between 25 and 27  
14 tons; is that correct?

15 A. Approximately 27 tons.

16 Q. And how much money did you collect with reference to the  
17 marijuana that was introduced into Seattle?

18 A. 200,000 which was then given to La Rouge, Marshall Way.

19 Q. And was that 200,000 all of the money you collected with  
20 reference to that?

21 A. I believe so.

22 Q. I thought that you had said that out of that summer of  
23 '93 load, that in fact you brought a million dollars -- it  
24 might have been Canadian, you tell me, but a million dollars to  
25 Dodd Berger; did you not?

1 A. Oh, that is not the collecting, this is the pay.

2 Q. That is the pay?

3 A. Yes.

4 Q. During the summer of '93 load, again, was -- what  
5 Mr. Duboc was wanting was an offloading crew in the United  
6 States, correct?

7 A. Yes.

8 Q. And he asked you to find that crew; did he not?

9 A. Yes, he did.

10 Q. And you went back to the old crew of Berger and the  
11 Nelsons, didn't you?

12 A. Yes, I did, unfortunately.

13 Q. And recruited them to participate in the offloading and  
14 ultimately transportation of the marijuana from Seattle down to  
15 California, correct?

16 A. Yes, I did.

17 Q. That was the -- the one that came aboard the vessel, the  
18 Southern Cross that we saw the photos of?

19 A. Yes, it is.

20 Q. In the fall of '93, the fall -- moving away from the  
21 summer of '93 and the two loads we just talked about, in the  
22 fall of '93 was there not another hashish load in which you  
23 played a role brought into British Columbia, Canada?

24 A. Yes.

25 Q. And approximately how much did you -- excuse me. What

1 was the tonnage on that load?

2 A. That was 30 tons.

3 Q. Approximately how much did you collect for that load?

4 A. 30 million Canadian.

5 Q. And of that 30 million Canadian, in the fall of '93, I  
6 believe you took one million Canadian to Mr. Berger; did you  
7 not?

8 A. Yes, I did.

9 Q. And you took one million Canadian to the Nelsons; did you  
10 not?

11 A. Yes, I did.

12 Q. And you also took \$400,000 in U.S. currency to the  
13 Nelsons, correct?

14 A. Yes, I did.

15 Q. And I believe you said, and I'll try to accurately quote,  
16 you decided to pay -- excuse me -- quote, I decided to pay  
17 myself for once after all of those years of working, end quote.  
18 Did I get that right?

19 A. Yes, you did.

20 Q. That's when you paid yourself the five million Canadian,  
21 five million plus, Canadian dollars, correct?

22 A. Yes. I guess I got greedy.

23 Q. That's the same five million that ultimately ended up in  
24 the hands of Muhammad?

25 A. Muhammad Echovafni.

1 Q. In Morocco?

2 A. Yes.

3 Q. As far as you know, it's still there?

4 A. As far as I know. It should be there.

5 Q. Have you made any efforts to help the United States  
6 Government recoup that five million Canadian -- those five  
7 million Canadian dollars?

8 A. Yes, sir. As a matter of fact, Greg Small, the agent  
9 that I worked with exclusively for two years, him and I made  
10 many efforts which I have copies of at home of our trying to  
11 retrieve that money back.

12 Q. What kind of efforts were those, Ms. Roberts?

13 A. What kind of efforts?

14 Q. Uh-huh.

15 A. We made phone calls to his son in New York. We made many  
16 phone calls to Morocco to the home in Tangier, Morocco. We had  
17 sent letters to Mohammad -- to his house in Spain, also to his  
18 house in Tangier, Morocco.

19 Q. Were there any of those letters ever answered?

20 A. No, they were not.

21 Q. Were any of your phone calls ever answered?

22 A. No. He would not return my phone call.

23 Q. Then I gather in '94 and '95, you spent those two years  
24 in Spain; did you not?

25 A. Yes.

1 Q. Did you -- during that time, did you engage in any  
2 criminal activity?

3 A. In what during that period?

4 Q. '94, '95 while you were in Spain?

5 A. '94, and '95? Yes, I did.

6 Q. And?

7 A. Yes, I did.

8 Q. And describe for the ladies and gentlemen of the jury  
9 what criminality you engaged in in Spain and wherever in '94  
10 and '95?

11 A. In '94, I was still in the United States.

12 Q. Okay.

13 A. And at that point in time, I was collecting money from  
14 the Doctor in Palm Springs, California in which I had to pay  
15 the people, Dallas Nelson, Carol Nelson, Dodd Berger for the  
16 1993 load that came in to Washington state.

17 Q. Okay. And approximately how much money did you collect  
18 in '94?

19 A. One million, for Mr. Dodd Berger, another million for  
20 Dallas and Carol Nelson, Canadian, and 400 thousand USD for  
21 Dallas and Carol Nelson and Doug Nelson.

22 Q. Doug Nelson is the son of Dallas and Carol Nelson; is he  
23 not?

24 A. Yes, he is.

25 Q. You also had at least the one false United States

1 passport; did you not?

2 A. I had -- yes, one false United States passport.

3 Q. And you obtained one false United States passport for  
4 your daughter; did you not?

5 A. Yes, I did.

6 Q. And are you aware that those are also violations of  
7 United States law?

8 A. Yes, I am.

9 Q. All right. Has anybody threatened to charge you with  
10 those violations?

11 A. No.

12 Q. As a matter of fact, they are taken care of in your deal  
13 in California; are they not?

14 A. I have no idea.

15 Q. Did you ever file any United States taxes on any of this  
16 money?

17 A. Yes. As a matter of fact I have two tax attorneys. One  
18 tax attorney is George Colas in Las Vegas, and also I have  
19 Mr. and Mrs. Purdy, which have worked for the Internal Revenue  
20 Service for 27 years.

21 I'm on an extension currently with the Internal  
22 Revenue Service. They just filed another extension, because  
23 I'm waiting to get documents from the government so that I can  
24 declare absolutely every penny that has been given to me  
25 through this organization, sir.

1 Q. If you had to estimate for his honor, the ladies and  
2 gentlemen of the jury now what would it be -- every penny that  
3 you have gotten -- through your drug dealing?

4 A. Approximately about a million and a half.

5 Q. Only a million and a half?

6 A. Approximately.

7 THE COURT: Tell me -- say that again. I'm not quite  
8 sure I understood your question or her answer.

9 MR. KENNEDY: Yes, Your Honor.

10 Q. Give us your best estimate now of approximately how much  
11 money you believe you are going to declare on your income taxes  
12 as money you got from your drug dealing?

13 A. Approximately a million and a half.

14 Q. And am I correct that you haven't filed any taxes yet?

15 A. I'm on extension.

16 Q. Am I correct that you haven't filed any taxes yet?

17 A. Yes. Uh-huh.

18 Q. Any tax returns rather?

19 A. No.

20 Q. So there has never been a time to date that you've ever  
21 filed U.S. tax returns?

22 A. When I lived with Mr. Beatty, which was 17 years ago.

23 Q. Back in the '70s?

24 A. Yes.

25 Q. Now, this -- in 1987 when the hashish came into



1 Pittsburgh, California, as you have described, if I understood  
2 your testimony, you got Tom and Dan Vance to participate in  
3 some fashion in that activity; is that correct?

4 A. Excuse me, sir. I did not help them participate. As a  
5 matter of fact, sir, I have a very good memory of this. There  
6 was so much pressure from their father, those boys -- one of  
7 the boys was literally -- Dan -- I'll never forget it, crying  
8 because his father had pressured them so much into  
9 participation in those two events. And I'll never forget it.

10 Q. But didn't you drive the two boys to the place where the  
11 drugs, the hash was coming in?

12 A. Yes. And Daniel Vance was crying. And I tried to talk  
13 him out of not participating. But he was under pressure from  
14 his father and his other brother, Tom.

15 Q. So you brought those two boys against their own desires  
16 and all to the Pittsburgh drug site?

17 A. This is what their father wanted, sir.

18 Q. But you didn't have to do what their father wanted, did  
19 you?

20 A. No.

21 Q. Cal Robinson was someone you recruited for drug dealing;  
22 was he not?

23 A. It wasn't actually me, sir. It was Tom -- excuse me, Tom  
24 Vance.

25 Q. Robert Berger was someone you recruited for drug dealing,

1 correct?

2 A. Yes.

3 Q. Bill Lyttle is someone you recruited for drug dealing?

4 A. No, sir.

5 Q. Who recruited Bill Lyttle?

6 A. Excuse me. Tom.

7 Q. You've already told us you recruited Doug, Dallas, Carol  
8 Nelson into drug dealing, correct?

9 A. Yes. Now that -- excuse me, sir. They had also worked  
10 for Tom Vance, Gary Vance. He actually recruited them way  
11 before I did.

12 Q. All right.

13 When you say Tom Vance, you mean Gary Vance?

14 A. Gary Vance.

15 Q. Because Tom Vance -- that is one of the boys, correct?

16 A. Yes. I'm not trying to confuse you. Also Gary Vance  
17 because his real name is Tom Vance, the father.

18 Q. Right. Exactly. But the boys are Tom Vance and Dan  
19 Vance; are they not?

20 A. Yes. And may I make one other statement, sir?

21 Q. You may indeed.

22 A. Yes. Before Gary Vance recruited Mr. and Mrs. Nelson,  
23 Gary Vance had recruited them to work on the America West  
24 airline pilot situations where the loads were coming out of  
25 Columbia. And those two -- that one load that arrived from

1 Columbia into Washington state, again, by aircraft, large  
2 aircraft, commercial aircraft, Dallas had worked on and his  
3 son.

4 Q. Okay.

5 You also recruited Steven Herd to work in drug  
6 dealing; did you not?

7 A. Absolutely not.

8 Steve Herd is a long-time player in this game.

9 Q. But you did involve yourself in drug dealings with Steven  
10 Herd?

11 A. Yes, I did.

12 Q. And you recruited your sister, Cindy, to work in  
13 connection with this drug dealing and money laundering; did you  
14 not?

15 A. Absolutely not, sir.

16 Q. What was Cindy doing in your adjacent room in July of  
17 1993?

18 A. In my what?

19 Q. Excuse me. I believe you -- pardon me.

20 A. Sure.

21 Q. I believe you testified on direct that Cindy was in this  
22 hotel room in California in an adjacent hotel room in  
23 California while you were moving -- arranging to move the  
24 marijuana down from Seattle to California; isn't that true?

25 A. Is what --

1 Q. That Cindy was in the adjacent room?

2 A. Yes, she was.

3 Q. So she was with you while you were doing that?

4 A. Yes.

5 Q. She was aware of what you were doing?

6 A. She can get up here and testify that she was completely  
7 unaware of what she was doing. She thought that she was going  
8 on a vacation in the RC, sir.

9 Q. And you never had her courier money?

10 A. Absolutely not. Never involved my family in that.

11 Q. So that would be true of your brother, Gary or Jerry?

12 A. No, it's Jerry Roberts.

13 Q. And you wouldn't involve him either, would you?

14 A. Absolutely not.

15 Q. Because you used his cell phone as I understand you?

16 A. Yes, sir. We were getting very sloppy then because I was  
17 very tired and overworked from Claude Duboc. And as -- I was  
18 getting very sloppy during those years, I asked my brother to  
19 borrow his cellular phone. He had no idea what was going on.

20 Q. And I believe you also recruited an individual named  
21 Heberto Rodriguez, also known as Tico; is that correct?

22 A. When you say recruited, this man had been in the drug  
23 business for years. So was I twisting his arm?

24 Q. No. I wasn't suggesting you were twisting his arm. But  
25 you did ask Mr. Rodriguez to participate, along with Blue, in

1 the Canadian and the Australian drug smuggling; did you not?

2 A. Yes. As a matter of fact, at that point in time, Julian  
3 Rodriguez which is currently in prison had asked me, because he  
4 was quite currently bored at the time. He was actually  
5 projecting -- if we could put a project together. He actually  
6 wanted to work in Canada. These guys get bored after a while.  
7 They don't know when to quit.

8 Q. Marshall Way is someone I believe you testified with whom  
9 you have engaged in drug dealing; is that correct?

10 A. Yes, sir.

11 Q. Is he someone whom you asked to be engaged in drug  
12 dealing activity?

13 A. Yes.

14 Q. I believe there was a gentlemen by the name of John or  
15 Patrick Faye. Do you know that name?

16 A. Oh, yes, I do.

17 Q. And he is -- do you know that his name is also Joe  
18 Wiggins?

19 A. Oh, yes, I do.

20 Q. You lived with Mr. Faye or Mr. Wiggins for a while; did  
21 you not?

22 A. No, I -- I had dated him for one month exactly.

23 Q. And this is the same Mr. Faye or Mr. Wiggins whom you  
24 described as the English thug who kidnapped your daughter?

25 A. He is an English thug he also works for the British

1 authorities setting up projects and having them busted.

2 Q. Okay. Richard Shen is another individual whom you  
3 recruited to engage in drug dealing; is he not?

4 A. When you say recruit, I'm a little offended.

5 Q. I don't mean to offend you. What I mean by recruit is  
6 ask them to come and participate. Is that correct?

7 A. Yes. He is a long time drug dealer.

8 Q. But you have asked Richard Shen to participate in drug  
9 deals; have you not?

10 A. Yes, I did.

11 Q. You have also asked Barry Allen to participate in drug  
12 deals?

13 A. No, I did not.

14 Q. Well, Mr. Allen did participate in some drug deals in  
15 which you were involved; did he not?

16 A. Yes.

17 Q. He was recruited -- excuse me I know you do not like that  
18 word. Excuse me. He was asked to participate by Mr. Shen; is  
19 that it?

20 A. Mr. Shen, myself at that time, yes.

21 Q. So you -- so you asked -- you jointly asked that, you and  
22 Mr. Shen asked Mr. Allen to participate in the drug dealing?

23 A. Yes.

24 Q. And finally I believe the last one you asked to  
25 participate is Dr. -- first name Dr. Mike, Mr. Rogerson or

1 Rogerson, correct?

2 A. Yes.

3 Q. Now, Mr. Rogerson was a member of the Hells Angels in  
4 Canada; was he not?

5 A. He was one of the top leaders.

6 Q. Of the Hells Angels?

7 A. Yes.

8 Q. They are pretty tough people, aren't they?

9 A. I have no clue, and personally don't care.

10 Q. So you weren't afraid of dealing with Mr. Rogerson and  
11 the Hells Angels in Canada?

12 A. I don't consider -- I deal with people directly. I  
13 don't look at what is behind them.

14 Q. My question is, you weren't afraid to deal with Hells  
15 Angels in Canada?

16 A. I was not afraid to deal with Mr. Rogerson.

17 Q. Now, in '95, if I understood you correctly, you spent the  
18 entirety of that year in Spain; did you not?

19 A. Yes.

20 Q. And during that period of time, you started to face I  
21 believe you called it reality, correct?

22 A. Yes.

23 Q. And that reality was that you knew, did you not, that you  
24 had to do something about this extensive criminal history in  
25 which you had participated, correct?

1 A. Yes.

2 Q. In '95, you knew that Mr. Duboc had been arrested; did  
3 you not?

4 A. Excuse me?

5 Q. In '95 you knew that Mr. Duboc had been earlier arrested  
6 in '94; did you not?

7 A. Yes.

8 Q. And you were worried that Mr. Duboc might turn on you and  
9 give evidence against you; were you not?

10 A. I wasn't worried. I knew that he'd turn evidence on  
11 everybody.

12 Q. Including you?

13 A. All. Including myself, yes.

14 Q. And you knew that Mr. Way and Berger, Mr. Berger and the  
15 Nelsons had been arrested out in California, you knew that; did  
16 you not?

17 A. Yes, I did.

18 Q. And you knew that potentially they could turn on you; did  
19 you not?

20 A. I knew there was a potential. And, I -- I had no  
21 question in my mind that they would. And I would hope for  
22 their own sake and their own future that they would.

23 Q. You knew in '95 you had to do something; did you not?

24 A. No. I didn't know I had to do anything. I just came to  
25 the realization after being on the roller coaster ride for so



1 many years that -- I had a breakdown and I cried for one month  
2 and finally regrouped. And decided to call my father, which is  
3 an ex drug dealer, my daughter, and an attorney that would  
4 represent me. And asked them what they felt. And they all  
5 encouraged myself to turn myself in.

6 Q. And you decided to covertly or to quietly turn yourself  
7 in in the San Francisco bay area; did you not?

8 A. Yes.

9 Q. The gentleman with whom you first met with in terms of  
10 the government in the United States Government and turned  
11 yourself in was Customs agent Greg Small?

12 A. Yes.

13 Q. And he was working out of San Francisco?

14 A. Yes, he is or was.

15 Q. How did you get to Mr. -- the agent, Customs Agent Small?  
16 How did you know that he'd be the person to whom you should  
17 speak about turning yourself in?

18 A. Yes, sir. I didn't know who would be intercepting me in  
19 the United States. I had Bernard Seigal set up that  
20 arrangement here in the United States. He'd be in fact the  
21 attorney that represented me when I entered into the United  
22 States.

23 Q. And Mr. Seigal is a San Francisco lawyer, as we know?

24 A. Yes, he is, sir.

25 Q. So it's Mr. Seigal who got you in touch with Greg Small?

1 A. Not until I arrived by airplane in San Francisco.

2 Q. Had prior arrangements been made for you to fly from  
3 Spain into San Francisco?

4 A. In what sense?

5 Q. In the sense that you had to fly into San Francisco  
6 ultimately to meet Agent Small; did you not?

7 A. I didn't know again, who I was going to be talking to.

8 Q. Thank you. So when you flew into San Francisco, you knew  
9 that you were going to see your attorney, Mr. Seigal?

10 A. Yes, I did. I hoped.

11 Q. What documentation or identification did you use to board  
12 the aircraft and to enter the United States to meet with your  
13 attorney, Mr. Seigal, in San Francisco in -- I believe we are  
14 talking early '96; are we not?

15 A. Yes. Uh-huh.

16 I think it was either Julie Roberts or Kathleen  
17 Evans. I do not recollect. I'm not sure.

18 Q. So you can't tell us whether or not you entered -- strike  
19 that for the moment.

20 In early '96, I believe the date is February, date of  
21 '96 when you ultimately covertly surrendered; is that correct?

22 A. Yes, sir, it was.

23 Q. You can't tell us whether or not on that occasion you had  
24 Julie Robert's identification or Kathleen Evan's  
25 identification?

1 A. I have one question, sir. Mr. Hankinson --

2 THE COURT: You can't ask.

3 A. I'm just trying to reflect if I had my Julie Robert's  
4 passport. Yes, I do reflect, sir.

5 My Julie Robert's passport when I was held as  
6 custody, excuse me not in custody, held as ransom in Spain from  
7 John Faye.

8 Q. While they were holding your daughter?

9 A. Yes, and my daughter. He had gone through my house and  
10 taken my original passport, Julie Roberts. And he took my  
11 phone books with phone numbers, and therefore I did not have my  
12 original passport to travel with into the United States or I  
13 would have.

14 Q. Understood.

15 A. Okay. But I had Kathleen Evans, I believe.

16 Q. Is that a U.S. passport?

17 A. Yes, it is.

18 Q. That is the phony passport about which you testified?

19 A. Yes.

20 Q. So you used that to come into your meeting with  
21 Mr. Seigal?

22 A. Yes. Uh-huh.

23 Q. In San Francisco now in February of '96, does Mr. Seigal  
24 make arrangements for you to see Customs Agent Small?

25 A. When I entered into the United States, Gregg Small,

1 United States Customs officer and Dale -- I do not remember his  
2 last name -- United States Coast Guard, and Mr. Seigal received  
3 me at the airport.

4 Q. So Agent Small was with your attorney, Mr. Seigal, what  
5 at San Francisco Airport?

6 A. Yes.

7 MR. KENNEDY: If I may approach, Your Honor?

8 THE COURT: Uh-huh.

9 Q. I'm placing in front of you, Ms. Roberts, a document we  
10 have received. And it appears to be to Greg Small dated  
11 February 28th, '96 from you; is that correct?

12 A. Yes, it is.

13 Q. Okay. And you are familiar with this document; are you  
14 not?

15 A. Yes, I am.

16 Q. Did you prepare this document?

17 A. Yes, I did.

18 Q. When did you prepare it?

19 A. February whatever date that is of 1996.

20 Q. February 28 of '96?

21 A. February what?

22 Q. February 28, '96?

23 A. February 28 of '96.

24 Q. You were preparing this in order to provide Agent Small  
25 with as much information as you could about your activities and

1 indeed the activities of other people with whom you had worked  
2 in drug dealing over the years, correct?

3 A. Yes, sir.

4 Q. And you tried, as best you could, to be as truthful and  
5 honest on that occasion of preparing this report, didn't you?

6 A. Yes, many reports.

7 Q. One of the things you say in this report is, quote, John  
8 Knock has been retired for several years; do you not?

9 A. As far as I knew --

10 Q. Excuse me. First tell me.

11 A. Yes.

12 Q. That is a correct quote. Quote, John Knock has been  
13 retired for several years end quote?

14 A. Yes.

15 Q. When you came to the United States and began meeting with  
16 Customs Agent Small, and I'm sure with other representatives of  
17 law enforcement, one of the things on your mind would be what  
18 could you give them in terms of either money for forfeiture or  
19 in terms of other criminals that they might be interested in in  
20 order to help yourself, correct?

21 A. Yes.

22 Q. And helping yourself meant ultimately doing everything  
23 you could to stay out of jail; did it not?

24 A. Yes.

25 Q. And, as a matter of fact, you have been successful in

1 that so far, haven't you?

2 A. Yes, I have, sir.

3 Q. Among the people -- strike that.

4 You told us that I believe it's this year, calendar  
5 1995, that you spoke to John Knock approximately every couple  
6 of weeks by telephone, correct?

7 A. Yes.

8 Q. Now, those were calls that you make to John Knock?

9 A. Yes.

10 Q. He could not call you because he didn't know where you  
11 were, correct?

12 A. That's correct.

13 Q. As a matter of fact, you didn't want him to know where  
14 you were?

15 A. No, I did not.

16 Q. So -- and I believe you were in Spain?

17 A. Yes, for part of those calls.

18 Q. Okay. But where did you tell him that you were?

19 A. In Canada.

20 Q. And why did you lie to John Knock about where you were?

21 A. Because eventually I knew that I was going to be turning  
22 myself in, and I knew that I would be able to get some kind of  
23 credit when I arrived here in the United States.

24 Q. That credit would include turning John Knock in; would it  
25 not?

1 A. Yes, it would, sir.

2 Q. So you wanted to -- as I believe your phrase was, keep  
3 John hanging; is that correct?

4 A. Yes.

5 Q. Now, you knew -- I believe based upon your  
6 conversations -- that John Knock by this time, '95, was pretty  
7 lonely, missing his wife and child; did you not?

8 A. Yes, I did.

9 Q. You discussed that with him?

10 A. Yes. As a matter of fact, during this period, when I had  
11 strung out John Knock, one of the conversations between John  
12 Knock and myself was that John Knock, in fact I believe he was  
13 probably hanging out in Paris or Belgium then, he wanted to  
14 turn himself in.

15 And he had realized then that he'd never be able to  
16 see his wife or son. He had clearly mentioned to me that he  
17 wanted to turn himself in, and that he'd be more than willing  
18 to give up any information on Claude and his wife, Claude Duboc  
19 and his wife.

20 Q. So you knew that John Knock was thinking of turning  
21 himself in, but if in fact John Knock turned himself in before  
22 you could turn him in, you wouldn't get credit for it?

23 A. That is true, sir.

24 Q. So you were wanting to move as quickly as you could in  
25 order to get yourself turned in, and to get credit for turning

1 him in, correct?

2 A. I wasn't thinking like that then, sir. But that does  
3 make some sense, yes.

4 Q. And John Knock was aware at the time, as you were aware,  
5 that he was wanted in Canada; was he not?

6 A. He knew that he was going to be wanted, yes.

7 Q. In Canada?

8 A. In Canada and the United States.

9 Q. How did he know that he was wanted in the United States?

10 A. Well, I would assume like myself.

11 Q. Well, don't assume. Tell us what information or actual  
12 knowledge you had that John Knock knew that he was wanted in  
13 the States?

14 A. He'd know that he'd be wanted for the RUBY R project.

15 Q. Back in 1987?

16 A. Yes.

17 Q. But there hadn't been any criminality by John Knock,  
18 according to you in the United States, since 1987, had there?

19 A. Yes, sir, that's correct.

20 Q. At one point during your conversation with John Knock,  
21 John Knock mentioned to you that he was trying to get  
22 legitimate money to pay his attorneys in San Francisco; did he  
23 not?

24 A. Yes.

25 Q. And as a matter of fact in your notes, you will see that



1 reference. And I believe the word legitimate money is  
2 underlined; is it not?

3 A. Yes, it is.

4 Q. And am I correct that legitimate money in that sense  
5 means nondrug money?

6 A. Yes, sir, it does.

7 Q. During 1995, when you would have those roughly twice a  
8 monthly phone conversations with John Knock, you didn't attempt  
9 to record any of those, did you?

10 A. Not while I was in Spain.

11 Q. With reference to Mr. Rogerson, you told us about  
12 meetings that Dr. Mike had with you and Claude Duboc; is that  
13 correct?

14 A. Yes.

15 Q. There were no meetings, as far as you know ever between  
16 Mr. Rogerson and Mr. Knock, were there?

17 A. No, sir.

18 Q. With the recording that was played yesterday of a phone  
19 conversation that I believe was on the 8th day of March of '96,  
20 where you are calling in in the company of federal agents?

21 A. Yes.

22 Q. To an answering machine of Mr. Knock's that you believed  
23 was in Belgium; is that correct?

24 A. I believe so, yes.

25 Q. And in that you talked about someone being a colleague.

1 Do you recall that?

2 A. Yes.

3 Q. And that is Mr. Roger Darmon?

4 A. Yes, sir.

5 Q. And Mr. Roger Darmon is a man whom you testified was  
6 really the right-hand man of Claude Duboc in terms of the  
7 Canadian smuggling; was he not?

8 A. Yes, sir. And I can elaborate on that if you would like  
9 me to.

10 Q. Well, we will get back into that in just a minute please.

11 And Mr. Darmon was -- excuse me, you mentioned also  
12 in that call, quote, a company paycheck, end quote; did you  
13 not?

14 A. Yes, sir, I did, sir.

15 Q. And Mr. Darmon would also have been interested in  
16 retrieving this money in the company paycheck; would he not?

17 A. Yes, sir.

18 Q. And that I gather was this 20 million dollars, the 20  
19 million Canadian dollars that Mr. Rogerson first said you he  
20 had squirreled away. Then in the last conversation he didn't  
21 seem to know anything about it; is that correct?

22 A. Yes, sir.

23 Q. Mr. Rogerson, if I understand it, is still a fugitive; is  
24 he not?

25 A. Yes, sir.

1 Q. I want to go back for just a moment to Mr. Vance and ask  
2 you something I wanted to ask earlier but I failed to.

3 So if you can, take yourself back to what I think is  
4 probably '86, '87. When as a result of the Colombian marijuana  
5 loads you and he participated in, he ultimately got arrested?

6 A. Yes, he did.

7 Q. And you tried to warn him, but he wouldn't listen; is  
8 that right?

9 A. Yes.

10 Q. And he went to jail; did he not?

11 A. Yes, he did.

12 Q. And ultimately in jail, regrettably he contracted cancer,  
13 did he?

14 A. Yes.

15 Q. Ultimately he was released on compassion leave and died?

16 A. Yes, he did.

17 Q. Now, during this time that he was in jail --  
18 approximately how long was he in jail? Do you know? He was  
19 released because of his terminal cancer?

20 A. Yes. I think probably four years. I'm not sure. I  
21 don't remember.

22 Q. And during that four years, you were in communication  
23 with him; were you not?

24 A. Yes, I was.

25 Q. You sent him letters?

1 A. I sent him letters, yes.

2 Q. And most of those letters you were sending either in  
3 northern California or somewhere in Oregon; were you not?

4 A. No, actually I would send them to his mother.

5 Q. To his mother in --

6 A. Yes.

7 Q. Where was she?

8 A. She was in Ocean Side, California.

9 Q. And did you tell him at the time that you were working  
10 with Claude Duboc?

11 A. No, I did not.

12 Q. Did you have an affair with Mr. Duboc?

13 A. Yes, I did.

14 Q. Did you tell Mr. Vance that?

15 A. No.

16 Q. As a matter of fact, you told Mr. Vance that you were  
17 going to wait for him, didn't you?

18 A. At some point I did, yes.

19 Q. So you lied to Mr. Vance, didn't you?

20 A. I didn't want to lie to him. Our relationship -- I lived  
21 with Mr. Vance for two years. And right before he had gotten  
22 arrested, I was basically going to end the relationship. I had  
23 no further -- I actually didn't even realize that I would end  
24 up going back into the drug world. I wanted to finish all of  
25 this. But, I got back into it unfortunately.

1 Q. Wasn't it -- while he was in prison, wasn't Mr. Vance  
2 trying to get you to get some money to liaisons?

3 A. Yes.

4 Q. And you -- you declined to do that; did you not?

5 A. Yes, I did.

6 Q. When you turned yourself in, was that -- ultimately you  
7 pled guilty pursuant to a plea agreement out in California.  
8 Correct?

9 A. Yes.

10 Q. And under that plea agreement, you got no time in jail  
11 ultimately?

12 A. Yes.

13 Q. In that -- in the plea agreement, they -- during part of  
14 the plea agreement before your sentencing they did what is  
15 called a presentence report; did they not?

16 A. Yes.

17 Q. You saw it? You went over that presentence report?

18 A. Yes.

19 Q. And to the extent that it contained anything with which  
20 you disagreed or was not accurate, you through your lawyer  
21 Mr. Seigal corrected; did you not?

22 A. Yes.

23 Q. And in that PSR, there is a notation --

24 MR. HANKINSON: I'm going to object, Your Honor.

25 May we approach on this?

1 THE COURT: Come up.

2 (At the bench.)

3 MR. HANKINSON: It's my understanding that  
4 presentence investigations are confidential investigations.  
5 If Mr. Kennedy has been given access to Ms. Robert's  
6 presentence investigation, I would think we need to know the  
7 circumstances, because has he been authorized by the court of  
8 some sort, because I'm not sure how he would have access to her  
9 presentence --

10 MR. DAAR: I was provided a copy of it by Julie  
11 Roberts.

12 MR. KENNEDY: And Mr. Darr provided a copy to me,  
13 Your Honor.

14 THE COURT: Got it from the witness.

15 MR. HANKINSON: Thank you.

16 (Back in open court.)

17 Q. Among the things that they are interested in this  
18 presentence report was your assets, correct?

19 A. Yes.

20 Q. And at the time you listed approximately 270,000 dollars  
21 in cash; did you not?

22 A. Can you --

23 Q. May I show it to you?

24 A. Yes, please.

25 Q. I would like you to take a look at that for a moment,

1 Ms. Roberts, and tell us whether or not that document appears  
2 to be a copy of your presentence report?

3 A. Yes, it is a copy.

4 Q. And do you see where -- take your time. Look at it as  
5 much as you want. But, do you see where I have flagged  
6 \$270,000?

7 A. Yes.

8 Q. So that presentence report actually lists 270,000 dollars  
9 of cash for you; does it not?

10 A. Yes, it does.

11 Q. Does that refresh your recollection?

12 A. Yes. Uh-huh.

13 Q. Now, did you have to forfeit that 270 thousand dollars in  
14 cash?

15 A. Eventually. Not the complete 270, but, yes, I did have  
16 to forfeit the remainder of --

17 Q. I believe you testified yesterday -- and correct me if  
18 I'm wrong -- that you had to forfeit \$60,000 in cash?

19 A. Sixty-seven thousand. Approximately 67,500.

20 Q. So the balance -- the difference between the 67,500 they  
21 allowed you to keep is approximately \$200,000, correct?

22 A. Well, sir, they didn't --

23 Q. Is that correct?

24 A. No.

25 THE COURT: She is answering you.

1 MR. KENNEDY: All right.

2 THE COURT: Go ahead, ma'am.

3 A. I can give an explanation that when Mr. Carl Lillie was  
4 over in Hong-Kong doing research on everyone's accounts  
5 cleaning out everyone's accounts and getting information for  
6 the United States Government, he had called me and told me  
7 to -- or dealing to set up the transfer, a money transfer from  
8 Hong-Kong, my account into the United States, which I then  
9 transferred into my bank account in Nevada; Las Vegas, Nevada.

10 And he had said it was my money. But --

11 Q. He being who?

12 A. Mr. Carl Lilley.

13 Q. All right. And then from that point the person that was  
14 in charge of me, being Greg Small United States Customs, and my  
15 prosecuting attorney, at the time Steven Corrigan, had told me  
16 that I could use the money for personal expenses. And they  
17 were going to take this money away from me, that I had to be  
18 very careful with this money. And I can go into that.

19 Q. Actually when you testified yesterday --

20 A. Uh-huh.

21 Q. -- that you had forfeited \$125,000 value in a Spanish  
22 home?

23 A. Yes.

24 Q. A GMC Suburban, a Camaro, and \$67,500. That was not all  
25 of your forfeitures then?



1 A. That was not all. I forgot a couple of them. Can I  
2 see -- Judge Paul, could I see some of my documentation,  
3 Mr. Hankinson?

4 THE COURT: Just ask a question, please.

5 MR. KENNEDY: Thank you.

6 A. There was -- I just have to reflect a minute here. There  
7 was a Spanish home in Spain which I forfeited to the  
8 government. There was some property in Mexico which I  
9 forfeited to the government. There was a Suburban, GMC.  
10 There was a Camaro that I forfeited to the government. And  
11 the remainder of the money that has been transferred over from  
12 Hong-Kong, which would have been approximately 67,500.

13 Q. Well, didn't the law enforcement agents allow you to keep  
14 some money to start up the lingerie boutique?

15 A. No, sir.

16 Q. They didn't help you with that?

17 A. Absolutely not, sir. I have three private loans on that  
18 boutique.

19 Q. This Camaro that was forfeited by you. That was a Camaro  
20 that you didn't decide on your own to buy, was it?

21 A. No, it was not, sir.

22 Q. As a matter of fact, agent Greg Small told you to use  
23 some of your money to buy a 1996 Camaro, correct?

24 A. He asked me, yes. He asked me to buy this Camaro because  
25 they in fact needed some cars for the agency.

1 Q. So he asked you to buy a 1996 Camaro, put it in your  
2 garage or wherever so he could then come and seize it, correct?

3 A. He didn't ask me to put it in my garage. I had bought  
4 the vehicle for the government. And I then put it in my  
5 parent's garage.

6 Q. And when he seized it, this Camaro that he had asked you  
7 to buy, he gave you a receipt saying this was pursuant to your  
8 plea agreement; did he not?

9 A. Yes, sir.

10 Q. But it wasn't pursuant to your plea agreement, was it?

11 A. He told me it would be part of my plea agreement but it  
12 never -- it was never put on my plea agreement.

13 Q. Didn't you write a letter to the Assistant United States  
14 Attorney saying that when Mr. Small wrote on the forfeiture  
15 that he was seizing this Camaro pursuant to a plea agreement  
16 that that was not true?

17 A. Yes, I did, sir.

18 Q. You also expected to be able to get a -- a finder's fee  
19 for the money that you were able to direct law enforcement or  
20 the government to seize from other criminals with whom you  
21 worked; is that correct?

22 A. Yes, sir. When I first came in and turned myself in,  
23 Mr. Carl Lilley told me that I would get a 10 percent finder's  
24 fee for any information with regards to bank accounts.

25 Q. And you still expect to get a ten percent finder's fee

1 when this sorts it out so you have, don't you --

2 A. No, I will not pursue it.

3 Q. Why won't you pursue it?

4 A. Because I have my freedom and I'm happy with that.

5 Q. So you are giving up 10 percent of what might be millions  
6 of dollars because you are happy?

7 A. I gave up millions of dollars. I never asked for  
8 millions of dollars when I worked for Claude Duboc. I -- money  
9 was never -- I just did a job.

10 Q. Money never mattered to you?

11 A. Money never really mattered to me as long as I could pay  
12 my current overhead and had a little extra spending money.  
13 Money was not my main issue.

14 Q. You certainly were not a career criminal for money, were  
15 you?

16 A. Excuse me? Would you like to repeat that, sir?

17 Q. I'm saying, you certainly were not a career criminal in  
18 order to make money, were you?

19 A. I made -- if -- you are going to have to excuse me for a  
20 second. Again, money was not my issue with a lifetime history  
21 unfortunately from my father that I was very familiar with,  
22 with this lifestyle.

23 Q. Well, just a few more questions. I'm almost finished.

24 We know that you have lied in the past when it served  
25 your interests; have you not?

1 A. In what sense, sir?

2 Q. In any sense. Haven't you told lies when it served your  
3 interests?

4 A. I don't believe that I have told any lies.

5 Q. But you lied -- strike that.

6 Excuse me. You have never lied in your life; is that  
7 your testimony?

8 A. Oh, yes. I'm sure I have made up stories in my past.

9 Q. So you are saying that you have lied in the past?

10 A. Yes. I guess I have lied in my past.

11 Q. When you've lied, you have tried to do it to improve your  
12 own position and protect yourself; have you not?

13 A. No, I have not, sir.

14 Q. You have lied just for the sheer pleasure of lying?

15 A. Would you please repeat yourself.

16 Q. Yes. If you didn't lie in order to improve your own  
17 position or to protect yourself, you just lied for the pleasure  
18 of lying then, no?

19 A. I'm sorry, sir. But I don't lie for the pleasure of  
20 lying.

21 Q. Well, you -- certainly you don't want to go to prison, do  
22 you?

23 A. No, I do not.

24 Q. You certainly would lie to keep yourself out of prison,  
25 wouldn't you?

1 A. Excuse me?

2 Q. You would certainly lie to keep yourself out of prison,  
3 wouldn't you?

4 A. No, I would not.

5 Q. Do you know -- if I understand it correctly, the people  
6 who are going to decide whether or not to charge you with  
7 telling the truth or lying here are the prosecutors; are they  
8 not?

9 A. Yes, they are, sir.

10 Q. And what -- you understand that those prosecutors are out  
11 to get John Knock. Do you not understand that?

12 A. Yes, I do understand that.

13 Q. And you are going to help them get John Knock; are you  
14 not, Ms. Roberts? Do anything you can to help them?

15 A. No, I'm not doing anything I can. Because all of my  
16 testimony is very correct and accurate. Those are my dealings.  
17 I don't hold any grudge or blame any one. From the time I  
18 arrived in the United States I've never blamed anyone for my  
19 actions.

20 Q. But you don't want to seem to want to accept the  
21 consequences of your actions, do you?

22 MR. HANKINSON: Argumentative.

23 THE COURT: Sustained.

24 MR. KENNEDY: Thank you, Your Honor. Nothing  
25 further.

1 THE COURT: Take a little break before the next  
2 cross, folks. 15 minutes.

3 (Jury out.)

4 (Recess taken.)

5 (Recess taken.)

6 THE COURT: Be seated, please. Mr. Daar.

7 MR. DAAR: Thank you, Your Honor.

8 CROSS-EXAMINATION

9 BY MR. DAAR:

10 Q. Good morning, Mrs. Roberts.

11 A. Good morning, Randy.

12 Q. You used my first name because you have met me  
13 previously?

14 A. Yes. On three different occasions you came to my  
15 lingerie boutique.

16 Q. And when I did come, I talked about this case with you,  
17 correct?

18 A. Yes. As a matter of fact I always okay'd it with my  
19 probation officer, Pat Foyer, when any agent and/or any  
20 attorney representing another client on this case, I would  
21 always acknowledge with my probation officer that anyone  
22 stopped in to talk to me.

23 Q. And when I came to see you, I asked you questions similar  
24 to which were asked of you on the stand, correct?

25 A. Yes, sir.

1 Q. Did I ever threaten you in any way?

2 A. Absolutely not.

3 Q. Did I ever imply to you in any way that my client, Albert  
4 Madrid, has anything but compassion for you?

5 A. That is very much the truth. Albert has love and  
6 compassion.

7 Q. Did I ever express to you any anger by my client that you  
8 would be testifying against him?

9 A. No, you did not.

10 Q. Did I ever ask you to do anything but to tell the truth?

11 A. Yes, sir.

12 Q. So you feel absolutely no pressure from myself or from  
13 Mr. Madrid to do anything but to tell the truth?

14 A. That's correct.

15 Q. Now, you have been referring -- the jury can probably see  
16 also -- to some notes, rather extensive notes to help refresh  
17 your memory, correct?

18 A. Yes.

19 Q. And those notes are about 19 or 20 pages, single-space  
20 typewritten, correct?

21 A. Yes.

22 Q. And you further in your own handwriting made little  
23 further notes on there, correct?

24 A. Yes, I did, sir.

25 Q. Now, the original notes were typed up by the government